

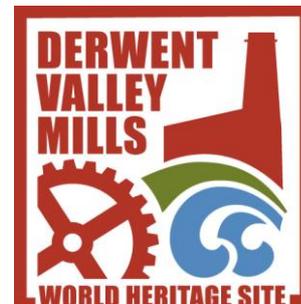
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Clare Thornton
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire **DE5 3BT**

26th June 2014

Dear Clare

AVA/2014/0470: Outline planning application for demolition of existing buildings and construction of residential development (approximately 107 dwellings), with all matters (save for access) reserved, on land off Derwent Street, Belper.

Please find below my response to the consultation concerning the above application. These comments were verified by the World Heritage Site Conservation and Planning Panel at their latest meeting.

The site is within the Derwent Valley Mills World Heritage Site (DVMWHS) and the Belper and Milford Conservation Area. 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 Outstanding Universal Value (OUV) of the Site was defined by the following criteria, agreed by UNESCO when the mills were inscribed. 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 UNESCO World Heritage Committee recorded 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 early 19th 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 towns.

A Management Plan for the World Heritage Site was created in 2002, and has as the second of its seven aims to: “*establish guidelines for the future management of the site, and the buildings and land within it, so that the special character of the cultural landscape is protected and enhanced.*” It also has as the sixth of its twenty-five objectives to: “*maintain and enhance the quality and distinctiveness of the Derwent Valley Mills cultural landscape.*”

I have consulted with Derbyshire County Council’s Conservation and Design Section over this application, and have received the following advice.

Development for this site is welcomed, in principle, as it offers the opportunity for repair to the urban fabric at this significant and visually sensitive historic edge of settlement location, and its integral and intimate relationship with its significant open countryside setting.

Application

The whole site is within a broader area of Belper, for potential re-development, between the river and the A6. This area is identified and allocated by Amber Valley Borough Council for housing and mixed-use development, supported by particular planning policies (ER1c) in the Local Plan and a Supplementary Planning Document. The SPD requires that any prospective developer prepares a masterplan of the whole area affected by policy ER1c. This pre-requisite masterplan for the larger site ownership assemblage is clearly absent from the proposals.

Lessons need to be learnt from other sites in Belper – Wards Warehouse, on the southeast side of the Morrisons roundabout, now sits in a diminished curtilage where the rest of the site has been redeveloped as housing. The Warehouse sits in a deteriorating condition and is unlikely to deliver the ‘mixed-use’ element of the earlier proposals.

Furthermore, the requirements and aspirations of the SPD to deliver a mixed-use development in this locality are not fulfilled in this application as it does not develop ideas for the comprehensive regeneration of the whole area and only delivers residential development even in areas of the site that lend themselves to other uses.

Despite the information submitted in support of this application, any specific detailed assessment of the physical proposals is limited by virtue of its outline status, with matters key to its success or otherwise being reserved. However, the submission establishes a number of mitigation proposals to help assimilate the proposed development within its urban setting in an edge of settlement location.

The key mitigation measures include:

- a design layout that reflects the character of historic settlement patterns within Belper such as the terraced housing and narrow lanes associated with the Clusters;
- building heights that reflect the gradation in height down to the Derwent to minimise visual intrusion;
- proposals in keeping with local context and character;
- the retention of existing vegetation where practicable and the replacement of lost trees with new specimens.

Outstanding Universal Value and Authenticity

In the designation of the World Heritage Site (WHS), the qualifying criteria and supporting statement clearly establish the significance of its landscape context and the relationship of the historic settlement to it. This is a particularly important consideration of this proposal being, as it is, an edge-of-settlement location, abutting the floodplain of the River Derwent. This is not something that is particularly well covered in the Landscape and Visual Impact Assessment (LVIA).

Despite its outline status, the application's indicative conceptual design response draws heavily on the prevailing layout of the historic millworkers housing, built to serve Strutt's original Belper textile mill complex. An understanding of the historic significance of the locality is an essential requirement for any proposed development in this context. Acknowledgement of this significance to inform the design process to arrive at a sensitive solution, containing perceivable visual references of the context will determine the success of the intervention. While it is accepted that rows of housing are a justified response to the site's context, it is considered that the adoption of east-west alignment for the layout of the proposed housing development may not be appropriate in this instance, especially as the east west pedestrian links through the south side of Bridge Street, identified by your agents in their presentation as being very desirable, have proved to be undeliverable.

Whilst copying the residential development pattern of worker-housing, to the east of the A6 (the former turnpike road) could seem a contextual approach, this area of Belper was developed for industrial, commercial and community uses. The modern application of the historic housing pattern risks confusing the relationship of this area to the principal monuments of the WHS. In reality, where it exists, worker-housing on the west side of the A6 road runs north-south, i.e. parallel to the road and the river. This site is sufficiently large for its own character and identity to be established, which does not impact on the existing authentic historic character of this part of the WHS.

The proposed layout offers limited opportunity to produce a definite western edge to Belper. Nor does it present a clear design rationale of how this edge will be appropriately dealt with. This is of concern as it is the critical interface between the meadows and Belper and is clearly visible in the Monitoring Views for the WHS. The plateau occupied by the former industrial uses starts to present a desirable edge to the settlement, raised above the natural slope of the lower part of the valley. However, as a result of the proposed development's orientation, 'fingers' of the open countryside would visually 'leak' into the spaces between the rows of housing, mixing with the built forms and thereby blurring any distinct boundary between the developed settlement and the natural landscape of the river corridor and open countryside beyond.

Related to the problem described above, the orientation of the housing terraces, as indicated, opens up views from the rural landscape to the west, to potentially unsightly areas associated with the residential use by allowing visual access into the related private gardens. This could result in the overall impact of this development being heightened where there will be little or no control over its appearance. It is likely that the DVMWHS monitoring views would record a missed opportunity for enhancement of the visual quality of the area;

In terms of the built design, it remains unclear exactly what the proposed development will look like, which seems to be a critically important factor in assessing its overall acceptability in what is a very sensitive location. The observations above relate to the conceptual layout submitted and describe anticipated problems as a result of the emerging arrangement. The applicant is welcome to allay these concerns and demonstrate that this is the optimum scheme to maintain the Site's OUV. However, it is advised that further consideration be given to a number of areas, as follows:

Scale, massing and materials

The Design and Access Statement provides examples of building 'typology' and 'materiality' but this does not provide the requisite assurances that this will be a quality scheme as required by the recognised sensitivity of the site. The site aims to deliver predominantly 2-storey development, which primarily takes its lead from the historic terraces elsewhere within the town. There is the opportunity to develop a more distinctive residential development on this site that better responds to the scale of existing commercial and industrial development in the locality. In this context, a comprehensive redesign of the site might explore the use of 3-storey properties to reflect the scale of adjacent buildings such as Unity Mill and offer increased opportunities for architectural expression.

Density

The scale of the development in terms of height as discussed above, relates to the resultant density of the site. Apart from offering a more appropriate scale for the industrial and commercial context of

the site, an increase in height offers the opportunity for a higher density and a better mix of tenure than uniform small two storey houses; apartments, larger houses and the possibility of integral home-based business or workshop use. A higher density would provide the opportunity for the creation of more satisfactory urban spaces, particularly beside the Unity Mill.

Western edge of settlement and southern boundary of development

The main views of the development are from elevated vantage points, from the west, across the Derwent Valley. From these locations the site is clearly visible, although it is evident that the site has a derelict appearance in an edge of settlement location abutting open countryside. The design of this western edge is considered to be key to the overall success of the development in terms of its integration into the urban fabric and its effect on the Outstanding Universal Value of the site.

The expression of the proposed development, through the elements that form its boundary, needs to establish the most appropriate scale, form, and massing for the built elements; the relationship of buildings to public open space, service roads, car parking, pedestrian routes, structural tree planting and smaller scale soft landscape planting. The introduction of mixed uses that provide interest and attraction for the public such as craft workshops and 'shop windows' would stimulate a more varied and lively environment than would housing alone.

The deviation of the road alignment in the north west corner of the site appears to isolate pockets of development which would seem difficult to articulate as part of the overall development. They also miss the opportunity to contribute to the required quality for this settlement edge.

Interior of site

Having established a definite built edge to the development to its western boundary, the interior of the site offers greater potential for place-making with imaginative use of built form, private defensible spaces and safe and attractive public realm. The promotion of pedestrian routes, identified as a feature of the historic housing, is laudable if these can be achieved where opportunities are presented or with the co-operation of adjacent land-owners. The play and recreation spaces identified adjacent to the meadows area would be more sensibly located within the heart of the development to provide naturally supervised and protected leisure areas.

The integration and acknowledgement of Unity Mill as a significant building to the context, as well as within the list of principal monuments of the World Heritage Site, is welcomed and to be expected in a suitably sensitive development. All opportunities it presents for integration into successful urban design scheme, such as vistas, backdrop to significant public open spaces should to be exploited for maximum benefit afforded by this unique heritage asset, i.e. it should not just be surrounded by car parking.

The studies of details of floorscape, etc., submitted as part of this application, are commendable acknowledgment of context and local distinctiveness; application of the spirit and quality of these traditional and locally distinctive details into the final development are obviously appropriate and to be welcomed.

Mixed use

The application for this component site of the greater re-development area, proposes single residential use. The Local Plan policies seek to promote a mix of uses, which has numerous advantages. Some of the images submitted as 'typology' would lend themselves to uses other than residential, at ground floor, with housing above in a development of increased height to the 2-storey scale proposed.

The appropriateness of the isolated site at the west end of Derwent Street, on its south side, remains to be demonstrated, given its detached location from the larger site. This site might be better suited for commercial or leisure uses, such as restaurant or bar that supports the use of the Meadows as a recreation space for the whole of Belper.

Summary

In general terms, the World Heritage Site Partnership would welcome the development of this derelict industrial site. The relationship of the application site to the larger area available for re-development, however, needs to be explained by way of a masterplan, as required by local plan policies and the supplementary planning document. Complimentary uses need to be extended into this residential proposal, to promote a lively and varied environment. While the stated contextual design references are encouraging, with agreement for the basic arrangement of the housing, the Partnership has concerns for the layout in terms of its ability to produce the required repair to the urban fabric at this visually critical western edge. Given the limitations of an outline application, we remain to be convinced that the scale and layout of the development will maintain the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site.

Before the application is determined, we would request that the initial conceptual layout proposals are re-assessed in light of the comments above, with a greater focus on the importance of landscape character on the OUV of this part of the WHS and the creation of a site with its own character related to its specific context but informed by the wider historic context in which it sits. It is also difficult to assess the acceptability of the scheme without more fully developed architectural proposals for the development. If the site is passed to a developer with limited architectural ability or desire then there is no agreed starting point by which to negotiate an appropriate outcome. A nebulous 'anywhere' housing scheme would not be appropriate on this site. This is a visible site on the edge of Belper that

if not carefully and sensitively developed may not only be a missed opportunity but could also impact negatively on the WHS's OUV.

I hope these comments can be considered when a decision is made concerning permissions for this development.

Yours sincerely

A handwritten signature in black ink that reads "Adrian Farmer". The signature is written in a cursive style with a large initial 'A' and 'F'.

Adrian Farmer

Heritage Co-ordinator
Derwent Valley Mills World Heritage Site.

Cc Rob Thorley, Rachael Coates AVBC.