

DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Alan Redmond
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire **DE5 3BT**

14th February 2019

Dear Alan

AVA/2018/1250: Demolition of existing buildings and erection of Extra Care Accommodation for the elderly, including communal facilities, landscaping and car parking on land off Derwent Street 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). 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 18th 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:

The site is on land to the west of the former turnpike roads of Chapel Street/Bridge Street, through the historic mill town of Belper. Development of land on this side of the town has been restricted and its character formed by its close proximity to the River Derwent and its flood plain, given over in part to meadows. The application site is immediately adjacent to a number of Attributes that contribute to the significance of the World Heritage Site, including Unity Mill, Unity Mill House and Nos 1 to 10 Chevin View, all of which are grade II listed.

The site forms part of a larger area covered by Amber Valley’s Local Plan Policy ER1c: Mixed Use Development at Derwent Street. The site forms a small part of the ER1c area of land that is allocated for a mix of uses. This policy states that planning permission will be granted for mixed use development on land north and south of Derwent Street, Belper, as shown on the Proposals Map, including tourism, Shops (A1), Restaurants and Cafes (A3), Drinking Establishments (A4), Hot Food Take Aways (A5) and Assembly and Leisure (D2), following the approval of a comprehensive development brief for the site and providing that the proposals:

- a. incorporate improvements to the highway network to offset the impact of additional vehicle movements on B Street (A6), including the provision of a new road link to the west of Bridge Street, subject to detailed investigation;
- b. incorporate improved pedestrian links between existing retail units within and on the edge of the town centre;
- c. are of a form, scale and design which reflects the location of the site within Belper and Milford Conservation Area and the Derwent Valley Mills World Heritage Site;
- d. satisfy any criteria in relation to specific policies for each land use. Housing may also be acceptable as an element of any redevelopment proposals, if it can be demonstrated that this would be essential to enable a comprehensive scheme to be implemented.

The proposed Extra Care facility would have a constant scale of three storeys, forming a car parking courtyard to the west and a smaller garden courtyard to the east, facing Unity Mill and Unity Mill House. The application includes no information against which to assess the development’s impact on its historic context and the included designated heritage assets. Nevertheless, the height of the development would rival that of Unity Mill and thereby adversely affect the significance through its dominance as a building of industrial scale within a market town urban context.

The development would be patently contained and introspective, devoid of any means to form positive links and connections within the locality, to benefit the community through opportunities for permeability such as pedestrian links, public accessibility and integration through the provision of shared facilities, such as cafes and meeting rooms, etc. The relationship of the development with Derwent Street could also be enhanced through detailed interface that allowed better integration.

The assertions put forward in paragraph 4.27 of the submitted Planning Statement are capable of being challenged. “The proposed development is considered to accord with the broad principles set out within the SPD. Although a masterplan for the entire ER1C allocation has not been submitted, this extra care scheme follows the health and care scheme being brought forward by Derbyshire County Council and will add to the mix of uses being delivered in the policy area. It also complies with the uses supported to be developed in the Town Centre under policy TC1. The development has been designed to complement future development to the North and should act as a catalyst for the remaining development proposals to come forward in the remaining part of the allocation”.

The inclusion of a public library within the county council’s development on the south side of Derwent Street satisfies the spirit of the ER1c policy as part of other uses. Its mixed use development not only encourages public accessibility but pedestrian links have been included in a number of locations from the heart of the town centre.

While the proposed design and modelling, to the Derwent Street elevation of the extra care facility is generally of a suitably high quality, the north elevation and aspects of the east elevation, facing the World Heritage Site attributes, are not considered to be suitable responses to this sensitive context. Furthermore, the development cannot be considered to complement future development to the north and should act as a catalyst for the remaining development proposals for the remaining part of the site. The plain service elevation incorporates no design devices that might mitigate the impact of a three storey development.

In conclusion, in its existing form, the development is considered to be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site by virtue of its scale and inappropriate design in critical parts, which would have an adverse effect on the setting of those attributes and their contribution to the significance of the world heritage site. The harm would be ‘less than substantial’ with respect to the NPPF’s requirement for the assessment of public benefit.

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', written in a cursive style.

Adrian Farmer

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