

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

21st October 2019

Dear Heather

**AVA/2019/0887: Replace existing timber windows with PvC-U Synerjy casement windows finished externally in a Golden Oak wood grain foil with 9mm leaded bars at 3 River View, 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 November.

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 site is located within the Belper and Milford Conservation Area. The application relates to a modern house, built in the early 1980s. The dwelling is part of a small group of modern buildings, on ground historically used as allotments and gardens to the historic workers’ cottages. The house occupies a prominent position, on elevated ground, which is highly visible from Derby Road, and the sites of the mill complex and its surrounding community. The design of the house has been reasonably successful in breaking-up its bulk and presenting an organic form and massing, which is assimilated into this high value traditional context. Despite the use of split-faced coursed stone walls, rather than a tooled finish, the stone mullioned windows retain the character and appearance of the locally distinctive vernacular building tradition. The dark brown, painted window frames would have been intentionally chosen to present appropriately-recessive frames, set within deep opening reveals. The windows’ least appropriate feature is the ‘leaded lights’, which are almost certainly applied or ‘stuck-on’ elements to the modern glass panes. The frames have a modern, double-rebated or storm-proofed profile, for the opening lights to the casement windows, rather than the traditional flush profile, which would have been a more appropriate response.

The proposed works involve the replacement of its dark, painted window frames for ‘Golden Oak’ uPVC frames. Despite claims to the contrary, it is considered that the impact of this change would be highly visible and damaging to the appearance of this sensitive context. Notwithstanding the inappropriate use of uPVC, in an historic context of the highest significance, the proposed colour is considered to be the most harmful of the popular colours for window frames in this material. Furthermore, none of the woodgrain options of the proposed manufacturer would be acceptable. While painted timber frames would be the most acceptable type of replacement frame, the finishes of grey, black/brown or smooth anthracite could be suitably recessive, although the artificial woodgrain effect should be avoided as false effect that would harm the authenticity required in a World Heritage Site.

Historic England’s national guidance ‘Traditional Windows: Their Care, Repair and Upgrading’ (HEAG039 Publication date: September 2014 English Heritage Reissue date: February 2017), sets out the reason why uPVC window frames are inappropriate in historic contexts. However, given that the building is relatively modern, with individual casements within stone surrounds, the use of uPVC could, reluctantly, be accepted. Had the existing frames been of a flush profile, the double-rebated arrangement of the proposed frames would have represented an unacceptable alteration. However, their surface finish and colour should be dark and recessive, ideally smooth, to minimise the difference in appearance from the existing frames. I strongly consider that the dark oak frames proposed would

have a detrimental impact on the character and appearance of the Derwent Valley Mills World Heritage Site and would, therefore, be harmful to its significance, as defined by its Outstanding Universal Value (OUV). The level of harm, as defined in the NPPF (February 2019) would be 'less than substantial', although harm to the designated heritage assets of the Derwent Valley Mills World Heritage Site and the Belper and Milford Conservation Area, could not be assessed to provide any positive public benefit.

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