

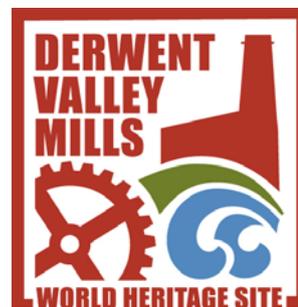
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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**Stephen Bate**  
**Development Control**  
**Neighbourhoods**  
**Derby City Council**  
**The Council House**  
**Corporation Street**  
**Derby DE1 2FS**

19th March 2018

Dear Stephen

**02/18/00225: Erection of a dosing rig to serve the pumping station adjacent to 5 Poplar Row, 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 February.

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 application site is within the Darley Abbey Conservation Area and in close proximity to a grade II listed row of former millworkers cottages, which are ‘attributes’ of the World Heritage Site. The proposal is for a tank of some size to the front of the relatively modern, traditionally-built pumping station. The need for the tank is accepted, as is the benefit it will bring in terms of reducing or removing the intermittent nuisance odour. Although the dosing tank could be considered to be an honest piece of equipment, it would be prominent in this open location, visible within views of one of the Site’s attributes and arguably an undesirable intrusion into the domestic character of the site.

Despite referencing all the appropriate methodology advice, guidance and legislation, the Heritage Statement fails to adequately assess the impact of the proposal on the heritage assets or describe any alternative options that may have been investigated. Mitigation is not described as the Statement concludes there would be no harm or adverse impact resulting from the proposals. Its siting would appear to make no concession to its sensitive location above and beyond any other site. As there is no explanation of the relationship of the dosing tank and the host building, it is not known whether the tank could be located behind the building or indeed screened by some acceptable means.

In order to reduce the visual impact of the proposed plant, it is hoped that its siting can be reassessed against the potential harm to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site and the setting of one of its statutorily listed attributes.

Thank you for this opportunity to comment on the application.

Yours sincerely

A handwritten signature in black ink that reads "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.