

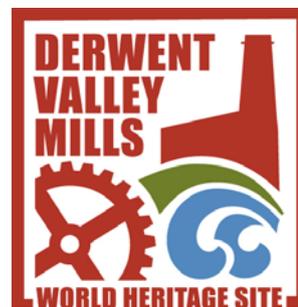
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

14th December 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 January.

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 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 with members of the DVMWHS Conservation and Planning Panel at a site visit held on Friday 20th July, and have received the following advice:

The Partnership has provided a number of responses in relation to the proposed development on 23 July and again on 18 September 2018. The sensitivities of the site in relation to the DVMWHS are already well versed in these. Concerns have been expressed in relation to the scale of the proposed development and the potential adverse impact it could have on the setting of the Silk Mill and the southern entrance to the WHS. There have also been concerns expressed over the accuracy and robustness of the visual impact assessment.

It is understood that as part of this re-consultation the Integrated Heritage, Townscape and Visual Impact Assessment document has been updated in so far as the methodology and some of the viewpoints within it. The methodology statement (2.1) appears to be more comprehensive and the process of how the photographic information has been used with the Derby City Council (DCC) 3D model appears to be relatively clear. However, Derby City Council needs to satisfy itself that the methodology meets with current best practice by seeking professional advice from someone familiar with undertaking visual impact assessments in urban environments.

Notwithstanding this, our concerns remain over the impact of the development and the previous viewpoints commented on. In addition to this the DVMWHS Partnership would like to comment on the other viewpoints which have been amended or added as part of this re-consultation:

- View 4. P32 – 35. NW of Exeter Bridge (amended) – the new tower block is clearly visible above the rooftop of the adjacent office/residential buildings and so impacts on the approach to the WHS and the associated monitoring view.
- View 5. P36 – 39. The Peacock Inn, Nottingham Road (amended) – this illustrates the monolith like scale of the proposed development and how it will completely obscure the Cathedral. Although some distance outside the WHS this will impact negatively on the sequential approach towards the WHS and the historic city skyline.
- View 6. P40 – 43. Holmes Bridge (new viewpoint) – at present it appears as though a glimpse of the Silk Mill is possible from the bridge and between the two relatively new apartment blocks allowing some degree of interpretation of the mill in context with the weir and relatively un-changed historic skyline. The proposed visual clearly illustrates how the new development will become an overly dominant feature of the skyline

and possible further obscure views of the Silk Mill as one moves along the bridge and so further harming the setting of the WHS.

- View 8 St Helen's House / St Mary's Footbridge (new viewpoint) – although this view is positioned outside the DVMWHS, part of the Silk Mill is visible, notably the tall chimney flue, which allows it to be relatively well interpreted within the historic skyline in conjunction with the Cathedral. As with the other views commented on this is also considered to be an important part of the sequential approach to the WHS, whether on foot or road-based transportation method. The proposed view from this position illustrates how the proposed development will be of a completely unsympathetic in scale as it will compete with the dominant features of the historic cityscape.
- View 9 St Mary's Bridge – this illustrates that the proposed development delivers a high magnitude of change to the historic city skyline as its presence will only serve to become the most dominant feature from this position. This would have a negative impact on the area associated with the corresponding WHS monitoring view.

In closing on this consultation response it must also be reiterated that the views of both Derby City's Conservation Officer and Historic England are supported. While the principle of development on this site is not considered to be wholly unacceptable it would, as it stands, amount to a degree of harm on the OUV of the DVMWHS amounting to less than substantial harm as defined in the NPPF.

Thank you for this opportunity to comment on the application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adrian Farmer', written in a cursive style.

Adrian Farmer

Heritage Co-ordinator,

Derwent Valley Mills World Heritage Site.

cc Chloe Oswald, Derby City Council.