

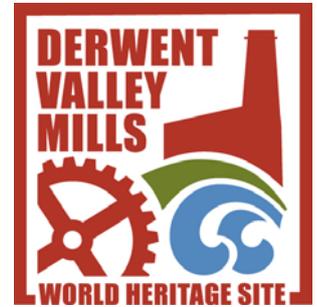
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Dylan Jones
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire **DE5 3BT**

8th July 2016

Dear Dylan

AVA/2016/0535: Development of 201 houses on land between Crich Lane and Far Laund, Belper together with associated works.

Please find below my response to the consultation concerning the above proposal. These comments will be taken to the World Heritage Site Conservation and Planning Panel for verification in September.

The site is partly within the Buffer Zone of the Derwent Valley Mills World Heritage Site (DVMWHS). 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 Outstanding Universal Value (OUV) of the Site was defined by the following criteria, agreed by UNESCO when the mills were inscribed. 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 UNESCO World Heritage Committee recorded 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 and Design Section (which advises the World Heritage Site Partnership in planning matters) over this application, and have received the following advice.

There is insufficient evidence to show the level of impact on the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site this development is likely to have. The most likely impact will be on the rural setting, which is, in itself, an attribute of the World Heritage Site's Outstanding Universal Value (see <http://www.derwentvalleymills.org/derwent-valley-mills-world-heritage-status/statement-of-outstanding-universal-value/values-and-attributes/> for details). The World Heritage Site partnership would recommend two pieces of work to better understand these likely impacts.

Firstly, a visual impact assessment is needed, showing the likely impacts of the development on the rural setting from points across the valley. This should include views from Belper Lane, which is within the World Heritage Site at the 160 metre contour level, adjacent to the Strutt’s farm, at Wyver, as well as views from the footpath along the Chevin Hill, from which a clear understanding of the mills’ setting within the valley’s relict rural landscape can be made.

Secondly, a visual impact assessment is needed, on people’s appreciation of the rural setting of the World Heritage Site when travelling in and out of the valley, including all highways and footpaths. Included amongst this assessment should be the impact on the undeveloped rural setting in views along the length of Whitewell Lane, from within the Buffer Zone on the opposite side of the valley. The application site is clearly identifiable by the mound of Bessalone reservoir and the mast. The skyline is clearly devoid of any development south of Newbridge Road, as it rises up from Ambergate, until the heart of Belper.

From this side of the valley, it is considered that any development above the footpath that crosses the application site, on the upper part of the field rising up to the skyline ridge of Bessalone Hill, is likely to be visible, depending on the height of the dwellings proposed, and therefore harmful to the rural setting of the WHS and its Outstanding Universal Value. Furthermore, development of the upper slopes on the east side of the Bessalone ridge, facing Far Laund, will also be visible, again depending on the height of the proposed dwellings. Despite being outside the Buffer Zone, the visibility of any development will be harmful to the rural setting of the WHS and therefore its Outstanding Universal Value. Given that the application is seeking approval to the submitted layout, the WHS Partnership must object to the application, pending the outcome of the recommended visual impact assessment studies.

It has recently been established that there is strong support within ICOMOS-UK for Bessalone reservoir to be considered an attribute of the OUV of the DVMWHS, despite it being outside the WHS boundary and the Buffer Zone. Given that this attribute lies immediately adjacent to the application site, it would also be appropriate for

further study to be encouraged, to allow a better understanding of its contribution to the cultural significance of the World Heritage Site and any potential harm that might be caused by the proposed development.

I hope these comments can be considered when a response is given concerning this application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adrian Farmer'. The signature is written in a cursive, flowing style.

Adrian Farmer

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