## **DERWENT VALLEY MILLS WORLD HERITAGE SITE**

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Sarah Pearce
Amber Valley Borough Council
Town Hall
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16th November 2018

Dear Sarah

AVA/2018/0947: Construction of a single new dwelling at Green Bank, 28 Sunny Hill, Milford.

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

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 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:

This application follows the withdrawal of an earlier application (AVA/2018/0354) for a single dwelling. The design and footprint of the proposed dwelling within the site have been revised. The site is located within the Belper and Milford Conservation Area. It is also opposite a grade II listed building.

Green Bank is an unlisted brick dwelling, with stone dressings and half-timbered gables, of reasonably high status, built in the first decade of the 20th century, in a local version of the Arts and Crafts style. However, it is considered to be an 'attribute' of the World Heritage Site and, therefore, a contributory component of its significance. This is borne out by documentary evidence showing that Green Bank was built by the Strutts, making it an integral part of the narrative of textile manufacture.

The Strutt Farm Rental shows that Green Bank was finished by 1908 as the first tenants had an agreement from 25th April of that year. The property was sub-let after a year or two to the English Sewing Cotton Ltd., providing accommodation for a series of tenants, the specific details of which are unknown, at this time, other than evidence that a George Janes, from Macclesfield, Cheshire was lodging in Belper as a Silk Mill Manager in 1911, as a Silk Throwing Manager and later, in an electoral roll (in possibly 1919), at Green Bank.

The 1939 Registration Act shows that Walter Makin, a Silk Mill Manager, and his family was living at Green Bank, which was subsequently sold to the Makin family by the Strutts. A definite drift of skilled silk labour, to Belper and Milford, from Macclesfield (from census information) was possibly as a result of a decline in a similar industry.

For over a century, therefore, the site has been occupied by this single dwelling. The boundary along Sunny Hill is a typical stone wall. This wall would be breached and permanently interrupted to form a new vehicular access, as has happened. There would also be associated changes to the topography of the site to accommodate the construction of the dwelling and vehicles. Such changes would have an adverse impact on the character and appearance of the conservation area.

Despite modern infill, the character of Sunny Hill is semi-rural, with stone boundary walls built onto the road, as it eventually climbs to the rural landscape beyond. Green Bank, and the application site in question, is literally on the edge of the settlement, being adjacent to the agricultural fields to the west and north. Until recently, mature vegetation concealed most of the house from view, adding to its semi-rural character. The historic houses along Sunny Hill take various forms, including individual stone cottages or rows of cottages, constructed along the contours with gables generally facing onto the hill.

It is acknowledged that the revised proposal addresses some of the specific detailed issues raised in respect of the harm that would result from original development proposal. Its scale has been reduced and its position relative to Green Bank, only, has been improved. However, the principle of development on a site that makes a positive contribution to both the World Heritage Site and the closely-associated conservation area, cannot necessarily overcome the fundamental issues by amending the design and layout.

The statement that the character of the streetscape would be improved by "...obscuring the inappropriately massed and designed 1970's house, to the North East...", is disingenuous given that the site has been opened up by the removal of mature vegetation and the unauthorised removal of the boundary wall, which itself has opened up views of the adjacent houses (paras 1.5 and 5.1.2).

The lower garden area of Green Bank both contributes to an appropriately-sized plot for a house of some significance within the narrative of the mills, setting it apart from the smaller, more humble dwellings and to the variety of density of the settlement, which determines the character and appearance of the conservation area. As directed in the pre-application advice, it has not been demonstrated that a new dwelling on the site that would not dilute the status and hierarchy of Green Bank within its appropriately-sized curtilage, causing consequential harm on an attribute of the World Heritage Site, which would be harmful to its Outstanding Universal Value. While this harm is assessed to be 'less than substantial', there would be no public benefit to balance this harm to a designated heritage asset of the highest value and of international significance.

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

Yours sincerely

**Adrian Farmer** 

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.

cc Sarah Brooks, AVBC