

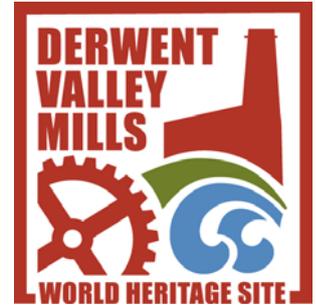
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Sara Booty
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Derby City Council
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14th April 2014

Dear Sara

Ref: 02/14/00198 – Residential development for up to 45 dwellings, formation of access road, car park and open space at land off North Avenue, Darley Abbey.

Please find below the Derwent Valley Mills World Heritage Site response to the consultation concerning application DER/02/14/00198. These comments will be taken to the World Heritage Site Conservation and Planning Panel for endorsement at their next meeting in May.

The proposed development site lies partly within the Derwent Valley Mills World Heritage Site and partly in the 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 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 has as the second of its seven aims to: “*establish guidelines for the future management of the site, and the buildings and land within it, so that the special character of the cultural landscape is protected and enhanced.*” It also has as the sixth of its twenty-five objectives to: “*maintain and enhance the quality and distinctiveness of the Derwent Valley Mills cultural landscape.*”

I have consulted Derbyshire County Council's Conservation and Design Section over this proposal, and the following comments are based on their advice.

This undeveloped area of open, green countryside was deliberately included within the Buffer Zone to protect the setting of the Site. Any significant development would impact in a negative way on the setting of the Site by substituting housing for this survival of the natural rural landscape context within which the historic industrialisation emerged and survives today in its arrested state.

The Statement of Outstanding Universal Value for the Derwent Valley Mills, endorsed by UNESCO, states: “The cultural landscape of the Derwent valley was where the modern factory system was developed and established, to accommodate the new technology for spinning cotton developed by Richard Arkwright and new processes for efficient production. The insertion of industrial establishments into a rural landscape necessitated the construction of housing for the workers in the mills, and the resulting settlements created an exceptional industrial landscape. The change from water to steam power in the 19th century moved the focus of the industry elsewhere and thus the main attributes of this remarkable cultural landscape were arrested in time”.

The proposed development is wholly within the Buffer Zone for the Derwent Valley Mills World Heritage Site and immediately abuts the Site itself; the access road and proposed car parks and playing field is within the World Heritage Site. The Site is characterised at this point as open natural flood plain to the River Derwent, where the only tangible signs of human intervention north of the Darley Abbey Mills complex is the railway, essential infrastructure e.g. strategic roads and sewerage works, and the occasional isolated farmstead, before the Site reaches the historic settlements of Makeney and Milford.

The application site is highly visible from within the World Heritage Site, from Darley Abbey to Breadsall, and just beyond. From the public amenity route of the Derwent Valley Heritage Way that follows the edge of the River Derwent, the lower valley slopes rising from the river meadows of the flood plain, on its western side, retain an undeveloped character; the tower of St Matthew's Church, Darley Abbey, is almost the only visible built feature within this expanse of tree covered slopes. If the application site were to be developed with housing as proposed, despite its lower level than the existing adjacent housing of North Avenue, it would not be perceived as a natural extension to the existing edge of settlement development, but would appear as a highly visible, isolated development within this, the designated 'Green Wedge', consisting of the tree covered valley slopes and the natural meadows of the River Derwent's flood plain. Furthermore, the housing in North Avenue would be opened up by breaching the existing green screen to form the vehicular access.

Any built development will reduce the open, landscape character of the setting and consequently impact on the Outstanding Universal Value of the World Heritage Site. Screening as a form of mitigation is not of any real help, firstly because such an argument could be used over and over again in such circumstances and the open landscape setting would be lost incrementally, and secondly, tree screening can be lost by felling, thinning or disease.

The Derwent Valley Mills' intact 'arrested' condition, in a rural landscape setting, was a significant contributing factor in its inscription. Loss of that landscape would be damaging to the Outstanding Universal Value. For this reason the Derwent Valley Mills WHS Partnership objects to the proposed development and trusts that its comments will be taken into account in the determination of this outline planning application.

Please also see the attached comments received by the county council's landscape architects regarding these proposals, following a request for advice from the World Heritage Site team over possible landscape impacts – I hope these too can be considered as part of the World Heritage Site response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adrian Farmer'. The signature is written in a cursive, flowing style with some loops and flourishes.

Adrian Farmer

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

Ref: 02/14/00198 – Residential development for up to 45 dwellings, formation of access road, car park and open space at land off North Avenue, Darley Abbey.

In response to the request to comment on the 'Landscape Assessment' (LA) and 'Visual Impact Assessment' (VIA) submitted in support of the development of 45 dwellings, open space and a car park at land off North Avenue, Darley Abbey I make the following observations:

The LA is effectively in three parts:

- Consideration of landscape character and the sites role in contributing to that character;
- Consideration of the site's contribution to the 'Green Wedge' designation and the effect of its removal from it; and
- Consideration of the site's contribution to the Derwent Valley Mills World Heritage Site (WHS) and its buffer zone.

Taking each of these considerations in turn I have the following comments:

Landscape Character - The LA correctly identifies that the site is located within an urban area as defined in 'The Landscape Character of Derbyshire' publication but immediately adjacent to the Peak Fringe and Lower Derwent: Riverside Meadows Landscape Character Type (LCT), which effectively captures the River Derwent and its floodplain. The Derbyshire landscape character assessment is a broad strategic countywide assessment that divides the landscape into different landscape character types based on a range of attributes. It clearly does not operate at the site level, which in part explains why the site area is captured within the urban area. In reality the proposed site is a relict landscape once forming part of the wider Peak Fringe: Wooded Slopes and Valleys LCT and now separated from the rest of this LCT through the expansion of Allestree and the construction of the A38 to the north. There is some appraisal of the local character in paragraphs 2.4 to 2.8 which confirms that the site occupies land on the lower valley slopes to the Derwent Valley and as such is an outlier of a LCT that lies beyond the city limits to the north. This LA, although not acknowledged in the report, does effectively confirm that the site is on the lower valley slopes to the Derwent Valley and site observations confirm that it reads as part of the Wooded Slopes and Valleys LCT. Furthermore at the local level the site is perceived as part of the well wooded slopes forming the eastern edge of Darley Abbey with the church acting as a focal point above the trees. Other settlement is not prominent in the current view due to the extensive tree cover and general maturity of the landscape.

Green Wedge – The report sets out the two essential characteristics of the Green Wedge designation;

- They have an open undeveloped character; and
- They penetrate the urban area from the open countryside

In addition Green Wedges perform the following functions:

- Define and enhance the urban structure of the city as a whole
- Separate parts of the city to help maintain identity and reduce the impression of urban sprawl
- Act as “buffer zones” between residential communities and industrial areas
- Have existing or potential recreational and ecological value

The LA then goes on to justify why this development proposal will not have a significant impact on either the characteristics or the functions of the Green Wedge. It is clear that this particular Green Wedge was designated to protect those landscape character types that extend into the city from the north; namely the Riverside Meadows forming the floodplain to the River Derwent and the last remaining enclaves of the Wooded Slopes & Valleys LCT on the lower slopes to the valley immediately adjacent to the floodplain. With a general lack of development associated with this landscape this effectively establishes the two essential characteristics of the Green Wedge designation. It is unreasonable to suggest that the development of other residential areas in the locality such as that along North Avenue and South Avenue has set a precedence for development because these developments most likely pre-date the Green Wedge designation and are arguably why there was seen to be a need for some level of protection in this area. Even a modest development of this size will have an adverse impact on some of its functions through the general loss of greenfield land, the perception of further urban sprawl and the general loss of visual amenity associated with the undeveloped valley in this locality, particularly when viewed from the Heritage Way. The development of two and three storey dwellings on rising ground will be easily evident above the existing vegetation forming the boundary to the site.

World Heritage Site - The LA acknowledges that the site is contained within the WHS Buffer Zone with the access road, car park and playing field within the WHS designation itself. It goes on to state (para 4.2) that the impact on the WHS will not be significant for the following reasons:

- The site is not visible from the north, west or south, due to its low ground level and the presence of existing screening
- The site is relatively well screened from the Green Wedge to the east by existing landscape features

Unfortunately in both of these justifications the applicant fails to relate these judgements to the ‘Outstanding Universal Values’ (OUV) attached to the designation. Furthermore the ‘Statement of Outstanding Universal Value’ makes particular reference to the landscape. The qualifying criteria and supporting statement clearly establish the significance of the landscape in the designation of the WHS. The inclusion of this land, with the proposed development site, within the WHS and its supporting Buffer Zone was a conscious decision to help protect the OUV attached to the designation, which relates to both the built heritage and the landscape context. Nowhere within the LA are these OUVs

discussed or considered in order to assess the potential impact of this development proposal on these values and attributes.

It is my view that the WHS boundary and buffer zone were deliberately drawn to take account of all that land that contributes to its OUV or could impact on these values. The site forms part of an area of landscape that is part of the “remarkable cultural landscape...arrested in time”. I do not accept therefore the assertion in section 4.2 that the development site “does not have any particular historical significance in a functional sense” when it clearly contributes to the landscape context for the WHS and in the appreciation of its landscape setting. Indeed photographs included in the LA at viewpoints 1, 3 and 4, aptly demonstrate how this well vegetated site and wooded backdrop helps to reinforce the rural, undeveloped nature of the WHS and its immediate setting as a ‘a landscape arrested in time’. It is my view that the development of this site will introduce additional impacts that will affect the OUVs that define the WHS.

Visual Impact Assessment

The outline application is also supported by a separate Visual Impact Assessment (VIA). The VIA identifies the Zone of Theoretical Visibility associated with the proposed development based on new housing with a nominal height of 8.0m, although it is unclear how well this relates to proposed three storey terraced development on rising ground. This establishes potential locations around the site that will be able to view the development and 8 locations have been chosen to represent these views. A number of more distant viewpoints have also been considered in the VIA but have been discounted as part of the formal assessment. I note that some of these locations (e.g. Viewpoints 3 and 4) are from footpaths extending through the landscape where the site can be seen from several locations.

Some of the photo locations have been poorly selected and, although following the guidance, they tend to show the site much further away than it is in reality. This is particularly evident at viewpoints 1 to 3. From the Derwent Valley Heritage Trail there are numerous locations where the site can be seen. In some locations the sloping field is visible; in others it is screened or filtered by existing vegetation in the landscape. However in all these views it is evident how little impact there is from existing settlement. The backdrop to the site is formed by the well vegetated embankments to the A38 and the older parts of Darley Abbey are well screened by extensive tree cover other than the church, which forms a prominent focal point on the ridge.

Overall the VIA assesses visual impacts for the surrounding area to have moderate to minor significance based on the fact that the area is generally viewed against a backdrop of existing residential areas and the fact that additional planting as part of the proposal will further mitigate these impacts. I do not accept these judgements given that the site and immediate surroundings are not dominated by existing residential development and the land is typical of the wider landscape

character, which is an important attribute in the OUV of the WHS. Simply suggesting a small incremental change is not significant is not a valid argument with respect to the aims and objectives of both the Green Wedge and WHS designations.

Overall

There are a number of key failings with this application none more so than the lack of recognition for the overall sensitivity of the site with respect to its inclusion in the Upper Derwent Valley Green Wedge within the city but also as part of the Derwent Valley Mills World Heritage Site and its associated buffer zone. The application has been prepared and assessed as if this is simply a green field site beyond the settlement framework. The Landscape and Visual Impact Assessment hasn't taken sufficient account of the WHS designation with particular reference to its Outstanding Universal Value, its integrity and authenticity, and the overall aims and objectives of the designation, which affords the site the very highest level of protection.

Existing residential development in the immediate locality is not a dominant feature in the current views of the site and is not in itself a mitigating factor particularly given that much of this development pre-dates the designation of the WHS. Visually the site is well contained but this doesn't diminish the significance of the site in contributing to the setting of the WHS and helping to demonstrate how this cultural landscape has been preserved to this day – indeed photographs submitted with the application show how the site seamlessly links with the riverside meadows and the landscape that defines the WHS. Although the site is partially screened by existing vegetation within the landscape it is evident that new 2 and 3 storey housing on rising ground will be visible from some vantage points and this development will be visually detached from other dwellings in the area therefore heightening its impact.

In terms of the policy context for considering the proposal it is clearly at odds with Derby City Council's emerging Policy E2: Green Wedges; not being one of the 7 categories that might be considered acceptable for development in Green Wedges. With respect to Policy E29: Protection of World Heritage Site and its surroundings, this proposal will not help "to preserve and enhance the special character of the area" and will have an adverse effect on its setting including views into and out of the site. Even if the proposed development can only be viewed from a small number of vantage points within the WHS, it will contribute to increased urban sprawl and urbanisation of the valley at this locality, consequently impacting on the aims and objectives of both Green Wedge and WHS designation. If a site needs to be screened to the extent suggested in the VIA, then invariably it is the wrong development in the wrong place; simply hiding the development doesn't necessarily make it acceptable due to a range of other considerations.

At paragraph 5.6 in the Planning Statement there is reference to the Local Plan examination in 2006 where the planning inspector commented on the proposed deletion of this area from the Green Wedge allocation at that time. In his statement he states “any residential development would have an unsatisfactory relationship to the adjoining long established group (of houses). It would not be ‘rounding off’, as was claimed by the promoter, but a clear extension into open countryside”. I don’t see that anything has changed since the inspector’s comments at that time with the area still allocated as a GW and forming part of the WHS and its buffer, and I don’t believe that the applicant has brought forward any compelling argument to overturn the policy context for this development.

I trust these comments are of some assistance in progressing the matter.

Gary Ellis

Landscape Architect

Conservation & Design Section

Derbyshire County Council