

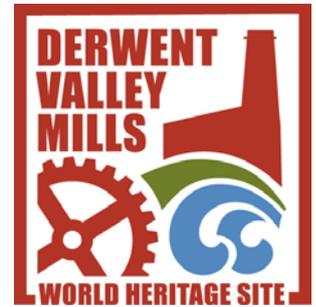
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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20th January 2021

Mark Penford
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire **DE5 3BT**

Dear Mark

AVA/2020/0846: Conversion of a barn used for agricultural purposes into a dwelling house (C3) and parking provision on-site for one vehicle, opposite the Blue Bell Inn, Farnah Green, Belper. Amended Scheme.

Please find below my latest response to the consultation concerning the above application. These comments will be passed to the World Heritage Site Conservation and Planning Group for verification in February.

The site lies within the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone. 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 2020. It has as the first of its nine 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 20 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 application site, and the small agricultural building within it, are located within the Buffer Zone of the Derwent Valley Mills World Heritage Site, approximately 750m from the Site itself. The nearest listed building is Long House, adjacent to the Blue Bell public house, downhill from the site, to the north. The Blue Bell stands, in its relatively detached context, at the gateway entrance to Farnah Green, which falls from the south, set against the extensive rural approach to the settlement. Farnah Green itself is a dispersed settlement of farmsteads and traditional dwellings with a small number of twentieth century dwellings of various size and type.

The character of the application site is that of an enclosed field within an open rural landscape, rising away from Farnah Green to the skyline, to the east. The barn itself is a small discreet, ancillary building, set hard against the western boundary and the rural lane of Farnah Green, opposite to the Blue Bell public house. It is set distinctly within the open landscape context, on the edge of the small settlement of Farnah Green, outside the town of Belper. The traditionally constructed stone barn occupies a position against Farnah Green, and despite being screened by vegetation, is visible along the lane, from both above and below.

The proposal is for the conversion of the barn, to provide a single dwelling, within the volume of the barn structure. The dwelling would have one bedroom, a kitchen and a living/dining room. Existing openings would generally be used, except for a small new opening to the currently blank roadside elevation. The previously proposed pair of rooflights, which were located over the living/dining and the bedroom spaces of the proposed layout, have been removed from the east roof plane. This has been included on the revised plans, FG0018 and FG0085, submitted in response to initial comments on the original application documents and, for the avoidance of doubt, would leave a living room naturally-lit only by the gable window, as the door would be solid. Nevertheless, the simple vernacular character of the barn, and its contribution to the locally distinctive Derbyshire character as a functional building formerly and originally used for housing and feeding livestock, would be altered by its conversion for human habitation; Building Regulations would require the building to be resistant to the ingress of ground water, requiring damp-proof membranes, tanking or excavation of the natural topography of the field, within which this utilitarian building has been nestled for over a century; the external equipment associated with the introduction of space- and water heating, plumbing and drainage, telecommunication and TV receiving equipment, leakage of internal lighting, blinds/curtains to the window openings would all cumulatively express the incongruous changed use of the building in this inappropriate context.

The amended proposal is significantly reduced from the original scheme, which the applicant considered to be a sensitive conversion. Despite the reduction in what has currently been applied for, however, the change from its original, incidental agricultural use to a residential use, is considered to cause a loss to the ‘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. While the domestic curtilage has currently been limited and meets the requirements of the local Highways Authority, the subsequent demands of private residential use in the 21st century, including boundaries for privacy and security, additional car parking and the inevitable increase in domestic paraphernalia, would fundamentally and adversely change the character of the site and the surrounding context.

Despite its age and authentic vernacular character, the building's contribution to the landscape character is not so great that its loss would have a significant impact on the landscape character. Its conversion to domestic use would cause greater harm than would the natural decay of the redundant building, or indeed its removal as an expedient to remove the safety risk that has recently resulted in unsightly fencing at the site entrance.

Footway AV4/69/1 and Restricted By-Way AV4/76/4 combine to give public access adjacent to the site, allowing visibility from the public realm in addition to those from Farnah Green from the north and south.

In a recent appeal decision (APP/M1005/W/19/3233180: 30 September 2019, outline application AVA/2018/0916) for the development of 3 dwellings at land off Ashbourne Road, where the main issue was the effect of the proposed development on the setting of the Derwent Valley Mills World Heritage Site (WHS), the Inspector acknowledged that although the Buffer Zone is not itself a heritage asset, its role is to protect the setting of the WHS.

Having regard to Framework paragraph 196, the inspector assessed the harm to the setting of the WHS would be less than substantial, which amounted to a harmful impact which would adversely affect the significance of the WHS as a designated heritage asset. This was a level of harm that was not justified, despite the appeal scheme resulting in three new dwellings, in that instance, potentially adding to the mix and supply of housing in the Borough, together with other public benefits, including improved highway safety, accessibility to the bus stops, limited economic benefits associated with the construction of the dwellings, jobs and future occupants spending in the local economy.

Critically, however, despite the inspector agreeing with the main parties that the appeal site was not part of the relict industrial landscape, where late 18th and early 19th century industrial development may still be seen in an 18th/19th century agricultural landscape, it did contribute to the rural character of the locality and the approach to the WHS even though it did not affect views into or out of the WHS. The site at Farnah Green is within the relict 18th century landscape and is a sensitive component of the cultural landscape for which there is no clear and convincing justification to introduce a harmful development and loss of significance.

It is considered that the proposed development would have an adverse impact on the character or appearance of the rural setting of the Derwent Valley Mills World Heritage Site and would, therefore, be harmful to its significance as defined by its Outstanding Universal Value. The harm to the designated heritage asset would be 'less than substantial' as defined in the current NPPF (February 2019), although the great weight afforded to the conservation

of designated heritage assets would require the development to include significant public benefits were it to outweigh the harm to assets of international, national and local heritage value.

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 a long, sweeping underline.

Adrian Farmer

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