

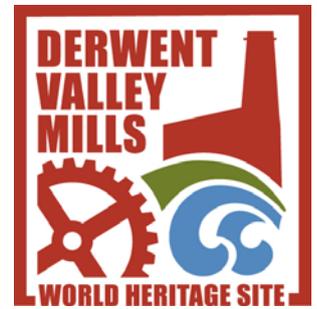
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Alan Redmond
Amber Valley Borough Council
Town Hall
Ripley
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22nd July 2019

Dear Alan

AVA/2019/0424: Development of 15 dwellings at the former council depot, Derby Road, Duffield

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 September.

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 application site lies immediately against the present day A6 - the former turnpike road - and was previously occupied for use as a gas works, before its use by the county council as a works depot. This use involved a relatively small number of small scale buildings. The relatively intact ‘gatehouse’ office dates from the first half of the 19th century and was part of the original gas works.

Consistent with the previously approved development (AVA/2016/1257), the current proposal includes the retention of the lodge, which would preserve its contribution to the integrity of the World Heritage Site and its significance.

Gatehouse

The increased footprint of built development would impact on the setting of the gatehouse, with little space remaining around it, with the greater scale of its extension and the adjacent dwellings subsuming/dwarfing the lodge as the isolated building it has previously existed.

The vehicular access to the gatehouse plot has been changed to be from the rear access road, rather than through the access gates, related to the gatehouse, of the former depot site, directly off Derby Road.

A more pragmatic approach to the impact on the setting of the gatehouse, as a non-designated heritage asset, would probably be justified, given that it is not listed.

New housing

The new proposal includes a similar number, and mix, of dwellings to the approved scheme, to a conceptually similar layout arrangement. However, the dwellings have become larger in scale, partly due to incorporating the proposed office/gym spaces within the envelope of the house, rather than over the detached garages. The space between and around the dwellings appears significantly reduced, with less space available for the softening effect of structural soft landscaping. This is particularly evident on the row facing Derby Road, where existing trees would be lost adjacent to the gatehouse, with little opportunity to mitigate the urbanising impact of seven very large dwellings, most of which, are effectively three storey in height.

Materials

The dwellings are all proposed to be rendered, externally, which is likely to present an overbearing appearance, comprising a significant amount of highly visible, non-contextual material. It is accepted that render is used along this section of Derby Road, although it is often a later addition covering fairfaced brickwork. It is also acknowledged that there are rendered, or pebble-dashed houses, with brick plinths, which are currently on the site; these two pairs of semi-detached houses have much less of an impact than would the proposed development of 15 houses. The new housing, opposite have brick ground floors and present about as much render as is tolerable.

The external brick chimneypieces, to the proposed dwellings are noted.

Boundary treatment

The design of the front boundary wall needs to be to a high quality and given an appropriate level of consideration as to the contribution it can make to local distinctiveness and design quality. The existing houses appear to have had a hedge boundary rather than an urban, hard-landscaped frontage. Any opportunity to introduce a tree – or trees – of a substantial size, would be beneficial in reducing the impact of the hard, built development.

Setting as an Attribute

One attribute of the World Heritage Site is its rural landscape setting. Being more remote from the village settlement than claimed, the application site adjoins open countryside.

The reduced density (number) of housing of the approved scheme was welcomed in order to allow the existing perimeter trees to retain their contribution to screening the built development from the adjacent countryside, thereby preserving the rural setting of the World Heritage Site. The current scheme includes a similar number of dwellings to the approved scheme, but their increased size offers little opportunity for landscaping as described above.

The secondary entrance to the former depot site allowed a visual connection through the site, to the open landscape of the Derwent Valley to the west. This would be lost both under the approved scheme and the current proposal.

Authenticity

Consistent with the approved development, the more contemporary design is considered to be a more appropriate response to with regard to the authenticity of the World Heritage Site.

In summary, the development would not adversely affect the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site through erosion of its rural landscape setting, subject to the design considerations

highlighted here, preservation of the tree screening and the inclusion of meaningful landscaping to mitigate the urbanising impact of the development, particularly given its increased density.

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