

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

15th February 2018

Dear Paul

**AVA/2018/0025: Development of six dwellings at Primrose Wood, Crich Lane, 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. 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:

An important attribute of the World Heritage Site is the rural landscape setting to the industrial buildings and urban settlements. Sustaining or enhancing that rural, undeveloped character is a material consideration in this development where the rural character, as experienced when moving through the river valley, including static views from the opposite side of the valley, survives to a remarkable degree.

The application site sits within an area of trees that rest on the top of the hillside, on the undeveloped side of Crich Lane. The site has previously been the subject of an outline application (AVA/2014/0974). In consideration of the impact of that proposal, it was considered that, in principle, a small, limited development of the type promoted, could be realised without adversely affecting the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. The proposals illustrated how built development could be introduced into a natural landscape location should the quality of the design response and construction be appropriately high. Consequently, no objection was raised to a proposal of the type described in the application. Furthermore, the contemporary design of the eco-houses was considered to be of a high quality, commendably sustainable in environment terms and appropriate to the sensitive location in this area of world significance.

The sustainable nature of the houses, as promoted, would also lend itself to the use of materials such as natural timber cladding, which would mitigate any glimpse views of the development in winter, when the trees are bare. It was specifically recommended that should the principle of housing on this site be established, a more traditional, heavy masonry construction for the dwellings would not be acceptable, as it would be unlikely to represent an appropriate response to this special context.

Comments on the pre-application enquiry (COR/2017/0221) to the current application, advised that the proposals would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site due to the failure of the design response to meet the quality required for this natural wooded site that contributes to the landscape character of the Buffer Zone. A reserved matters application (AVA/2017/0500) for the detailed design of one dwelling (Plot 3), was not referred to the Derwent Valley Mills Partnership. Had it been, its advice would have indicated that the design quality approved for that single dwelling would be considered to fall short of the quality recommended and anticipated through the original application.

The scheme for the six houses in this full application is not considered to be an appropriate response to the character of this sensitive site. The mitigation that a suitable design response would offer is absent in the current proposal. In an attempt to incorporate lightweight timber cladding material, as a token acknowledgement to the open, wooden context, the design cannot hide what is essentially a standard house, with arbitrary changes in surface material rather than an honest expression of volumes. The visibility of significant areas of flat, rendered walls would be increased by the staggered, informal sub-urban layout and variety of house types, in contrast to the repetitive rhythm of the proposal for solar houses.

In summary, it is considered that the proposals in this application would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site due to the failure of the design response to meet the quality required for this natural wooded site that contributes to the landscape character of the Buffer Zone. While this harm would be less than substantial, 'harm' nevertheless has an adverse impact on its significance as a heritage asset of the highest level and would contribute cumulatively to other harmful development within the Derwent valley Mills World Heritage Site, its immediate and wider setting.

The suburban character of the houses fails to mark them out as housing that might be seen in any area not having 'world' significance, in a way that the proposals of the original outline application demonstrated was achievable.

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 with some loops and flourishes.

**Adrian Farmer**

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.  
cc Sarah Johnson, AVBC