

DARLEY DALE TOWN COUNCIL

# SHLAA Darley Dale Assessment Review

Appendix C Proforma Analysis — Local Plan Committee Report, 13 May 2026

Prepared by: Darley Dale Town Council | Date: May 2026 | Status: Evidence Base Submission

## Purpose and Scope

This report analyses the Assessment Review Proforma documents relating to Darley Dale contained in Appendix C of the Local Plan Committee Report dated 13 May 2026. It focuses on two specific issues:

- (1) Sites where Severn Trent Water has rated the sewage drainage impact as RED (high) or where the Matlock – Bakewell Road (Hooley Town) Sewage Pumping Station and Combined Sewer Overflow (CSO11) is identified as impacted, but the site is nonetheless recommended for development.
- (2) Other internal inconsistencies in the Darley Dale assessments where material negative indicators — RED or unresolved AMBER ratings — do not prevent a recommendation for development.

This analysis is submitted as a formal evidence base document by Darley Dale Town Council (DDTC) to support its existing formal objections concerning drainage capacity and the PD10 policy map boundary. DDTC has previously submitted formal requests to DDDC, including a request for a Drainage Impact Assessment in light of STW's own acknowledgement that the Darley Dale sewer network is operating at or beyond capacity.

## Section 1: The RED Sewage Rating — SHLAA281 Recommended Despite High Impact

### 1.1 SHLAA281 — Stancliffe Quarry, Dale Road North, Darley Dale (80 dwellings)

SHLAA281 is the only Darley Dale site that receives a formal RED rating from Severn Trent Water for sewage infrastructure impact. It is nonetheless assessed as both suitable and developable, representing the most significant and directly demonstrable inconsistency in the Darley Dale assessments.

SHLAA Reference	SHLAA281 — Stancliffe Quarry, Dale Road North, Darley Dale
Site Area	10.85 ha
Proposed Use	Residential development
Housing Capacity	80 dwellings
Deliverability	Developable (0–10 years)
Overall Suitability	Yes

## Ratings Summary — SHLAA281

Assessment Area	Rating	Key Finding
Sewerage infrastructure (STW)	RED	HIGH impact on NORTHWOOD – DALE ROAD NORTH (CSO) and DARLEY DALE – FOUR LANE ENDS (Sewage Pumping Station). Two Category 3 and 4 pollution points immediately downstream.
Surface water sewerage (STW)	AMBER	Medium impact. Brownfield site with surface water entering combined system — described as 'undesirable'.
Biodiversity (Derbyshire Wildlife Trust)	RED	Medium to high impact; extensive broadleaved woodland likely to be lost. Biodiversity Net Gain requirements 'could be very high'.
Heritage (DDDC Conservation Officer)	RED	Development likely to result in harmful impact on the significance and setting of Stancliffe Hall (Grade II Listed).
Contamination (Environmental Health)	AMBER	Possible high lead levels and other contaminants from historic quarrying activity.
Primary school and GP (infrastructure)	AMBER	Normal area primary school over capacity and projected to remain so. GP practices reported over capacity. S106 mitigations only proposed.
Adult social care (DCC)	AMBER	Limited care facilities available in the area; only affordable housing extra care services available.

### 1.2 The Inconsistency

Despite two RED ratings (sewerage infrastructure and biodiversity), one further RED rating (heritage), and multiple AMBER ratings, the proforma concludes Overall Suitability: Yes and Deliverability: Developable. The sole justification offered is that the site has been allocated in the Local Plan since 2017 under Policy HC2(m) and DS3, and that an outline planning application for 80 dwellings is pending. The assessment itself acknowledges in the Conclusion Summary that 'Severn Trent has indicated that the development would have significant impact on the sewage infrastructure' — yet this is not reflected in the suitability conclusion.

A pre-existing allocation does not legitimise a RED sewage infrastructure rating, particularly in circumstances where STW has confirmed to DDTC that the Darley Dale drainage network is already at capacity, and where no Drainage Impact Assessment has been conducted. The two Category 3 and 4 pollution points immediately downstream of the proposed connection are an objective indicator of existing network stress, not a future risk to be mitigated.

DDTC formally objects to the continuation of SHLAA281's developable status without a prior Drainage Impact Assessment and without a credible STW commitment to upgrade the downstream network.

## Section 2: Sites Rated GREEN for Sewage but Explicitly Identifying Hooley Town (CSO11) as Impacted

The following three recommended sites all receive GREEN sewage ratings from STW, yet each proforma explicitly states that development 'may impact MATLOCK – BAKEWELL RD (HOOLEY TOWN) (Sewage Pumping Station and Settled Storm Overflow)'. CSO11 is the very overflow that STW has confirmed to DDTC is operating near-daily during rainfall events and is at capacity.

The GREEN rating in each case is assigned solely on the basis that a gravity connection is physically achievable — not on the basis that the receiving infrastructure has capacity to accept additional load. This methodology is internally contradictory: an impact on a known, acknowledged, at-capacity overflow cannot rationally be rated as low impact.

### SHLAA911 — Land at Audley St Elphin's Park, Dale Road South (25 dwellings)

Deliverability	Developable (6–10 yrs)
Sewage rating (STW)	GREEN — Low impact (connection achievable via gravity)
CSO infrastructure identified as impacted	MATLOCK – BAKEWELL RD (HOOLEY TOWN) — Sewage Pumping Station and Settled Storm Overflow
Pollution points downstream	<i>No pollution points immediately downstream cited</i>

#### Other Material Negative Indicators

Assessment Area	Rating	Finding
Flood risk (LLFA)	RED	High surface water risk along entire eastern boundary.
Landscape / PD10	AMBER	Site currently designated under Policy PD10. Acknowledged as forming part of important open space along A6 corridor preventing coalescence.
Schools / GP	AMBER	Primary school, Highfields secondary and GP practices all over capacity — S106 mitigation only.

#### Key Inconsistency

The site carries a RED flood risk rating and sits within PD10 designation. The proforma proposes reducing the developable area to exclude the flood risk zone but provides no explanation of how the PD10 designation is lawfully overridden.

### SHLAA1093 — Land Between Old Hackney Lane and Hackney Road (14 dwellings)

Deliverability	Developable (6–10 yrs)
Sewage rating (STW)	GREEN — Low impact (connection achievable via gravity)
CSO infrastructure identified as impacted	DARLEY DALE – DALE ROAD SOUTH (CSO) and MATLOCK – BAKEWELL RD (HOOLEY TOWN) — 'multiple CSOs further downstream'
Pollution points downstream	<i>One pollution point reported immediately downstream; multiple CSOs located further downstream which would be impacted</i>

### Other Material Negative Indicators

Assessment Area	Rating	Finding
Highway access	AMBER	Site has no frontage on adopted highway. Access entirely dependent on routing through a separate appeal site (APP/P1045/W/25/3361297) that has not yet been implemented.
Landscape / PD10	AMBER	Within PD10 area. Forms part of undeveloped gap maintaining separation between Darley Dale and Matlock.
Schools / GP	AMBER	Highfields school and GP practices over capacity. S106 contributions required.

#### Key Inconsistency

The entire recommendation is conditional on a third-party appeal development proceeding and its internal layout being amended to provide access. If that development is not built, there is no viable highway access. The sewage impact on CSO11 and one pollution point immediately downstream is rated GREEN.

### SHLAA1094 — Land to the SW of Darley Lodge, Bakewell Road, Darley Dale (25 dwellings)

Deliverability	Developable (6–10 yrs)
Sewage rating (STW)	GREEN — Low impact (connection achievable via gravity)
CSO infrastructure identified as impacted	MATLOCK – BAKEWELL RD (HOOLEY TOWN) — 'multiple CSOs further downstream which would be impacted'
Pollution points downstream	<i>No pollution points immediately downstream cited; multiple CSOs further downstream impacted</i>

### Other Material Negative Indicators

Assessment Area	Rating	Finding
Flood risk (Environment Agency)	RED	SW corner falls within Flood Zone 2. Sequential test required. LLFA: western part in Flood Zone 2; low to high surface water risk in NE corner; 3 internally flooded properties within 80m; main river 85m away.
Highway access	AMBER	Site has no frontage on adopted highway. Access dependent on adjacent unadopted cul-de-sac (Boden Close, Section 38 agreement in place).
Landscape / PD10	AMBER	Site protected under Policy PD10. Proforma dismisses this on the subjective basis that adjacent development has 'obscured' openness — a weak justification for overriding a formal designation.

#### Key Inconsistency

This site carries a RED Environment Agency flood risk rating (Flood Zone 2), has no direct adopted highway access, and overrides PD10 designation on subjective grounds. The Hooley Town sewage impact is nonetheless rated GREEN.

## Section 3: SHLAA955 — A Further Inconsistency Not Involving Hooley Town

### SHLAA955 — Land on the West Side of Darley Road North (40 dwellings) — Developable

Assessment Area	Rating	Finding
Flood risk (LLFA)	<b>RED</b>	West half of site at high surface water flooding risk. Majority of surface water flood risk rated at 'high risk'.
Highway access (DCC Highways)	<b>AMBER</b>	Access directly from Dale Road North described as 'unachievable' due to level differences and visibility issues. Viable access depends entirely on Olympian Way, a private unadopted road over which the Highways Authority has no jurisdiction.
Landscape / open space	<b>AMBER</b>	Forms important open space along A6 corridor. Visible from PDNP. Assists in maintaining settlement separation.
Sewerage (STW — CHURCH ROAD CSO)	<b>GREEN</b>	Rated low. Impacts DARLEY DALE – CHURCH ROAD (CSO) and DARLEY DALE – FOUR LANE ENDS. One Historic Flood Risk Register point and one pollution point downstream.

The net developable area has been reduced to 40% of the total site (1.42ha out of 3.55ha) to mitigate flood risk. However, the proforma does not address the fundamental issue that the Highways Authority cannot confirm adoptable access exists, as this depends on securing rights over private third-party land. The recommendation to classify this site as developable — when highway access is formally described as unachievable via the public road — is a material inconsistency.

## Section 4: Summary Table — All Darley Dale Recommended Sites with Material Unresolved Concerns

SHLAA	Site	Dwellings	RED Sewage?	CSO11 / Hooley Town Cited?	Other RED Flags	Outcome
SHLAA281	Stancliffe Quarry, Dale Rd North	80	<b>YES — HIGH</b>	No (Four Lane Ends)	RED biodiversity, RED heritage	Developable
SHLAA911	St Elphin's Park, Dale Rd South	25	No (GREEN)	<b>YES</b>	RED flood risk (east)	Developable

					boundary), PD10	
SHLAA955	Darley Road North (west side)	40	No (GREEN)	No (Church Rd CSO)	RED flood risk (west half), no adopted access	Developable
SHLAA1093	Old Hackney Lane / Hackney Road	14	No (GREEN)	<b>YES + multiple CSOs downstream</b>	No adopted highway access, PD10 area	Developable
SHLAA1094	SW of Darley Lodge, Bakewell Rd	25	No (GREEN)	<b>YES + multiple CSOs downstream</b>	RED EA flood zone, no highway frontage, PD10	Developable
<b>TOTAL</b>	<b>All five recommended Darley Dale sites with unresolved issues</b>	<b>184</b>				

## Section 5: Systemic Concern — The GREEN Rating Methodology for Hooley Town is Flawed

Across all Darley Dale recommended sites, Severn Trent Water's GREEN rating for sewage infrastructure impact is explicitly based only on whether a gravity connection to the existing network is physically achievable. It is not based on whether the receiving network has capacity to accept additional foul water load. This is confirmed by the standard STW wording used in every GREEN rating:

*"Development may impact [CSO name] ... Based on a review of topography, it is anticipated a connection can be made into the existing system via gravity."*

This methodology ignores the cumulative impact of multiple new residential connections on a network already acknowledged — by STW itself, in direct correspondence with DDTC — to be operating at or beyond capacity. The following specific deficiencies are identified:

- **No cumulative assessment:** Each proforma assesses the sewage impact of its site in isolation. No combined assessment of the impact of all proposed Darley Dale allocations on the shared network and on CSO11 at Hooley Town has been conducted.
- **No reference to STW's capacity confirmation:** STW has confirmed to DDTC in direct correspondence that the Darley Dale drainage network is at capacity. None of the proformas reference this position. The assessments are therefore based on incomplete information.
- **No Drainage Impact Assessment:** DDTC submitted a formal request for a Drainage Impact Assessment. This has not been acknowledged or actioned. In the absence of such an assessment, the foundation on which GREEN sewage ratings rest is untested and potentially unsound.
- **Near-daily CSO11 operation not referenced:** The proformas do not reference the documented near-daily operation of CSO11 at Hooley Town during rainfall events, despite this being known to DDTC and communicated to DDDC. An overflow operating at near-daily frequency cannot rationally be treated as having spare capacity for multiple new upstream residential connections.

## Section 6: DDTC's Formal Position and Requirements

DDTC formally requires the following before any of the five sites identified in this report are confirmed as allocations in the Regulation 19 Local Plan:

- A Drainage Impact Assessment covering all proposed Darley Dale allocations in combination, assessing cumulative impact on the shared sewerage network and specifically on CSO11 at Hooley Town (MATLOCK – BAKEWELL RD), must be commissioned and its results entered in the evidence base.
- STW must provide a formal written position on whether the Darley Dale network has capacity to accommodate the proposed allocations, and if not, what infrastructure upgrades are required, at whose cost, and to what timetable. This position must be secured before Regulation 19 submission.
- SHLAA281 must not be retained as a developable site while it carries RED ratings for sewage infrastructure, biodiversity and heritage, without a credible mitigation plan for each that is secured in writing from the relevant statutory body.
- DDTC's three formal written requests — concerning the PD10 boundary, the Tier 2 settlement hierarchy review, and the Drainage Impact Assessment — must be formally entered into the Evidence Base and preferably substantively responded to before the Regulation 19 consultation commences.

This report is submitted as a formal evidence base document and is intended to be read alongside DDTC's formal letter of objection to process failure dated 28 April 2026. DDTC reserves its right to raise all matters contained in this report before the Planning Inspector at the Regulation 19 examination, and to draw the Inspector's attention to the absence of a Drainage Impact Assessment and the systemic inconsistency in the application of sewage infrastructure ratings to Darley Dale sites.

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

*This document is prepared in connection with DDTC's representations to the Derbyshire Dales Local Plan review and is intended for entry into the DDDC Local Plan evidence base. DDTC reserves all rights to rely upon this analysis at Regulation 19 consultation and at examination.*