

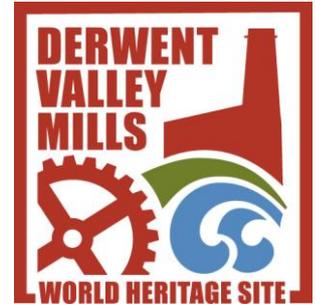
## DERWENT VALLEY MILLS WORLD HERITAGE SITE

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**Sara Claxton**  
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**Development Control**  
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**Derby City Council**  
**The Council House**  
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**Derby DE1 2FS**

18th June 2015

Dear Sara

**Ref: DER/04/15/00720: Residential development of up to 49 dwellings and areas of open space on land off North Avenue, Darley Abbey.**

Please find below the Derwent Valley Mills World Heritage Site response to the consultation concerning the above application. These comments will be taken to the next Conservation and Planning Panel for verification in July.

The proposed development lies within the Buffer Zone of the Derwent Valley Mills World Heritage Site. 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 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 and Design Section (which advises the World Heritage Site Partnership in planning matters) over this application, and the World Heritage Site Conservation and Planning Panel, and have received the following advice.

The application proposes the construction of up to 49 residential units on land off North Avenue, Darley Abbey, which lies within the buffer zone of the Derwent Valley Mills World Heritage Site. The World Heritage Site Partnership provided advice on planning application DER/02/14/00198/PRI which was refused in September 2014. Whilst recognising this application proposes a different layout and means of access off North Avenue, additional tree planting to the south east of the site and noting the submitted Heritage Statement, we do not consider the changes alter the previous advice given, which is repeated below.

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 proposed development immediately abuts the Site itself; indeed 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.

Thank you for giving us the opportunity to comment on this application.

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.