# DERWENT VALLEY MILLS WORLD HERITAGE SITE

County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG
T: +44(0) 1629 536831
E: dvmwhs@derbyshire.gov.uk

www.derwentvalleymills.org


15th July 2022

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

Dear Sarah

**AVA/2021/0983: Change of use of land for tourism purposes and installation of 5 glamping pods at Chevin Green Farm, Chevin Road, Belper.**

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 later this month.

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 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 approximately 250 metres from the Derwent Valley Mills World Heritage Site itself. The nearest listed building is Bankfield House, directly opposite the application site, across Chevin Road. Bankfield House is listed in grade II. The site is adjacent to Chevin Green Farm, owned by the applicant, a complex hosting a mix of uses including commercial offices, dwelling houses and a former bed and breakfast business. Historically, the land has been used as an orchard, although it is currently devoid of trees. Such is the dominance of the agricultural landscape that is experienced at this location, the greenfield land of the application site exhibits an extensive sense of openness, particularly to the west of the enclosed farmstead, where the topography allows the green backdrop of the enclosed field pattern to rise above the isolated buildings. It is largely in this form that it has existed, since before the factory-based manufacture of textile, was developed and imposed on this open agricultural landscape, harnessing the power of the River Derwent, within this self-same valley as the application site.

Paragraph 103 of UNESCO Operational Guidelines for the Implementation of the World Heritage Convention state: "Wherever necessary for the proper protection of the property, an adequate buffer zone should be provided. For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property."

It is recognised why the Buffer Zone of the WHS is not considered to be a designated heritage asset, in itself, within the definitions relating to the legal protection of heritage assets, in England. Typically, the assessment for determining the setting status applicable to other English heritage designations, this mechanism does not allow for the situation within the DVMWHS, where the 18th-century relict rural landscape, itself, is an (element of an) attribute of the WHS that contributes to its significance, as defined in its Statement of Outstanding Universal Value. Not, therefore, a designated heritage asset within the narrow definition of the UK planning system, but a setting that is a contributor to heritage value of recognised world significance, nevertheless, as Paragraph 103 above, describes.

In addition, AVBC LP Policy EN29 'Derwent Valley Mills World Heritage Site Buffer Zone' states that: "Within the Derwent Valley Mills World Heritage Site Buffer Zone, as shown on the Proposals Map, the Borough Council will require all development proposals to preserve or enhance the setting of the World Heritage Site, including views into

and out of the site. In considering proposals, the Borough Council will have regard to the aims and objectives of the Derwent Valley Mills World Heritage Site Management Plan."

The proposal includes the change of use of an agricultural field, adjacent to the former farmstead, for tourism purposes, and the erection of five yurts, associated paths and parking, with additional landscaping for screening purposes. The two types of yurts proposed, comprise complex form hexagonal plan forms, with links or attachments, of rectangular form. The roofs are pitched and the eaves details transform into gablet roofs over the entrance doors. Little detail is provided on external materials and finishes, although there is mention that these 'may' be recessive. The walls appear to be of vertical timber cladding, with roofs of coursed material, tiles, slates or possibly felt tiles.

In principle, the Partnership supports the development of tourism within the WHS, where it does not impact adversely on its Outstanding Universal Value. However, the proposals would reduce this part of the relict 18th century rural landscape that provided the setting for the WHS, and which is an element of an attribute of its internationally recognised significance.

In terms of design, any conceptual notion associated with bell tents, tee-pees, etc., through the hexagonal plan- and conical roof-forms, would be diluted by the attached roofs to the links, whose ridges are at the same level as the apex of the cones. Unlike tents, the Pod type B would have four windows which would add to their more cabin-like appearance and association with long-term needs and existence. Unlike temporary tents and caravans, the proposed glamping tents would be substantial, permanent structures. Arranged into an initial group of five, the pods would, as acknowledged in the application documents, be highly visible built elements within the open countryside. Being neither orchard, nor conventional camping facility, the proposal would represent encroachment of permanent development into the open countryside.

In terms of landscape character, the degree of screening from hedgerow planting, commensurate with that prevailing character, demonstrates that natural screening would be totally ineffective. Nevertheless, should the development be acceptable, it should not need to be screened; the effectiveness of tree screening is also reduced in the winter months. If approved, access to the site would be via the modern access track, an intrusive element which was never a feature of the discreet access to the historic farmstead. The intensification of the use of this track, with additional parking, would not have formed part of any justification for its original intervention into the rural context.

The proposed development would not preserve the character or appearance of the rural setting of the Derwent Valley Mills World Heritage Site and would, therefore, be harmful to its significance, as defined by its Outstanding Universal Value (OUV). 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**

CONTROLLED