

Review of (Public Pack)Derbyshire Dales Local Plan - Settlement Hierarchy Agenda Supplement for Local Plan Committee, 08.10.2025

Darley Dale Town Council (DDTC) have serious concerns over its potential over-development, loss of landscape and character and being coalesced with Matlock. Part of that concern relates to its categorisation as a Tier 2 settlement in the settlement hierarchy and the potentially higher associated allocation of new housing.

On that basis the Town Council reviewed the October 2025 settlement hierarchy review carried out by Derbyshire Dales District Council (DDDC), carried out by DDDC in preparation for the Local Plan review to be performed in 2026. This document reports DDTC's findings.

Trying to understand the 3,775 population figure, Table 2 page 20

Based on cross-referencing available evidence and common practices in UK local plan settlement hierarchies:

It appears to be a built-up area (BUA) or settlement-defined estimate rather than the full civil parish population. Darley Dale is an "amalgam" of smaller component areas (e.g., Darley Hillside, Churchtown, Two Dales, Upper/Lower Hackney, Farley), and we understand that councils often use ONS-defined "built-up area subdivisions" or custom GIS boundary adjustments to exclude rural fringes/parish outliers. The full Darley Dale parish (ONS 2021: 5,787) includes some dispersed rural elements, so a core settlement figure could be lower.

- The 2016 Settlement Hierarchy Assessment used adjusted 2011 Census data (~5,125), which was already below the raw parish figure (~5,413) due to such boundary tailoring.
- A similar downward adjustment for 2021/updated data could yield a lower number, but 3,775 represents a substantial drop (~35% from ONS 5,787), which is not explained by census trends (the area saw modest growth).

In local planning contexts like settlement hierarchies, we understand that councils often use BUA figures (or custom boundary adjustments) to reflect the compact, functional core of a settlement for scoring purposes, excluding outlying hamlets or non-contiguous parts.

Key Evidence and Comparison

Darley Dale example:

- Full parish usual residents (ONS 2021 Census): 5,787.
- Council estimate in Table 2: 3,775 (rounded to nearest 25).

This is a significant downward adjustment (~35% reduction), likely to exclude dispersed rural elements, outlying parts of the amalgam (e.g., fringes of Farley, Upper/Lower Hackney, or non-core Two Dales areas), and focus on the contiguous built-up core along the A6 corridor.

- For reference, the ONS 2021 BUA for Darley Dale (a separate, predefined compact area) is 3,996 — close to the council's 3,775 but not identical. The council figure isn't directly the BUA; it's parish-based with boundary-specific tweaks.

Consistency across Table 2 on p20:

- The same methodology applies to **all** settlements in Table 2 — not just Darley Dale. The report does not indicate exceptions; it describes a uniform process for the assessed lower-tier settlements (Tiers 3–5 focus, with higher tiers like Darley Dale noted but not re-scored in detail).

In short, **Darley Dale is not an exception** in the page 20 table — the 3,775 (and all other Table 2 figures) follow the stated parish-based, geography-adjusted, rounded methodology. The lower figure for Darley Dale simply reflects a more substantial adjustment due to its parish containing significant non-settlement rural land compared to more compact villages.

Population Figure Used in the Adopted Local Plan 2017

In the **Adopted Derbyshire Dales Local Plan (December 2017)** and its core evidence base (June 2016 Settlement Hierarchy Assessment), Darley Dale's population was consistently quoted as **approximately 5,000 – 5,125 residents**.

Exact References:

1. Settlement Hierarchy Assessment (June 2016 – CD43)

- This is the official evidence document that justified Darley Dale's Tier 2 status.
- Page 7 & Table 2: Darley Dale population = **5,125** (adjusted 2011 Census figure for the amalgamated settlement).

This was **not** the full parish figure (which was 5,413 in 2011), but it was still a relatively high adjusted figure that included the main built-up areas along the A6 (Darley Hillside, Churchtown, Two Dales, Hackney, etc.).

2. Inspector's Report (November 2017)

- The Planning Inspector accepted the council's figure of ~5,000 and noted that Darley Dale's population was larger than Wirksworth (which had ~4,750 in the same assessment), yet was still placed in Tier 2 due to its amalgam nature.

There is a clear discrepancy.

- The **2016/2017 justification** for Darley Dale's Tier 2 status was based on a population of **~5,000–5,125**.
- The **October 2025 report** (Settlement Hierarchy Agenda Supplement for Local Plan Committee) now uses **3,775** - a drop of **more than 1,200 people** (roughly 24–25% lower).

This is a **significant change** in the population data used **for the same settlement**.

Important point: The council did **not** use the strict ONS Built-up Area (BUA) figure (~3,996 in 2021) in 2017 either - they used a higher adjusted figure **that supported Tier 2**. The 3,775 in 2025 is therefore the **lowest estimate ever used** for Darley Dale in the Local Plan process.

Summary of Consistency

- Both the 2017 Adopted Plan (**~5,000**) and the 2016 evidence (**5,125**) use a **higher adjusted figure** aligned with the functional amalgam/core settlement area - **not** the strict ONS Built-up Area (BUA) (~3,874 in 2011) or full parish total.
- This is **inconsistent** with the 2025 report's **3,775** (adjusted 2021 parish-based, more restrictive boundary), which is ~24–26% lower than the figures that originally justified Tier 2.
- No references in the 2017 documents use anything close to 3,775 or a strict BUA equivalent; the higher ~5,000/5,125 supported its self-containment and sustainability arguments.
- **There are no comparable discrepancies** in the other towns or villages listed in the Derbyshire Dales settlement hierarchy when comparing the 2016/2017 figures (used to establish/maintain tiers) to the 2025 adjusted estimates in Table 2 (September 2025 Settlement Hierarchy Review Report).

The key pattern is:

- **Darley Dale stands out** as the only settlement with a substantial downward adjustment in the 2025 report (from ~5,000–5,125 in 2016/2017 to 3,775 in 2025, a ~24–26% drop).

- For **all other** settlements (Tiers 1, 3–5), the 2025 estimates are generally consistent with (or only modestly lower/higher than) the adjusted figures used in the 2016 assessment and 2017 adoption. Changes are small, often within 5–15% (typical for census updates, boundary tweaks, or rounding), and do not represent a material reduction that could challenge tier status.

Why No Comparable Discrepancies Elsewhere?

- **Higher-tier settlements** (Tiers 1–2): Only Darley Dale shows a sharp reduction. Market towns (Tier 1) show growth or stability, consistent with their strategic role.
- **Lower-tier settlements** (Tiers 3–5): Adjustments are smaller and often **upward** (reflecting 2011–2021 growth in places like Doveridge, Brailsford). Downward changes (e.g., Cromford -3.8%) are trivial and within expected census/rounding variance.
- The 2025 methodology (adjusted 2021 parish data to settlement geography) is applied uniformly, but **Darley Dale's parish** has more extensive rural/dispersed elements (amalgam fringes), allowing for a larger exclusion in the adjustment. Other settlements are more compact, so adjustments are proportionally smaller.

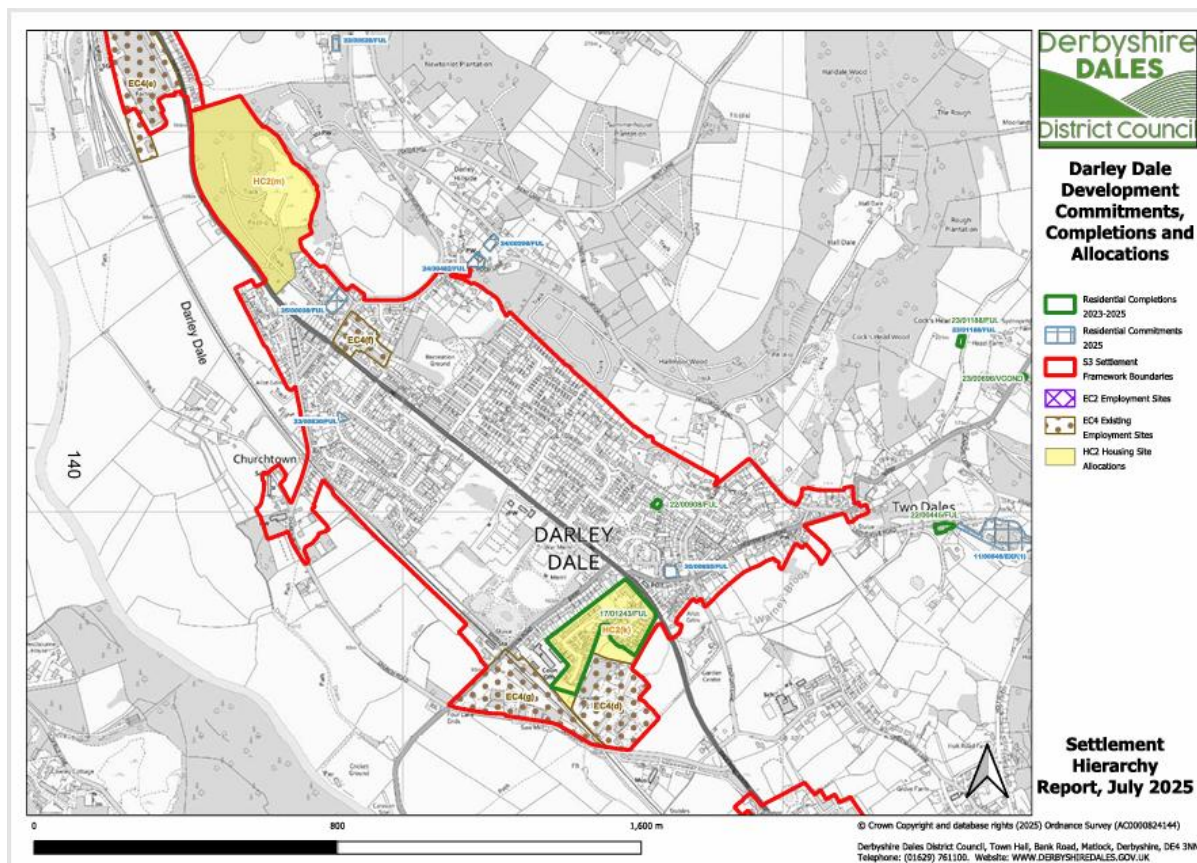
Implications for Potential Tier Status Reduction

- The **Darley Dale-specific drop** (~1,225–1,350 fewer people than justified Tier 2 in 2017) is unique and could be **challenged as inconsistent methodology** or selective boundary tightening.
- No similar "trigger" exists elsewhere — other settlements' figures remain broadly aligned with prior evidence, so no equivalent basis for re-tiering arguments.

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Map of Darley Dale Settlement Boundary

(Settlement Hierarchy Agenda Supplement for Local Plan Committee, Page 140)



This map with S3 Settlement Framework **Boundary shown in red**, probably explains the 3775 population figure as it implies the ONS BUA theory, excluding the fringe settlements (eg; Two Dales, Hackney) and concentrates on the serviceable and self-containment area of the settlement, the A6 corridor.

The map on page 140 appears to illustrate a **tighter, more restrictive boundary** for Darley Dale in the updated hierarchy evidence — deliberately excluding peripheral components like Two Dales and Hackney. This aligns with the report's population adjustment to **3,775** (adjusted 2021 parish data trimmed to match this core geography).

- If the council uses this narrower boundary to justify a lower population estimate (and to avoid reassessing Tier 2 status based on 'services' alone), **logical consistency** requires applying the **same boundary** to control future housing allocations and permissions.
- Continuing to allow housing outside this boundary (e.g., in excluded areas like Two Dales or Hackney) would undermine the report's own evidence: it would inflate effective population/sustainability claims while contradicting the map's definition of the "settlement" for hierarchy scoring.

Why This Boundary Matters for Housing

Under the adopted 2017 Local Plan (and standard UK planning practice), **Policy S3: Development Within Defined Settlement Boundaries** limits most new development (including housing) to **within the defined settlement boundaries** for Tier 1–3 settlements like Darley Dale. These boundaries are shown on the **Policies Maps** (Inset 1 for Darley Dale in the 2017 plan) and are intended to focus growth on the built-up core to promote sustainability, reduce sprawl, and protect countryside.

- **Policy S3** states: "Within the defined settlement development boundaries (Policy S2), planning permission will be granted for development where..." (followed by criteria on scale, design, access, etc.). Outside these boundaries, development is restricted (Policy S4: Development in the Countryside).
- The boundaries are **not** automatically the full civil parish or ONS Built-up Area (BUA); they are **council-defined** to reflect the functional settlement for planning purposes.

Practical Expectations in the Emerging Local Plan

The revised Local Plan will update or retain settlement boundaries via **Policies Maps** or a similar mechanism.

If the 2025 hierarchy evidence relies on this tighter boundary for Darley Dale's scoring, future housing proposals should be **directed primarily within it to**:

- Maintain self-containment and service viability without over-extending the amalgam.
- Avoid sprawl into countryside or less sustainable fringes.
- Align with NPPF sustainability principles (directing development to defined, accessible cores).

Exceptions could still apply (e.g., rural exception sites for affordable housing, conversions, or strategic allocations if justified), but **general housing growth** (e.g., market dwellings) would logically be confined to the mapped core to match the evidence base.

The Settlement Hierarchy document prioritizes ongoing strength in functional criteria (shops/services/facilities + sustainable transport access) as sufficient to keep Tier 1/2 status locked in, without needing a full re-score like the lower tiers (3–5) get in the long document.

How This Revised Boundary Affects Tier 2 Status

It reinforces Darley Dale as '**singled out**' in a protective way — the council treats it (and the Tier 1 market towns) as a distinct category where services/transport sustainability alone "continues to suggest" top-tier status.

No reassessment means no fresh scoring of population size, employment, or self-containment thresholds - even though these were key in the 2016 justification (e.g., ~5,000 residents + amalgam role). The 2025 report's lower adjusted population (3,775) in Table 2 is presented but **not used to trigger a review**, so the exclusion effectively **insulates Darley Dale** from any downward pressure from quantitative changes.

- This could hinder a direct challenge to Tier 2 status on population discrepancy - arguing the drop from ~5,000 (2017) to 3,775 (2025) should prompt reassessment is harder because the council explicitly says services/transport are unchanged/strong enough to maintain status **without re-evaluating other factors**. The methodology is multi-criteria in theory, but in practice, they applied a services-first threshold for higher tiers.

The page 140 map's exclusion of Two Dales/Hackney explains the population drop but **undermines** the 2016 "amalgam" rationale that in part elevated Darley Dale to Tier 2.

- If the council defines the functional settlement boundary more narrowly now, DDTC argues that this reduces self-containment/sphere of influence (fewer residents to support services), justifying as a minimum, either a **Tier 3 review** or **capped housing growth** within the new core boundary.

Further Misnomers in Tier 2

Employment Opportunities

Part of the argument for Tier 2 status is the strength of employment opportunities that in turn drive increased demand for housing. Molyneux Business Park was specifically listed as a 'major employer in the area'.

- The owners of Molyneux Business Park (Mr E. Byam-Cook & Ms J. Lloyd) suggested when asked in March 2026 that **employment numbers** within the businesses renting space have either been **static** over the last 4 years, **or declined** whereby the number of Companies has remained more or less static but the number of employees per let have reduced.
- Forged Solutions continue to grow in employee numbers but as the employment numbers are pulled from group accounts with 5 group member companies it is **not possible to apportion** exact numbers to new **jobs in Darley Dale** as the group accounts don't show site specific details.

- The Council in Matlock provide a significant number of commuting employees from Darley Dale but the upcoming Local Government Reorganisation is expected to reduce numbers significantly

The sustainability and self-containment of employment within Darley Dale is therefore not as buoyant as the reports suggest and expect, potentially putting downward numbers on expected housing levels to support the Darley Dale jobs, rather than increase them.

In March 2026 DDTC carried out a short survey of buyers of new houses on the 3 most recent new housing developments along the A6 corridor, Boden Close, Whitworth Park and Normanhurst Park. The survey was designed to test DD's Tier 2 self-containment position by asking if new residents worked in DD, and if they travelled to work by foot. Only 15% work in DD and 4% walk to and from work. The survey showed 50% worked outside DD and the balance of 35% are retired. Of those that did not work in DD, 63% used a car to travel to and from their place of work.

Transport Links

DD has regular bus services to Matlock, Bakewell and Sheffield but none to the nearest retail parks and chain stores in Chesterfield. It has no rail service other than a volunteer run heritage railway that runs infrequently between Northwood and Matlock. The A6 road runs through Darley Dale but has been plagued by roadworks in recent years and suffers from congestion caused by regular pooling/ flooding.

With no rail service and limited direct bus routes to larger shopping areas, connectivity to and from DD is limited.

Potential Challenge to Tier 2 Settlement Status or Housing Quota

This boundary tightening explains the population drop but creates a vulnerability: if the council later proposes housing allocations or permissions **outside** this map (e.g., extending into Two Dales/Hackney fringes), it could be challenged as inconsistent with their own hierarchy evidence. In consultation, DDTC would argue:

"The boundary on page 140 excludes key amalgam components and justifies the lower population – creating both an opening to challenge Tier 2 status and that housing should be strictly limited to this core to ensure consistency and prevent unsustainable expansion."

We believe that this strengthens DDTC's case for reducing Darley Dale's housing quota or capping growth, as the functional "settlement" is now defined more narrowly than in 2017.

Summary

Darley Dale's tier 2 status within the DDDC's Derbyshire Dales Settlement Hierarchy in 2016 was based on its parish population of around 5000, its services (primary school, post office etc), its connectivity (A6 and buses) and its employment opportunities.

In 2025 a DDDC Settlement Hierarchy review reaffirmed DD's tier 2 status confirming it as a 'service centre' which it decided hadn't changed since its original designation and therefore no reassessment was necessary. All Tier 3 and higher settlements were reassessed. It cited Molyneux Business Park as a major employer which does not stand up to scrutiny.

At the same time DDDC considered DD's boundary to be just the built-up area along the A6 and in the reduced area dropped the population to around 3800. DD is the ONLY settlement in Derbyshire Dales that has had its population decreased in the 2025 review.

Policies dictate that new housing developments are confined to within settlement boundaries. But DD still retains a Tier 2 designation and with it, holds an expectation of a higher requirement for new house building compared to higher Tier settlements.

The owners of Molyneux Business Park have confirmed that the overall number of employed people in the various companies on site has not grown in the last 4 years. Council worker numbers in Matlock will be reduced under the new local government reorganisation. Only Forged Solutions had increasing employee numbers over the last 4 years but by an unknown figure, so the employment component of DD's is not as secure as a Tier 2 designation suggests/ requires.

DDTC believe, based on the evidence in this Settlement Hierarchy review that DD's treatment and position is extraordinary.

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Formal Request for Reassessment of Darley Dale's Tier 2 Settlement Hierarchy Status in the Emerging Local Plan (2020–2045)

Darley Dale Town Council therefore formally requests a **full reassessment** of Darley Dale's Tier 2 (Local Service Centre) status under Policy S2 of the Adopted 2017 Local Plan, and its continued designation in the emerging revised Local Plan.

1. Original Justification for Tier 2 Status (2016/2017)

Darley Dale was singled out as the sole Tier 2 settlement in the June 2016 Settlement Hierarchy Assessment (CD43) and the Adopted 2017 Local Plan on the basis of a multi-criteria scoring system. Key evidence included:

- Adjusted population of **5,125** (2016 CD43) / approximately **5,000** residents (Adopted Plan, para 3.10).
- Strong amalgamated role (Darley Hillside, Churchtown, Two Dales, Upper/Lower Hackney, Farley) providing self-containment.
- Overall score of **37 points** (Economic 18 + Social 19) — significantly higher than the best Tier 3 settlement (Cromford at 28).

This justified Darley Dale's unique Tier 2 position to support additional housing and jobs while enhancing sustainability (Policy S2 supporting text).

2. Material Changes in the 2025 Evidence Base

The September 2025 Settlement Hierarchy Review Report (Table 2, p.20) now estimates Darley Dale's population at **3,775** — a **24–26% reduction** from the 2016/2017 figures. This figure is derived from 2021 Census parish data adjusted to a **tighter settlement boundary** (shown on p.140 of the report), which excludes key amalgam components such as Two Dales and Hackney. The new estimate aligns closely with the ONS 2021 Built-up Area figure of 3,996 for the compact core.

3. Reduced Local Employment Opportunities and Self-Containment

Employment data further weakens the original self-containment rationale:

- Forged Solutions' reported 444 employees cover 5 sites (3 UK, 2 USA) — any increase is not localised or wholly apportioned to Darley Dale.
- Ecobat lies outside the settlement boundary and is a commutable site.
- Molyneux Business Park owners confirmed in March 2026 that the number of renting companies has remained roughly stable in the last 3 years, but employee numbers per business have shrunk; they state they would not consider themselves a major employer in Darley Dale.

In addition, the expected Local Government Reorganisation (LGR) job losses at Matlock County Hall (a major proximity employer for Darley Dale commuters) will further reduce accessible local employment opportunities.

4. Hypothetical Re-Score Using Original 2016 Methodology

Applying the same CD43 scoring system to 2025 data produces the following result:

- Economic score: reduced from 18 to **7** (fewer businesses inside the tighter boundary + no major employer + diminished Matlock proximity due to LGR).
- Social score: unchanged at **19** (services and transport remain as stated).
- **Overall score: 26** (down from 37).

This places Darley Dale **below** the strongest 2016 Tier 3 settlement (Cromford = 28) and well below its original Tier 2 threshold.

5. Environmental and Sustainability Implications

With reduced local employment inside the new boundary, residents are increasingly likely to either work from home with occasional office travel or commute daily. This pattern carries clear environmental costs: higher fuel consumption and carbon emissions, elevated traffic volumes on the A6 and local roads, greater road wear and infrastructure strain, and increased air pollution and congestion.

These impacts directly undermine the settlement's ability to achieve true self-containment and conflict with NPPF sustainability objectives.

6. Requirement for a Robust and Sound Evidence Base

The National Planning Policy Framework (NPPF) is clear that **all policies must be underpinned by relevant and up-to-date evidence** (Paragraph 32). A Local Plan can only be found "sound" at examination if it is positively prepared, justified, effective and consistent with national policy. The current evidence base for Darley Dale's Tier 2 status is neither relevant nor up-to-date: it continues to rely on 2016/2017 population, boundary and self-containment assumptions that have been materially overtaken by the 2025 data.

Failure to undertake a full reassessment of Darley Dale therefore risks rendering the emerging Local Plan unsound. An inconsistent or selective evidence base that ignores significant changes in population, settlement geography, local employment and commuting patterns would leave the Plan vulnerable to challenge at examination and could undermine its overall robustness.

7. Request for Reassessment

In light of the above, Darley Dale Town Council formally request that the District Council:

1. Undertake a **full reassessment** of Darley Dale using the original multi-criteria CD43 methodology, incorporating the 2025 population figure, redefined boundary, updated employment data and LGR impacts.
2. Reconsider Darley Dale's Tier 2 status (potentially downgrading to Tier 3) and limit future housing allocations to the new core boundary shown on p.140 as per policy.
3. Ensure consistency between the evidence base and the revised Local Plan before the draft consultation stage.

Date: **2nd April 2026**

By: **Cllr D Chapman. Darley Dale Town Council**