

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Paul Wilson  
Amber Valley Borough Council  
Town Hall  
Ripley  
Derbyshire DE5 3BT

10th September 2019

Dear Paul

**AVA/2019/0471: Outline application for the erection of up-to two dwellings including details of means of access on land adjacent to Highfields, Belper Lane End.**

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 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 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 have received the following advice:

The application site is immediately opposite the World Heritage Site. The small settlement at Belper Lane End, which is set around and concentrated at the junction of Belper Lane and Dalley Lane, contains a mix of traditional Derbyshire vernacular buildings and modern dwellings. The modern dwellings that have infilled between the traditional vernacular buildings demonstrate the impact on the character of place where new buildings fail to respond to context. The settlement has historically included a chapel, a school, a public house, farms and cottages.

The site is visually contiguous with the wider rural landscape, which surrounds the small settlement and the application site. The open landscape character is clearly evident as it extends to the horizon, in a sweeping arc from the north, west and south. To the east of the site, the rising land contains Wyver Wood and the enclosed farmland of Wyver Farm, located wholly within the world heritage site. The current garden and parking uses associated with the curtilage of Highfields, visually accommodate the dominant open landscape character, despite the temporary occupation by mobile homes and storage containers.

A number of claims in the Design and Access Statement need to be addressed in consideration of the physical context of the application site and the understated impact of the proposed development.

The introduction of two dwellings on this prominent, open site would have a significant impact on the settlement, with discernible encroachment into the open rural landscape. The planning statement specifically states that the outline application is to establish the principle of development for two dwellings (3.4). Nevertheless, the application asserts that the dwellings could be assimilated into the context without harm and would follow the grain of development within the settlement. Furthermore it considers that (Para 5.24) the indicative layout demonstrates that the development would be well-designed:

*5.7 The proposals involve the redevelopment of previously developed land. The site is adjoined on by existing residential development and the proposed dwellings would be viewed in their context rather than appearing as an intrusion into the open countryside. The illustrative layout shows the dwellings arranged in a row maintaining the linear grain of the settlement and helping them to assimilate into their surroundings.*

As a relatively modern, isolated bungalow, Highfields follows no established development pattern for this small settlement and is itself unrelated to the core of buildings in the settlement. It cannot be considered as having been assimilated into its surroundings, nor, therefore, could an additional two dwellings in its garden. The linear grain of the settlement has evolved in quite a different means than the insertion of two detached dwellings arranged in what cannot be considered to be 'a row'. While the land related to Highfields has been used for parking and storage of mobile homes and storage containers, there has never been buildings along the south side of Belper Lane End beyond the current cottages, 80 metres to the west of the application site. The north side has historically accommodated a Methodist (Wesleyan) Chapel, an early school and a small group of cottages, set against the lane, opposite open countryside.

*5.2 The application site is within the built framework of the settlement and is adjoined by residential development. The pre-amble to Saved Policy H4 defines infill as "the completion of an otherwise substantially built up frontage by the filling of a small gap with usually no more than one or two dwellings". The proposals involve the erection of two dwellings on an area of brownfield land and as such is in compliance with Saved Policy H4.*

The land between the application site and the core of the village has never been developed and has historically been used as allotments. The assertion that Highfields is part of the built frame work of the settlement and that the proposal would be regarded as infill and therefore satisfy Local Plan Saved Policy H4 would appear to be an incorrect interpretation of the policy's scope and objective.

*5.8 The current condition of the site of the site is such that it appears somewhat unkempt and could be considered detrimental to the character and appearance of the local area and wider landscape. The re-development of this area of previously developed piece of land will therefore have significant positive benefits in relation to the appearance of the area.*

This assessment in the application overlooks the possibility of improving the appearance of the site without the need for further development, particularly one which itself would be detrimental to the character, appearance and significance of the open landscape setting to a designated heritage asset of the highest value. While the proposed development is only indicative, it is possible to assess that the siting, scale, orientation, form and massing of the dwellings would have a distinctly sub-urban character, which would be incongruous within this context. Irrespective of the potential design quality, the application of materials and detailing that might reflect and contribute to local distinctiveness, the principle of this type of development is considered to be unacceptable in this location and in no way represents "significant positive benefits".

The proposed development of this site is considered to be a reduction in the relict rural setting of the Derwent Valley Mills World Heritage Site, which would be harmful by its adverse impact one of its 'attributes', namely its landscape setting. The harm would be 'less than substantial', as defined in the NPPF, but great weight should be given to the conservation of this designated asset of high significance. As the NPPF goes on to advise, this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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 script is cursive and fluid, with the first name "Adrian" written in a larger, more prominent hand than the surname "Farmer".

**Adrian Farmer**

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.

**cc Sarah Brooks, AVBC**