

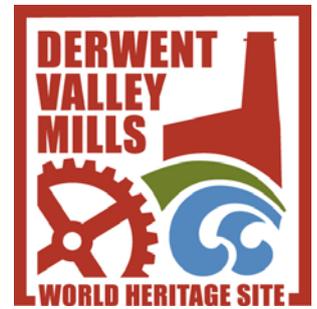
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

1st November 2017

Dear Clare

**AVA/2017/1128: Residential development of 65 dwellings including demolition of 153 Belper Lane and outbuildings at Whitehouse Farm, 153 Belper Lane, Hilltop, 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 in December.

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 18<sup>th</sup> 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:

The proposals for the development of this site comprise 65 houses (25 detached). The revised layout has increased the distance between its western edge and the eastern ridge of the Dalley.

These comments relate to the current proposal. However, the comments on the previous proposal are still applicable and are included at the end of this response for that reason.

The loss of the rural landscape setting of the Derwent Valley Mills World Heritage Site impacts on its Outstanding Universal Value and the criteria for which it was inscribed on the UNESCO World Heritage List. Viewpoint B (figures 18, 19 & 20), view south from Belper Lane and viewpoint C (figures 21, 22 & 23), view east from Longwalls Lane/Midshires Way, illustrate that the proposed development will lead to the loss of the World Heritage Site’s rural setting.

While the impact of the proposed development on views from Dalley Farm and Ashbourne Road has been 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 would represent harm to its Outstanding Universal Value.

It is felt that some development may be acceptable in the south-eastern corner of the proposed site, however, the amended proposal will still negatively impact on the OUV of the World Heritage Site.

Any development on this site would need to be of a high design quality that does not dilute the area’s authentic heritage by presenting bogus features.

The current proposal would still involve the visible introduction of built development into the rural landscape, which would cause a degree of harm equivalent to the previous proposals, despite the reduced number of houses.

The Heritage Impact Assessment (HIA) reports on any surviving significance of Whitehouse Farm through a visual survey of its fabric, map and documentary evidence. There is little in the way of illustrative photography in the HIA and nothing on phasing. There seems to be a pre-1844 core to the building which survives to a greater or lesser extent, but the building has also been subjected to considerable alteration during the 20th century, with the loss of original fabric. Despite the loss of historic fabric of the farm, the building survives to bear testament to its association with the Strutts, in the family’s ownership from 1865 to 1932.

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. In comparison with previous proposals, the level of harm has not reduced as a result of this revised application, as the loss of the Attribute is a common factor in both applications.

In comparison with previous proposals, the level of potential harm has not significantly reduced as a result of this revised application.

As proposed, it is considered the current development would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site.

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 Rachael Coates, AVBC**

*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.*