DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Rae Gee Amber Valley Borough Council Town Hall Ripley Derbyshire DE5 3BT

6th July 2018

Dear Rae

AVA/2017/1336: Change of use from 30 caravans (approved by Planning Permission BER/964/39) to 11 lodges for residential use, together with associated infrastructure and landscaping scheme at Haytop Farm Caravan Park, Alderwasley Park, Whatstandwell.

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 later this month.

The site lies within the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone and abuts the River Derwent. 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:

The DVMWHS Partnership responded to the consultation on this application originally in February of this year. We

consider that the comments made then still stand. Those comments were:

The site, which forms part of the wider woodland backdrop along the River Derwent, is an important feature of the

Buffer Zone, or the immediate setting of the DVMWHS, as part of the arrested rural landscape. Although the

supporting documentation states that proposed development will not be visible from within the WHS there are some

concerns with the potential impact of the proposals. Whilst when in full leaf the site may not be visible, recent

photographs of the existing site taken by a member of the WHS team indicate that, in winter, holiday

accommodation is already visible from along the A6. Therefore there are concerns that further encroachment

towards the lower reaches of the Derwent Valley will make the holiday site more visible.

It is noted that additional trees are to be planted to mitigate the visibility of the cottages form part of the proposed

development. However, the site will still be visible in the short to medium term and there is uncertainty over the

effectiveness of the new trees in screening the development. The local planning authority needs to take this into

consideration and seek specialist advice from its landscape and tree officer in the determination of the application.

Within this in mind it is considered that the proposed development has the potential to have a negative visual impact

on the immediate setting of some of the main attributes of the WHS, such as the River Derwent and the former

turnpike road (A6). Therefore the World Heritage Site Partnership objects to the proposed development as it has the

potential to have an unacceptable adverse impact on the OUV of the DVMWHS.

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

Yours sincerely

Adrian Farmer

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

cc Sarah Johnson, AVBC