

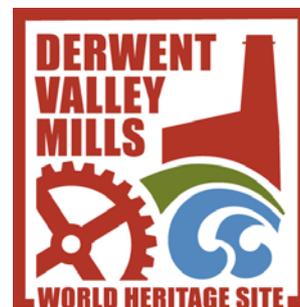
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

22nd January 2021

Dear Sara

Amended comments – DER20/01542/FUL: Creation of a cycleway at land to the north of Haslams Lane, Derby (between River Derwent and Derby to Duffield railway line).

Please find below my amended response to the consultation concerning the above application, following further discussions with our conservation advisor and the conservation officer for Derby City Council. These comments will be passed to the World Heritage Site Conservation and Planning Group for verification in February.

The application site 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 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:

The proposed development is located wholly within the DVMWHS and comprises the provision of a 1.9km long north-south cycleway running along the eastern bank of the River Derwent. This section of cycleway would form part of the 31km Derwent Valley Cycleway (DVCW) running through the Derwent Valley Mills WHS and will link the WHS at Haslams Lane in the south to the Little Eaton Grade Separated Junction in the north. Notwithstanding the industrial park to the east the river corridor in this location remains relatively unaltered and is considered to form part of the arrested rural landscape of the WHS.

It is clear from the plans and information on Google Earth that almost three quarters of the new cycleway will follow the course of the River Derwent along the route of existing tracks. These are to be repaired and upgraded, where required, to bring them up to a useable standard. A new central 660m length of track will be required to connect these and the drawings indicate that this will follow existing landscape features such as field boundaries and drains.

The fact that the cycleway follows the route of a number of existing tracks and field boundaries will help reduce the overall visual impact of the scheme. However, the typical section details indicate that tarmac is proposed as a surface finish for the new cycleway. This is considered to be an alien and unsympathetic material, and one which would only serve to urbanise this very rural part of the WHS on the fringe of Derby city. We would therefore suggest that an alternative, preferably free-draining, surface should be considered such as a self-binding well-compacted hoggins; a material that is used on many other similar rural cycleways. The width of the cycleway should also be kept to a minimum to avoid any additional negative visual impacts and we would advise that it should be no wider than the current proposed width of 2.5m.

Paragraph 21.1 of the current DVMWHS Management plan (2020-25) encourages local planning authorities to insist that a Heritage Impact Assessment should be produced, in accordance with ICOMOS guidance, for all proposals that are over 10 dwellings and/or ½ a hectare. A very basic measurement of the scheme indicates that the proposed development has a total area of approximately 0.4925 hectares (i.e. 1970m x 2.5m). Although this is substantially lower than the threshold in para 21.1, the nuance of the proposed development is its length which, in my opinion, has the potential to have more far reaching impacts. Therefore, in this particular instance we would recommend that a HIA is undertaken to help address this concern, allowing a better understanding of its potential impact.

It is also worth mentioning that the recommendation in para 8.2.1 of the supporting HS to enhance a small culvert/bridge, taking the current footpath over a stream, is supported given that it is likely that this structure is contemporary to some of the Darley Abbey Mills buildings. Provided that further investigations reveal that it bears some relationship to the WHS, and that any interpretation is done to a high standard of design, then this has the potential to further improve our understanding of the WHS.

Whilst the DVMWHS Partnership holds no objection to the proposed development in principle, we would advise that the above points be addressed to help mitigate any adverse visual impacts that may be caused through the introduction of the new cycleway. Provided the recommendations in this consultation are taken on board it is anticipated that the proposed development should only have a very small to negligible adverse impact on the setting of the WHS. Any harm should be outweighed by the benefits brought through improved access and better interpretation of the arrested rural setting of this part of the WHS.

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.