

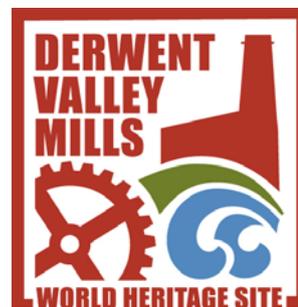
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

Shand House, Dale Road South, Darley Dale, Matlock, Derbyshire, DE4 3RY

T: +44(0) 1629 536831

E: [info@derwentvalleymills.org](mailto:info@derwentvalleymills.org)

[www.derwentvalleymills.org](http://www.derwentvalleymills.org)



**Laura Neale**  
**Development Control**  
**Neighbourhoods**  
**Derby City Council**  
**The Council House**  
**Corporation Street**  
**Derby DE1 2FS**

23rd July 2018

Dear Laura

**DER/05/18/00771: Erection of a new building providing 202 residential apartments on off Phoenix Street, 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 outside but abutting the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone. 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 with members of the DVMWHS Conservation and Planning Panel at a site visit held on Friday 20<sup>th</sup> July, and have received the following advice:

Broadly speaking, these comments are in alignment and supportive of those made by Historic England and Derby City’s conservation officer. However, there are potential impacts which need to be addressed concerning the DVMWHS which this consultation response discusses/highlights. This response also takes into consideration the observations made, during the site visit, concerning the potential impact of the proposed development on the international designation.

The site, whilst just outside the Buffer Zone of the World Heritage Site, is close to, and within the setting of Derby’s historic Silk Mill, one of the key Derwent Valley Mills and an attribute contributing to the World Heritage Site’s outstanding universal value.

At the site visit, Conservation and Planning Panel members were struggling to accept the accuracy of the visuals provided, believing that the impacts on the World Heritage Site would be far more damaging than the visuals suggest. They believe the current ‘Integrated Visual Assessments’ are misleading and there is a need to look again at the methodology used.

Visualisations have been done which suggest little impact on the view from World Heritage Site Monitoring View 49 (Silk Mill from Cathedral Green) but it is important to remember that the UNESCO-endorsed monitoring views are only indicative, not exhaustive. Standing at the point of Monitoring View 49, the WHS Partnership believes a greater impact would be made by the development on the view towards the river than suggested. It should also be remembered that once work on the Museum of Making project is completed at the Silk Mill in 2020, then the Silk Mill bell tower will be publically accessible, so views from the tower also need to be included to understand the impacts of setting.

As mentioned by Historic England, there is a lack of information on impacts to views when approaching and moving around in and close to the World Heritage Site. One key view, not addressed by the visuals provided, is from the train, as you head up the Derwent Valley Mills World Heritage Site from Derby to Matlock. Heading north, key landmarks to engage with heading north are the Guildhall clock tower, Derby cathedral tower, then the Silk Mill bell

tower. These glimpses of the city are limited but important and visuals, showing these would not be further degraded, would be helpful.

Acceptable viewpoints and an agreed robust methodology (including appropriate camera lens, and the use of helium balloons to ensure there is no doubt concerning the height of the development) need to be established before the DVMWHS Partnership can be confident in identifying the scale of the impacts on the Silk Mill and the wider WHS. These need to be agreed with the city council's conservation officers and Historic England, in consultation with the DVMWHS Partnership.

Although the setting of the Silk Mill has been eroded to some degree in the past, it is likely that a building of this scale provides a greater threat to the setting of the Silk Mill, and the southern entrance to the World Heritage Site, than previous development in the city. That is why the visualisation work needs to be robust and extensive.

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 style with a large initial 'A' and 'F'.

**Adrian Farmer**

Heritage Co-ordinator,

Derwent Valley Mills World Heritage Site.

cc Chloe Oswald, Derby City Council.