

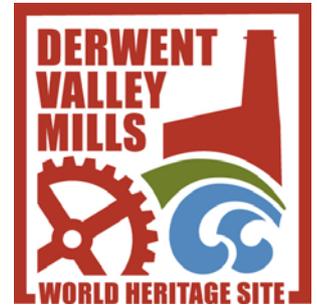
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

20th July 2017

Dear Clare

AVA/2016/1020: Residential development of 150 dwellings and infrastructure and demolition of 153 Belper Lane and outbuildings at Whitehouse Farm, 153 Belper Lane, Hilltop, Belper.

Please find below my response to the latest 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) 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 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 received the following advice:

Further amended proposals

After examining the revised proposals for the development of this site, it is acknowledged that the amended proposals comprise of a reduced number of houses to 118 (49 detached); a revised layout with a more ordered pattern of built form; increased distance between the western ridge and the limit of the proposed estate; different standard house types. The following comments relate to those revised proposals, but it is considered that the original comments are still applicable and are included at the end of this response for that reason.

Rural landscape setting

The loss of part of the rural landscape setting of the Derwent Valley Mills World Heritage Site continues to be powerfully demonstrated in submitted viewpoint B (figures 18, 19 & 20), view south from Belper Lane and viewpoints C (figures 21, 22 & 23), view east from Longwalls Lane/Midshires Way.

While the impact of the proposed development on views from Dalley Farm and Ashbourne Road has been virtually removed, the impact on the rural setting of the World Heritage Site remains visible from key viewpoints. As an Attribute of the World Heritage Site, the incremental loss to the rural setting of the arrested eighteenth century industrial process would represent harm to its Outstanding Universal Value.

Demolition of Whitehouse Farm 153 Belper Lane

The revised Heritage Impact Assessment reports on further investigation into any surviving significance of Whitehouse Farm through a visual survey of its fabric, map and documentary evidence. Although the historic fabric of the farm has been much altered, the building survives to bear testament to its association with the Strutts, in the family’s ownership from 1865 to 1932, with an association that continues to the present day, over 150 years later.

As the oldest surviving building on this section of Belper Lane, it would also be regrettable if access were not gained which only involved the loss of a modern property with no historic significance, from Belper Lane or Whitehouse Rise. The demolition and total loss of this undesignated heritage asset and Attribute of the World Heritage Site would be harmful to the Outstanding Universal Value.

Inappropriate house types

The visual images of the revised scheme only serve to demonstrate that the overall design has failed to be raised to a level of quality that would be appropriate for a site with world significance. The house designs incorporate applied historic features commonly applied to a standard sub-urban development on sites with no cultural significance or visual sensitivity. This false character is acutely contrasted with the genuine historic assets to which it would be

associated. Rather than adding value by the quality and honesty of its response, it would de-value the authentic assets by its presence. This is recognised as an exceptionally special place, but in all its aspects, the proposed design has failed to respond to this context with an equally special solution.

Recommendations

As proposed, it is considered the revised development would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. As described above, this harm would result in three ways; the significant impact on part of one of its Attributes, the rural landscape setting of the arrested industrial development, which took place from the 18th century onwards, in the Derwent Valley; the loss of a building with related significance to the World Heritage narrative; and the failure of the design response to mitigate that harm through a development of suitably high quality within a context of international significance.

The following comments were provided in respect of the previous development proposals on 9th May 2017, and still stand:

Context

The application site comprises five open fields on the edge of the built framework of Belper. At the centre of the collection of fields is a menege, defined by floodlights on columns; the large adjacent field is used by horses; a public footpath runs across the site from Belper Lane, before descending from the ridge down to Dalley Lane. The field boundaries include extensive lengths of coursed stone walls, which contribute to the local character.

Adjacent to the site is the relatively modern estate dwellings of Mount Pleasant – located within the Buffer Zone. From Belper Lane this collection of houses presents a roofscape, above which the form and limits of the town can still be interpreted; the ridge of Windmill Lane is visible in the middle distance, with the higher ground of Openwoodgate, beyond. The extent of Belper town, surrounded by its rural setting, can be appreciated on entering the town along Belper Lane, with the World Heritage Site immediately located on one side of the lane, and its protective Buffer Zone on the other (see photo viewpoint 8).

Similarly along Dalley Lane, despite its minimal distance from the Mount Pleasant housing, Belper's rural setting is very much in evidence. In the valley bottom, De Bradelei Mill and Chapel Street can be picked out within the lower part of the town centre, but the rising land of Belper Lane is contained within the rural relict landscape of the World Heritage Site – one of its Attributes.

Character of the town's development

Belper is a historic town that has developed away from the river flood plain, extending up the valley slopes. The encircling open countryside provides containment to the town, and limits its extent in a readable way, despite more recent expansion. By comparison, the proposed development seeks to impose a sub-urban layout within a historic context of international significance. Despite this status, the layout makes no contextual references to this sensitive place.

Form of adjacent housing

The houses in Mount Pleasant are clearly ordered in rows, a characteristic form of the town, as at Long Row and the Short Rows, Field Row, etc. The linear, repetitive rhythm of the houses on Whitehouse Rise read as a strong feature from across the valley, for example from Swinney Lane. By contrast, the proposed layout follows a sub-urban model, sub-dividing the site into clusters, served by estate roads, with rear gardens grouped in the middle of each cluster. As a new interface between town and countryside, the design response makes no reference to this highly significant and sensitive context.

Proposed development - revised

The proposed layout essentially develops the entire application site, except for two attenuation ponds and a MUGA, relocated in the amended scheme to the north-west corner of the site. Plots extend up the slope, towards the highest parts of the site, to the west and the north. At the ridge line, marking the western edge of the site, the former wide landscape buffer proposed to screen the western edge of the development, which was considered to be contrary to the landscape character of the area, has been broken up and the built development pulled away from the western ridge. While this amendment might avoid the development being visible from Dalley Farm, at least, the negative impact of the proposed development from other key viewpoints remains.

Had the original layout been informed by an appreciation of the cultural significance of the site, through the Heritage Impact Assessment, plots extending as far as the ridge would not have been put forward as an appropriate proposal. The minor revision to the layout cannot therefore be deduced as a genuine improvement.

Notwithstanding the comments on the harm of the development, in principle, the retention of the dry stone field boundary walls and extension of the physical features, as a generator of a more rural character and local distinctiveness, is considered to be positive were it to form part of a more holistic design concept in terms of its layout, form, massing and materials that more reflected an edge of settlement, rural context.

The scale of the development is such that the appreciation of the World Heritage Site's rural setting would be significantly impacted on from a number of locations, including the locations mentioned above – Belper Lane (photo viewpoint 8), Dalley Lane, Swinney Lane,

Chesterfield Road and Belper Cemetery (photo viewpoint 4).

Uncropped, one of the identified monitoring views of the DVMWHS, No. 32, 'East Mill and Bridge Hill from Chesterfield Road' (pictured), clearly shows the importance of the undeveloped rural valley side to the west, on Bridge Hill and Mount Pleasant.



It was previously advised that a substantially smaller development in the south east corner of the application site may be acceptable, especially if it was accessed from Whitehouse Rise. In terms of the revised proposals this would equate to plots 1-57 and 80-88 (65 dwellings), subject to the applicant demonstrating that even this scale and location of development did not adversely impact on the Outstanding Universal Value of the World Heritage Site.

Demolition of Whitehouse Farm

A new vehicular access is proposed from Belper Lane, only achievable by the demolition of 153 Belper Lane, also known as White House Farm. An assessment of the farmhouse has been provided as part of the revised application documents. While the survey shows the farmhouse to have undergone changes, both internally and externally, by virtue of its survival, it retains some historic significance, both in its own right and as part of the World Heritage Site.

Recently discovered documentation has also revealed that White House Farm was a Strutt-owned farm, sold off in December 1932 to Mr George Beardsley after the death of George Herbert Strutt left the family with substantial death duties to pay.

The Strutt farms are 'Attributes' of the World Heritage Site. A World Heritage Site is made up of all its Attributes, and none should be given greater priority over another – it is an integral whole. The loss of the building, therefore, would cause a degree of harm to the World Heritage Site's significance and substantial evidence would be needed to demonstrate the case for the demolition of a Strutt Farm bringing considerable public gain or for it not contributing to Outstanding Universal Value.

Recommendations

As proposed, it is considered the revised development would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. This harm would result from the significant impact on part of one of its Attributes, the rural landscape setting of the arrested industrial development, which took place from the 18th century onwards, in the Derwent Valley.

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

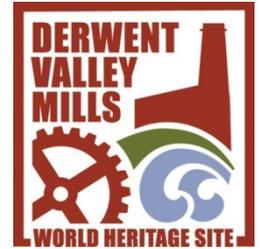
Yours sincerely

A handwritten signature in black ink, appearing to read "Adrian Farmer". The signature is written in a cursive, flowing style.

Adrian Farmer

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.
cc Rachael Coates, AVBC

Planning (Development Control) in the Derwent Valley Mills World Heritage Site



District, Borough and Unitary Councils, as Local Planning Authorities, are responsible for the determination of domestic, commercial and a range of other planning applications that are submitted within their jurisdiction. They are not responsible for determining waste and minerals applications – these are the responsibility of the Minerals and Waste Authority which in the case of the Derwent Valley Mills World Heritage Site (DVMWHS) is Derbyshire County Council or Derby City Council within its administrative boundary.

The District and Borough Planning Authorities travelling north through the DVMWHS are:

- Derby City Council
- Erewash Borough Council
- Amber Valley Borough Council
- Derbyshire Dales District Council

When an application is submitted to a Local Planning Authority (LPA) in the DVMWHS the Authority assesses whether there may be an impact on the Outstanding Universal Value (OUV) of the DVMWHS. OUV is the reason why a site is inscribed (included) on the United Nations Educational, Scientific and Cultural Organisation's (UNESCO's) World Heritage List. Information on the DVMWHS OUV can be found at <http://www.derwentvalleymills.org/derwent-valley-mills-conservation/planning/>

If the LPA feels there will be an impact, or is uncertain, they can refer the application to the DVMWHS Partnership for confirmation, clarification and advice. The DVMWHS Partnership is a non-statutory consultee. This means LPAs are not under any statutory obligation to consult with the DVMWHS Partnership. Notwithstanding this, LPAs do need to show due diligence in an application's determination. If an LPA was found to have failed to follow due process or incorrectly interpreted relevant legislation then a planning decision could be challenged through judicial review.

The DVMWHS Partnership has an agreement with the Conservation, Heritage and Design Service (CH&DS) at Derbyshire County Council to provide it with advice on the impacts of applications in the DVMWHS and its Buffer Zone as to their impacts on OUV. The Partnership does not always refer an application to the CH&DS if it is a reasonably straight forward judgement. However, the great majority of applications submitted to the Partnership are referred to the CH&DS.

When an application is referred to the CH&DS, officers within the Service will review the application and give their professional view on potential impact or suggest what additional information is required to be able to assess impacts. This response is then incorporated into the DVMWHS Partnership's standard consultation response letter template and sent to the LPA.

The LPA must judge for itself how to proportionally respond or address the content of any consultation response received from the DVMWHS Partnership.

The DVMWHS Partnership coordinates a Conservation and Planning Panel which meets six times a year. One role of this Panel is to review all the planning consultation responses that are issued by the Partnership since the previous Panel meeting. If it is felt that any response requires clarification or alteration a subsequent consultation response will be supplied by the Partnership to the relevant LPA.

From time to time, due to the consultation response supplied by the DVMWHS Partnership, the LPA may be asked by an applicant to organise a meeting with one of the DVMWHS Coordinators to clarify advice on site. The Partnership is happy for one of its Coordinators to attend these meetings if they are organised and attended by planning officers of the LPA. In addition to this, the Coordinator may be supported by an Officer from Derbyshire County Council’s CH&DS, especially if it relates to their professional expertise.

At any time in the application process an applicant for, or an objector to, a scheme may ask for it to be reviewed by the DVMWHS Partnership’s Conservation and Planning Panel at its next meeting. While this can usually be accommodated, there is no scope for the applicant or the objector to present to the Panel. However, from time to time, the Conservation and Planning Panel may invite an applicant to present to the Panel for clarification. This is likely to be for major schemes where there is not an outright objection to the principle of development but where design quality/philosophy is pivotal to its acceptability.

It must be remembered that in all cases it is the responsibility of the LPA to determine applications that are submitted to it. The DVMWHS Partnership’s non-statutory consultation responses provide information to be considered when determining the application.

If an LPA refuses permission for an application as a result of, or partly as a result of, a DVMWHS Partnership consultation response and the applicant appeals the decision then the Partnership will support the LPA in any defense of their decision as much as resources allow.

Planning (Development Control) in the Derwent Valley Mills World Heritage Site

