

DARLEY DALE TOWN COUNCIL

Proposed Alternative Policy PD10

Matlock to Darley Dale A6 Corridor: Settlement Separation and Coalescence Prevention

A policy that allows appropriate sustainable development whilst protecting the strategic gap, significant views and preventing coalescence

Prepared by: Darley Dale Town Council | **Date:** 12th June 2026 | **Status:** Formal evidence base submission - proposed policy alternative

1. Purpose of This Document

Darley Dale Town Council (DDTC) submits this proposed alternative Policy PD10 as part of its formal evidence base for the Derbyshire Dales Local Plan Regulation 19 consultation. DDTC does not seek to prevent all development in the Matlock to Darley Dale corridor. DDTC seeks a policy that is sound - meaning it is justified, effective and consistent with national policy - and that genuinely delivers what the DDDC Local Plan Committee's draft plan's 166 commitments to coalescence prevention and landscape protection require.

DDTC's proposed policy is drafted to:

- Permit appropriate sustainable development within the corridor where it demonstrably does not compromise the strategic gap between Matlock and Darley Dale;
- Retain an explicit prohibition on development that would cause or contribute to the coalescence of the two settlements;
- Protect significant views into, across and out of the Derwent Valley from key public vantage points;
- Establish a genuine Green Network of undeveloped, publicly visible open land - and explicitly exclude internal open spaces within residential developments from counting toward that network; and
- Provide a monitoring framework that measures the actual physical gap between settlements, not the retention of a boundary area that can be redrawn.

2. Proposed Supporting Text (paragraphs 5.62-5.66)

DDTC proposes the following supporting paragraphs to replace or supplement paragraphs 5.62-5.63 of the draft Local Plan:

5.62 - Purpose and Background

The settlements of Matlock and Darley Dale lie in the Derwent Valley along the A6 corridor and are separated by a narrow strip of open land. Since their original settlement in the medieval period, the two communities have maintained distinct identities. The open spaces between them are essential to preventing their physical and visual coalescence - the merging of two distinct settlements into one continuous built-up area. This has been a fundamental objective of planning policy in Derbyshire Dales since the adoption of the first Local Plan.

5.63 - The Strategic Gap

The strategic gap between Matlock and Darley Dale performs three distinct and irreplaceable functions that together justify its designation as a protected Separation Zone:

- (a) Physical separation - maintaining a gap of undeveloped open land between the built edges of the two settlements, so that they remain distinct communities rather than a single conurbation;

(b) Visual separation - ensuring that the gap is visible from key public vantage points, including the A6 trunk road, the White Peak Loop cycleway, riverside walks along the River Derwent and elevated positions within the Peak District National Park, so that the open character of the valley between the two settlements can be perceived; and

(c) Landscape character - protecting the open, rural character of the Derwent Valley floor and hillsides from incremental erosion by development, preserving the setting of the Peak District National Park and the quality of long-distance views into, across and out of the valley.

5.64 - The Green Network

Within and adjacent to the Separation Zone, a Green Network of publicly accessible, undeveloped open land is identified on the Policies Map. The Green Network comprises land that is both undeveloped and visible from the key public vantage points described in paragraph 5.63(b). Land that is enclosed within a development scheme - including open space provided as part of a residential development, landscaped courtyards, amenity areas or pocket parks within a built scheme - does not form part of the Green Network and does not count toward the Separation Zone's monitoring target. The Green Network target requires that the land remains genuinely open and visible; internal landscaping within a development is not a substitute for open, undeveloped land.

5.65 - Sustainable Development Within the Corridor

DDTC recognises that some forms of development may be appropriate within or adjacent to the Separation Zone without compromising its strategic purposes. The policy is designed to permit such development where it is genuinely compatible with the Zone's objectives - specifically, where it does not reduce the physical or visual gap between the settlements, does not affect significant views, and does not contribute to actual or perceived coalescence. Applications within the Separation Zone will be assessed against these tests. The burden of demonstrating compliance rests with the applicant.

5.66 - No Incremental Erosion

The cumulative effect of individually modest development proposals can erode the strategic gap over time even where each proposal appears, in isolation, to have limited impact. This plan requires that all applications within or adjacent to the Separation Zone are assessed against the cumulative effect of all existing, approved and proposed development in the corridor, not merely against the immediate site context. Approved development within or adjacent to the Zone does not establish a precedent or create a changed baseline that reduces the protection afforded by this policy for subsequent proposals.

3. Proposed Policy PD10 - Matlock to Darley Dale A6 Corridor

PROPOSED POLICY PD10: Matlock to Darley Dale A6 Corridor - Separation Zone

OBJECTIVE

The primary purpose of this policy is to prevent the coalescence of Matlock and Darley Dale by protecting the strategic gap between the two settlements from development that would reduce the physical or visual separation between them. Within the PD10 Separation Zone, as identified on the Policies Map, this objective takes precedence over other considerations.

PART A - PROHIBITION

Development within the PD10 Separation Zone will not be permitted where it would:

(a) Reduce the physical distance between the built edges of Matlock and Darley Dale along the A6 corridor;

(b) Close or materially narrow the visual gap between the two settlements as perceived from the A6 trunk road, the White Peak Loop cycleway, riverside walks, Riber Castle viewpoint or other elevated positions with views across the Derwent Valley; or

(c) Cause or contribute to the actual or perceived coalescence of Matlock and Darley Dale as distinct settlements.

No design mitigation, landscaping or open space provision within a development scheme can compensate for a development that falls within categories (a), (b) or (c) above. Proposals in categories (a) to (c) will be refused.

PART B - PERMITTED DEVELOPMENT

Where a proposal does not fall within Part A, development within the PD10 Separation Zone may be permitted where the applicant demonstrates, by evidence, that the proposal:

- (i) Does not erode the openness or undeveloped character of the Separation Zone;
- (ii) Protects significant views into, across and out of the Derwent Valley from the key public vantage points identified on the Policies Map;
- (iii) Does not harm the setting of the Peak District National Park; and
- (iv) Does not contribute to the cumulative erosion of the strategic gap when assessed against all existing, approved and proposed development in the corridor.

The following types of development may, subject to satisfying the tests at (i) to (iv), be acceptable within the Separation Zone:

Agriculture, horticulture, forestry and outdoor recreation, and essential operational development required for these uses;

Works essential to the functioning of existing lawfully established uses, where those works do not increase the built footprint or height of the existing structure beyond its current extent;

Alterations to existing buildings, where the alteration is internal or does not increase visual prominence, does not erode openness and does not contribute to coalescence; and

Infrastructure required in the public interest where no alternative location outside the Separation Zone is reasonably available.

PART C - THE GREEN NETWORK

Within the Separation Zone, the Green Network as identified on the Policies Map comprises land that is:

- (a) Undeveloped - not built upon, surfaced or enclosed as part of any development scheme; and
- (b) Publicly visible - open to view from at least one of the key public vantage points identified on the Policies Map.

The following do not form part of the Green Network and do not count toward the strategic gap monitoring target:

Open space provided within a residential, commercial or mixed-use development scheme, regardless of its size or quality;

Landscaped courtyards, amenity areas, pocket parks or play areas enclosed within a development scheme;

Buffer planting or screening provided as mitigation for a development within the Zone; and

Land that has been developed and then cleared or restored, unless the restoration has been in place for a minimum of ten years.

PART D - CUMULATIVE IMPACT

All planning applications for development within or adjacent to the PD10 Separation Zone must be accompanied by a Cumulative Separation Assessment demonstrating that the proposed development, assessed in combination with all existing, approved and proposed development in the corridor, does not reduce the physical or visual gap between Matlock and Darley Dale below the minimum separation distance identified on the Policies Map.

The approval of any development within the Separation Zone does not establish a precedent for further development. Each subsequent application will be assessed against the cumulative position at the time of determination, including all previous approvals. The principle of a 'changed baseline' - in which existing or approved development is used to argue that the corridor is already compromised and further development is therefore acceptable - will not be accepted as a basis for permitting additional development.

4. Comparison: Adopted Policy, Draft Policy and DDTC Proposed Policy

The table below compares the three iterations of Policy PD10 across the key dimensions of policy effectiveness. DDTC submits that the proposed policy is the only version that satisfies all four NPPF soundness tests.

Dimension	Adopted PD10 (2017)	Draft PD10 (June 2026)	DDTC Proposed PD10
Fundamental test	Near-absolute prohibition - development not permitted except two narrow categories	Criteria-based - development permitted where four criteria are demonstrated	Prohibition first (Part A) - then permitted development gateway (Part B) where demonstrably no harm
Coalescence prevention	Implicit in the prohibition - development not permitted therefore gap protected	Mentioned in criterion (a) only - no stand-alone prohibition on coalescence-causing development	Explicit primary purpose stated - stand-alone prohibition on coalescence-causing development - cannot be traded off against design
Views protection	Not explicitly stated	Criterion (c) protects 'important views into, across and out of the Derwent Valley'	Retained and strengthened - key public vantage points identified on Policies Map - views tested against specific named viewpoints
Green Network	Not included	Not explicitly defined - risk that internal green spaces count toward any Green Network	Explicitly defined - undeveloped and publicly visible land only - internal development open spaces explicitly excluded
Cumulative impact	No specific provision	No specific provision	Mandatory Cumulative Separation Assessment for all applications - anti-ratchet provision explicitly preventing 'changed baseline' argument
Extensions to existing buildings	Works essential to existing uses only	Explicitly added as permitted category	Retained but limited to alterations that do not increase visual prominence, erode openness or contribute to coalescence

Enforcement basis	Clear rule - less open to challenge	Criteria-based - developer can argue compliance	Prohibition is clear rule - Part B gateway requires applicant to demonstrate compliance by evidence
NPPF soundness	Sound in principle - not enforced in practice	Not sound - weaker than adopted policy, no coalescence statement, Green Network risk	Designed to be sound - justified, effective, consistent with NPPF paragraphs 20 and 174

5. Proposed Monitoring Framework

DDTC proposes the following replacement monitoring framework for Policy PD10. The current draft monitoring target - 'retention of area identified as strategic gap' - is circular because the area is defined by a boundary that can be redrawn. DDTC's proposed indicator measures the actual physical gap between settlements.

Policy	Indicator	Target	Data source
Proposed Policy PD10: Matlock to Darley Dale A6 Corridor	Physical gap between the northernmost built edge of Darley Dale and the southernmost built edge of Matlock along the A6 corridor, measured in metres at the narrowest point.	No reduction in gap distance from the baseline measurement established at the adoption of this plan. Minimum gap distance to be specified in metres on adoption.	Ordnance Survey data - annual measurement. Planning applications database - cumulative development tracking. Green Network survey - annual review confirming Green Network land remains undeveloped and publicly visible.
	Number of planning applications granted within the Separation Zone citing PD10 compliance, and number refused with PD10 cited as a ground of refusal.	Annual enforcement record published as part of the Monitoring Report.	Development Management database. Annual Monitoring Report.

6. Key Public Vantage Points - Proposed Identification

The proposed policy refers to 'key public vantage points identified on the Policies Map.' DDTC proposes the following primary vantage points for identification, from which the strategic gap and significant views are assessed. This list is not exhaustive - additional viewpoints may be identified through the Landscape Character Assessment.

Ref	Vantage point	Views and significance
VP1	A6 trunk road - travelling between Matlock and Darley Dale (both directions)	Primary route through the valley - the most widely experienced view of the strategic gap. Development visible from this corridor directly affects the perception of coalescence for all road users.
VP2	White Peak Loop cycleway - section through the Derwent Valley	Publicly accessible cycleway through the valley floor - significant views across the gap from a non-motorised user perspective.
VP3	Riber Castle elevated position - views across the valley	Elevated position with long-range views across the Derwent Valley showing the gap between Matlock and Darley Dale against the hillside backdrop.

VP4	Elevated positions within the Peak District National Park boundary - including High Peak Trail and access land on Stanton Moor	Views from within the PDNP looking down into the Derwent Valley - any development closing the gap would be visible against the valley floor from PDNP viewpoints.
VP5	Darley Dale church tower and historic core - views south toward Matlock	Historic viewpoint from the settlement's existing character area - the gap is experienced from within the community looking toward the neighbouring settlement.
VP6	Riverside walks along the River Derwent	Publicly accessible riverside walk along the Derwent valley floor adjacent to the River Derwent between Red House to the west and the ARC Leisure Centre to the east - significant views across the Hackney hillside gap from a non-motorised user perspective.

7. What DDTC Asks of the Inspector

DDTC submits this proposed policy as a constructive and evidence-based alternative to the draft Policy PD10. DDTC asks the Planning Inspector to:

	Request
1	Find that the draft Policy PD10 is not sound on grounds of not being justified, not being effective and not being consistent with national policy - for the reasons set out in DDTC's formal Regulation 19 representation on Policy PD10.
2	Require DDDC to revise Policy PD10 before the plan is found sound, and to consult stakeholders on the revised policy and its boundary map before the examination hearing.
3	Consider DDTC's proposed policy - set out in full in this document - as evidence of what a sound and effective alternative would look like, to assist DDDC in its revision.
4	Require that any revised Policy PD10 explicitly states that the prevention of coalescence between Matlock and Darley Dale is its primary purpose, that internal open spaces within development schemes do not count toward any Green Network designation, and that cumulative impact is assessed for all applications within the corridor.
5	Require that the revised PD10 boundary map and the methodology by which it was drawn are disclosed to stakeholders before the examination hearing on Policy PD10.

Darley Dale Town Council | Formal Evidence Base Submission | June 2026

This document is submitted by DDTC as a formal evidence base document and proposed policy alternative for entry into the DDDC Local Plan evidence base. It should be read alongside DDTC's PD10 Contradiction Analysis (Updated), DDTC's formal Regulation 19 Representation on Policy PD10, and the full suite of DDTC evidence base documents. DDTC reserves all rights to rely upon this proposed policy at Regulation 19 examination.