DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Alan Redmond 29th July 2019 Amber Valley Borough Council

Town Hall Ripley

Derbyshire DE5 3BT

Dear Alan

AVA/2019/0582: Demolition of existing house and construction of two detached houses with integral garages at 12a 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 September.

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 site is in close proximity of a wealth of designated and non-designated heritage assets, which are also attributes of the World Heritage Site. It is also located within the Belper and Milford Conservation Area.

The proposed application site is currently occupied by a single detached house. The proposal is for the demolition of the existing detached dwelling and the construction of a two detached dwellings, of contemporary design. The existing house is a typical developer-built suburban house, dating from the early 1980s, and has no architectural interest or significance related to the history of this mill town. However, by virtue of its siting, against the short row of 14-20 Belper Lane, and its bulk being broken-up and set back to the rear of the plot, it ensures that a significant area of open garden space exists in front of the dwelling. This open space is considered to make a contribution to the lower density character of this semi-rural historic context, as would previously have been defined by dispersed cottages and farmsteads at the time of the development of the textile industry in Belper.

The small historic area of the Scotches, comprised of 14 dwellings in 3No rows, one of which is listed in grade II, is given more of an appropriate open setting by virtue of the siting of the existing single dwelling. Despite the modern development adjacent to the Scotches having a negative impact on the character of the conservation area, the separate character of the small settlement is still capable of being interpreted.

The proposed construction of two dwellings would occupy much of this open garden frontage, with highly prominent buildings, effectively three storeys in height, would distinctly present an inappropriate increase in density. The engineered accesses to the garages, with prominent retaining walls, would also present a distinctly urban character, in contrast to the existing rural vernacular character, interspersed with identifiable modern infill.

In this context, the design would have a strongly assertive presence, with bold and expressive roof profiles, running contrary to the ridge line orientation of the surrounding context. The complex form of two dwellings and attached garages structures would challenge the vernacular scale, form and character of the rows above and below the site, the rows opposite, 19-33 Belper Lane, including the grade II listed property directly opposite, 23 Belper Lane.

It is considered that the proposed development would be harmful to the significance of the World Heritage Site, as expressed in its Outstanding Universal Value, due to the scale and massing of the proposed dwellings not reflecting the local character of this place of international significance.

The dominant nature of the proposed development would also impact on the setting of a number of attributes, causing harm to the semi-rural context of 5-8 The Scotches and 23 Belper Lane, directly.

Despite being 'less than substantial', this harm cannot be outweighed by any public benefit, as assessed under paragraph 196 of the revised NPPF (July 2018) and, therefore, the proposed development cannot be justified.

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 Sarah Brooks, AVBC