

From: [clerk](#)
To: ["sarah.pearce@ambervalley.gov.uk"](mailto:sarah.pearce@ambervalley.gov.uk)
Subject: Planning Application AVA/2020/0253
Date: 03 July 2020 14:22:00

Dear Sarah,

The Town Council are writing in objection to [AVA-2020-0253](#) for a change of use and conversion of convent to C1 (hotel), extension to and conversion of convent building to create one dwelling, erection of one detached dwelling, erection of two barns, erection of conference centre and associated engineering works to create car parks.

It is very disappointing that there has already been felling of trees on the site without permission, and I am sure that the Council will be taking appropriate action as required for this. We are also concerned that extensive groundworks are rumoured to have taken place, and have asked enforcement officers to investigate. We would strongly object to any further tree damage on the site, and are unimpressed with the applicant's contention that the trees are dead or dying. If they are, then this is possibly a recent situation that may have been bought about, and the circumstances of any 'dead or dying' trees on the site should be investigated by the Tree Officer, to understand what conditions have bought this about.

Clearly this is a site of the highest sensitivity, being in a World Heritage Site, and Conservation area and within 50 meters of a listed building. Sites literally do not come much more sensitive. The landscape and visual assessment states that the zone of theoretical visibility of the proposed development would largely occur within 1.2km of the site. This distance would include the Grade 1 North Mill and its setting, the historical River Gardens and much of the conservation area. The NPPF identifies World Heritage Sites as heritage assets of the highest significance. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefit. It should be noted that 'less than substantial harm' does not mean 'no harm'.

It is our view that whilst sensitive conversion to a Hotel would be an appropriate use of the building, new builds, extensions and a conference centre are wholly inappropriate. Even if we agreed that there should be new build in this most sensitive of areas, the designs are for incongruous carbuncles, which in our view would damage the Outstanding Universal Value of the World Heritage site. An extension on a historical building such as this in its sensitive location is not acceptable to us.

The Derwent Valley Mills World Heritage Site Management plan 2020-2025 is explicit. ***"New development should contribute to the economic and social vitality of the World Heritage Site. This is not a balance judgement. Any development that can be seen to negatively impact on the World Heritage Site, its Buffer Zone and wider setting, therefore impacting negatively on the Outstanding Universal Value, should not be granted permission."*** We

absolutely agree with this, and believe that the balance is that the public benefit of this development would by far be outweighed by the damage to the Outstanding Universal Value of the World Heritage Site.

We urge refusal.

Kind Regards

Emma Smith

Town Clerk

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