DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Mark Penford Amber Valley Borough Council Town Hall **Ripley** Derbyshire

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8th December 2020

Dear Mark

AVA/2020/0615: Siting of three glamping tents for tourism use at Lea Hurst, Leashaw, Holloway.

Please find below my response to the consultation concerning the above application. These comments will be passed to the World Heritage Site Conservation and Planning Group for verification in February.

The site lies 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 maintain the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site by protecting, conserving, presenting, enhancing and transmitting its culture, economy, unique heritage and landscape 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 2020. It has as the first of its nine aims to: "protect and conserve the Outstanding Universal Value of the DVMWHS to ensure its transmission to future generations." In accordance with this aim, and with reference to the operational guidance in Section 20 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 application site is the former orchard and kitchen garden area to the grade II listed Lea Hurst. Lea Hurst is located within the Buffer Zone and the Dethick, Lea and Holloway Conservation Area. While the Buffer Zone exists to protect the setting of the WHS, the relict industrial landscape – where late-18th and early-19th century industrial development may still be seen in an agricultural landscape – is itself an 'attribute' of the WHS's Outstanding Universal Value. Lea Hurst is of importance to the significance of the WHS as a result of its historical connections, part of its textile manufacturing narrative.

Lea Hurst contributes to the WHS's landscape setting and possesses connections with the Nightingale family.

Significant historic documentation exists regarding Florence Nightingale, her family and their relationship with Lea Hurst, the Derwent valley and Derbyshire. The connection is therefore historic as well as visual.

The proposal is for three 'glamping' safari tents within the former orchard and kitchen garden area. Each tent would have an overall height of 4.2 metres, with the area of each being 16.5m x 6m. At 96 square metres, the scale of each structure would be significant.

In terms of visual impact, the roofs of the tents would be clearly visible above the orchard wall, itself visible from the field entrance at Yew Tree Hill. The glamping safari tents would be incongruous and intrusive features within this context, with their presence being constant for at least the 10-year period requested.

The proposed development would not preserve the setting of the Derwent Valley Mills World Heritage Site, so would be harmful to its significance as defined by its Outstanding Universal Value (OUV). It would therefore fail to meet the requirement of AVBC Local Plan saved policy EN29. The harm would be 'less than substantial' as defined in the current NPPF (February 2019):

Policy EN29: Within the Derwent Valley Mills World Heritage Site Buffer Zone, as shown on the Proposals Map, the Borough Council will require all development proposals to preserve or enhance the setting of the World Heritage Site, including views into and out of the site.

While the harm to the designated heritage assets would be 'less than substantial' the great weight afforded to the conservation of designated heritage assets would require the development to include significant public benefits were it to outweigh the harm to assets of international, national and local heritage value.

For this reason, the Derwent Valley Mills World Heritage Site Partnership cannot support this development.

Yours sincerely

Adrian Farmer

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

cc Sarah Brooks, AVBC