AVA/2026/0005
Demolition of former MAFF building and replacement with self-build detached house (may affect the character and appearance of the Conservation Area and setting of Listed Buildings)
Former MAFF Building, 22 Bridge Foot, Belper

Context
The proposal sits within a highly sensitive site in the heart of the **World Heritage Site** and the Belper and Milford **Conservation Area**. Development has the potential to affect the **Outstanding Universal Value** of the WHS. Where we have determined that a development effects the OUV of the World Heritage Site, we require as a matter of course that the applicant provides a Heritage Impact Assessment that complies fully with the latest UNESCO guidance and 2022 Toolkit. I discuss this later. At present the old MAFF building is small and relatively unobtrusive, although it is not a positive building in the Conservation Area. The context is low-lying, floodplain, with large amounts of open space to the north and some trees and shrubs along the riverbank. I note that the agent has shown images of houses on Bridgehill as context, but the actual immediate context is the riverside, the low-lying land and small-scale traditional buildings fronting the road, not Bridgehill.

Less Than Substantial harm
I am at this stage not satisfied that the application, submitted Heritage Statement (HS) and Impact Assessment has adequately addressed all of the impacts on all of the affected heritage assets. There are likely to be harms which need to be justified and explored further. At this stage, I can say that the scheme does not follow our pre-application advice and is likely to cause 'less than substantial' harm to:

A. the setting of the **grade I listed North Mill**, as the principal building and only surviving Strutt cotton factory, as appreciated from Belper Lane, views of which would be blocked by the development,
B. the Outstanding Universal Value of the WHS, as defined by '**Attribute 5** - A 'relict' industrial landscape, where late 18th and early 19th century industrial development may still be seen in an 18th/ 19th century agricultural landscape containing evidence of other early industrial activity', as the encroachment onto former water meadows, and incremental loss of open space with a new residential curtilage, does not support this aspect of OUV,
C. the setting of the row of cottages (listed **grade II – Nos. 18-20 Belper Lane**), which derive significance from their small scale and their clustering local landmark appearance as a former Cottage Hospital and before that a turnpike cottage. The development is likely to compete with them and not be subservient in form, eaves and ridge height.
D. The character of the Conservation Area, from all of the above and its visual impact on becoming the focal point on entering the town from the west, with its associated disproportionate prominence.

The HS does not include any map research in the archives (other than from online OS maps) that might inform the application about its historic origins. The HS does not include any assessment of the listed buildings, Nos. 18-20 Bridge Foot, what they are or

were, their significance, the contribution of setting to their significance, or the impact of the development on the significance of these listed buildings. It does not follow Historic England GPA3 (2017) established guidance on assessing the setting of heritage assets. There is no visualisation of the relationship of the proposed development alongside the listed building, no street view to show comparative eaves and ridge height, massing etc. It does not show the effect of building 450mm above the existing ground level and how this compares with the existing listed buildings on the road frontage, which are set lower down and are comprised of three separate houses, merged into two. It claims that the building is subservient but does not provide any information to support that assertion.

The application does not include any assessment of the impact of the development on the setting of Belper North Mill (see later comments). I find the application lacking in a robust assessment of the impact on the setting of designated heritage assets or impacts.

Significance of the Site

The application is submitted with a Heritage Statement prepared by the agent. It states that the site was prior to the 1950s part of a small holding belonging to the owner of the Talbot Inn. In fact, the land was tenanted by the owner of the Talbot Inn from the Strutt Estate.

Historic maps reveal that the site lay to the immediate north of the Strutt Estate Cottage Hospital, which remains as a listed building in its own right (now nos. 18-20 Bridge Foot). These are illustrated in the Inscription document for the WHS – page 66).



Strutt Estate map of ca. 1796 (D1564/S3A) – extract with the land labelled 'Mr Strutt's'

The site itself is illustrated on a series of Strutt Estate plans in the archives. Two plans of 1796 predating the Cottage Hospital, but showing a small 'Turnpike House', describes the land as 'Mr Strutt's' (DRO - D1564/S3A and DRO D1564/S155/1). A Strutt Estate map of c.1805 (DRO D1564/3) shows the site as marked for 'Mrs Frost' but it is clearly lined as belonging to the Strutt Estate, with a dark grey outline, in common with all of their land acquisitions shown on this map. At this date the roadside cottages appears to be an amalgam of the earlier tollhouse and some extensions. By 1819 the meadow is shown as occupied by John Frost in common with the site of the Talbot Inn. By 1820 the land is called 'Derwent Meadow'. The township map (DRO D2360//98b) illustrates the later 'cottage hospital' as three separated attached dwellings.



Strutt Estate map of ca. 1796 (D1564/3) – extract from c. 1805, with the land labelled 'Mrs Frost' but outlined in grey as are all of the Strutt Estate ownerships.

The land has consistently been part of a water meadow, known as Derwent Meadow, from the late 18th century, up until it was sold, presumably to MAFF by the Strutt Estate. The land to the north which is proposed as an extension of the garden is still part of the open space, connected to the water meadow. There is a row of riparian vegetation and mature trees lining the river bank, which fall within the garden of Nos. 18-20. Aerial photos from 1921 (EPW005818) and 1931 (EPW036065 and EPW036061) shows the trees clustered close to the floodgates and an open allotment garden running along the edge of the river. The water meadow is completely open.

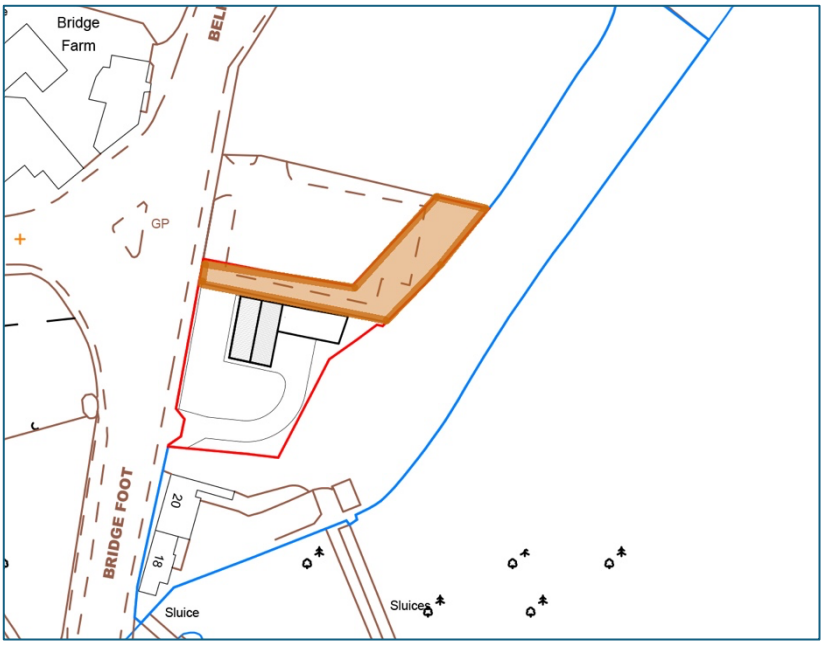
The first time that the existing building appears on an Ordnance Survey map is 1962. Prior to that, the site is part of the water meadow / flood plain. A slice of the land associated with the Cottage Hospital, which remains as garden, was adopted with a large detached building, which appears on the 1952 OS map. This is also visible in the 1921 aerial photos.

Impacts
The site is open and provides clear views towards the mill complex and on descending Belper Lane, towards the bottom, there are currently views across the roof of the MAFF building looking directly across to the North Mill. It appears that the development would completely remove these views of the North Mill from Belper Lane. These views have not been considered, modelled, and no assessment has been made of the impact on the loss of the views of the North Mill and East Mill from a development which is taller than the existing development.

Pre-application advice was provided in April 2025. This advised the following:

- A single storey dwelling is more appropriate
- Any materials would need to reflect those in nearby properties
- Consideration would need to be given to the WHS, Conservation Area and the nearby listed building
- The design should have reference to other design characteristics of other nearby properties (i.e. window openings, no large expanses of glazing).
- Planning matters discussed included potential flooding issues, and the relocation of the hedge.

I have looked at the Block Plan which was initially submitted with the application and that showed a red line contained by the existing site boundary. A later plan showed this extended with the red line creating a new boundary. The current plan shows the residential boundary extending north into the present car park, taking a large slice out of the car park to both the north and a secondary extension to the east. See overlay below showing the extension of the curtilage into the open space (in buff). This significantly increases the footprint of the developed area to include a large new curtilage. Whilst not agricultural land, the car park nevertheless preserves the openness of the former meadow. This would be diminished by a new boundary and associated domestic space.



The proposed plan extends the plan of the site north into an area which is now car park serving The Talbot Hotel. In my view, that is harmful to the Outstanding Universal Value of the World Heritage Site for the following reasons:

- Loss of openness
- Loss of identity of meadow as a separate entity and introduction of domestic paraphernalia (either under PD rights, such as structures, boundaries, including tall fences to protect privacy, or other non-PD features – e.g. trampoline, hardstanding, planting, hot tub, etc.)
- Incremental loss of rural setting (Attribute 5 of OUV) by changing land from open semi-agricultural, to one of domestic curtilage.

The design still retains elements which are particularly impactful and visually distracting in a highly sensitive part of the WHS / CA. These include solar panels and a glazed balcony, which will be distracting in winter views from Belper Bridge, North Mill, and some views from the River Gardens. The roofs contain multiple rooflights which are distracting and cluttered. It is better to have a design which reduces clutter, with simple forms, even if these include larger areas of patent glazing on the roof, and low-iron glass, to avoid multiple dotted rooflights. It is preferable to either use ASHP and other means of embodied energy efficiency, or design to Passivhaus standards, rather than incorporate a bank of solar panels, which would be unnecessary if designed to Passivhaus standards. The design could, for example, include an element such as a flat sedum roof, to soften the impact and / or avoid blocking views. That could reflect the existing flat roofed element to remove the need to block views.

Summary – I am recommending further work is done to establish the impacts before we can rule out harm to multiple designated heritage assets. The application should consider the setting of heritage assets properly, following GPA3 (Historic England guidance – 2017). At the present time, the impacts are considered to be harmful and until we understand what that entails fully, and any additional information needed following the FRA assessment and any local change in land levels and an analysis of the building floor levels and impacts on heights relative to existing buildings, I am not able to make further recommendations in terms of revisions to the design. At this stage, therefore, and until we have that missing information I am not requiring that the applicant undertake a full UNESCO compliant Heritage Impact Assessment (UNESCO 2022 Toolkit). Depending on what the findings provide, we may still require that in due course.

Mel Morris
10th February 2026