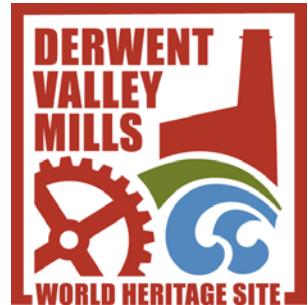


DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

10th March 2021

Dear Sarah

AVA/2020/1211: Erection of new build dwelling within the grounds of the existing (may affect the setting of a Listed Building) at 6 Chevin Road, Milford.

Please find below my response to the consultation concerning the above application. These comments will be passed to the World Heritage Site Conservation and Planning Group for verification in April.

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 maintain the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site by protecting, conserving, presenting, enhancing and transmitting its culture, economy, unique heritage and landscape 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 2020. It has as the first of its nine aims to: "protect and conserve the Outstanding Universal Value of the DVMWHS to ensure its transmission to future generations." In accordance with this aim, and with reference to the operational guidance in Section 20 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:

No 6 Chevin Road is also located within the Belper and Milford Conservation Area. It is listed in grade II, as part of the entry on the Statutory List of Nos 4-6 Chevin Road, Milford View. The application site is immediately adjacent to one of its main textile mill sites, with its eastern boundary defined by the mill lade fed by the River Derwent. The site is intimately associated with the golden thread that runs through the heart of the WHS and which unifies the mill community settlements. In addition to being part of the grade II listed building, the site is surrounded by numerous designated heritage assets and attributes that contribute to the international significance of the WHS, as defined by its Outstanding Universal Value (OUV).

The history of the site is not fully understood or described. Described as late-18th century/early-19th the cottages would appear to pre-date the formation of the school, in 1818, for the millworkers' children. However, the cottages are thought to have been a School House for Milford School. The cottage(s) is likely to have provided head-teachers' accommodation, which could have been formed by alterations, extensions and re-modelling of previously existing buildings - a practice common with Arkwright in Cromford and the Strutts in Belper, Milford and the surrounding settlements of their estate – rather than built specifically as the School House. The architecturally conscious design of the private elevation of Mill View is more polite than other Strutt houses in Milford. In addition to its significance for meeting the criteria for inclusion on the Statutory List, the association with the school, the Strutts and, therefore, the textile narrative of the WHS, the site possesses significances, known and unknown, which contribute to the OUV of the WHS, and it is desirable they be preserved.

The application site, the land north of No 6 Chevin Road, was originally allotments, separate from the garden land associated with the cottages. Those allotments were subsequently taken into the ownership of No 6, on which a number of ancillary structures have previously been erected. Allotments are elements of attributes that contribute to the OUV of the WHS. Their survival, as land not previously developed for anything other than ancillary structures to the house, allows their contribution to the cultural landscape of the mill communities to be interpreted, as it was inscribed onto the UNESCO World Heritage List, in 2001.

The significance and importance of the DVMWHS is well documented, with the wealth of designated heritage assets, including listed buildings and the conservation area, all being an integral part of the international importance of the WHS, as the origin of the factory system and the start of the industrial revolution.

In the Statement of Outstanding Universal Value (OUV) (2010) for the Derwent Valley Mills World Heritage Site, the contribution to its integrity and authenticity is defined as follows:

Integrity

The relationship of the industrial buildings and their dependent urban settlements to the river and its tributaries and to the topography of the surrounding rural landscape has been preserved, especially in the upper reaches of the valley, virtually intact. Similarly, the interdependence of the mills and other industrial elements, such as the canals and railway, and the workers' housing, is still plainly visible. All the key attributes of the cultural landscape are within the boundaries. The distinctive form of the overall industrial landscape is vulnerable in some parts to threats from large-scale development that would impact adversely on the scale of the settlements.

Authenticity

Although some of the industrial buildings have undergone substantial alterations and additions in order to accommodate new technological and social practices, their original forms, building materials, and structural techniques are still intact and easy to discern. Restoration work on buildings that have been in a poor state of repair has been carried out following detailed research on available documentation and contemporary built architectural examples, and every effort has been made to ensure that compatible materials are used. In those cases where buildings have been lost through fire or demolition, no attempt has been made to reconstruct. The overall landscape reflects well its technological, social and economic development and the way the modern factory system developed within this rural area on the basis of water power.

The application is for a new residential dwelling in the grounds of the existing grade II listed dwelling of Milford View, No 6 Chevin Road. It would include the ground works required to create suitable retaining walls, plus the adjusted retaining walls required to create additional parking spaces to the upper driveway. The three-bedroom family dwelling would be on three floors, including mezzanine accommodation within the roof space. The proposed design is contemporary in its expression, externally clad with timber and large areas of glazing expressed to a modern scale and style. A prominent balcony would run the full length of the house, facing the river valley to the east and along its southern elevation, further asserting its presence as a new dwelling on the site.

Though not the only means by which an area is experienced, views clearly are a consideration, and changes to the physical appearance of the WHS are monitored by a series of key views along the length of the Site. Monitoring View No 38 includes the application site:

Description (2008): The most important Strutt millworkers housing in Milford is in the form of terraces, some 'back to back' which follow the contour lines of the steep valley side. Although nearly all the mills buildings have been lost those structures that do remain are of great importance and the mill chimney, although 20th century is a major landmark. This view has, in the foreground, allotments, which were an important part of the domestic economy of the mill community in the 18th and 19th century. The view from here cannot be too dissimilar to that seen in the early 19th century.

Set amongst numerous attributes of the WHS, including important water courses (mill lade and River Derwent) the introduction of a large, detached modern dwelling would impact on the interpretation of the cultural landscape, the (absent) principal monuments of the mills, the workers' housing, chapels, school, etc. Its presence would have an

adverse impact on the OUV of a place of international importance, the change to which is unjustified and would offer no public benefit.

The openings in the boundary walls along Chevin Road are limited, but at the same time where they do exist, hold historic evidence of the pedestrian route of millworkers to the mill site. The approval of the new driveway and garage to No 6 Chevin Road (AVA/1999/0612 & 0613), on which the proposed development draws justification for its accessibility, pre-dated inscription of the site of the Derwent Valley Mills on the World Heritage List, in 2001, which would be a material consideration were it to be a current proposal.

Paragraph 184 of the NPPF states that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

A concern for all designated heritage assets, but for the WHS in particular, is the cumulative impact of harm through loss of authenticity and integrity of its significance. Proposals for larger residential developments within the WHS, such as those at Darley Abbey, Bullsmoor, Belper Lane and Crich Lane have threatened to erode the landscape setting. However, this is not only a concern for the loss of the relict industrial landscape where late-18th and early-19th century industrial development may still be seen in an 18th/19th century agricultural landscape, as defined by the surrounding Buffer Zone of the WHS. It applies to previously undeveloped smaller sites within the WHS itself, within the core of the built elements of its cultural landscape. Small scale developments, in this case as a single dwelling, erode the significance and heritage value of the irreplaceable resources, as recognised in the NPPF.

For the reasons described above, the proposed development would fail to preserve the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site (EN29). Its adverse impact would be harmful to the designated heritage assets. The harm would be ‘less than substantial’ as defined in the current NPPF (February 2019), although the great weight afforded to the conservation of designated heritage assets would require the development to include significant public benefits were it to outweigh the harm to assets of international, national and local heritage value.

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