

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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**Alan Redmond**  
**Amber Valley Borough Council**  
**Town Hall**  
**Ripley**  
**Derbyshire**                      **DE5 3BT**

17th October 2018

Dear Alan

**AVA/2018/0916: Outline application for the development of 7 dwellings at land off Ashbourne Road, Blackbrook.**

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

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 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 18<sup>th</sup> 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:

Blackbrook comprises a small group of buildings, originally, loosely ranged around the flour mill and forge/smithy. Historically, the pattern of residential development for this small settlement has either been dispersed or of a linear form, against the road or on the edge of fields. Despite the presence of twentieth century ribbon development of semi-detached houses, the application site contributes a distinctly rural character to the locality.

While the field does not represent the more substantive ‘relic’ rural landscape of other setting areas of the World Heritage Site, the site’s character contributes to the setting of the World Heritage Site, in this locality, and the experience at this point of entry to the Site.

Although the application is in outline, with all matters reserved except for the access, the indicative plan and number of dwellings indicate a distinctly sub-urban development, which would, therefore, be incongruous in this context and have an adverse impact on the setting of the World Heritage Site.

The Revised NPPF (paragraph 193) directs that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance, and at paragraph 194, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

In conclusion, development of this site, for the scale and layout indicated, would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. While the harm would be ‘less than substantial’, the World Heritage Site is a heritage asset of the highest value.

Consequently, its conservation carries the highest weight and the public benefit would need to be of at least the same weight.

I hope these comments can be considered when a decision is made concerning this development.

Yours sincerely

A handwritten signature in black ink, appearing to read "Adrian Farmer". The signature is written in a cursive style with a large initial 'A' and 'F'.

**Adrian Farmer**

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.  
cc Sarah Brooks, AVBC