

# The Belper North Mill Trust

*Registered Charity No. 1068485 Company No. 350918*

4 January 2019

Ms Sarah Brooks  
Amber Valley Borough Council  
Town Hall  
Ripley  
Derbyshire  
DE5 3BT

Dear Ms Brooks,

**BELPER MILLS COMPLEX, BRIDGE FOOT, BELPER, DERBYSHIRE**  
**Application Nos AVA/2018/0819 & AVA/2018/0818**

The Trust has the following comments on the above Planning Applications in respect of the Belper Mills.

We consider that the prospect of the redevelopment of the Belper Mills Complex in a manner that provides a sustainable future for the whole site, whilst respecting and interpreting its historical heritage, is to be welcomed. We consider that it is vital for the redevelopment to include an enlarged, improved and distinctive heritage venue as an integral part of the Derwent Valley Mills World Heritage Site where people can be inspired by the history, technology, innovation and continuing legacy of the mills and their communities.

The Trust supports the comments by Historic England and the Derwent Valley Mills World Heritage Site Partnership in relation to the Planning Application.

**Our concerns**

- 1) The need for a comprehensive costed survey of the site covering all of the built assets both above and below ground.

The Belper Mills site has signs of significant deterioration and the North Mill and other structures are on Historic England's 'At Risk' register. We are aware that FI Real Estate Management have been offered funding by Derbyshire County Council from its Great Place Vital Valley project for such a survey and urge Amber Valley Borough Council to ensure that this offer is taken up to inform future works on the site.

- 2) The need to include an expanded heritage attraction appropriate to the importance of the site and in particular of the North Mill within the Derwent Valley Mills World Heritage site, that is sustainable and viable and for this attraction to be embodied in the plans for the site.
- 3) The need for an interpretation strategy to formulate how and where such a heritage attraction can be provided and that balances the needs of residents, visitors and businesses.

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We understand that, as with the condition survey, Derbyshire County Council have offered FI Real Estate Management funding from its Great Place Vital Valley project for this purpose.

- 4) The application does not demonstrate a full understanding of the heritage assets of the site which include not just above ground structures but also their associated water power infrastructure and water ways. These are not only fundamental to the history of the site, but also to its continuing operation, and have the potential to contribute to energy efficient power generation on the site and the mitigation of flood risk. We appreciate that the horseshoe weir, sluices and flood gates are not included in the plans as they are under different ownership, but the proper maintenance and management of these is critical to the long-term future of the site which cannot be considered properly without taking these into account.
  
- 5) The scheme needs to allow for adequate parking space for the scale of activities planned. The mixed development and the greater commercial and tourism use of the redeveloped site require more parking spaces than are available on site. The Trust has previously urged Amber Valley Borough Council to consider the West Mill and East Mill sites together for planning purposes, to the benefit of both and of the town, and to find a solution to the acute problem of parking. We would welcome a full planning design brief for the application site, together with that of the original West Mill site, to ensure that the opportunity is not lost to provide a high-quality townscape and to prevent development in an unsatisfactory piece-meal and opportunistic way in this historically important part of the town. A full options appraisal, developed in close association with Historic England and the DVMWHS Partnership would be of benefit to the applicant, the town and the Derwent Valley.
  
- 6) Car parking specifically for 117 residential apartments in the East Mill. The Design and Access Statement identifies 95 car parking spaces for the East Mill residents in four separate areas shown as 'East Mills Car Parks'. One of these (with 39 spaces) occupies the ground floor of the East Mill while the other three are outdoors. All three outdoor parking areas, consisting of 56 parking spaces, are on land that is not in the ownership of the applicant but is owned by Amber Valley Borough Council. This land consists of the access road from the A6 to the River Gardens, a popular local park and recreation area, and the only vehicular access to the River Gardens parking areas.
  
- 7) Car parking specifically for the North Mill. Six floors of the North Mill, including the basement, are currently divided into 49 lettable units including the museum and Derwent Valley Visitor Centre which occupies the basement and part of the ground floor. The top floor (the attic) is not currently let, although this area has been leased previously. The Design and Access

