

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

7th October 2019

Dear Heather

**AVA/2019/0812: Erection of proposed stable, barn and tack room, widening of existing access gate and construction of boundary fencing and retaining wall at Mill House, Ashbourne Road, Blackbrook.**

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 November.

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:

The site is located within the Buffer Zone of the Derwent Valley Mills World Heritage Site, which represents the main heritage consideration of the proposal. The application site is not within a conservation area or likely to impact on the setting of a listed building, with the former Methodist Chapel, Plains Lane and Strutt’s Crossroads Farm being the closest to the site.

Blackbrook has formed around the Black Brook, from which the settlement takes its name. It comprises a small group of buildings, the core of which is loosely ranged around the flour mill and forge/smithy. The mill and Mill House are clearly central to the development of Blackbrook, with the entire area of the present day garden/paddock of Mill House previously having been the mill pond.

The application site contributes to the distinctly rural character of the locality. While the field does not represent the more substantive ‘relict’ rural landscape of other setting areas of the World Heritage Site, the site’s open character contributes to the setting of the world heritage site, in this locality, and the experience at this point of entry to the Site. This character is consolidated by the enclosed field pattern of the open rural landscape, which flows continuously from the Ashbourne Road, across the former mill pond and up the slopes of the hillside to the skyline. The picturesque quality of Mill House, with its projecting roof overhangs, decorative barge boards and ornate chimney stacks, is highly visible on the approach to the settlement from the west.

The existing stabling and related structures are of relatively modest scale and are set down below the Ashbourne Road and the native hedgerow of the boundary, which is usefully higher at this location, thereby screening the structures to a large degree.

The proposed increase in structures, albeit of a similar type, to a similar width and height, is significant, and would add a further 25 metres to the existing 24 metre run of buildings against the roadside boundary. Maintaining the ridge level of the additional structures, against a hedge that reduces in height as it extends away from Mill House, would present a significant visual barrier to the former mill pond, now the green space of its garden/paddock. This intervention would detrimentally change the character of the locality. Within the site, the changes to create a level area in front to the stables, barn and tack room would also have an impact on its natural topography and character.

The surviving buildings in Blackbrook, together with its natural and constructed features, are considered to be non-designated heritage assets. This was recognised in a recent appeal decision on a site opposite where three houses were proposed on an open green space. The inspector considered that the protection of the World Heritage Site's setting is particularly important, because of the critical significance to the Property's Statement of Outstanding Universal Value (SOUV) of the location of the mills and their associated settlements, within a rural landscape, arrested in time.

The Revised NPPF (paragraph 197) requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Revised NPPF (paragraph 193) directs that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance, and at paragraph 194, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

In conclusion, development of this site, for the scale and layout indicated, would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site, as a designated heritage asset. While the harm would be 'less than substantial', the World Heritage Site is a heritage asset of the highest value. Furthermore, it is considered that there would be harm to non-designated heritage assets, which no public benefit can be demonstrated to ensue.

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.

**Adrian Farmer**

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