

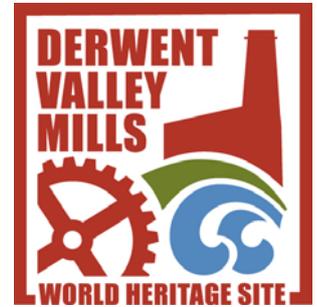
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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**The Community Planning Team
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire DE5 3BT**

8th September 2014

Dear Sir/Madam

Amber Valley Local Plan Part I Proposed Changes to the Core Strategy

Please find below my response to the consultation concerning the changes to the Core Strategy. These comments will be taken to the next meeting of the World Heritage Site Board for verification in October.

Three additional sites proposed for housing allocation have raised particular concern for being within the Derwent Valley Mills World Heritage Site (DVMWHS) or its 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 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 early 19th 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 towns.

To better and more fully explain the Site's OUV, a Statement of Outstanding Universal Value was created for the Derwent Valley Mills in 2010 and endorsed by UNESCO. It can be found at www.derwentvalleymills.org/images/stories/DVMWHS_SOUV_master.pdf

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, we have consulted with Derbyshire County Council's Conservation and Design Section (which advises the World Heritage Site Partnership in planning matters) over this response, and have incorporated their advice in this response.

Whilst there may be a number of planning and development issues relating to the proposed sites, the World Heritage Site Partnership is limited to commenting on the impacts on the Outstanding Universal Value.

Bullsmoor/Cherry House Farm, Belper (250 dwellings) and Pottery Farm, Belper (200 dwellings)

A site visit to these two proposed housing allocation sites was held before this response was compiled. Part of the Bullsmoor housing allocation is identified in the existing Local Plan in 2006 as proposed business and industrial development (ER3).

The sites are in the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone and serious consideration must be given to the potential impact of development on the Outstanding Universal Value. The allocation sites are directly west of a recent application for residential development which was turned down at Appeal, with the planning inspector highlighting the impact of housing in the Buffer Zone as a key reason for refusal.

The Appeal Decision of 3 June 2011 stated that the implication of housing in the buffer zone in this location was a major consideration as outlined below:

- Issue (i) whether the scheme would sustain and enhance the significance of the WHS, bearing in mind the appeal site lies within the identified buffer zone,
- Similarly, whether the scheme would preserve or enhance the character or appearance of the Conservation Area.
- Reason 10 states: "It seems to me that at the very heart of the designation of the WHS is that this minor, essentially rural little river valley had the new [as it was then] industrial factory system superimposed upon it. Hence the elements of the green natural landscape that remain, close to the heart of Belper are a very important part of the setting and indeed the meaning or significance of the WHS. The appeal site and the rest of the abutting open land alongside the Coppice Brook and The Park represent a tongue of green, natural landscape that weaves into the eastern side of the settlement and, to my mind, forms an intrinsic part of understanding the setting of the WHS – the associative connection between the historic events that happened here and its wider surroundings."

These comments are also valid for these sites as they form part of the land abutting open land alongside the Coppice Brook and indeed are both part of that 'tongue of green, natural landscape that weaves into the eastern side of the settlement'.

The site visit also revealed that different parts of the allocations carry various degrees of sensitivity in relation to the potential impact on the landscape setting of the WHS and therefore its OUV. The present extent of the housing allocation site is not acceptable. This is not to say that no housing could be developed within a revised area. The site requires visual sensitivity mapping, field by field, to identify the sensitivity and potential impact on the OUV. In addition sensitivity mapping should be used in reconsidering the extent of the currently allocated business and industrial development zone at Bullsmoor.

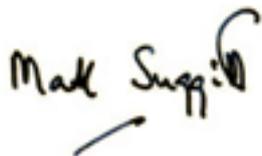
Derwent Street, Belper (120 dwellings)

This site falls within the Derwent Valley Mills World Heritage Site. It is a brownfield site in need of redevelopment. It has been established, with thanks to the Supplementary Planning Document of 2013, that a sensitive mixed-use would be most appropriate for the Site, including housing. The World Heritage Site Partnership accepts this recommendation, but has yet to be convinced that the boundaries proposed in the Core Strategy document for a smaller site specifically for housing within the larger development area is acceptable or appropriate. A master plan for the whole site was recommended in the Supplementary Planning Document and the Partnership still feels this is appropriate and desirable. Housing could form a considerable component, subject to impacts on OUV.

All three sites can, to some degree, be seen from UNESCO's Monitoring View Number 36 for the Derwent Valley Mills, and more work is needed to establish the degree of impact on the Outstanding Universal Value, including the relict landscape setting of the mills and their communities. The full set of views can be seen at www.derwentvalleymills.org/images/stories/pdf/Appendix_2I_Monitoring_Views.pdf

I hope these comments can be considered when a decision is made concerning allocations within the Local Plan.

Yours sincerely

A handwritten signature in black ink that reads "Mark Suggitt". The signature is written in a cursive style with a small arrow pointing to the right below the name.

Mark Suggitt

Director
Derwent Valley Mills World Heritage Site.

Cc Rob Thorley, Rachael Coates AVBC.