

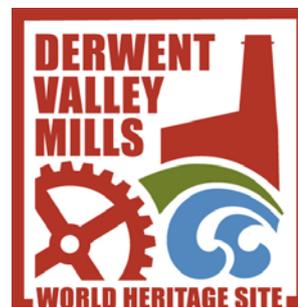
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Sara Claxton  
Development Control  
Communities and Place  
Derby City Council  
The Council House  
Corporation Street  
Derby DE1 2FS

22nd May 2019

Dear Sara

**19/00591/FUL: Installation of replacement 25m high mast, nine equipment cabinets and ancillary works on land at North Avenue, Darley Abbey.**

Please find below the latest DVMWHS 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 June.

The proposed development 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:

The site is located just outside the historic settlement of Darley Abbey and within the corner of an agricultural field surrounding the River Derwent. The top of the existing mast is visible from the A38 which passes the site immediately to the north. The existing telecoms equipment comprises of a relatively slender mast and antenna of approximately 20m tall and low-level plant equipment cabinets; all of which is enclosed within a timber fenced compound of approximately 1m in height.

The immediate area around the site is very much part of the arrested rural landscape associated with the DVMWHS. This is a key feature of the setting of the River Derwent, an important attribute of the WHS, in this part of the internationally recognised heritage asset.

A much taller communications ‘tower’ would replace the existing telecoms ‘mast’, and, at approximately 25m tall this will result in an overall increase in height of approximately 5m. The visual impact of the mast would also be significantly greater due to its built form, as a vertical lattice structure topped with a large cylindrical structure featuring an array of communication antennas and dishes. An increase in the low-level plant equipment will also extend the footprint of the fenced enclosure, although existing vegetation and landscape features are likely to help screen much of this.

The supporting Heritage Statement identifies the site as being secluded in view of it not being considered to be currently visible from a public viewpoint. However, the new mast is likely to be a much taller and voluminous/bulkier structure, and the present mast was photographed from public viewpoints by the World Heritage Site Team as part of the evidence relating to a 2016 planning appeal (Planning Inspectorate References APP/C1055/W/15/3137935 and APP/C1055/W/15/3141117) – see Appendix 11 to the DVMWHS Proof of Evidence below. The DVMWHS Partnership would therefore question this assessment and the impact it may have on views from public rights of way such as the Derwent Valley Heritage Way. Similarly views from alongside the A38 should be taken into consideration. It is also important to point out that just because part of a designation is not visible this does not necessarily make its contribution to its setting or significance any less important.

As discussed in the Heritage Statement, it is appreciated that some of the harm done by the new tower could be mitigated through the level of public benefit brought to the local area in terms of the improvements to local

businesses, the community and the heritage tourism economy, etc. However, as it is not currently possible to determine the level of harm likely to be incurred it would be difficult for the local planning authority to make an informed decision as to whether or not the level of public benefit will offset any harm done with the information provided.

The DVMWHS Partnership would therefore advise that the applicant submits a suitable visual impact assessment of the mast from agreed locations to help determine the level of harm incurred on the OUV of the DVMWHS by the new development. This should include 'as existing' and proposed photomontages to a recognised landscape assessment standard.

Thank you for this opportunity to comment on the application.

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 Chloe Oswald, Derby City Council.