

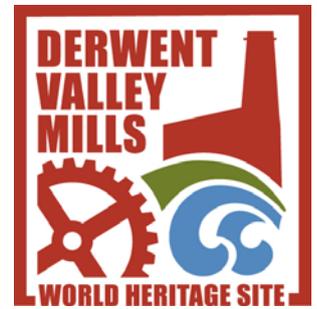
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Alan Redmond
Amber Valley Borough Council
Town Hall
Ripley
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8th October 2019

Dear Alan

AVA/2019/0835: Reserved matters application following the approval of AVA/2018/0010 for land to the rear of 144A Kilbourne 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 in November.

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:

Due in part to the potential impact on the open rural character of the setting to the Derwent Valley Mills World Heritage Site, the decision notice to the outline application to which this reserved matters relates advised:

The applicant is advised that the site is located within the Buffer Zone of the Derwent Valley Mills World Heritage Site and within the setting of Pottery Farm, a grade II listed building, careful consideration must be given when designed the reserved matters application, to not affect any harm caused by the dwelling on the setting of Pottery Farmhouse, a grade II listed building and the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site, by its visual intrusion into the open countryside. It is recommended that the harm would be minimised if the dwelling hereby approved were limited to being no greater than a single storey as a two-storey dwelling would be incongruous in this context.

Reserved matters application AVA/2018/0181 for the previously approved outline permission AVA/2014/0886 was refused on 29 June 2018, due to the inappropriateness of the design and the harm that would result from its impact on the setting of Pottery Farm and the OUV of the World Heritage Site.

The supporting Heritage Statement has identified the heritage assets that have the potential to be affected by this proposed development. However, the significance of the rural setting of both the World Heritage Site and the listed Pottery Farmhouse have been under-played. While the garden of the existing dwelling plot has been previously developed, its open character impacts significantly less than would a large new dwelling that breaks the established development pattern by projecting into the open landscape. Since the relict landscape within the Buffer Zone is an Attribute of the World Heritage Site, and therefore part of its significance, it should be treated in the same way as the World Heritage Site. Equally, any further loss of the open rural landscape around Pottery Farm could be harmful to its setting should the appearance of the new development not be mitigated sufficiently, as has been consistently advised.

The recent decision related to a number of development proposals for Bullsmoor, recognised the contribution of its ‘valued landscape’ to the rural setting of the world heritage site. A more recent appeal decision on a site in Blackbrook, where three houses were proposed on an open green space, despite not being part of the relict 18th century rural landscape, the inspector considered that the protection of the World Heritage Site’s setting is

particularly important, because of the critical significance to the Property's Statement of Outstanding Universal Value (SOUV) of the location of the mills and their associated settlements, within a rural landscape, arrested in time.

Advice on what could be acceptable for the design of the proposed dwelling has promoted the value of a rigorously executed, uncompromisingly contemporary aesthetic. The satisfactory assimilation of an intervention into this sensitive rural context is considered to be best achieved by through being simple and recessive in form, detailing, materials and colour, and honest expression of their time avoiding pastiche.

With regard to the current reserved matters application, effectively, a two-storey dwelling is being proposed, although the upper storey is contained within an open roof space. The resultant scale and height is not necessarily unacceptable, were a suitably rigorous design concept to be conceived in order to justify the increased volume and height, through its inherent mitigating benefits. However, the proposals in their current form would result in a two-fold adverse impact by having an incongruous and inappropriate domestic character and scale.

With respect to the submitted design, significant improvements have been made in terms of siting, orientation and form. The expression has moved away from the overtly domestic and sub-urban character of previous designs. Nevertheless, in a number of detailed areas the proposals would not deliver the mitigation required to justify the departure from the Development Plan and the potential harm to the setting of the World Heritage Site. This conclusion is made on the following objective assessment of the design:

- The open-ended patio, on two sides of the living/dining room, generates an eccentric, asymmetric form with an associated complexity of junctions, both in form and materials. Simple geometric forms are characteristic of the County's vernacular building tradition, for both agricultural and domestic building types; negative, recessive gables are not part of that agricultural vocabulary;
- The brick ground floor treatment, with a shallow depth of cladding is insufficient to carry the agricultural aesthetic;
- The palette of materials and detailing is overly complex and adds to the domestic character that it has always been considered as required to be avoided. Two types of vertical cladding are proposed;
- Contrary to advice, a second storey has been introduced. Far from disguising the first floor, as a feature more typical of a dwelling than a large agricultural building, it is expressed in its fenestration, particularly in the west gable and the proliferation of rooflights on the south and north roof slopes, the latter facing the listed Pottery Farm;
- A distinctly 'hole-in the wall' approach to the fenestration promotes domestic character, particularly in the ground floor openings within the brickwork. The brick soldier-courses over each opening further draws on the sub-urban domestic detail;
- That 'hole-in-the-wall' approach to the fenestration applies to the west gable facing the open landscape, which also incorporates an inappropriate Juliet balcony;
- The garage element relates awkwardly to the attempted agricultural typology, and has a distinctly sub-urban appearance. It disguises a potentially simply clad, basic gable form;
- Roof verges are thin and domestic-scaled, particularly over the void created to provide the inset patio.

I hope these comments can be considered when a decision is made concerning this development.

Yours sincerely

A handwritten signature in black ink that reads "Adrian Farmer". The signature is written in a cursive style with a large initial 'A' and a long, sweeping underline.

Adrian Farmer

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.

cc Sarah Brooks, AVBC