DERWENT VALLEY MILLS WORLD HERITAGE SITE

Room 169, North Block, County Hall, Matlock, Derbyshire, DE4 3AG T: +44(0) 1629 536831
E: info@derwentvalleymills.org

www.derwentvalleymills.org



28th July 2014

Sara Booty
Development Control Team Leader
Development Management
Derby City Council
The Council House
Corporation Street
Derby DEI 2FS

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. Comments on the original planning application for the residential development were provided to the panel in a letter dated 14 April 2014. The comments in this consultation relate to the amended scheme submitted in July 2014, and will be taken to the World Heritage Site Conservation and Planning Panel for endorsement at their next meeting in August.

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.

Firstly, in response to the individual changes described in the letter from the agent dated 2 July 2014:

I. Removal of playing field:

This would mitigate the impact of the proposed development in so far as that it would serve to maintain the existing agricultural landscape up to the boundary of the WHS.

2. Amended access road configuration:

The road has been straightened and is closer to the existing residential development along South Avenue. Whilst additional tree planting is shown alongside to screen the road and existing residential development from view, it still represents development within the WHS boundary. Both the road and the planting of the trees would further encroach into the arrested landscape of the WHS.

3. Revised housing layout:

A marginal improvement to the scheme has been achieved by setting the housing plots further away from the WHS boundary, so that they are now contained wholly within the buffer zone, thereby increasing the depth of the planting 'buffer'. Another small improvement to the scheme results from all the houses being of a maximum of two storeys in height. However, the WHS Partnership does not feel these measures are sufficient to protect the setting of the WHS. As the development is within the buffer zone it would impact on the setting of the WHS. Further damage to the setting would be caused by the development as it would become a more dominant feature of the WHS in this location.

4. Additional tree planting to the south east of the site:

This is claimed to enhance the setting of the WHS by screening the existing housing along North Avenue. However, there will be little, if any, overall advantage when comparing it to the original scheme other than removal of the existing telephone masts. Planting of the trees, in this particular instance, and the addition of the access road, would have a damaging impact on the arrested landscape of the WHS.

We do not agree with the comment that the 'revised scheme seeks to minimise and mitigate any harm to the setting of the WHS... to the degree that it can reasonably be considered as less than substantial harm". Referring back to comments made on 14 July, "This undeveloped area of open, green countryside was deliberately included within the buffer zone to protect the setting of the site...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".

Overall, whilst there are some minor improvements to the scheme, many of the principal concerns of the DVMWHS Partnership have not been addressed. We would therefore refer you back in full to the original comments made in the letter from the Partnership dated 14 July 2014, together with those supplemented by the County Council's Landscape architect. The Partnership maintains its objection to the proposals to develop this land.

I hope these comments can be considered as part of the World Heritage Site response.

Yours sincerely

Adrian Farmer

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