

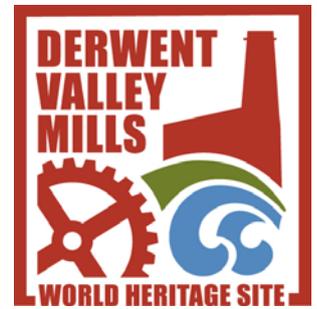
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

15th August 2019

Dear Sarah

## **AVA/2019/0589: Conversion of a barn to a residential dwelling at Grange Farm, Shaw Lane, 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 in September.

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 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:

Grange Farm is located within the Buffer Zone of the Derwent Valley Mills World Heritage Site. As stated in the Planning Statement, the group is closely related to the mill community of Milford where a physical survival of the historic textile community makes its significant contribution to the significance of the world heritage site. This historic farmstead forms an integral part of the relict 18th century landscape setting of the world heritage site, the setting itself being an attribute of the Site’s Outstanding Universal Value. Elevated views of Milford from the public footpath (Belper Footpath 18) above the application site, contain the group of agricultural buildings that form Grange Farm.

Several concerns relate to the proposed conversion to residential use. Addressing its compliance with Policy H6 and EN2 of the Development Plan, the application documents state that the buildings, being of a permanent and substantial construction, can be converted without extensive alteration, rebuilding or extension. The structural report is more cautious on this issue, but nevertheless concludes that, subject to certain remedial works, “...the buildings are suitable for the proposed conversion from a structural viewpoint...”. However, there is sufficient uncertainty for the suitability of the existing structure and fabric to accommodate a residential conversion, to suggest that in reality, significant alteration and rebuilding would be necessary and unavoidable, including:

- the report fails to recognise the historical significance, as a diminishing feature, of the lime ash floor, cast on straw or reed by recommending its remove. Though internal works to a non-listed building, this would represent both a loss of authenticity to a component of the landscape setting and an alteration or re-build that would fail to meet H6 of the Development Plan;
- similarly, the significant excavation to change external ground levels in order to provide amenity space, as a consequence of the proposed conversion, would change the authentic character of the farmstead that was naturally assimilated into the prevailing topography of the hillside, and within which the traditional buildings nestle with reverence and respect, in an harmonious relationship between natural world and the activities on man upon it;
- there would be further loss of authenticity to the farm buildings as a result of the residential conversion through lowering of ground floor levels leading to the almost inevitable underpinning or new foundations,

the removal of a retaining skin of brickwork, additional structural members to address roof spread, usually by the insertion of a structural ridge beam;

- given that the farmstead is highly prominent from the public recreational routes of Belper Footpath 18, designated as the Derwent Valley Heritage Way, a layout which avoided the need for additional rooflights should be sought, as the multiple punctuation of the roof planes would result in a distinctly less agricultural character to the farmstead and its rural setting;

It should be acknowledged that substantial alterations would result from the demands of modern living standards and Building Regulation for structural safety, energy conservation, resistance of moisture from the ground, not to mention guarantees required by mortgage lenders and building institutions.

In principle, the conversion to residential use could be acceptable were the associated impacts of this demanding use be limited and thoroughly understood prior to determination, through a scheme that established a scale of development that maintained the agricultural character of the farmstead within its rural setting, reducing the impact of the proposed alterations, which would in reality be greater than has been acknowledged in the application. In its current form, therefore, it is considered that the proposed development would negatively impact on the significance of the world heritage site as expressed through its Outstanding Universal Value. The harm would be 'less than substantial' as defined in the Revised NPPF although great weight should be given to the conservation of the Derwent Valley Mills World Heritage Site as a designated asset, the setting of which, though not a designated heritage asset in its own right, contributes to its significance (OUV).

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, flowing style with some loops and flourishes.

**Adrian Farmer**

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