

**Brian Twigg,  
Development Services Manager  
Amber Valley Borough Council  
Town Hall  
Ripley  
Derbyshire**

**DE5 3BT**

May 25<sup>th</sup> 2007

Dear Mr Twigg,

**REDEVELOPMENT OF FORMER BLEACHING MILL AND DYEHOUSE  
SITE, MILFORD**

Thank you for giving the DVMWHS Partnership the opportunity to comment on these development proposals. It is an important site within the World Heritage Site and merits careful consideration in this context. I have the following points to make:

- 1) **PROPOSED USES:** The DVMWHS Management Plan ( para 2.2.1) and the DVMWHS Economic Development Plan highlight the importance of retaining and attracting new employment activities within the WHS if the Derwent Valley is to have a sustainable future. It is therefore regrettable that the proposed use of this former industrial site is largely residential. However it is noted that the AVBC Local Plan identifies the site for mixed use, with a limit of 50 housing units, and that it was the Local Plan Inspector who commented that the site could accommodate 70 housing units. It is felt that permission should be given for no more housing than the maximum identified. It will be important for the developer to demonstrate realistic proposals for other (non residential) uses within the site to meet the development brief (see point 4)
- 2) **DEVELOPMENT IN THE FLOOD PLAIN.** The Management Plan notes increasing pressure for development within the floodplain (2.2.3) and the increasing threat of flooding such development could cause. It is therefore

regrettable that, as a site within the flood plain, its former industrial use renders it a 'brownfield' site and as such, in government policy terms, suitable for redevelopment. It is noted that the site is shown in the AVBC Local Plan as suitable for redevelopment for mixed use. However the Partnership would like reassurance that there is no requirement to raise the ground level prior to redevelopment, to protect new dwellings from flooding, as happened at the nearby former foundry site, preventing any opportunity of interpreting surviving industrial archaeology and making the new development more prominent. Also the treatment of the river margins needs to be carefully considered to maximise opportunities for the delivery of biodiversity targets. (See point 6).

- 3) **ARCHAEOLOGY.** This site was developed in the late 18<sup>th</sup> century and early 19<sup>th</sup> century, by the Strutts, for a bleaching mill and later dyeworks. It therefore directly relates to the two criteria for which the Derwent Valley Mills were inscribed on the World Heritage List. These 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”; and 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 UNESCO World Heritage Committee recorded 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 early 19<sup>th</sup> century; and 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 towns.) Government Planning Policy Guidance (PPG 15) identifies the importance of World Heritage

Sites and makes their inscription a material consideration in the planning process. Planning Policy Guidance Note 16 requires the archaeological significance of a site to be assessed, using criteria set out by the Secretary of State. Such an assessment has been carried out for this site and the potential for nationally important remains to survive below ground has been recognised in that assessment. The fact that the potential for significant archaeological remains, relating to the site's 18<sup>th</sup> and early 19<sup>th</sup> century industrial use, was highlighted by the Borough Council in its planning development brief is welcomed and applauded, as is inclusion in the submitted scheme the proposal to reveal and consolidate for presentation the archaeological remains of the former 18<sup>th</sup> century bleach mill. The DVMWHS Partnership places the highest level of importance upon this. The Borough Council's requirement for the developer to produce a detailed desk based archaeological and building assessment (Pre-Construct Archaeology; Sept 2005) is also welcomed and applauded. The Partnership was able to provide considerable assistance in the production of the assessment, by making available to Construct Archaeology an extensive archive of historic photographs not previously in the public domain. The resultant assessment provides an excellent basis on which further archaeological investigation, consolidation and interpretation may be founded. It also provides information on the surviving above ground remains of industrial buildings and structures of significance, some of which are listed. Their retention, repair and appropriate re-use is of the highest importance.

- 4) **DEVELOPMENT BRIEF** The Partnership welcomes and supports the Borough Council's production of a planning development brief for this important site and commends it for commissioning the distinguished conservation architectural practice 'Purcell Miller Tritton Architects' to assist it in this work. It notes that the resultant brief takes full account of the site's industrial archaeological significance and identifies three key

opportunities; namely: (i) Retaining and re-using existing listed and other buildings worthy of retention, whilst securing the removal of unattractive industrial buildings and replacement of historical industrial uses with a mix of uses which would be more environmentally friendly; (ii) Opening up public access to the site and the riverside for pedestrians and cyclists, including the re-instatement of a footbridge over the weir to the western side of the river, and by contributing to the potential for a long-distance route along the Derwent Valley; (iii) Measures and/or financial contributions towards the enhancement of educational and other community facilities within the village. It also welcomes the guidance on how density, scale, height and massing should be dealt with to secure a development that respects the character and significance of the site and its setting. In particular it supports the guidance that new development here should be in the form of blocks that 'echo' (but not ape) the 19<sup>th</sup> century industrial buildings which once stood on the site. It is noted that English Heritage also supports the Borough Council's approach. It is regrettable that many members of the Milford community seem either to have not been aware of the public consultation on the brief when it was at draft stage or did not respond to it. The DVMWHS Partnership could help facilitate consultation if a similarly high profile location within the World Heritage Site comes up for development, and would be keen to do so. The Partnership wonders whether objectors to the design approach are aware that to have a conventional housing development here, spread over the whole of the development site, would greatly limit the ability to open up, retain and interpret in-situ the former water courses and also the revealing, retention and interpretation in-situ of the archaeological remains of the former bleaching mill. It would also be likely to make impossible the retention of the northern part of the site (formerly used for the historically significant use of tentering and then allotments) as open, undeveloped land. However it is noted that the current proposals are for blocks of a greater height than those recommended in the brief. This must

be a major consideration in the determination of planning permission. It is suggested the applicant's architect be required to produce photo montage illustrations of the impact of the new development on the site and its setting. A model of the proposed development would also be a valuable aid to assessment of the proposed scheme.

- 5) **DESIGN** Because of the significance of the site within the DVMWHS the Partnership, unusually, took a proactive role in contacting the developer at an early stage in the development process to encourage him to retain the services of an architect with a strong track record in the field of designing buildings of high design quality in sensitive heritage locations. It was therefore pleased to note that Latham and Associates had been retained. The Partnership welcomed the Borough Council's decision to refer the Latham scheme to the Regional Design Review Panel, 'OPUN', and noted that the Panel largely approved of the designs submitted, but had reservations regarding the extent to which the ground floors of the blocks had been given over to parking, which might encourage crime, and the need for landscaping of the open areas to be very carefully considered. The design of the proposed buildings is a sophisticated response to the design brief and depends heavily upon the use of high quality materials, careful detailing and good workmanship. The experience at the foundry site is again useful to consider, as there the developer did not retain the services of the original architect to supervise construction and as a result constructional finesse was lost. For the designs proposed for the Mill site poor implementation would be greatly damaging to the outcome.
  
- 6) **LANDSCAPING** It is an important objective to try and secure the consolidation, presentation and interpretation of the archaeological remains of the former bleaching mill, and of the former industrial watercourses, by means of skilfully incorporating them into a 'hard'

landscaping scheme. The Partnership supports the English Heritage recommendations that the full extent of the former mill lade, including the part which ran beside the former dye house, should be revealed, together with the bridges which spanned it. The paving and landscaping of the entrance points to the site will be particularly important. Any historic paving which survives should be retained or, if badly disrupted, the material salvaged for re-use. The extensive use of concrete artificial 'stone' setts, as proposed, is not appropriate for a site of this importance.

- 7) **ECOLOGY** The World Heritage Management Plan seeks the enhancement of biodiversity (2.3.6 & 3.1.2 & 4.2.16) The Partnership supports and endorses the comments of the Derbyshire Wildlife Trust in its comments that the site presents opportunities for biodiversity gain, in particular, at the tongue of land to the north, bounded on both sides by water, which offers an ideal situation for wetland habitat creation. The development of a site management plan would be desirable.
  
- 8) **ACCESS AND TOURISM** The development brief identifies as one of its three key objectives the opening up of public access to the site and the riverside for pedestrians and cyclists, including re-instatement of the historic footbridge over the weir to the western side of the river, thereby contributing to the long distance route through the Valley. It is regrettable that the proposed development does not deliver this benefit. Of the principal mill settlements in the DVMWHS Milford is alone in having no interpretation facilities, other than an interpretation board at the southern end. Proposals are in hand for two further interpretation boards to be erected at the former foundry site, secured by the Borough Council in agreement with the developer of that site, who is funding the work. It is hoped that a similar agreement can be entered into with the developer of the Mill site for one or more interpretation boards here. The need to

skillfully integrate archaeological remains into the hard landscaping scheme has already been dealt with.

I hope these comments will be taken into account in the determination of the planning application.

Yours sincerely,

Adrian Farmer

Coordinator  
Derwent Valley Mills World Heritage Site

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