DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

8th September 2014

Dear Clare

AVA/2014/0470: Outline planning application for demolition of existing buildings and construction of residential development (approximately 107 dwellings), on land Off Derwent Street, Belper.

Please find below my 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 Panel for verification in October.

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 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 and Design Section (which advises the World Heritage Site Partnership in planning matters) over this application, and have received the following advice.

Wider contextual considerations

While the additional annotation suggests notional principles and concepts, the amendments to the current application do little to alter the overall thrust of the previous comments of 26 June 2014, which remain essentially relevant and outstanding. Specifically, these are the outstanding need for an overall 'masterplan' for the redevelopment area and the provision for a mix of uses to continue the traditional variety and vibrancy of the place. The successful integration of a significant area of re-development is unlikely to result from a single use; much more certainty needs to be given to the aspirational pedestrian links to the town centre and adjacent facilities indicated.

Visual Impact

As previously stated, the visual sensitivity of this area needs to be at the forefront of the design process, to stimulate an appropriate quality of urban design response as demanded by the context and status of the area. The opportunity is presented for a development that responds to the unique adjacent townscape, landscape and heritage assets of the World Heritage Site and the contribution they make to its Outstanding Universal Value. The design response needs to be appropriately sensitive to the appearance and character of its special context.

Detail

With respect to the revised proposals, it is noted that the indicative layout shows the terraced housing rearranged to a north-south orientation, with the benefits that this could potentially bring, particularly to the western edge of the development as it is seen from the river corridor. It also illustrates the unsatisfactory relationship of the proposed housing on the south side of Derwent Street at its western end – this site could lend itself to a different land use. The measure of success for the development, however, is highly dependent on the detailed design of the buildings and the spaces contained by them, which is impossible to determine merely from an indicative layout. Meaningful assessment cannot be made of the scale, the relationship of the blocks to each other or with the adjacent context; the application and interplay of materials; the possibilities for a distinctive and interesting western edge to the development have not been developed, with the informal, organic layout illustrated demonstrating nothing of the special quality anticipated/expected.

<u>Summary</u>

Reiterating from before, in general terms, the Derwent Valley Mills World Heritage Site Partnership welcomes the development of this derelict industrial site. The relationship of the application site to the larger area available for redevelopment, 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, we have 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 this development.

Yours sincerely

Adrian Farmer

Heritage Co-ordinator

Derwent Valley Mills World Heritage Site.

Cc Rob Thorley, Rachael Coates AVBC.