

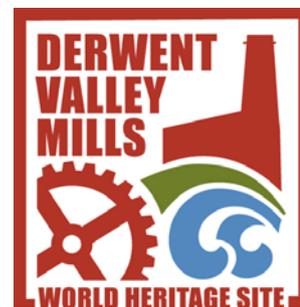
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

29th July 2019

Dear Stephen

19/00976/FUL: Erection of a dosing rig with emergency shower unit to serve the existing pumping station and erection of a boundary wall by 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 September.

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 were initially provided on the proposed development in March 2018, in which the historic sensitivities of the site were set out in relation to the DVMWHS. While the need for the proposed development is accepted there were initially concerns over the location of the new dosing tank. These concerns were addressed by the applicant in later revisions to the scheme which were commented on in June 2018 and again in July 2018 and the proposed development was considered to be satisfactory.

However, on reviewing the current proposals, additional ancillary equipment is required to include an emergency shower unit with a 4.0m high brick perimeter enclosure around it. The drawings indicate that the footprint has bloated to become larger than that of the existing building. This will alter the domestic character of the existing pumping station to that of a larger sewerage treatment site. Because of this substantial increase in size and prominence this is considered to be a retrograde step in the design and as such there will be an increase in the visual impact on the World Heritage Site and the setting of its attributes.

Therefore the World Heritage Site Partnership cannot agree with the assessment made in paragraph 11 of the Heritage Statement which suggests that ‘there would be no additional impacts to heritage assets as a result of the modifications to the proposed installation...and that the proposed development would not result in harm to...the Outstanding Universal Value of the DVMWHS’.

As it currently stands, in NPPF terms, the proposed development would result in less than substantial harm, albeit at the lower end of the scale. Consequently, the Partnership objects to the proposed development as it will have a negative impact on the OUV of the DVMWHS. In order for the scheme to be considered to be acceptable we would advise that the footprint is substantially reduced in size. It would also be worth considering how the design quality of the proposed development could be improved to make it as visually recessive as possible as an additional means of mitigating any adverse impacts.

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 a long, sweeping tail on the 'r'.

Adrian Farmer

Heritage Co-ordinator,

Derwent Valley Mills World Heritage Site.

cc Chloe Oswald, Derby City Council.