

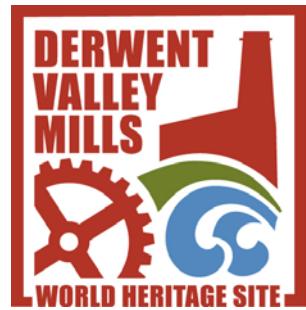
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Helen Frith
Amber Valley Borough Council
Town Hall
Ripley
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13th June 2019

Dear Helen

AVA/2019/0408: Application for approval of reserved matters following the approval of outline application

AVA/2017/0374 for Tapton Estates Ltd, 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. 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 DVMWHS Partnership previously expressed a strong preference for this site to remain in commercial use. As a brownfield site, screened by relatively mature trees on some of its boundaries, its change of use for housing development was acknowledged as having less of an impact than other sites in and around Belper. The conceptual masterplan proposals, on which outline application was determined, included a positive, green connection through the centre of the site, to the open rural landscape, on the higher, visible land to the east. Assurances for the retention and strengthening of the woodland boundaries as mitigation for the extension of housing away from Belper towards the separate settlement of Milford, and the loss of historic industrial character of the area, contributed to the partnership's reluctant support for the development, in principle. Subsequent dialogue has suggested a good quality of design, honestly expressive of its time with house types in a relatively contemporary style.

It is of concern therefore, that these fundamental concepts of the development have been significantly eroded in the reserved matters application. In the much revised layout submitted as part of the application, built development has encroached into the tree-edged boundaries, with the loss of screening and consequential urbanising impact to the green, landscaped setting of the World Heritage Site, together with the associated impacts on the site's ecology and habitats. The strong conceptual green corridor linking to the open countryside has not only been severely diluted, its shift in location negates the benefit of being associated with the site access, the first impression of which now focusses on an unstructured mix of two and three storey rows of houses and garage blocks on a ubiquitous urban road pattern.

These houses are of unremarkable design, loosely based on traditional elements of vernacular construction – including which could be seen on any site without visual sensitivities of inherent associations with a place having world significance. The arbitrary application of feature stone facades represents the lack of any meaningful or holistic design approach, adopting a wallpapering approach to standard house designs lacking any contextual association with the place.

These comments are considered to be consistent with those provided by the Partnership on the respective pre-applications COR/2018/0055 and COR/2019/0036.

It should come as no surprise, therefore, that it is considered that the disregard for the premise on which the consent for 'in-principle' change of use for the site was based, inevitably leads to an assessment that the reserved matters scheme, as submitted, would fail to mitigate the adverse impact on the setting of a designated heritage asset of the highest value. This impact on the setting would be harmful to the significance of the World Heritage Site, as defined by its Outstanding Universal Value.

While it was not possible to establish whether there would be harm to the Site's OUV, at outline stage, the detailed proposals demonstrate that there would be harm, which would be 'less than substantial' as defined in the NPPF. While it is appreciated that this assessment would lead to examination of the level of public benefit that might be set against this harm, the reversion of the scheme to better incorporate the acceptable concepts of the approved outline application would better preserve the significance of the World Heritage Site than any public benefits that would allow the proposed development in the form submitted.

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".

Adrian Farmer

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