## **DERWENT VALLEY MILLS WORLD HERITAGE SITE**

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Clare Thornton Amber Valley Borough Council Town Hall Ripley Derbyshire DE5 3BT

12th December 2017

Dear Clare

## AVA/2017/0322: Outline planning permission for development of 185 houses with associated works on land between Crich Lane and Far Laund, 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 February.

The site lies partly 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 18<sup>th</sup> 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:

Extensively, the comments of the World Heritage Site Partnership, submitted in relation to the previous details of the application on this site, in its letter dated 19 April 2017, still stand.

The applicant should be encouraged to submit a Heritage Impact Assessment (HIA) in accordance with ICOMOS guidelines, as recommended by UNESCO. It would be advisable if this assessment was undertaken by a suitably qualified and experienced heritage professional.

It is of concern that an outline application is being considered for this site within the Derwent Valley Mills World Heritage Site Buffer Zone, as there is insufficient detail to determine impacts on the World Heritage Site's Outstanding Universal Value.

Without a Heritage Impact Assessment and detailed proposal, it is not possible to support development on this greenfield site within the Derwent Valley Mills World Heritage Site Buffer Zone, as it is likely to adversely impact on the World Heritage Site's Outstanding Universal Value. Similarly, any development to the east of the Buffer Zone, which can be seen from the World Heritage Site or its Buffer Zone is also likely to negatively impact on the rural setting of the World Heritage Site and the Partnership cannot, therefore, recommend its approval.

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

Yours sincerely

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Adrian Farmer Heritage Co-ordinator, Derwent Valley Mills World Heritage Site. cc Rachael Coates, AVBC