

DARLEY DALE TOWN COUNCIL

# SHLAA281 — Stancliffe Quarry, Dale Road North, Darley Dale

## Detailed Assessment Review

RED Sewage Infrastructure | RED Biodiversity | RED Heritage | Minerals Constraint | Injunction on Access | Cliff Instability | Active Planning Applications in Abeyance

**Prepared by:** Darley Dale Town Council | **Date:** May 2026 | **For entry into:** DDDC Local Plan Evidence Base

## 1. Purpose and Scope

This document is submitted by Darley Dale Town Council (DDTC) as a formal evidence base analysis of the SHLAA281 Assessment Review Proforma contained in Appendix C of the Local Plan Committee Report dated 13 May 2026. It should be read alongside DDTC's SHLAA Darley Dale Assessment Review, DDTC's analyses of SHLAA911, SHLAA955, SHLAA1093, SHLAA1094, and DDTC's formal letter of objection to process failure dated 28 April 2026.

SHLAA281 — Stancliffe Quarry, Dale Road North — is a 10.85 hectare brownfield former quarry site. *It carries the largest concentration of serious constraint ratings of any Darley Dale SHLAA site.* The proforma records two RED ratings (biodiversity and heritage), a RED sewage infrastructure rating, multiple AMBER ratings, and a catalogue of unresolved site-specific constraints that have prevented the site from being developed despite being allocated in the current Local Plan since 2017. The proforma nonetheless classifies the site as Developable. DDTC identifies eight grounds on which this classification is unsound:

- Sewage infrastructure: RED — two Category 3 and 4 pollution points immediately downstream of the proposed connection; an acknowledged hydraulic network capacity constraint
- Biodiversity: RED — medium to high impact; loss of extensive broadleaved woodland; BNG requirements described as potentially very high and a possible constraint to viability
- Heritage: RED — harmful impact on the significance and setting of Stancliffe Hall (Grade II Listed) beyond the former quarry floor
- Access: an *injunction is in place* preventing stone removal via the only previously used access. The access cuts through a listed wall. Alternative access planning applications are undetermined and held in abeyance.
- Minerals: an extant minerals permission to extract sandstone runs until 21 February 2042 and the emerging Minerals Local Plan will continue to safeguard the sandstone resource. Development and mineral extraction are fundamentally incompatible.
- Cliff instability: the north-east quarry face is subject to stability issues requiring cliff stabilisation works whose cost is unquantified.
- Planning applications in abeyance: current planning applications are held in abeyance pending unresolved discussions between the developer and DDDC.
- Viability: AMBER — site viable only with mitigation measures; abnormal costs including cliff stabilisation are TBC and uncosted.

## 2. Site Overview

<b>SHLAA Reference</b>	SHLAA281 — Stancliffe Quarry, Dale Road North, Darley Dale, Matlock
<b>Site type</b>	Brownfield — former quarry and surrounding woodland
<b>Site area</b>	10.85 ha

<b>Proposed use</b>	Residential development
<b>Housing capacity</b>	80 dwellings (reduced from 100 dwellings allocated in adopted Local Plan)
<b>Delivery timescale</b>	0–5 years / 6–10 years (both recorded — inconsistency noted)
<b>Deliverability classification</b>	Developable (DDTC formally contests this)
<b>Current Local Plan status</b>	Allocated under Policy HC2(m) and DS3 — 100 dwellings. Within Settlement Development Boundary (Policy S2).
<b>Sewage infrastructure (STW)</b>	RED — HIGH impact. NORTHWOOD – DALE ROAD NORTH (CSO) and DARLEY DALE – FOUR LANE ENDS (Pumping Station). Two Category 3 and 4 pollution points immediately downstream.
<b>Biodiversity (DWT)</b>	RED — medium to high impact; loss of extensive broadleaved woodland; BNG 'could be very high'; possible constraint to viability
<b>Heritage (Conservation Officer)</b>	RED — development beyond quarry floor likely to result in harmful impact on significance and setting of Stancliffe Hall (Grade II Listed)
<b>Highway access</b>	GREEN in principle from A6 — BUT injunction in place preventing use of previous access; access cuts through Grade II listed wall; alternative access applications undetermined
<b>Landscape</b>	AMBER — moderate impact; TPO woodland wraps around site on three sides; visible from PDNP elevated viewpoints
<b>Contamination</b>	AMBER — possible high lead levels and other contaminants from quarrying
<b>Minerals constraint</b>	Extant minerals permission to extract sandstone — end date 21 February 2042; emerging Minerals Local Plan will safeguard sandstone resource
<b>Cliff instability</b>	North-east quarry face subject to stability issues; cliff stabilisation works required; costs TBC
<b>Planning applications</b>	Current applications held in abeyance pending unresolved discussions with DDDC
<b>Viability</b>	AMBER — viable only with mitigation measures; abnormal costs including cliff stabilisation TBC

### 3. Issue One: Sewage Infrastructure — RED Rating with Active Downstream Pollution Points

#### 3.1 What STW says

The STW sewage infrastructure assessment produces the only **RED sewage rating** among all Darley Dale recommended SHLAA sites:

*"RED – Severn Trent has advised that the potential impact on sewerage infrastructure is high. Development may impact NORTHWOOD - DALE ROAD NORTH (Combined Sewer Overflow) and DARLEY DALE - FOUR LANE ENDS (Sewage Pumping Station). There are two pollution points (Category 3 and 4) immediately downstream of this location which would be impacted by this development. Based on a review of topography, it is anticipated a connection can be made into the existing system via gravity (Connection MH Ref: SK26644095)."*

This is the most serious sewage infrastructure rating in the entire Darley Dale SHLAA set, for the following reasons:

- The impact is rated HIGH — not medium or low. This is not a precautionary GREEN rating based on gravity connection achievability alone. STW has explicitly assessed the impact as high.
- Two pollution points are recorded immediately downstream — Category 3 and Category 4. Category 3 is a significant pollution incident; Category 4 is a serious pollution incident under the Environment Agency's Common Incident Classification Scheme. These are not potential future risks — they are documented, active pollution records at points immediately downstream of the proposed connection.
- Two separate infrastructure points are cited as impacted: NORTHWOOD – DALE ROAD NORTH (a Combined Sewer Overflow) and DARLEY DALE – FOUR LANE ENDS (a Sewage Pumping Station). The development would stress both.
- The Conclusion Summary acknowledges: 'Seven Trent has indicated that the development would have significant impact on the sewage infrastructure' — yet the overall conclusion is Developable. No mitigation mechanism, infrastructure upgrade commitment, or STW investment programme is identified.

### 3.2 The hydraulic capacity dimension

In addition to STW's RED assessment, the Environment Agency's AMBER physical constraints comment adds a further dimension:

*"They are situated on a Secondary Aquifer, and care should be taken to avoid the potential for pollution of the groundwater resource. All developments should connect to the existing foul mains drainage network. Development will need to ensure that there is available capacity within the receiving sewerage network and sewage treatment works. Developers and the Local Planning Authority should confirm available capacity with Severn Trent Water before allocating sites."*

This is a direct EA instruction that available capacity must be confirmed with STW before allocating the site. No such capacity confirmation has been obtained. DDTC has confirmed from a STW representative at a public engagement event in Matlock that the Darley Dale drainage network problems are caused by a hydraulic capacity constraint — not a blockage or maintenance issue. The EA's instruction to confirm capacity before allocation, combined with STW's own RED high-impact rating, means that SHLAA281 cannot properly be confirmed as an allocation until a Drainage Impact Assessment has been conducted and STW has formally confirmed that network upgrades will be delivered to accommodate the development.

Furthermore, the surface water assessment adds: 'AMBER – Severn Trent has advised that the potential impact on surface water sewerage is medium. Brownfield Site, adjacent surface water system enters combined system which is undesirable.' The entry of surface water into the combined sewer system is specifically flagged as undesirable — it is precisely this combined loading that causes CSOs to overflow more frequently. On an 80-dwelling brownfield development, surface water management via SuDS must be mandated and independently verified before allocation.

#### Formal Objection — Sewage Infrastructure

SHLAA281 is the only Darley Dale SHLAA site to receive a RED sewage infrastructure rating from STW. Two Category 3 and 4 pollution points are recorded immediately downstream. The EA has explicitly required that network capacity be confirmed with STW before the site is allocated. Neither has been done. DDTC formally requires:

1. A Drainage Impact Assessment specifically for SHLAA281, addressing the impact on NORTHWOOD – DALE ROAD NORTH (CSO) and DARLEY DALE – FOUR LANE ENDS (Pumping Station), and the two downstream pollution points.
2. A formal written capacity confirmation from STW before SHLAA281 is retained as an allocation, setting out what network upgrades are required, at whose cost, and to what committed timetable.
3. A surface water drainage strategy demonstrating that surface water from the development will not enter the combined sewer system, as required by STW's own AMBER surface water rating.

## 4. Issue Two: Biodiversity — RED Rating and a Threat to Viability

The Derbyshire Wildlife Trust assessment produces a RED environmental constraints rating and the ecological appraisal — described as the DWT's own further work beyond the initial assessment — reveals the site's biodiversity complexity:

*"RED - Derbyshire Wildlife Trust have advised development of the site would have a medium to high impact, including the loss of woodland and impact on protected species. Development is likely to result in the loss of extensive areas of broadleaved woodland as well possibly smaller areas of grassland and scrub. Biodiversity Net Gain requirements could be very high on this site as new woodland would need to be created and/or existing woodland significantly enhanced. This could pose a constraint to the extent and type of development that would be viable."*

The DWT further appraisal finds:

*"The site has potentially supports Habitats of Principal Importance, including lowland mixed deciduous woodland (high distinctiveness) and other habitats include other broad leaved woodland and neutral grassland/modified grassland, tall herb, ephemeral grassland and mixed scrub. The site is identified in the Local Nature Recovery Strategy as an area that could potentially support heath land vegetation."*

This RED biodiversity rating has three specific implications that the proforma fails to adequately address:

	Implication	Detail
1	<b>Lowland mixed deciduous woodland is a Habitat of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006.</b>	Development that results in the loss of a Section 41 habitat requires specific justification under the NPPF's biodiversity policies (paragraph 180). The proforma's Developable conclusion does not engage with this requirement. A site that requires loss of a nationally recognised important habitat cannot simply be classified as Developable on the basis of a pre-existing allocation.
2	<b>BNG requirements 'could be very high' and 'could pose a constraint to the extent and type of development that would be viable.'</b>	This is the DWT's own assessment — not DDTC's. DWT is saying that BNG on this site may be so demanding that it affects viability and developability. Yet the Viability Assessment records only 'AMBER — site viable with mitigation measures' without quantifying the BNG cost. Until a BNG assessment is conducted against the ecological baseline established by the DWT appraisal, the viability assessment is incomplete.

3	<p><b>The Local Nature Recovery Strategy identifies the site as potentially supporting heath land vegetation.</b></p>	<p>LNRS designation does not prevent development but creates a planning obligation to consider the site's potential contribution to nature recovery. An 80-dwelling development that removes LNRS-identified land requires a compensatory strategy that the proforma does not address.</p>
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The Landscape assessment adds that TPO woodland wraps around the boundaries of the site on three sides and that the site is 'visually screened' by large areas of protected woodland. The development of the site requires removal of this woodland — which is both TPO-protected and ecologically valued — in order to achieve the visual impact mitigation that the landscape assessment itself relies upon. This is internally contradictory: the mitigation depends on retaining what the development requires removing.

#### Formal Requirement — Biodiversity

4. A full BNG assessment must be conducted using the DWT's ecological appraisal as the baseline, quantifying the BNG requirement in metric units before any housing capacity or viability assessment is confirmed.
5. The viability assessment must be revised to incorporate the quantified BNG cost. If BNG requirements are as high as DWT's assessment indicates, the site's viability and the 80-dwelling capacity figure must be reconsidered.
6. A specific assessment of the Section 41 (NERC Act 2006) habitat loss — lowland mixed deciduous woodland — must be published, demonstrating compliance with NPPF paragraph 180, before the site is retained as an allocation.

## 5. Issue Three: Heritage — RED Conservation Officer Rating and the Stancliffe Hall Setting

The DDDC Conservation Officer assessment produces a **RED** heritage constraints rating:

*"RED - Derbyshire Dales District Council's Conservation Officer has noted that: Development is likely to result in harmful impact on the significance and setting of that part of the site beyond the former quarry. Development is likely to result in minimal impact on the significance / setting of the former quarry site and its relationship to Stancliffe Hall (approval for access through the listed wall, has previously been approved)."*

This **RED** heritage rating is both specific and significant. Stancliffe Hall is a Grade II Listed Building. Harm to the setting of a Grade II Listed Building is a material consideration of significant weight under NPPF paragraphs 205–208:

- Under NPPF paragraph 206, where a development proposal will lead to less than substantial harm to a designated heritage asset (including via harm to its setting), the harm must be weighed against the public benefits. The Conservation Officer has identified likely harmful impact — not possible or uncertain harm, but likely harm.
- Under NPPF paragraph 208, where the harm to a designated heritage asset is less than substantial, this harm must be clearly and convincingly justified. The proforma does not provide or reference any such justification. The Developable conclusion simply notes the constraint without resolving it.
- The Conclusion Summary notes: 'Development within the quarry site itself may not lead to harmful impacts on the historic setting of Stancliffe Hall, however development of the remaining part of the site is likely to result in harmful impacts on the identified significance of this land and

its relationship to Stancliffe Hall.' This means that only the quarry floor — a fraction of the 10.85 ha site — can be developed without heritage harm. The proforma does not recalculate the net developable area or the 80-dwelling capacity on this basis.

- The County Council Archaeologist has also noted AMBER constraints: the former Stancliffe Quarries (MDR9054) may include surviving elements of Sir Joseph Whitworth's 19th century rock gardens. A desk-based assessment and walkover survey are required before development.

There is a further access dimension within the heritage assessment. The Conclusion Summary notes that the access through the listed wall — the Cawdor Well boundary — has 'previously been approved' but has been subject to an injunction (see Section 6). The access point that has planning approval cuts through a Grade II listed structure. The injunction preventing its use for stone removal has not been lifted. Any residential access through this listed wall requires the injunction to be resolved and the heritage impact to be formally assessed as part of any planning application.

### Formal Requirement — Heritage

7. The net developable area and housing capacity of SHLAA281 must be recalculated to exclude all land beyond the quarry floor where the Conservation Officer has assessed harmful heritage impact. An 80-dwelling capacity figure based on the full 10.85 ha site cannot be sustained.
8. A heritage impact assessment (HIA) addressing the impact on the setting of Stancliffe Hall must be commissioned, published and entered into the evidence base before SHLAA281 is retained as an allocation.
9. The desk-based assessment and walkover survey required by the County Archaeologist must be conducted before allocation is confirmed.

## 6. Issue Four: Highway Access — An Injunction, a Listed Wall, and Applications Held in Abeyance

### 6.1 The access position

The Highways Authority rates access GREEN in principle from Dale Road North (A6), but the Conclusion Summary reveals a significantly more complex and unresolved access position:

*"However the site has been subject to an injunction preventing the removal of stone via an unauthorised access onto the A6. The access cuts through a Grade II listed wall. — alternative access planned to remove stone, and outstanding planning applications for access non determined due to lack of evidence."*

This passage requires careful analysis. Three separate access problems are in play simultaneously:

	Problem	Consequence
1	<b>An injunction is in place preventing stone removal via an access onto the A6.</b>	An injunction is a court order. It cannot be resolved by planning permission or SHLAA classification. It must be discharged by the court that issued it. Until the injunction is lifted or varied, this access point cannot lawfully be used. The proforma does not identify the court, the parties, or any process for resolution.
2	<b>The access point cuts through a</b>	A listed building consent was previously granted for access through the listed wall. However, that consent was for stone removal — not for residential

<p><b>Grade II listed wall (the boundary wall to the Stancliffe Hall grounds, including the Cawdor Well).</b></p>	<p>development access. A fresh listed building consent would be required for permanent residential access through a Grade II listed structure. This is a separate consent regime entirely and is not guaranteed.</p>
<p><b>3 Outstanding planning applications for access are undetermined due to lack of evidence — and current applications are held in abeyance.</b></p>	<p>Planning applications relating to the site are suspended pending unresolved discussions between the developer and DDDC. This is not a routine pending application. It is an application stalled because evidence is missing. This is precisely the situation that makes a Developable classification on a 0–10 year timescale unrealistic.</p>

## 6.2 The 0–5 year delivery timescale

The proforma records a delivery timescale of both '0–5 years' and '6–10 years' — an inconsistency that itself signals assessor uncertainty. But the 0–5 year timescale is not credible given the access position. Before development can commence, all of the following must occur:

- The injunction must be resolved by court process;
- Alternative access planning applications (currently unevidenced and in abeyance) must be determined;
- A new listed building consent must be obtained for any permanent access through the Grade II listed wall;
- The minerals constraint must be resolved (see Section 7);
- Cliff stabilisation works must be designed, costed, and executed;
- An outline planning application for 80 dwellings — currently pending — must be determined; and
- Biodiversity mitigation, contamination investigation, and archaeological survey must be completed.

The cumulative weight of these unresolved prerequisites makes a 0–5 year delivery entirely implausible. A 6–10 year timescale is itself optimistic. DDTC submits that SHLAA281 should be reclassified as Developable only on a 10+ year timescale pending resolution of the access, minerals, and heritage issues — and that the 80-dwelling capacity figure must be recalculated once the developable area is properly constrained.

### Formal Requirement — Highway Access

10. DDDC must confirm the current status of the injunction — the court, the parties, and any process for resolution — and publish this in the evidence base.
11. DDDC must confirm what alternative access route is proposed and why the outstanding planning applications are undetermined due to lack of evidence. The missing evidence must be identified and its provision timetabled.
12. The delivery timescale for SHLAA281 must be corrected to reflect the actual prerequisites for development commencement. A 0–5 year timescale is not credible and must be removed from the proforma.

## 7. Issue Five: Minerals — An Extant Permission Running to 2042 and Emerging Minerals Local Plan Safeguarding

The Conclusion Summary contains a minerals constraint of *exceptional significance* that the proforma's Developable conclusion does not adequately engage with:

*"Extant minerals permission to safeguard and extract mineral reserve on site, and discharge of conditions regarding the future extraction of the site, condition 3 end date 21/02/2042. Approved access road no longer available as an access route to remove remaining mineral reserve from the quarry. North east quarry face subject to stability issues. The current planning applications are held in abeyance pending discussions between the developer and Derbyshire Dales District Council. The emerging Minerals Local Plan will continue to safeguard all Carboniferous Limestone and it will also safeguard the sandstone resource, which covers Stancliffe Quarry."*

This is a highly material planning constraint that directly conflicts with the Developable classification:

- An extant minerals permission to extract sandstone runs until 21 February 2042 — 16 years from now. This is not a historic permission that has lapsed. It is a live, implementable permission. Planning authorities are required under the Planning Policy Framework for Minerals to protect mineral resources from sterilisation by other development.
- The emerging Minerals Local Plan will continue to safeguard the sandstone resource at Stancliffe Quarry. Mineral safeguarding in a Minerals Local Plan creates a presumption against non-mineral development within the safeguarded area. Housing allocation in a Local Plan for land covered by a Minerals Local Plan safeguarding policy requires a specific Minerals Assessment demonstrating that the mineral resource is not viable, that prior extraction is not feasible, or that the housing need outweighs the mineral safeguarding. None of these assessments appears in the SHLAA proforma.
- The approved access road for mineral extraction 'is no longer available.' This is directly connected to the injunction and access crisis described in Section 6. Without a viable access route for mineral extraction, the extant minerals permission cannot be implemented — but the permission remains live and the resource is still present. This creates a legal complexity between the minerals regime and the housing allocation that has not been resolved.
- Development and active mineral extraction are fundamentally incompatible on the same site. The north-east quarry face stability issues compound this: cliff stabilisation required for residential development may conflict with future mineral extraction from the same face.

### Critical Issue — Minerals Conflict

A housing allocation in the DDDC Local Plan for land that is simultaneously safeguarded in the emerging Derbyshire County Council Minerals Local Plan, and subject to an extant mineral extraction permission running to 2042, creates a direct conflict between two planning policy regimes. This conflict has not been resolved in the SHLAA proforma. Under the duty to cooperate, DDDC must engage with Derbyshire County Council as the Minerals Planning Authority before confirming any housing allocation on SHLAA281.

13. A Minerals Assessment must be conducted and published before SHLAA281 is confirmed as a housing allocation, demonstrating either that the mineral resource is not viable for extraction or that prior extraction is feasible and planned before housing development commences.
14. DDDC must formally consult Derbyshire County Council (as Minerals Planning Authority) on the proposed housing allocation and enter DCC's response into the Local Plan evidence base.

## 8. Issue Six: Cliff Instability, Abnormal Costs and Viability

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The Achievability Assessment records:

- Viability: AMBER — site viable with mitigation measures;
- Abnormal costs: AMBER — 'There are abnormal costs known, including cliff stabilisation works involved. Details, funding and costs are TBC.'

The AMBER viability rating and the TBC cliff stabilisation cost are directly linked. Cliff stabilisation of a quarry face is not a standard residential development cost. Depending on the height, condition and geology of the quarry face, it can range from hundreds of thousands to millions of pounds. The north-east quarry face is described as subject to stability issues — suggesting the instability is documented and material, not speculative.

DDTC submits that an Achievability Assessment that records abnormal costs as TBC cannot support an overall YES to achievability. Under NPPG on Housing and Economic Land Availability Assessments, a site is only achievable where there is a reasonable prospect of it being deliverable at an appropriate density and that it is financially viable. A site where abnormal costs are unquantified, where BNG costs are unquantified (Section 4), and where heritage mitigation costs are unquantified (Section 5) cannot properly be assessed as achievable. The cumulative effect of these unquantified costs may render the site unviable at 80 dwellings or any other density.

The viability assessment must be revisited once: (1) cliff stabilisation costs have been professionally assessed; (2) BNG requirements have been quantified; (3) heritage mitigation requirements have been established; (4) contamination investigation and remediation costs have been assessed; and (5) the net developable area has been recalculated excluding the heritage-sensitive land. DDTC formally requires this revised viability assessment to be published before SHLAA281 is confirmed as an allocation.

## 9. The Central Inconsistency: Pre-Existing Allocation Is Not a Substitute for Resolving Active Constraints

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The proforma's Conclusion Summary attempts to justify the Developable classification in the following terms:

*"Overall, this is a brownfield former quarry site that has been allocated for residential development in the Local Plan since 2017 under Policy DS3 and the principle of development on the site has been established. Given the complexities of bringing the site forward, there are still a number of issues that are currently being worked through with the landowner to be addressed."*

DDTC submits that this reasoning is *not sound* for the following reasons:

- A pre-existing Local Plan allocation does not override active constraints. The 2017 allocation was made without the benefit of the DWT's detailed ecological appraisal (which has subsequently identified Section 41 habitats), without the confirmed RED STW sewage infrastructure rating, without the injunction on access, and without the minerals safeguarding in the emerging Minerals Local Plan. The allocation is a material consideration but it is not a reason to classify a site as Developable when multiple RED ratings and unresolved legal constraints have emerged since it was made.
- 'Issues being worked through' is not a deliverability basis. For a site to be classified as Developable under NPPG, there must be a reasonable prospect of delivery within the stated timescale. Issues that are being worked through — but not resolved — do not establish reasonable prospect. If anything, eight years of working through issues since the 2017 allocation, with planning applications still in abeyance, is evidence that the reasonable prospect test is not met.

- The reduction from 100 to 80 dwellings is itself an acknowledgement that the 2017 allocation was incorrect. If the constrained net developable area (quarry floor only, excluding heritage-sensitive land beyond the quarry) is properly calculated, the capacity may reduce further.
- The NPPF requires that plans be positively prepared, justified, effective and consistent with national policy. A site allocation that carries two **RED** ratings, an unresolved injunction, an extant minerals permission to 2042, a minerals safeguarding in the emerging MLP, and an **AMBER** viability assessment based on unquantified abnormal costs is not justified or effective in NPPF terms.

## 10. Summary: All Issues and Ratings

Issue	Rating	DDTC finding
Sewage infrastructure (STW)	<b>RED</b>	HIGH impact confirmed by STW. Two Category 3 & 4 pollution points immediately downstream. EA requires capacity confirmation before allocation. No Drainage Impact Assessment exists.
Biodiversity (DWT)	<b>RED</b>	Medium to high impact. Loss of extensive broadleaved woodland including Section 41 Habitats of Principal Importance. BNG 'could be very high' and may constrain viability. BNG unquantified.
Heritage (Conservation Officer)	<b>RED</b>	Harmful impact on Stancliffe Hall (Grade II) setting beyond quarry floor. Net developable area must be recalculated to quarry floor only. HIA not published.
Highway access — injunction	<b>VOID</b>	Court injunction in force preventing use of previous access. Cannot be resolved by planning permission. No timetable for resolution.
Highway access — listed wall	<b>AMBER</b>	Access through Grade II listed wall. Previous listed building consent was for stone removal not residential. New LBC required.
Planning applications	<b>VOID</b>	Applications held in abeyance pending unresolved discussions. Missing evidence not identified. 0–5 year timescale is not credible.
Minerals — extant permission	<b>VOID</b>	Live minerals permission to extract sandstone until 21 February 2042. Emerging Minerals Local Plan safeguards the resource. No Minerals Assessment. No DCC (MPA) consultation evidenced.
Cliff instability	<b>AMBER</b>	North-east quarry face unstable. Cliff stabilisation required. Costs TBC — not quantified in viability assessment.
Viability	<b>AMBER</b>	Three categories of abnormal cost unquantified: cliff stabilisation, BNG, and heritage mitigation. Viability cannot properly be assessed until all three are quantified.
Contamination	<b>AMBER</b>	Possible high lead levels and other quarrying contaminants. Investigation required. Remediation cost not reflected in viability.
Landscape	<b>AMBER</b>	Moderate impact. TPO woodland on three sides. Loss of woodland both ecologically and visually contradictory — woodland screens the site but development requires its removal.
Surface water sewerage	<b>AMBER</b>	Medium impact (STW). Adjacent surface water enters combined system — 'undesirable' per STW. SuDS strategy required.

## 11. DDTC's Formal Requirements in Respect of SHLAA281

Req.	Requirement
1	A Drainage Impact Assessment for SHLAA281 must be conducted, addressing the RED sewage infrastructure rating, the two Category 3 and 4 downstream pollution points, and the impact on NORTHWOOD – DALE ROAD NORTH (CSO) and DARLEY DALE – FOUR LANE ENDS (Pumping Station). STW must provide written confirmation of available network capacity before the site is retained as an allocation, as explicitly required by the EA.
2	A surface water drainage strategy demonstrating that surface water will not enter the combined sewer system must be published before allocation.
3	A full BNG assessment using the DWT's ecological appraisal as baseline must be conducted and the BNG requirement quantified before the viability assessment is confirmed.
4	A Heritage Impact Assessment addressing the harm to the setting of Stancliffe Hall (Grade II Listed) must be commissioned and published. The net developable area and housing capacity of the site must be recalculated to reflect only the quarry floor area where the Conservation Officer has assessed minimal heritage impact.
5	The desk-based assessment and walkover archaeological survey required by the County Archaeologist must be conducted before allocation is confirmed.
6	DDDC must confirm the current status of the injunction, identify the court and parties involved, and publish a timetable for resolution. The Developable classification cannot be sustained while a court injunction prevents access.
7	DDDC must confirm what alternative access route is proposed and identify the missing evidence that has caused outstanding planning applications to remain undetermined. A credible access strategy must be evidenced and entered into the evidence base before allocation.
8	A Minerals Assessment must be conducted and Derbyshire County Council (as Minerals Planning Authority) must be formally consulted on the conflict between the housing allocation and the extant minerals permission (end date 21 February 2042) and the emerging Minerals Local Plan safeguarding. DCC's response must be entered into the evidence base.
9	The viability assessment must be revised to incorporate quantified costs for: cliff stabilisation, BNG requirements, heritage mitigation, and contamination investigation and remediation. An AMBER viability rating based on unquantified TBC abnormal costs cannot support an overall YES achievability conclusion.
10	The delivery timescale must be corrected. The 0–5 year timescale is not credible given the unresolved injunction, in-abeyance planning applications, minerals conflict, and unquantified abnormal costs. DDTC considers SHLAA281 to be at best a 10+ year site, subject to all the above matters being resolved.
11	DDTC reserves all rights to raise each of the matters in this document before the appointed Planning Inspector at Regulation 19 examination, and to draw the Inspector's attention to the extent to which a site that has been allocated since 2017 remains undeliverable in 2026 due to unresolved legal, ecological, heritage and minerals constraints.

**Darley Dale Town Council | Formal Evidence Base Submission | May 2026**

*This document is submitted by DDTC as a formal evidence base document for entry in full into the DDDC Local Plan evidence base. It should be read alongside DDTC's formal letter of objection to process failure (28 April 2026), DDTC's SHLAA Darley Dale Assessment Review, and DDTC's individual analyses of SHLAA911, SHLAA955, SHLAA1093, SHLAA1094, and the SHLAA1093 Stancliffe Homes Strategic Interest report. DDTC reserves all rights to rely upon this analysis at Regulation 19 consultation and at examination before the Planning Inspector.*