DERWENT VALLEY MILLS WORLD HERITAGE SITE

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7th March 2022

Mark Penford
Amber Valley Borough Council
Town Hall
Ripley
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Dear Mark

AVA/2022/0082: Proposed dwelling attached to existing dwelling at Fisherman's Lodge, Derby Road, Whatstandwell.

Please find below my response to the consultation concerning the above application. These comments will be passed to the World Heritage Site Conservation and Planning Group for verification in April.

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 maintain the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site by protecting, conserving, presenting, enhancing and transmitting its culture, economy, unique heritage and landscape 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 2020. It has as the first of its nine aims to: "protect and conserve the Outstanding Universal Value of the DVMWHS to ensure its transmission to future generations." In accordance with this aim, and with reference to the operational guidance in Section 20 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:

The application site is located within a highly prominent position adjacent to the River Derwent, the golden thread that runs through the 15-mile-long Derwent Valley Mills World Heritage Site. It is also set within the open, rural and cultural landscape of both the World Heritage Site (WHS) and the Whatstandwell Conservation Area. Additionally, the site is within close proximity to a number of other designated heritage assets, all of which are elements of attributes that contribute to the significance and Outstanding Universal Value (OUV) of this culturally-rich landscape. The high heritage value contained within the river valley, which gradually evolved since the late 18th century, includes the grade II, statutory listed buildings and structures of Whatstandwell Bridge, the Derwent Hotel (formerly Bull's Head Inn) and the outbuilding to the north east of the Derwent Hotel and Alderwasley Lodge.

The proposal is to construct a new two-storey, one-bedroom, semi-detached dwelling, attached to the north end of the converted, former field barn. The new dwelling would be built in a similar linear form and layout to the existing structure, reproducing the general window and door opening arrangement, to the eastern wall and roof plane, using similar wall and roof materials.

As the proposal would be to replicate the host building, the result would be to increase the length of the structure, to a scale twice its current length and volume, on this otherwise undeveloped site. This change to its appearance and character would adversely impact on the authentic representation and interpretation of the modest function it provided, within this open, rural flood plain, adjacent to the river.

No additional parking provision is declared in the application, although the inevitable potential for intensification of the use of the site, if not by the applicants, then future owners, for the siting of large vehicles, caravans, etc., would be highly visible and degrading of this prominent, open rural context, adjacent to a major transportation route, within the tourist destination of the County. The dwelling would inevitably demand an associated amenity space, which again would acquire a plethora of uncontrollable domestic paraphernalia.

As an element of an attribute that contributes to the 'significance of the WHS, as defined by its Outstanding Universal Value (OUV)', the authenticity of this structure in its historic setting would be adversely affected by the proposed and unjustified residential development.

As a contributor to the WHS's OUV, the 'setting' of the listed road bridge, over the River Derwent, would be obscured in certain views, by the proposed residential development. This would adversely impact on its open rural landscape setting, on approaches along the historic transportation routes from both the north and the south –

themselves elements of attributes of the WHS's significance - as well as experience of the bridge's setting from public positions along the length of the historic river crossing.

As a contributor to the WHS's OUV, the 'rural setting' of the Derwent Hotel and its ancillary building, together with that of Alderwasley Lodge, being the limited extent of built structures, associated with this historic context around the river crossing, would be adversely impacted by the proposed residential development.

The proposed intervention of a private residential building would represent incongruous development within this sensitive context, defined by its high heritage and amenity values. Despite its contribution, the former barn was not of such significance that its gradual decay could not have been an alternative to its conversion to holiday accommodation. The unjustified proposal for additional new development, as opposed to the conversion of a longstanding structure, in an arrested 18th century landscape setting, would compound the balanced, but tangible impact of the conversion, and would cause further urbanisation and inappropriate intensification of this valued place of world significance.

The adverse impact to the designated heritage assets, as described above, would be harmful to the significance of the Derwent Valley Mills World Heritage Site, as defined by its Outstanding Universal Value (OUV); the authenticity of this structure in its historic setting would be adversely affected by the proposed and unjustified residential development.

The harm to the designated heritage assets would be 'less than substantial' as defined in the current NPPF (20 July 2021), although the great weight afforded to the conservation of designated heritage assets would require the development to include significant public benefits were it to outweigh the harm to assets of international, national and local heritage value.

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

Yours sincerely

[redacted]

Adrian Farmer

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