DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Alan Redmond
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20th March 2023

Dear Alan

AVA/2023/0140: House type substitutions on Plot 70, Plot 78, Plot 83, Plot 85, Plot 89, Plot 110, Plot 111, Plot 113 at the former Whitehouse Farm site, 153 Belper Lane, Hilltop, 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 in April.

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:

Comments made in previous consultation responses have highlighted that this is an extremely contentious housing site in the DVMWHS Buffer Zone. The granting of planning permission for this housing scheme has since resulted in the Derwent Valley Mills WHS being placed in a State of Conservation reporting by UNESCO.

The WHS Partnership expects the planning authority to fully assess the proposed alterations, to ensure that there will not be any reduction in the level of public benefit delivered by the approved scheme. Anything that could lower the quality of the approved scheme or does not deliver the benefits promised by the applicant, could further tip the balance of harm against public benefit. Any further erosion of public benefit, which justified the Secretary of State granting approval for housing on this site, should not be permitted. The less than substantial harm that will be delivered by this application needs to be at least offset by the public benefit that was deemed by the Secretary of State to outweigh that level of harm.

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