

Formal request by Darley Dale Town Council to reassess the drafting of policy PD10 to fully protect the Hackney hillside against development.

Key Issues

The current wording and mapping of Policy PD10 (Matlock to Darley Dale A6 Corridor) in the adopted 2017 Local Plan are inconsistent with the policy's own objectives. The most prominent and defining landscape feature in the Derwent Valley – the open Hackney hillside – lies **outside** the designated PD10 boundary on the Policies Map.

This omission:

- Directly contradicts the 2015 Derbyshire Dales Strategic Landscape Sensitivity Study (high sensitivity for visual coalescence prevention and Peak District National Park setting).
- Undermines the spatial vision (S7) and the commitment to maintain settlement separation along the A6 corridor.
- Fails the tests of soundness under the NPPF (paras 31 and 35 – justified by evidence and effective in delivering plan objectives).

The opportunity to correct this critical gap exists now, ahead of the 8 April 2026 Local Plan Review Committee meeting and Regulation 19. Without explicit protection, the emerging plan risks being found unsound at examination.

Darley Dale Town Council therefore formally requests that the Hackney hillside receives **full and explicit protection** in the revised Local Plan through one or more of the following:

- extension of the PD10 boundary and adding more explicit wording,
- strategic open space designation, or
- identification as a valued landscape under PD5.

What Policy PD10 says and its perceived meaning.

The policy wording in the current 2017 adopted Local Plan is;

PD10 Matlock to Darley Dale A6 Corridor

In order to safeguard the intrinsic character and quality of the open spaces through the Derwent valley between Matlock and Darley Dale and to prevent the further coalescence of the settlements of Matlock and Darley Dale, the District Council will

resist development proposals which threaten the open spaces identified on the policies map unless:

- a) The development is required for the purpose of agriculture, forestry or outdoor recreation, and
- b) The development does not have an adverse impact upon the character of the area including views into and out from the Derwent Valley

Policy map attached.

Supporting paragraphs 5.62–5.63 confirm that this is grounded in the Derbyshire Dales Strategic Landscape Sensitivity Study (August 2015), which identified high-sensitivity land that prevents *visual* coalescence and remains undeveloped (noting that physical coalescence has already occurred in places such as Matlock/Upper Hackney and Darley Dale/Two Dales, but open space and vegetation along the A6 maintain perceived separation). The study also highlights the area’s proximity to the Peak District National Park setting and its visual prominence.

What is wrong with the policy as currently written and mapped?

The current PD10 boundary on the Policies Map (Inset 1 – Darley Dale / Inset 2 – Matlock) is demonstrably inconsistent with the policy’s own stated purposes. The green hillside between Upper and Lower Hackney is the most prominent and defining landscape feature in views from the River Derwent (see attached photo) - a key public recreational and visual asset within the Derwent Valley. Yet this hillside lies outside the designated PD10 open-space boundary. The policy map therefore fails to capture the very element that contributes most directly to the “intrinsic character and quality of the open spaces through the Derwent Valley” and the “views into and out from the Derwent Valley” that PD10 purports to protect. This mismatch is not a minor technicality; it undermines the effectiveness of the policy in delivering its objectives.

Policy S7 (Matlock/Wirksworth/Darley Dale Development Area Strategy) and the overall spatial vision nevertheless require maintenance of the strategic gap and protection of the A6 corridor’s character precisely to preserve the distinct identity of Darley Dale and avoid coalescence with Matlock. Any site allocations or development boundaries in the revised plan must be *justified by evidence* (NPPF para 31) and *effective* in delivering the plan’s *objectives* (NPPF para 35). The current drafting does not ensure this. Extending (or replicating) PD10-style protection to the Hackney hillside is therefore essential for soundness. The classified adjacent land is high sensitivity on visual-coalescence and National Park setting grounds; the same reasoning applies directly to this visually dominant slope.

Views and visual amenity: PD10 itself identifies “views into and out from the Derwent Valley” as a key consideration yet does not specify the most distinctive visual aspect.

The River Derwent is a public vantage point of high value (recreational route, green infrastructure corridor under PD4, and within/adjacent to the Derwent Valley Mills World Heritage Site buffer). Harm to the prominent hillside view would be an adverse impact on the character of the area — directly contrary to both PD10(b) and the wider NPPF requirement for development to be sympathetic to local character and landscape (NPPF paras 135, 174–176).

Coalescence (visual and perceptual): Even if physical merging is constrained by topography, development on the unprotected open hillside would erode the *perceived* separation between Matlock, Upper Hackney and Lower Hackney/Darley Dale. The 2015 Study explicitly recognises that visual coalescence prevention is a high-sensitivity factor. This engages the spatial strategy in S7 and the vision’s commitment to maintaining settlement integrity along the A6 corridor.

Countryside protection (S4) and Green Infrastructure (PD4): Land outside settlement boundaries is subject to strict control. The hillside contributes to the green infrastructure network, biodiversity (PD3), and the setting of the Peak District National Park — all material considerations that would weigh against allocation if fully protected.

Consistency with national policy: The NPPF requires local plans to identify and protect “valued landscapes” (even if not statutorily designated) and to prevent the merging of settlements where this would harm character. A plan, current or revised that ignored the most visible and sensitive part of the very corridor that PD10 was designed to protect would be neither justified nor effective.

What changes are justified and required for effectiveness?

That the Hackney hillside receives explicit protection in the revised Local Plan — whether by extending the PD10 boundary, designating it as a strategic open space, or identifying it as a valued landscape under PD5.

The current policy map boundary is an acknowledged gap that fails to deliver the policy’s intent. Protecting it is not anti-development; it is sound, plan-led planning that respects the landscape evidence base, the adopted development plan, and national policy.

Crucially, we would note that the A6 ‘*corridor*’ is not defined as a rigid physical boundary on the Policies Map but as a visionary and spatial concept rooted in the draft Spatial Vision. The current PD10 boundary on the adopted Policies Map therefore should not/ cannot be treated as the definitive limit of protection; it must be aligned with the broader spatial intent to maintain strategic open spaces and settlement separation.

Has the current policy as written, been effective?

Despite the overwhelming evidence that the views to and from the River Derwent are valued landscapes and the necessity to prevent coalescence essential, Darley Dale Town Council understands that **the policy has never been used**. Three developments, Boden Close, Whitworth Dale and Normanhurst Park that are covered by the policy map, along the A6 corridor and creating visual harm to the landscape views of the green spaces adjacent to the A6, were allowed without a PD10 challenge. All three were post the 2017 Local Plan adoption with PD10 in force.

What is the current situation?

The opportunity to change PD10 to provide clarity and protection of this hillside ahead of Regulation 19 is upon us **now**. A crucial Local Plan Review Committee meeting is scheduled for 8th April at which revisions to policy wording will be approved for use in the emerging plan. Decisions taken at that meeting need to use the updated draft of PD10

As it stands when this document was being written, it is both confusing and of concern to Darley Dale Town Council that the papers released ahead of the 8th April meeting list PD10 as a policy that will be changed, but is the only policy in the entire list that does not have its proposed changes publicised in advance.

Reading between the lines

In its District Council's preparatory work ahead of the Local Plan review 2026, Darley Dale Town Council were concerned over the continued designation as a Tier 2 settlement with population and settlement boundary aligned close to the built up area along the A6, and consequently raised a formal request on 4th April 2026 for a reassessment to be carried out.

The potential consequences Darley Dale Town Council predict by retaining Tier 2 status with a BUA boundary and reduced population figure are:

1. The hillside is treated as "countryside" rather than an urban extension

- The current settlement boundary is drawn tightly around the existing built-up area of Darley Dale / Lower Hackney. This is the legal/ policy classification of the settlement area for development control purposes.
- The Hackney hillside and Upper Hackney sits **outside** that boundary.
- Under Policy S4 (Development in the Countryside), land outside settlement boundaries is subject to strict control. Development is only allowed in very limited

circumstances (agriculture, forestry, rural exception affordable housing, or where “very special circumstances” are demonstrated).

- By keeping the boundary tight, DDDC can classify the hillside as countryside land. This allows the District Council to argue that releasing it is **not** an ‘urban extension’ or erosion of the settlement limit, but a controlled release of countryside to meet housing need.

2. It avoids stronger urban policy tests

- If the boundary were redrawn to include the hillside, the site would become an **urban extension**. It would then be assessed under normal settlement policies, making it harder to justify large-scale development without triggering full landscape, coalescence, and character assessments inside the settlement.
- With the current tight boundary, DDDC can present the hillside as a **greenfield countryside site** that can be allocated under the spatial strategy or site selection methodology as a “sustainable extension” while still technically complying with countryside policy wording.

3. It weakens coalescence and PD10 arguments

- The draft Spatial Vision and PD10 require “appropriate separation between settlements, in particular between Matlock and Darley Dale along the A6 corridor”.
- By keeping the hillside outside the defined settlement boundary, DDDC can argue that development there does **not** constitute coalescence **within** Darley Dale itself — it is simply development in the countryside between two settlements.
- This makes visual and perceptual coalescence easier to downplay in Sustainability Appraisal and site selection work.

4. It aligns with the lower population figure from the October 2025 Settlement Hierarchy Review

- The reduced population figure makes Darley Dale appear smaller and more “under-provided” for a Tier 2 settlement.
- A tight boundary + lower population figure allows the District Council to say: “We need to release additional land to fulfil Darley Dale’s Tier 2 role” without having to redraw the boundary and admit the current one is out of date.
- This combination makes the hillside look like the “most appropriate” site to meet the elevated housing target (575 dpa district-wide).

5. Practical effect in the Site Selection Methodology (8 April 2026 report)

- Sites are scored more favourably if they are “within or adjacent to existing settlements”.
- A tight boundary makes the hillside technically “adjacent” rather than “within”. This lets it pass sequential tests and score well without forcing a boundary review.

In summary:

The tighter settlement boundary could be interpreted as a deliberate **policy device**. It keeps the Hackney hillside classified as countryside (S4), avoids redrawing the boundary (which would trigger stronger urban policy scrutiny), weakens PD10 coalescence arguments, and gives DDDC the flexibility to allocate the site to help meet the government’s housing numbers while still claiming the plan is consistent with the settlement hierarchy and Spatial Vision. No precedents exist for the use of PD10 in refusing planning applications in green spaces along the A6 corridor – on the contrary, it has never been used.

This is why Darley Dale Town Council believes that it is reasonable to conclude whether the evidence base (population figure, boundary, and PD10 wording) is being shaped to facilitate development on the hillside rather than to reflect genuine planning needs.

What happens next?

Darley Dale Town Council believe that the original concept of a protection of the green spaces along the A6 corridor through Darley Dale, when viewed to or from the River Derwent, and the prevention of coalescence of Matlock into Darley Dale was correctly envisioned but the exclusion of the Hackney hillside from the policy map could prove to be a critical error.

The possible scenario presented in this document could extend to Darley Dale becoming a suburb of Matlock. Statements in the papers ahead of the April 8th Committee meeting show however that these core requirements for the emerging plan appear to remain in place.

Darley Dale Town Council would therefore like raise the following formal request to be responded to and entered into the emerging plan’s evidence base, as follows:

Formal Request from Darley Dale Town Council to Derbyshire Dales District Council to Protect the Hackney Hillside from Development Before Reg 19 in the New Local Plan

Darley Dale Town Council is of the opinion that the Hackney hillside is the most dominant green space when viewed from the River Derwent and provides separation between Matlock and the Hackneys, and between Upper and Lower Hackney.

This visual and spatial separation plays a vital role in the perception of separation between Matlock and Darley Dale when travelling along the A6 corridor and has been recognised as such since the early 2000's and protected by policy accordingly.

As the District Council tries to find sufficient land to achieve the higher housing targets set by the current government, and with land within Darley Dale at a premium, there is a possibility that the Hackney hillside could, albeit as a last resort, be used to help fill the housing quota. Darley Dale Town Council seeks to embed protection(s) against that in the emerging/ new Local Plan, before Regulation 19, and requests;

- 1) Extending or replicating robust protection to the Hackney hillside by
 - a) Revise the wording of PD10 to strengthen the protection it is intended to offer (eg: "The open spaces identified on the Policies Map, including the entire Hackney hillside between Upper and Lower Hackney as shown on [attached plan], shall be protected..." Or a new criterion under PD10(b) that explicitly references "the prominent hillside views from the River Derwent.")
 - b) Revise the PD10 policy map boundary to encompass the entire Hackney hillside
 - c) Give it strategic open space designation
 - d) Give it explicit identification as a valued landscape under PD5
- 2) Giving full weight to preventing both physical and visual/ perceptual coalescence between Matlock and Darley Dale specifically by specifying the Hackney hillside, and protecting the prominent views from the River Derwent.

Without a change, the emerging plan risks being found unsound at examination on the grounds that it is neither justified by the landscape evidence base nor effective in delivering the spatial vision and PD10 objectives (NPPF paragraphs 31 and 35)

Darley Dale Town Council wish to make it clear that whilst they remain committed to working constructively with the District Council to deliver sustainable development that meets genuine local needs, in the interest of both residents and visitors to Darley Dale, it cannot support the possibility of irreversible loss of the distinctive character and landscape setting that define Darley Dale and the Derwent Valley.

Date **7th April 2026**

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