

DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Heather Wynne
Amber Valley Borough Council
Town Hall
Ripley
Derbyshire **DE5 3BT**

18th March 2019

Dear Heather

AVA/2019/0101: Proposed three parking spaces at 2A 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 later this month.

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 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 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:

The application site is located in a distinctive settlement on the western slopes of the River Derwent at Milford. It is also located in the Belper and Milford Conservation Area within the setting of a number of attributes, both designated and non-designated heritage assets. Immediately adjacent to the site, Nos. 8 to 12 (consec), No. 12a and No. 14 Well Lane, No. 4 Sunny Hill, and the former Well House to North of No 14, Well Lane are listed in grade II and attributes of the World Heritage Site. Prominently visible from the application site are the chimney at Milford Dyehouse, Derby Road and Milford County Junior Mixed and Infants School, Chevin Road, both statutory listed in grade II and attributes of the World Heritage Site;

Other grade II listed buildings and attributes of the world heritage site, whose setting includes the application site, include Nos. 1 to 5 (consec) Chevin Alley, Cloister, No. 2, Chevin Road, Nos 13, 15 and 17 Chevin Road, the premises of Appor Limited, Chevin Road, Building 51 Milford Dyehouse, Derby Road and the Canteen at Milford Dyehouse, Derby Road.

The Heritage Statement, though only required to be proportionate to the scale of the proposals, demonstrates little understanding for the importance and significance of the context on an international level. Its conclusions are also subjectively dismissive, based on no assessment of the area to justify its conclusion of minimal impact and no harm: “The proposal will have a very minimal impact on the area and its surroundings and will not harm the nearby focal point of Milford Mill at the bottom of Sunny Hill”.

In reality, the impact and harm of the proposed development would be significant. Traditional vernacular buildings, dating from the period of expansion in the textile mills, are ranged around the open space of the triangular garden to No 2A Sunny Hill. The lack of development of the area could be due to the likelihood of it having had a productive use, as allotments. The garden’s high, significant stone retaining wall forms a continuous boundary feature to Sunny Hill, following a natural, logical line, reflecting a time when pedestrian movement and horse drawn carts dominated, rather than motor vehicles and their influence on the built environment of significant periods of the past. Stone boundaries contribute strongly to the character of Sunny Hill, forming a consistent feature to both sides of the hill in almost all locations where traditional, matching stone buildings are not set hard against the steeply inclined narrow lane, all the way to its summit, even where built development stops and gives way to the open landscape and enclosed fields.

The proposed break in the wall, and the presence of permanent vehicular parking provision, in this highly prominent location, within the setting of principals monuments, sites and other numerous attributes of the World Heritage Site, would represent an incremental loss that would be harmful its significance. The harm to the Site’s Outstanding

Universal Value would be 'less than substantial', as defined in the NPPF, and while Sunny Hill shares the detrimental impact of increased private car ownership with other historic settlements in the county, the reduction of three vehicles cannot outweigh the loss of character, appearance and significance of the highest heritage value. The application should therefore be refused without compromise.

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

Yours sincerely

A handwritten signature in black ink, appearing to read "Adrian Farmer". The signature is written in a cursive style with a large initial 'A' and a long, sweeping tail.

Adrian Farmer

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