DERWENT VALLEY MILLS WORLD HERITAGE SITE

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13th November 2019

Stephen Bate
Development Control
Communities and Place
Derby City Council
The Council House
Corporation Street
Derby DE1 2FS

Dear Stephen

DER 19/00976/FUL: Erection of a dosing rig to serve the existing pumping station and erection of a boundary wall at Pumping Station by 5 Poplar Row, Darley Abbey.

Please find below the latest DVMWHS response to the consultation concerning the above application. These comments will be passed to the World Heritage Site Conservation and Planning Panel for verification later this month.

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 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:

Comments on the above planning application have been made on a number of previous occasions; the most recently being on 29 July 2019. In the latest comments, concerns were expressed principally over the scale of the development as it appeared to have doubled in footprint. It was also advised that the design quality of the proposed development could be improved to help mitigate any adverse visual impacts.

Having reviewed the revised drawings and content of the covering email it is considered that the amended design offers a substantial improvement on that previously shown. The size of the compound has been reduced by approximately 1/3rd and the height of the enclosing brick wall lowered from 4.0m to approximately 3.54m. As with previous design iterations of the scheme, it is noted and accepted that the geometries of the new enclosure are dictated by the relationship of the new dosing rig to existing pipelines below it.

Given that the footprint of the enclosure has been significantly reduced this should help reduce its visual impact, and, overall, help it appear more subservient to the host building. The new enclosure is at least an honest expression of its utilitarian function and it will be constructed of material matching the existing pumping station giving it some sense of coherence. It is a shame, however, that this could not have been taken a step further, by exploring ways in which more recessive materials could have been used to further improve the design quality and reduce its visual impact.

Overall, the design changes have reduced the visibility of the development in the context of the DVMWHS. Whilst the change will not result in 'no harm' to the DVMWHS, the reduction in noxious odours will positively benefit the WHS. On balance, any adverse impacts on the OUV of the DVMWHS should be outweighed by this improvement.

Thank you for this opportunity to comment on the application.

Yours sincerely

Adrian Farmer

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