

DERWENT VALLEY MILLS WORLD HERITAGE SITE

Shand House, Dale Road South, Darley Dale, Matlock, Derbyshire, DE4 3RY

T: +44(0) 1629 536831

E: info@derwentvalleymills.org

www.derwentvalleymills.org



Mark Penford
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire **DE5 3BT**

8th May 2019

Dear Mark

AVA/2019/0301: Development of three houses on land to the rear of 77 Derby Road, Ambergate.

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 in June.

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 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 visible from within the World Heritage Site, from the A6, between 73 and 77 Derby Road, where the proposed access would occupy the full width of the intervening space. It is also visible in views from buffer zone to buffer zone, across the World Heritage Site, from Whitewells Lane. Between the relatively small ribbons of built development that comprise the settlement of Ambergate, which follow the Derby Road (A6) and Newbridge Road, the relict 18th century rural landscape extends south as the eastern valley slopes of the Derwent Valley as far as the former mill town of Belper. Although small within this context, the loss of the paddock and the trees, which until recently occupied the site, would cause an incremental and cumulative loss to the rural setting of the World Heritage Site.

The expansion of Ambergate would have been prompted to a large degree through the influence of those essential linear threads that form the heart of the Site’s significance: the river; the canal; the turnpike road and the railway lines. Although set back from the A6 (former turnpike road), the character of traditional development can be appreciated in the dwellings that form the context of this undeveloped land, previously used as a paddock. The historic photograph in the Design and Access Statement illustrates the grain of the built environment created from proven housing models, formed in rows, working both with the slope of the valley sides and, assuredly against it, with stepped rows following the topography. Their scale, mass, form and rhythm is both simple and responsive to their context.

In contrast, the intended concept of ‘grand designs’ is considered to be a fundamentally incongruous notion, relative to the adjacent local character and history. Inappropriately, the resulting character would be urban in character. The proposed development would work against its context, derived through contrived, highly-engineered works, creating alien platforms for the individual dwellings, its parking and amenity provision, resulting in development that would decidedly disregard its context to present a development that could be achieved in any place, rather than the special and particular context in question. Other than the use of a consistent external material, it is considered that the development would fail even to achieve the objectives in its supporting statement, namely:

- a holistic approach;
- a positive relationship of each dwelling to one another and their surroundings;
- exceptional levels of quality in terms of its design, materiality and sustainable principles;
- development sympathetic to the local vernacular;
- sensitively enhance and evolve the built environment;
- a high architectural integrity, blending sensitively into their surroundings and enhancing the overall architectural merit of Ambergate;
- not intrusive or out of character with the pattern grain and feel of development within Ambergate.

Though these would be desirable objectives within this sensitive context, it is considered that the design of proposed development promotes a distinctly different interpretation. Within the current DVMWHS Management Plan (2014-2019) Policy 2 Monitoring and Conservation: Policy P2.5 exists to ensure that new developments within the DVMWHS are of a high quality construction through the planning process.

Furthermore, a component of assessing the sustainability of a development, as set out in the revised National Planning Policy Framework (July 2018: 12, 'Achieving well-designed places'), the form of the proposed development is considered to have little regard to the local character and history, as described above. While there would be no objection, in principle, to residential development on this site, were the harm to the loss of the rural setting of a designated heritage asset of world significance be outweighed by any public benefit that the development would bring, there would be a presumption that, in order to be sustainable, the development would meet a number of design criteria including being sympathetic to local character and history.

It is considered that the proposed development would be harmful to the significance of the DVMWHS through inappropriate form of development within its setting, itself an attribute of the World Heritage Site's Outstanding Universal Value. This harm to a heritage asset of the highest value would be 'less than substantial', but still a high level of harm, for which any public benefits that might be contained within three dwellings of unsympathetic design, would not outweigh.

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 Sarah Brooks, AVBC