DERWENT VALLEY MILLS WORLD HERITAGE SITE

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18th September 2019

Laura Neale Development Control Communities and Place Derby City Council The Council House Corporation Street Derby DE1 2FS

Dear Laura

DER 19/01245/OUT: Proposed phased mixed use development at land off Victoria Street, Green Lane, Macklin Street, Becket Street, Colyear Street And Becketwell Lane, Derby.

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 September.

The proposed development lies within the wider setting of 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 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, Heritage and Design Service (which advises the World Heritage Site Partnership in planning matters) and have received the following advice:

The proposed development site sits wholly outside the DVMWHS and its Buffer Zone, within Derby City Centre. The proposal will require the demolition of a number of large modern buildings and some earlier, more historic buildings, although these are not considered to contribute to the wider setting of the DVMHS. The Skyline Study submitted with the application usefully illustrates the potential impact of the proposed development from a multitude of viewpoints in and around the city centre and from the wider rural landscape. It is clear from this document that the tallest component of the development, a 17 storey block, will impact on views, near and afar, of the historic skyline and further dilute its dominance. In particular, the DVMWHS Partnership has concerns that the proposed development will compete with the prominent features of the historic skyline such as the Silk Mill and Derby Cathedral.

Already, a tension has been created through existing developments such as the Intu Centre and Jury's Inn and, potentially, the large multi-storey development on Phoenix Street. Consequently these have diluted the dominance of the historic skyline as these new taller features detract from it.

Whilst the Partnership holds no objection to a development of this type in principle at this location, we have concerns over the height of the tallest component of the first phase of the development. It is to this end that we would urge the local planning authority to consider the appropriateness of this aspect of the development given that it could have a negative impact on the wider setting of the DVMWHS and its OUV.

Thank you for this opportunity to comment on the application.

Yours sincerely

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Adrian Farmer Heritage Co-ordinator, Derwent Valley Mills World Heritage Site. cc Chloe Oswald, Derby City Council.