

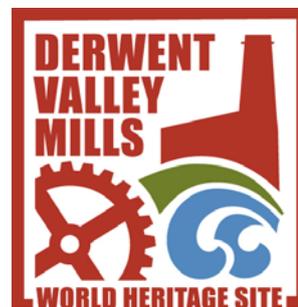
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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**Laura Neale**  
**Development Control**  
**Neighbourhoods**  
**Derby City Council**  
**The Council House**  
**Corporation Street**  
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18th September 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 November.

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:

Comments were provided previously by the Partnership on 23 July 2018 in which historic sensitivities associated in close proximity to the site were well versed. Primary concerns were expressed in relation to the height of the building and that it was not accurately represented in the Integrated Visual Assessment (IVA).

Section 2.0 (Methodology) states that the IVA has been carried out with reference to a recognised methodology in accordance with ‘Guidelines for Landscape and Visual Impact Assessment’ (Landscape Institute and Institute of Environmental Management & Assessment, 2013). While this provides some assurance that the photomontages submitted within the updated IVA are more realistic, it would be helpful to understand in more detail how they were constructed; the ‘Technical Methodology’ begins to explain this but it appears to be incomplete/missing.

Notwithstanding this, some of the images (notably Views 01, 02 & 03) included within the IVA demonstrate that the new building will contribute to the further erosion of the setting of the DVMWHS, including the Silk Mill. Until relatively recently the Silk Mill was one of the more dominant features in this part of the WHS. However, a number of recent taller developments, such as the residential buildings on the adjacent side of the river and Jurys Inn, have significantly altered the appreciation of the dominance of the building within the historic city skyline. Government guidance ‘Conserving and enhancing the historic environment’ (paragraph: 032 Reference ID: 2a-032-20140306) states that planning authorities should satisfy the following principle: protecting a World Heritage Site from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect. The new development marks a further step-change in the skyline and will have a cumulative impact on the setting of the Silk Mill.

As previously stated, concerns remain over the fact that the new development will obscure views from the train, as you head up by and through the Derwent Valley Mills World Heritage Site from Derby to Matlock.

It is to this end that the World Heritage Site Partnership objects to the proposed development in view of its negative visual impact and consequently its harm on the OUV of the DVMWHS. In NPPF terms it is considered that this will be less than substantial harm unless the LPA are satisfied that this harm will be outweighed by the public benefits (para 196).

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 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.