

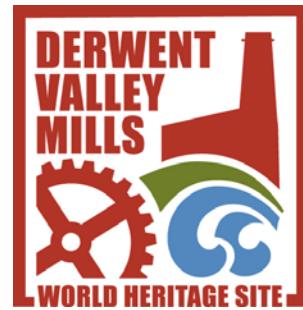
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Paul Clarke  
Development Control  
Neighbourhoods  
Derby City Council  
The Council House  
Corporation Street  
Derby DE1 2FS

20th December 2019

Dear Paul

**DER/05/18/00771: Erection of a new building providing 202 residential apartments on land 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, within the wider setting of the World Heritage Site and the Derby Silk Mill, a significant attribute contributing to its Outstanding Universal Value. 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 the following response to the latest consultation:

The Partnership has provided a number of responses in relation to the proposed development. 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. The Partnership has been consistent in its concerns and feels those concerns have been vindicated by the advice provided through the considered and thorough analysis from the ICOMOS International Technical Review in August 2019, and by Derby City’s Conservation Officer and HM Government’s own advisor, Historic England, most recently on 4th December 2019.

The latest additional material, a detailed analysis of the ICOMOS Technical Review notes, by Lathams Architects, tries to pick it apart with assumptions which do not fully grasp the nature of the World Heritage designation. Rather than trying to denigrate ICOMOS's Technical Review, it would be more constructive to undertake a Heritage Impact Assessment (HIA) in accordance with ICOMOS guidelines. If the applicant is confident that the scheme does not negatively impact on the OUV of the DVMWHS it should be borne out by the assessment. The HIA should be sent to ICOMOS as UNESCO's advisor on cultural heritage.

As the Partnership has made clear before, whilst 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".

**Adrian Farmer**

Heritage Co-ordinator,  
Derwent Valley Mills World Heritage Site.  
cc Chloe Oswald, Derby City Council.