

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Clare Thornton  
Amber Valley Borough Council  
Town Hall  
Ripley  
Derbyshire DE5 3BT

31st May 2017

Dear Clare

## Amended response

**AVA/2017/0374: Demolition and clearance of existing buildings and redevelopment of the site for residential use (up to 136 dwellings) at Derwentside Industrial Park, Derby Road, 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 later this month.

The site lies within the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone and immediately adjacent to the Derwent Valley Mills World Heritage Site and the Belper and Milford Conservation Area. 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 received the following advice:

Immediately to the east of this site, the open landscape rises out of the valley to demonstrate the close proximity and contribution of the rural setting of the World Heritage Site. The short row of terraced housing on Becksitch Lane is the only housing of any age in the vicinity, with inter-war and later housing fronting Derby Road and the small cul-de-sac of Derwent Avenue, all concentrated on the lower slopes of the valley.

This section of Derby Road has a long-established industrial use, expanding in the early twentieth century from earlier, isolated iron- and brickworks, with surviving evidence of the Park Foundry visible at the bottom of Becksitch Lane. Despite their significant footprint and height, the buildings of the industrial park are discreetly assimilated into their context. To Derby Road – the former turnpike road and contributory linear thread of the World Heritage Site – the perimeter trees and stone boundary walls successfully screen the indifferent buildings and provide a relatively attractive corridor, on the edge of the town. The perimeter trees to the other boundaries contain the industrial and commercial uses, screening the site from the agricultural land immediately to the east and the small-scale, ribbon housing developments to the north and south.

The Partnership prefers to see brownfield land developed for housing, before eroding the rural setting of the World Heritage Site. It is however, disappointing to see a reduction in industrial use for the Derwent valley floor as this is where it was historically located. Industry is a fundamental part of Belper’s historical expansion and character, forming the core of the World Heritage Site’s Outstanding Universal Value. The continuation of industrial use would preserve the Outstanding Universal Value and offer potential to contribute to its sustainable future. Furthermore, the unprecedented density of housing in this location would reduce the separation of the distinctly separate industrial communities of Belper and Milford.

While it would be regrettable to lose the industrial use on this site, its discrete nature and the lesser height of the proposed development would help to mitigate these negative aspects. In contrast to the light coloured industrial units, recessive materials and colours for the proposed houses, in any full application, would also help in the mitigation of introducing an unprecedented residential character.

It is understood that the applicant has agreed to have a condition attached to any consent ensuring that the perimeter landscaping is retained. This would help to preserve their contribution towards the visual character of the place,

particularly if the three ash trees are replaced to maintain the current level of tree screening. Comments on the conceptual design of the proposed housing scheme are not considered to be appropriate within this response, but full details of the perimeter stone wall, to be rebuilt as part of the vehicular access arrangement, should be controlled as part of this application to ensure a high quality is presented towards the World Heritage Site.

I hope these comments can be considered when a decision is made concerning this development.

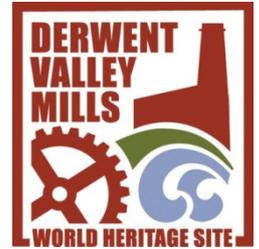
Yours sincerely

A handwritten signature in black ink, appearing to read "Adrian Farmer". The signature is written in a cursive, flowing style.

**Adrian Farmer**

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.  
cc Rachael Coates, AVBC

# Planning (Development Control) in the Derwent Valley Mills World Heritage Site



District, Borough and Unitary Councils, as Local Planning Authorities, are responsible for the determination of domestic, commercial and a range of other planning applications that are submitted within their jurisdiction. They are not responsible for determining waste and minerals applications – these are the responsibility of the Minerals and Waste Authority which in the case of the Derwent Valley Mills World Heritage Site (DVMWHS) is Derbyshire County Council or Derby City Council within its administrative boundary.

The District and Borough Planning Authorities travelling north through the DVMWHS are:

- Derby City Council
- Erewash Borough Council
- Amber Valley Borough Council
- Derbyshire Dales District Council

When an application is submitted to a Local Planning Authority (LPA) in the DVMWHS the Authority assesses whether there may be an impact on the Outstanding Universal Value (OUV) of the DVMWHS. OUV is the reason why a site is inscribed (included) on the United Nations Educational, Scientific and Cultural Organisation's (UNESCO's) World Heritage List. Information on the DVMWHS OUV can be found at <http://www.derwentvalleymills.org/derwent-valley-mills-conservation/planning/>

If the LPA feels there will be an impact, or is uncertain, they can refer the application to the DVMWHS Partnership for confirmation, clarification and advice. The DVMWHS Partnership is a non-statutory consultee. This means LPAs are not under any statutory obligation to consult with the DVMWHS Partnership. Notwithstanding this, LPAs do need to show due diligence in an application's determination. If an LPA was found to have failed to follow due process or incorrectly interpreted relevant legislation then a planning decision could be challenged through judicial review.

The DVMWHS Partnership has an agreement with the Conservation, Heritage and Design Service (CH&DS) at Derbyshire County Council to provide it with advice on the impacts of applications in the DVMWHS and its Buffer Zone as to their impacts on OUV. The Partnership does not always refer an application to the CH&DS if it is a reasonably straight forward judgement. However, the great majority of applications submitted to the Partnership are referred to the CH&DS.

When an application is referred to the CH&DS, officers within the Service will review the application and give their professional view on potential impact or suggest what additional information is required to be able to assess impacts. This response is then incorporated into the DVMWHS Partnership's standard consultation response letter template and sent to the LPA.

The LPA must judge for itself how to proportionally respond or address the content of any consultation response received from the DVMWHS Partnership.

The DVMWHS Partnership coordinates a Conservation and Planning Panel which meets six times a year. One role of this Panel is to review all the planning consultation responses that are issued by the Partnership since the previous Panel meeting. If it is felt that any response requires clarification or alteration a subsequent consultation response will be supplied by the Partnership to the relevant LPA.

From time to time, due to the consultation response supplied by the DVMWHS Partnership, the LPA may be asked by an applicant to organise a meeting with one of the DVMWHS Coordinators to clarify advice on site. The Partnership is happy for one of its Coordinators to attend these meetings if they are organised and attended by planning officers of the LPA. In addition to this, the Coordinator may be supported by an Officer from Derbyshire County Council’s CH&DS, especially if it relates to their professional expertise.

At any time in the application process an applicant for, or an objector to, a scheme may ask for it to be reviewed by the DVMWHS Partnership’s Conservation and Planning Panel at its next meeting. While this can usually be accommodated, there is no scope for the applicant or the objector to present to the Panel. However, from time to time, the Conservation and Planning Panel may invite an applicant to present to the Panel for clarification. This is likely to be for major schemes where there is not an outright objection to the principle of development but where design quality/philosophy is pivotal to its acceptability.

It must be remembered that in all cases it is the responsibility of the LPA to determine applications that are submitted to it. The DVMWHS Partnership’s non-statutory consultation responses provide information to be considered when determining the application.

If an LPA refuses permission for an application as a result of, or partly as a result of, a DVMWHS Partnership consultation response and the applicant appeals the decision then the Partnership will support the LPA in any defense of their decision as much as resources allow.

### Planning (Development Control) in the Derwent Valley Mills World Heritage Site

