

Dear Sir,

Darley Dale Neighbourhood Plan: Examiner Enquiries

Please find below the responses of the Darley Dale Neighbourhood Plan Working Group to your enquiries regarding the Darley Dale Neighbourhood Plan.

In the interests of clarity, we have inserted our responses in to your document:

Darley Dale Neighbourhood Development Plan (Submission Plan August 2018)

Please note that replies in red type are from our appointed Planning Consultant Helen Metcalfe. Responses in blue are from Andrew Creese, who explains his role in the process in his statement.

I trust that this meets with your approval and is self explanatory. However, should you have any further queries, please do not hesitate to contact me.

Yours sincerely,

Mary Myers, DDTC

Darley Dale Neighbourhood Development Plan (Submission Plan August 2018)

As you are aware I have been appointed to conduct the Examination of the Darley Dale Neighbourhood Development Plan. I can see that considerable community effort has gone into developing the Plan; in order that I may progress the Examination I would be grateful for the Qualifying Body's response to the initial enquiries below; the local authority may also have comments. The queries are not extensive but the responses will all contribute to the progressing of the Examination.

I still have considerable work to undertake in fully assessing the submitted Plan but my purpose here is to better understand the intention behind the policy content from the authors and it is not to invite new content or policies that will not have been subjected to the public consultation process. In some instances I need to be sure that the Plan policies meet the obligation to "provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency" (NPPF para 17*). It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent required for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community's intent is sustained in an appropriately modified wording for the policy.

I will concentrate here on matters of substance rather than drafting issues, unless there may be a possible misunderstanding behind an error in the text.

In order to ensure transparency with the conduct of the Examination a copy of these queries is being sent to the Local Planning Authority with a request that the exchange of emails be published on the webpage relating to the Neighbourhood Plan alongside the representations received during the Regulation 16 public consultation.

*NB As you are aware a new National Planning Policy Framework (NPPF) was published in July 2018 (now updated in February 2019) but the transitional arrangements in para 214 Appendix 1 on Implementation apply and thus this Examination is unaffected by the changed NPPF; accordingly all references to the NPPF in this document (and in the final Examination Report) are to the original 2012 NPPF document, unless otherwise indicated.

Contentious Issues:

The Local Plan allocation of a site on Old Hackney Lane – a matter determined before the Neighbourhood Plan – seems to have generated the most interest judging by the representations. Although much confusion seems to exist about how the site allocation arose, a number of comments suggest that the Neighbourhood Plan does too little to address the issues arising from the prospective use of this site and in particular about protecting the characteristic stone walls that feature in the locality. I believe there is a general realisation that the Neighbourhood Plan could not oppose the allocation (or not at least without allocating a more suitable alternative) but do you have any comments about the extent to which the new housing allocations have influenced the content of the submission Plan?

The NP group (acting on behalf of the Town Council) did not wish to undertake a site allocation neighbourhood plan – when the NP work began in 2015 Derbyshire Dales District Council was well advanced in its site allocation work and it was felt that the NP could add more value in providing a more specific design policy framework for the development of the sites. The parish had already seen a lot of growth prior to 2015 and there were strong voices even on the initial NP working group that were opposed to more growth in the parish. Although this individual left early on this was not an isolated opinion and it came through during the drafting of the NP. The NP group felt that there would likely be a big push back by the community if the NP was to undertake a site allocation process bearing in mind that a NP has to be passed by referendum the Local Plan does not.

The investment in the Place Analysis and the detailed policy wording is the community's response to the site allocation – they wanted to ensure that new development did not erode the distinctive character of the separate settlements.

A few representations comment that they have heard very little/too little about the consultation process prior to the notification from the local authority. Two particular representations query the extent to which contributions from young people – the next generation – and voluntary groups have been sought through the consultation process. I can see that the consultation process has been spread across a number of years and it is inevitable that there will have been variations in the level of consultation, particularly perhaps pre and post Local Plan adoption. Do you have any comments in response to the representations about the extent of participation effected within the consultations and whether it has extended to the whole community?

There were meetings and drop in sessions throughout 2015-2018 and that groups were contacted directly as well and encouraged to provide comments. The two lots of Reg 14 consultation meant that the Plan was available for 3 to 4 months for formal comment in addition to the early input – young people were engaged on the future potential of Whitworth Park.

I, Andrew Creese, have been a member of the Neighbourhood Plan Working Group for nearly five years, first as a Town Councillor and subsequently as a community member. I have no planning experience. I am in full agreement with the responses to the Examiner's queries from the Working Group and from Helen Metcalfe, our consultant.

In addition to these I would like to add some more personal observations related to the Neighbourhood Plan, relating both to its content and its process.

Firstly, the nature of Darley Dale as an entity has posed challenges. As the Plan makes clear, Darley Dale is a collection of settlements, and it is to these settlements that residents tend to feel their primary loyalty. People describe themselves as living in Two Dales, or Hackney, or Churchtown first and Darley Dale second. If the town has a “heart” it is most probably the Whitworth Centre and Park but these can feel rather remote from Farley or Morledge. Peoples’ concerns about the development of their area thus tend to be highly localised, as the recent concerns about the Hackney Lane site illustrate.

This lack of a “Town” identity may partly explain the relatively low levels of response in the consultation process - although consultations were held in several different parts of the town. It was probably also a factor in the Working Group’s decision to adopt a criteria-led approach to development rather than to propose specific sites.

The consultation process was concentrated in two main periods - mid 2014 to mid 2015, and late 2017 to mid 2018. Considerable publicity in the local press and social media was given to local consultations and copies of the draft plan were available at several locations in Darley Dale. Local associations and organisations were contacted. Participation in consultation sessions varied from just a handful of people to thirty to forty in a session. However the response to the household questionnaire was 10% (some 250 out of 2500 households) - almost twice the response rate to the draft Local Plan. Throughout the last 5 years progress on the Neighbourhood Plan has been on the agenda at each Town Council meeting and the Council website has carried drafts of the main documents.

The preparation of the Neighbourhood Plan coincided with the resubmission of the Local Plan. In part, this explains the very low level of support which the Neighbourhood Plan Working Group was able to access from the District (with the exception of the mapping department, who were very helpful). Indeed it came as a revelation to me to hear, at a Neighbourhood Planning meeting in a nearby parish, how supportive and far-reaching the support to a Neighbourhood Plan group there had been from the level above, from a different District Council. The feeling in the Darley Dale group was that our Neighbourhood Plan was seen as a nuisance.

Thus it is with a sense of déjà vu that I read again several of the points raised by the Examiner as emerging from District concerns. This applies particularly to the community consultation proposal and to the references to Darley Dale’s proximity to the Peak District National Park. On no fewer than three occasions we have had meetings with the District Council staff to explain why these are important to our Neighbourhood Plan. We feel we have taken full account of the District Council’s concerns to avoid contradiction, and that we are reinforcing rather than duplicating the relevant elements in the Local Plan on these topics.

The Darley Dale Neighbourhood Plan has involved a large number of people over a long period of time. The Working Group do not regard this as a perfect or ideal plan, but we do feel that this is the very best that can be achieved, given the circumstances of Darley Dale.

The Plan Content

The Plan period

A Neighbourhood Plan must state the period which it is covering and it is therefore appropriate to see the Plan period prominently on the front cover (although there is a stray reference to 2016-2033 in the top right corner). However, since the Plan was submitted in 2018 and cannot come into effect until 2019 at the earliest, a more appropriate Plan period would appear to be 2019 – 2033.

The timescale was intended to be 2017-2033 and the front cover does have this in the middle – the header on the first page saying 2016 is wrong the header on all subsequent pages and the ref in the text is 2017-2033 however if the examiner thinks it should now be 2019-2033 then that would be OK – this NP has had a particularly extended gestation

How does the Neighbourhood Plan fit with the District and national planning policies?

The representation from the local authority notes that the detail of housing sites allocated in the Local Plan is incorrect as the sites number four not three – the one omitted is at Stancliffe Quarry. Does correcting this omission affect any other aspect of the Plan?

No, the correction will not affect the plan – it is referred to as a site allocation at para 48 of the sub V3 NP and was in the previous Local Plan - it has been omitted in error from the table after para 13 and should be added.

The representation from the Peak District National Park Authority (whilst acknowledging the content in Section 11) suggests that this section ought to make reference to the duty to have regard to the purposes of the National Park.

The NP group worked closely with planners at the PDNP and found their input helpful. The duty to have regard to the purposes of the National Park is something the NP group strongly support and the impact of development in Darley Dale on the setting of the PDNP is something that the NP group and local people are very much aware of. The addition of this comment would reinforce this point and would be supported.

A representation suggests that the Plan ought to include a map of “the future development boundary” by which I believe is meant the Settlement Development Boundary. Was any thought given to the inclusion of such a map as this section might be the most appropriate place for its inclusion (and it might be of practical benefit to prospective developers).

The settlement development boundary is shown at Appendix D – this was provided by DDDC and could be used in the opening section of the Plan. It was not considered necessary for the TC to produce one as they accepted that the extent of the settlement boundary was something that DDDC had defined.

Your comments are invited on these lines of thought.

Darley Dale Today

A representation queries why the maps of existing employment locations omit the Langrove Mill site?

Map 5 and 6 showing existing employment sites were provided by DDDC, if one site is missing it needs to be added by DDDC

Engagement with the Community: A Key Principle

It is made clear within this section of the Plan that the engagement sought is a voluntary process, and the representation from the local authority is keen to ensure that this is absolutely clear, but it seems strange that the body that will make the ultimate decision on the planning application (and will thereby apply the Policies in the Neighbourhood Plan) is apparently excluded from mention. As the local authority representation suggests, over-formalising the process of community engagement may result in confusion between the statutory and “voluntary” expectations, not least in terms of the basis on which planning decisions will be made. The Neighbourhood Plan is intended to

encapsulate the community's policy positions to better inform prospective developers and planning decisions but it cannot amend the statutory determination procedures. Do you have any comments on these lines of thought?

The principle of pre-application community engagement both in policy making and in determining planning applications is endorsed in the NPPF. The NP is not excluding DDDC from the process – but setting out the preferred approach with the community in terms of engagement. It is expected and understood that DDDC are the decision makers this is set out in the opening section para 1 (1)

Policy content numbering

It may be a hangover from a previous draft but it is puzzling as to why most policies comprise solely a section numbered "1" (that is then followed by a number of criteria). Since there is no second section then the "1" appears superfluous. Having said this, it might be helpful to prospective developers to have the content of the "Landscape Character" policies combined with the "Design Principles" content – resulting in single policies with two primary elements. What was the thinking behind the policy format adopted for these two, generally related, topics?

In the first reg 14 version there were fewer polices because the character areas were not set out in separate policies but in one policy eg landscape character for Darley Dale. The general principles were pulled out of the Darley Dale Place Analysis as follows (NP 1 is from the first pre submission version)

NP 1: Protecting the Landscape Character of Darley Dale

- 1. Development should be of a high quality design that protects and contributes to the distinctive landscape character of the Parish. Development should;**
 - a) reflect the scale of the settlement and the rural nature of the Parish; and**
 - b) maintain a sense of openness between the settlements (where this is a key component of their distinctive character as identified in the Darley Dale Place Analysis at Appendix A). This is a particular feature of the character of Farley and Upper Hackney, Lower Hackney and Two Dales, Darley Hillside and Broadwalk; and**
 - c) maintain the green corridor and sense of openness along the Derwent Valley; and**
 - d) avoid coalescence by maintaining a sense of openness between the urban edge of Matlock and the rural landscape of Darley Dale Parish; and**
 - e) reflect the historic relationship between landform and morphology by being located on relatively flat parts of the valley or on plateaus but not on the steeper slopes where development would be prominent from the Peak District National Park.**
- 2. Protecting the landscape character in *Two Dales* means development should;**
 - a) be contained within the steep landscape and maintain both far and local views;**
 - b) be arranged in a linear deformed grid pattern following the main lines of movement with streets allowing glimpses of the landscape beyond;**
 - c) provide boundary treatments that clearly define the street using locally sourced materials for stone walls and which allows greenery along the boundary to be seen from the street.**
- 3. Protecting the landscape character in *Upper Hackney* means development should;**
 - a) maintain far views across the valley to the Peak District National Park; and**

- b) be arranged on the main lines of movement and on the narrow ridge to reinforce the linear settlement pattern which is reflective of the local landscape and topography; and
- c) provide boundary treatments that are low stone walls or hedging that are hard against the footpath to help enclose the street with greenery in front plots.
- 4. Protecting the landscape character in *Lower Hackney* means development should;
 - a) protect the green spaces that separate the various parts of Lower Hackney that provide access to the views; and
 - b) reflect underlying topography by developing on the flatter areas of the valley floor or the ridgeline and plateaus keeping the steeper areas open and undeveloped; and
 - c) reflect existing development patterns with more formal arrangements on major routes and less regular plot configuration on the narrow back lanes; and
 - d) provide boundary treatments that are to the street edge, against the footpath and are made up of low walls or of hedges.
- 5. Protecting the landscape character in *Parkway and Oker* means development should;
 - a) be confined to the valley floor to maintain the visual connections with the ridge lines visible between buildings; and
 - b) ensure that routes run to the edge of the site so that they can connect into the wider movement pattern;
 - c) allow space for street trees or for greenery in front gardens to provide landscaping to public spaces; and
 - d) seek to delineate public and private space with strong boundaries in local materials, to help knit new development into the local character.
- 6. Protecting the landscape character in *Churchtown* means development should;
 - a) maintain the strong visual links with both the ridge lines and the valley sides which is seen through fragmented high trees and buildings; and
 - b) ensure that a soft edge of large rear gardens to the open landscape of the valley bottom is maintained to provide greenery to the long views from the Peak District National Park and from higher vantage points in Darley Dale Parish; and
 - c) maintain strong and consistent boundary treatment in local stone and with some hedging to delineate public and private space and add enclosure to the street; and
 - d) protect the views of the Church spire.
- 7. Protecting the landscape character in *Darley Hillside* means development should;
 - a) reflect the street alignment and terraced plots which work with the landform, to help retain the link between settlement pattern and setting by
 - (1) allowing for long views across to the Peak District National Park; and
 - (2) reflecting the underlying topography; and
 - b) allow for front gardens to provide landscaping to enhance the street scene and to link Darley Hillside with the woodland beyond; and
 - c) ensure that more regular plots are located lower in the valley; and

- d) more formal streets have strong boundary treatment, low walls in local stone and hedging, and lanes having verges and more greenery.
- 8. Protecting the landscape character in *Broadwalk means* development should;
 - a) use the alignment of streets to safeguard views to the landscape; and
 - b) continue the cohesive boundary treatments to support local character; and
 - c) encourage the planting of street trees to mask on-street parking and to help improve the attractiveness of the street.
- 9. Protecting the landscape character in *Farley means* development should;
 - a) reflect the open and fragmented character which allows for long views to the Peak District National Park; and
 - b) provide boundaries (dry stone walling) and landscaping (trees) that work together to help enclose streets and to add visual character.

However, Reg 14 comments from DDDC were that the NP needed to make fuller use of the Place Analysis see Letter from DDDC 13.5.16.

‘The Darley Dale Place Analysis provides robust evidence to demonstrate the key landscape characteristics of Darley Dale, however as set out above the Neighbourhood Plan could be strengthened by utilising elements of the Place Analysis to set out key features that could be utilised in developments across the Neighbourhood Area.’ This change was summarised in the reg 14 comments in the consultation statement.

This resulted in much more text on each character area for both landscape and design so that the Place Analysis findings could be set out more fully and meant there had to be separate policies on each character area

Policy NP1: Protecting the Landscape Character of Darley Dale

Paragraph 81 says that “specific support will [also] be given for implementing Green Infrastructure initiatives” but it is not an apparent feature of the Plan? A representation notes with dismay that “the valley floor and the river and its habitat are not even mentioned in this section”.

The NP supports things like the white peak cycle loop see para 41 that was at inception when the NP was first prepared. Para 42 refers to DCC’s Strategic Statement on Planning and Health in Derbyshire and supports initiatives for encouraging walking and cycling. There were no specific routes identified by the group or as part of the consultation process.

It was not considered necessary to provide specific information on the biodiversity of the river valley in addition to that already in the Local Plan (see section on Environmental Quality and Health).

The River is described at para 36. However, the contribution of the river valley to landscape character is recognised and it is identified as a key attribute at para 40 – it is suggested that the bullet point ‘rivers and streams’ could be amended to the ‘River Derwent and streams.’ Corridor number 1 after para 78 page 27 also identifies the A6/Derwent Corridor – for clarity this is the River Derwent it is identified as a key corridor that provides an important landscape gap.

I note that within this Policy criterion (c) is provided with details of specific character areas whereas criterion (e) is not. As a person unfamiliar with the topography and reliant on the images on page 26 I find it difficult to envisage which are the “least visually sensitive” parts of the valley and why the “steeper slopes” might even be feasible to develop (although some area policies suggest that it

might even be acceptable?). I note from page 26 that the “upper valley slopes are relatively free from developmentreflecting previous planning policy of restraint” – do these equate with the steeper slopes? The representation from the local authority suggests that criterion e is already addressed within Local Plan Policy PD5 and I would suggest that the Local Plan Policy, whilst being equally general, is the more understandable for practical application. Your comments are invited on these lines of thought.

Criterion c - The community were keen to ensure that there was not a continuing ‘creep’ from development and they were very clear that Darley Dale is made up of a number of settlements and that the gaps between them were identified and should be protected. The separate character of the settlements was identified in the Place Analysis.

Criterion e – The Place Analysis page 6 includes a map with contour lines which could be used in the NP to identify the steeper slopes which are principally around Two Dales, Farley and Upper Hackney. The Place Analysis also notes that the sensitivity of landscape to change is in part determined by how visible it is from the National Park and these steep slopes are highly visible from the Peak District National Park. NP1 is intended as an overarching policy that establishes the key development principles – not building on the steep slopes is one of them.

I am puzzled about the design implications of some criteria which do not appear self-explanatory:

- “strong visual links have been maintained with both the ridge lines and the valley sides” – what do “visual links” require?

The reference is for the Churchtown character area table 2 page 20 and NP 4. Churchtown is described in the Place Analysis as a loose ribbon settlement. As Churchtown sits in the valley bottom and development is fragmented, the gaps between the buildings and the trees allow glimpses to the ridgelines on either side of the valley (the west side being outside the Plan area) as well as long views up and down the valley. To maintain these visual links any new development needs to be low density and to ensure that gaps remain between buildings and that the plots follow the linear development pattern (so you can glimpse the wider valley from within the character area.)

- “a layout that maintains the visual connections with the ridge lines so that the ridgelines are visible between buildings” – is there a layout that could block these?

The reference is for Parkway and Oker in NP 5 – Parkway and Oker are confined to the valley floor and have a feeling of being contained within the valley. However, the plot layout and massing provide glimpses to the valley sides (the ridgelines).

The criteria requires new development to allow glimpsed views onto the backdrop of local hills – and this would also mean avoiding building across the end of streets where this blocks off views to the wider countryside to allow for views into the wider landscape beyond the character area. If this wording is considered clearer then it could be used without affecting the intent of the criteria.

- “roads and footpaths should run to the edge so that they connect and integrate with adjoining areas” - in practice integration can only be achieved where there are connections to be made and every site must have at least one way in and out – so what is the implication of this criteria?

The reference is for Parkway and Oker where their layout typifies estate design layout of the 1970s. Parkway especially does not integrate with the rest of Darley Dale being a single access estate. The road loops around internally and this type of layout makes walking distances long, and makes it more likely that people use their cars and is not desirable. Criterion b of NP 5 is encouraging a road layout that ensures better connectivity to the other parts of Darley Dale.

- Criterion (b) of Policy NP7 is worded almost exactly the same as the overarching criterion (e) of Policy NP1 – duplication?

Lower Hackney sits partly on the flatter ground on the valley floor but also on plateaus higher up the valley with green gaps on the slopes.

- but it seems to accommodate “ridgeline” development but page 26 had seemed to suggest that the ridgeline or upper slopes were valued for their lack of development?

NP7 b supports development located either on the valley bottom or on the plateaus – agree ref to ridgelines should be removed.

- In similar vein a representation queries “what is ‘a degree of separation’” when referring to gaps between settlements?

A degree of separation is such that the 7 character areas can be clearly distinguished. This is possible at present due to the key gaps shown in diagram 1 on page 26. Future development will need to demonstrate that a sense of openness remains between the character areas due to the retention of these key gaps.

Your comments are invited on these lines of thought.

Policy NP10: Protecting the setting of the Peak District National Park

Paragraph 109 says that pre-application engagement will “seek to ensure that proposals for major development will not have a visual impact on the setting” of the National Park; however paragraph 110 is more accurate in suggesting that the visual impact of proposals will be assessed and addressed. All development will have some impact?

The community remained consistent in their desire to ensure that the setting of the PDNP was protected. Agree that at para 109 wording could be added ‘will not have a significantly adverse visual impact ...’ to be consistent with approach accurately set out at para 110.

Note ref to NP 9 at para 110 should be NP 10

The representation from the local authority suggests that this Policy duplicates rather than “works in conjunction with” Policy PD5 of the Local Plan. Disparities of wording can often serve to confuse and provide the basis for differences that might be exploited. In particular it is difficult to see how criterion 2 might be relevant since there is no part of the Neighbourhood Area that is *within* the National Park?

NP 10 (2) should read after ‘major development within Darley Dale parish should not adversely affect the’

The NP working group liaised with PDNP policy planners who were supportive of this policy at Reg 14 consultation. The NP group were keen to have a policy of this sort in their NP as it reflected the community’s concern about the impact of major development in the parish on the setting of the PDNP.

Your comments are invited on these lines of thought.

The Importance of Good Design in Residential Development

The representation from the County Council notes that the references at the top of this section (and elsewhere) relate to the 2012 NPPF and for the purposes of a 2019 publication the references need to be the latest version of the NPPF.

References to the NPPF were relevant when the NP was last amended; under the transitional arrangements it is understood that the NPPF 2012 is still the reference point.

The representation from the local authority suggests that bullet point 3 in the tabulation and the related footnote 38 add nothing to Policy HC1 in the Local Plan and therefore are not needed (especially if differences of wording give rise to confusion) eg who defines what is the “built-up area”?

That is reasonable – the NP group were clear that they did not want to allocate sites and were satisfied with the settlement boundary put forward by DDDC in their Local Plan.

Paragraph 119 says that the Plan “encourages” the use of BfL12. Paragraph 123 says that the Plan “requires” the use of BfL12.

Para 119 ‘encourages’ is correct – whilst the revised NPPF para 129 says that LPAs should ensure they make appropriate use of: ‘processes for assessing and improving the design of development’ and Building for Life is provided an example it is accepted that the NP cannot require it. Para 123 could be amended to: ‘This Plan encourages the use of Building for Life 12 (or an equivalent tool) by developers.’

The Policy itself is clear that the use of “BfL12 or equivalent” will be “encouraged” but then suggests that a minimum score of “9 greens” should be achieved. If the use of BfL12 is “encouraged” then a threshold of 9 greens can only be informative for the designer rather than material to a planning decision.

High design quality is a requirement (in accordance with the NPPF) it is the use of BFL12 that is encouraged. There would be no benefit in encouraging the use of BFL12 to encourage mediocre quality - the threshold of 9 greens is the measure of good design based on BFL12 criteria.

Perhaps the wording of NP 11 (4) could be amended ‘To demonstrate that the scheme is of a high design quality, applicants for major development proposals will be encouraged to provide an accompanying report to demonstrate that the scheme accords with national design standards – for BFL12 high quality design equates to 9 greens.’

Do you have any comments on these lines of thought?

Policy NP 11: Design Principles for C3 Residential Development

A representation queries why “design principles” should only apply to residential development (and I would add a query as to why they have no relevance to C2 residential applications)?

C3 was added based on comments from Frontier Estates (see reg 14 responses and their letter 12.4.18.) The community want all development to be of a high design standard but the focus of concern related to housing development principally for C3 use. The community will be satisfied with any amendment that maintains this intent.

The representation from the local authority applauds the use of footnote 42 but it is unclear why this might be a consideration exclusive to Parkway and Oker?

The lack of connectivity due to a road layout that does not integrate with the wider area is a particular issue for Parkway and to a lesser extent Oker. Future development in this character area should not replicate this approach. It is reasonable to suggest that all new development should ensure that it connects and integrates with adjoining areas (in particular enabling safe direct access for pedestrians) and this could be an added criterion in NP 1.

Criterion (d) appears to allow a choice between using the “principals” (*sic*) in the “Darley Dale Place analysis” or in the “Table 3” summary – Policy NP11 also says that it sets down “principles”. Given that the three do not all say the same thing (although they may be based around the same ideas) there is confusion about to which set of “principles” a designer is to work. If the subsequent detailed policies derive from the Darley Dale place analysis then are they not the most significant “principles”? Criteria 3 and 4 appear to address the same point in different words?

It is agreed that the detailed policies derive from the Place Analysis.

The summary tables are intended to provide an accessible summary of the description of the character areas and the future management to enable people who do not know the area to easily understand the issues. It may be acceptable and preferred that the summary tables form an appendix – so their content remains accessible.

The representation from Severn Trent suggests that Policy NP 11 “could go further to push and support sustainable development”. Clearly there is a Local Plan context for this but were these issues considered in the local context during the preparation of the Plan?

The local community and NP group defined sustainable development in the context of protecting landscape character. NP 11 (2) does encourage innovative design that could include sustainable construction methods – there was no particular focus on wider sustainable development issues.

Your comments are invited on these lines of thought.

Tables 4 – 11 Summaries of Character and Future Management and Policies NP 12 – NP 19

The representation from the local authority suggests that the “Future Management” element of these tables should be incorporated within the Policies (I note that some rewording would be required eg terms such as “this approach” would need more detail); at present there is no direct interconnection between the tabulations and the Policy statements and the basis for the selection of the Policy content is not apparent.

The summary tables are intended to provide an accessible summary of the description of the character areas and the future management to enable people who do not know the area to easily understand the issues. It may be acceptable that the summary tables form an appendix – so their content remains accessible.

There may need to be some editing to ensure that the “principles” do not stray into prescriptive detail.

Yes agreed – and lengthening the policies further would work against merging the landscape and design policies for each character area as suggested earlier in this note.

The local authority representation suggests that each character area Policy should open with: “Planning permission will be supported for residential development in xx where the proposal is of high design quality that will positively contribute to the character of its setting and may demonstrate:”

The LPAs suggested amendment would still reflect the intent of the NP and the community and would be supported.

The representation from the local authority questions the wording of criterion (b) in Policy NP15 Policy which seems to repeat a criterion from the landscape section but without adding clarity.

Agree that there is overlap here between landscape policy requirements and design policy requirements – the NP group did not want to lose the principal but will be advised by the examiner where it best fits.

The representation suggests that BfL12 and/or Plan footnote 42 might provide the most appropriate wording.

Agree that the footnote 42 and BFL12 provide suitable wording

Your comments are invited on these lines of thought.

Policy NP 20

Within this Policy wording is “development” intended to mean improvements only (as implied in paragraph 135 and the inclusion of element 2 of the Policy) or extend to new construction and improvements (to existing) community facilities. Your comments are invited on this line of thought.

The reference was left flexible – there will be significant population growth in Darley Dale and the NP group are aware that additional community facilities may be required. In the short-term improvements to the Whitworth (for example) are anticipated but the NP group were aware of the likely need for new provision (either as part of a refurbishment or new development) for young people as well, but no specific location had been identified.

Implementation

The representation from the local authority notes that the Appendix D pro-forma does not form part of the statutory process. Whilst its inclusion on the Town Council website may be helpful, its inclusion within a document about to become part of the Development Plan is probably not appropriate. Your comments are invited on this line of thought.

Appendix D is intended to assist developers in engaging with the Town Council at the Pre-Application stage and is included in the appendix to show the initial information that the Town Council would like to have to begin the pre app discussions. The pro forma would be used in the context of the Pre-Application Key Principle which is voluntary as set out clearly in the justification text to the Key Principle.