

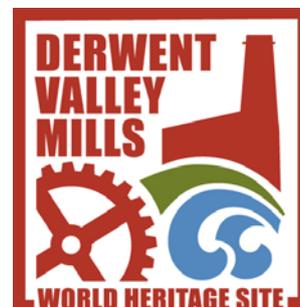
# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Sara Claxton  
Development Control  
Communities and Place  
Derby City Council  
The Council House  
Corporation Street  
Derby DE1 2FS

18th June 2021

Dear Sara

**DER20/01542/FUL: Installation of a replacement 24m high monopole supporting nine antenna apertures, four cabinets, retention of four cabinets and relocation of 0.3m dish on land at North Avenue, Darley Abbey.**

Please find below my response to the consultation concerning the above application. These comments will be passed to the World Heritage Site Conservation and Planning Group for verification next month.

The application site lies within 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 2020. It has as the first of its nine aims to: “protect and conserve the Outstanding Universal Value of the DVMWHS to ensure its transmission to future generations.” In accordance with this aim, and with reference to the operational guidance in Section 20 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 provided on a previous version of the application (ref **19/00591/FUL**) in May 2019 in which the sensitivities of the site in relation to the WHS were well versed. The current application appears to be for an identical proposal albeit for a slightly reduced mast height from 25m down to 24m. Concerns were expressed at the time about the potential negative impact the replacement mast could have, as the proposed development site is part of the arrested rural landscape and immediate setting of the WHS. The advice provided to the partnership was that ‘the applicant should submit a suitable visual impact assessment of the mast from agreed locations to help determine the level of harm incurred on the OUV of the DVMWHS by the new development. This should include ‘as existing’ and proposed photomontages to a recognised landscape assessment standard.’ This has not been produced, and, in addition, no heritage impact assessment has been submitted.

For the 2016 Darley Abbey planning inquiry (Appeal Ref A: APP/C1055/W/15/3137935 and B: APP/C1055/W/15/3141117) concerning North Avenue, the DVMWHS Partnership produced a document (Appendix A) which co-incidentally highlighted the existing mast’s visibility within the rural landscape from a number of positions (see attached). This reinforces the need for a suitable visual impact assessment but also points towards the fact that any increase in height and volume of the structure is likely to cause additional harm to the immediate setting of the WHS.

It is therefore advised that this additional information is provided in order that a more comprehensive assessment of the likely level of harm can be determined.

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.