DERWENT VALLEY MILLS WORLD HERITAGE SITE

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8th August 2017

Sara John
Development Control
Neighbourhoods
Derby City Council
The Council House
Corporation Street
Derby DEI 2FS

Dear Sara

03/17/00368: Demolition of the existing buildings and erection of a 186m length of flood wall and two office blocks on the site of 14 - 16 and Contractors Yard, City Road, Derby.

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 October.

The proposed development lies within the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone and directly abuts the WHS boundary alongside the river bank. 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 Outstanding Universal Value (OUV) of the Site was defined by the following criteria, agreed by UNESCO when the mills were inscribed. 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 UNESCO World Heritage Committee recorded 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 and Design Section (which advises the World Heritage Site Partnership in planning matters) over this application, and have received the following advice.

While there are no Listed Buildings within the site, the map regression exercise, included in the Heritage Impact Statement (HIS), appears to indicate that there are a number of mid-to-late 19th century industrial buildings that remain. During this period the maps included within the HIS indicate that the site was once a 'timber yard' and 'colour works' which was surrounded by a number of other industrial sites on both sides of the river. Whilst some of the remaining buildings are of some historic merit their architectural interest appears to be limited as they have been eroded by years of inappropriate modern alterations. Therefore, it is considered that their contribution towards forming an appreciation of the site as an historic industrial site is limited, and also because in more recent times much of the locality has been given up for modern housing developments.

Nonetheless the site is close to a number of important Attributes of the WHS such as the River Derwent, the Handyside Bridge and the Derby Silk Mill. It is therefore important that the design of both the flood defence wall and the office blocks is of the highest possible standard in accordance with the DVMWHS Management Plan.

Comments on the design of the flood defence wall have been provided in a number of previous planning consultation responses in which its broader impact on the OUV has been well versed. However, it must be reiterated that whilst there is a need for the flood defence it is considered that the design of the wall is not of a suitably high standard in that there has been an opportunity missed to engage it with the narrative of the DVMWHS and as a piece of good quality urban design.

It is unfortunate that the historic buildings are being considered for demolition although the continued commercial use of the site should, at least, provide some opportunity to interpret the former industrial use of the site. Whilst the World Heritage Site Partnership does not object to the proposed development in principle it is considered that the design has not yet been developed to a suitably high standard for such a prominent site. Therefore in order to ensure that the design meets the criteria set out in the DVMWH Management Plan it is suggested that the proposed development is referred to an independent design review panel. This is to help ensure that every opportunity has been explored to minimise the impact of the development on the OUV of the WHS.

Thank you for this opportunity to comment on the application.

Yours sincerely

Adrian Farmer

Heritage Co-ordinator,

Derwent Valley Mills World Heritage Site.