

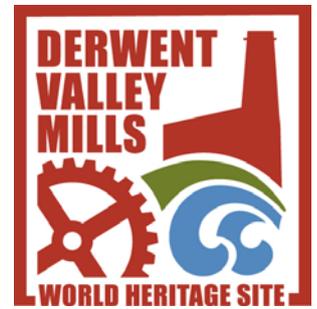
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Sarah Pearce
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire DE5 3BT

10th September 2019

Dear Sarah

AVA/2019/0737: Variation of condition 2 of AVA/2015/0338 to revise approved plans at 2 - 10 Lander Lane 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 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 approved residential development is a contemporary design, aimed at avoiding historic pastiche. Justification for an approach that can be slightly contentious with the general public, is that the design quality is of a high standard, ideally with the development of the design through to a detailed stage, being guided by the originator of the design concept, with the continued support of the patron.

This application to revise the approved scheme involves the omission of a number of elements that are considered to be intrinsic to the total design package, the content of which justified the approval of the development, following extensive negotiations, within a historically significant, prominent and sensitive context.

Ventilation stacks that added to the total design concept, and which would have provided visual interest, profile and skyline silhouette, have been removed; the courtyard elevations have been radically simplified, in terms of its modelling and visual interest, particularly to the tall, deep internal terraces, to each apartment and the expressive projecting corner terraces that flank the entrance to the courtyard; a single feature window on Block 3, facing Lander Lane, has been omitted, but more extensively, the design intentions with respect to the overall fenestration pattern, including proportion, sub-division and depth of reveal, would have their contribution lessened under the revised proposals, resulting in a much reduced overall design quality.

Paragraph 130 of the National Planning Policy Framework (February 2019) states that: “...Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used)”.

Fundamentally, the development would be similar to the one that was approved. However, the refinement of its detailed design would be reduced to a position where the justification for its contemporary approach could not be sustained. In deference to this place as having world significance, the design of any development should be of an appropriately high quality, using natural materials and acknowledging the local distinctiveness of the place. The relevant emerging policies on design quality and authenticity within the Management Plan, also need to be taken into account through the design development process.

For the reasons described it is considered that the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site would be harmed through the reduced quality of detailed design. The harm would be 'less than substantial', as defined in the NPPF, but great weight should be given to the conservation of this designated asset of high significance. As the NPPF goes on to advise, this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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 a large initial 'A'.

Adrian Farmer

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