

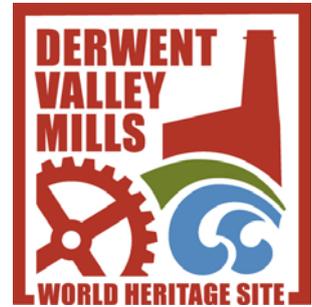
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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26 August 2016

Mark Penford
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire DE5 3BT

Dear Mark

AVA/2016/0754: Outline Application for a maximum of 150 dwellings, Public Open Space, Employment Floor Space on land at Bullsmoor, off Nottingham Road, Belper.

The site is 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 DVMWHS; 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 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 DVMWHS 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 DVMWHS Partnership in planning matters) over this application, and have received the following advice.

The Buffer Zone gives protection to the immediate setting of the DVMWHS, though its setting can extend beyond its boundary. Part of the buffer zone is the rural landscape surrounding the DVMWHS, which is itself one of a number attributes that contribute to the Site’s cultural significance. That rural character, therefore, is as important as that of the River Derwent and its associated principal monuments that collectively make up and define its international status and exists as an essential component of the OUV of the Site. It is considered that the most likely impact of the proposed development would be on the rural setting (see <http://www.derwentvalleymills.org/derwent-valley-mills-world-heritage-status/statement-of-outstanding-universal-value/values-and-attributes/> for details). Further information is to be found in the current version of the DVMWHS Management Plan 2014-2019 which is available on the DVMWHS website. We note that the Heritage Statement which accompanied the application did not reference this document.

The application is for a mixture of residential and industrial development on sloping agricultural land on the eastern edge of Belper. The loss of the collection of fields for housing development will harm the Outstanding Universal Value of the DVMWHS through the loss of a significant area of its landscape setting.

One of the identified monitoring views of the DVMWHS, No. 36, ‘Belper from the north end of Chevin Lane’, demonstrates the role the fields contribute towards the rural setting of the World Heritage Site. From this monitoring view the fields contribute to the rural landscape, within which the industrial process was established, prompting the growth of the town to its present day extent.

Adjacent to the south site running east west is a much used public right of way. The proposed development will negatively impact on the sequential appreciation of the DVMWHS’s rural setting when moving along this right of way.

The DVMWHS Partnership endorses the comments of Historic England (HE), in its letter of 10 August 2016. HE’s letter sets out in detail the position of the government’s advisor on the country’s heritage. It contains a detailed and comprehensive assessment of the potential impact of the proposed development on the OUV of the DVMWHS.

The Partnership takes issue with the submitted Heritage Statement, in particular the following:

- Paragraphs 6.10 and 6.11 fail to understand the nature of the Buffer Zone, or acknowledge that the rural landscape, in which the mills and their communities were inserted, is an attribute which contributes to the OUV of the DVMWHS. Since inscription in 2001, the Buffer Zone, as endorsed by UNESCO, has not been eroded by incremental development.

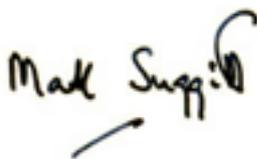
This is thanks in part to the planning inspectors' upholding of refusal at planning inquiries covering Hill Top Farm, Belper and land off North Avenue, Darley Abbey;

- Paragraph 6.13 is not correct. There has been no incremental development since inscription. Furthermore, whilst development did take place before inscription, the remaining rural landscape's value is greater as a surviving attribute explaining the relict industrial landscape, not lessened by nearby development. The industrial complex is not at odds with the rural setting – indeed the Statement of OUV acknowledges 'the insertion of industrial establishments into a rural landscape' as a key part of the DVMWHS story;
- Paragraph 7.1 questions the authenticity of elements of the DVMWHS. This statement should be refuted. Authenticity of World Heritage Sites is rigorously tested both before inscription and through on-going periodic reporting to UNESCO. The significance of the surviving rural setting is acknowledged through its designation as an Attribute. The application site is part of that authentic rural setting;
- Paragraph 7.2 is also incorrect. The value of the relict landscape to the DVMWHS is significant. The harm in its removal is considerably greater than 'slight'. This is not a 'negligible' intervention. While the overall impacts of the development may result in the evaluation that the heritage impacts constitute 'less than substantial harm', this harm is appreciated in the context of the DVMWHS as a whole, rather than simply the various mill clusters and their associated buildings. This means the complete 24 km stretch of the Derwent Valley including the river, other watercourses, the landscape, and the built environment such as farmsteads supplying the factory workers, and religious buildings, whether listed or not. The DVMWHS represents an asset of very high value. Although the site represents a small fragment of the 24km long DVMWHS, the proposals' local harm should not be under-rated when considering the effect on the DVMWHS as a whole.

The Partnership recommends that AVBC refers the applicant to the recent (July 2016) planning inspector's decision to support the refusal of development in the DVMWHS off North Avenue at Darley Abbey, DE22 1EZ (Appeal Decisions APP/C1055/W/15/3137935 and 314117, 22 July 2016).

To conclude, the DVMWHS' intact 'arrested' condition, in a rural landscape setting, was a significant contributing factor in its inscription. Loss of that landscape would be damaging to its OUV. For this reason the DVMWHS Partnership objects to the proposed development and trusts that its comments will be taken into account in the determination of this outline planning application.

Yours sincerely

A handwritten signature in black ink that reads "Mark Suggitt". The signature is written in a cursive style with a long, sweeping underline that extends to the left and then curves back under the name.

Mark Suggitt

Director, Derwent Valley Mills World Heritage Site.

cc Rachael Coates AVBC.