DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Sarah Pearce
Amber Valley Borough Council
Town Hall
Ripley
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DE5 3BT

25th May 2018

Dear Sarah

AVA/2017/0648: Proposed dwelling at land west of Broadholme Lane, Belper.

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 in July.

The site lies within 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 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:

Since submission of the DVM Partnership's initial comments, it has come to light that the application site forms one

of four allotments that served the four dwellings in the 'cluster houses', opposite, a house type which appears to

have developed in the Derwent Valley, in the early part of the 19th century following the earliest known example

from the late 18th century. The site is considered to be an attribute of the WHS for its contribution towards its

social-infrastructure related value as defined in the WHS Management Plan (2014-19). It therefore has significance

to the World Heritage Site narrative and contributes to its Outstanding Universal Value.

Whilst the revised proposals are a significant improvement over the earlier design, which occupied the full width of

the site, on balance it is considered that the amendments have failed to demonstrate that the change of use of the

site would not cause harm to an attribute of the World Heritage Site. As previously advised, the open allotments

should preserve their open character as gardens serving this important house type, in order to continue their

contribution to the significance of the World Heritage Site. It is therefore considered the destruction of the allotment

site would constitute, at the very least, as less than substantial harm under the criteria set within the NPPF.

The local planning authority will need to carefully assess the acceptability of this level of harm when set against the

likely public benefits in accordance with paragraph 134 of the NPPF before arriving at a decision.

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