



Gladman Developments Ltd

Derbyshire Dales Local Plan Examination

Matter 2 The Spatial Strategy

1. The position of settlements in the hierarchy

Is the position of settlements in the hierarchy within Policy S3 justified having particular regard to accessibility to services and employment?

1. Gladman are of the view that the updated Settlement Hierarchy Evidence Paper that was published by the Council in June 2016¹ provides a useful basis against which to consider the relative sustainability of settlements within the district in terms of the services and facilities that they provide. The presence of such facilities is an important determining factor in considering the suitability of a settlement for new development and in establishing a baseline position against which to develop a strategy within a local plan that enables the level of facilities and services to be maintained or improved over time in order to contribute towards sustainability. The ability to maintain and improve the level of services and facilities that are available locally to residents is central to setting a spatial strategy that focuses on the future vitality of settlements and contributes towards securing net gains in their sustainability.

2. The Study² recognises the position contained in the PPG that:

¹ Examination reference CD43

² Derbyshire Dales Local Plan Settlement Hierarchy Report, June 2016 (Paragraph 2.3)

“Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”³

3. The Report goes on to explain that: *“The intention of this Study is to identify and rank those settlements which are most appropriate from a social and economic standpoint to accommodate major development. It does not therefore propose restrictive blanket policies, but puts forward the evidence to support future allocations of development which are proportionate to the role and function of each settlement.”*
4. With the above paragraph in mind, it is important that the policies of the plan fully reflect the baseline position that has been established and enable a positive approach to future growth. The starting point for this is a settlement hierarchy against which the distribution of a proportionate level of growth can be undertaken.
5. As set out in our representations on the pre-submission version of the Plan, Gladman are of the view that the settlement hierarchy as set out in Policy S3 requires amendment in order to accurately reflect the evidence contained within the Council’s Settlement Hierarchy Report. In addition, some of the titles of the individual layers of the hierarchy should be amended or removed in order to better reflect the baseline position that has been established. Where relevant, opportunities to enhance the sustainability of settlements through the provision of new facilities should also form a consideration in the determination of growth requirements and the sites to be taken forward for allocation.

³ Ref ID 50-001-20140306

6. In relation to Darley Dale, Gladman suggest that this settlement is included within the 'Tier 1 Settlements' of the Hierarchy. It is accepted that the settlement does not perform exactly as the other settlements in Tier 1 do (Ashbourne, Matlock and Wirksworth). However, it clearly outperforms the other settlements contained in the evidence base document by some margin. Darley Dale has a wide range of services and facilities in the town as well as significant employment opportunities and is located in very close proximity to Matlock (with good public transport links) which has the higher order facilities that Darley Dale is lacking. Simply the lack of a town centre or secondary school should not mean that Darley Dale warrants a tier of the hierarchy of its very own.

7. Gladman support the inclusion of both Doveridge and Brailsford within the 'Accessible Settlements with Limited Facilities category (third tier)' of the hierarchy, although we consider that this tier should become the 'second tier' of the hierarchy for reasons stated above. This tier of the settlement hierarchy includes a number of settlements that offer a wide range of services and facilities rather than the 'limited' number that the associated title suggests. This is evidenced through the Settlement Hierarchy Paper at paragraph 4.4, which highlights that multiple social/community facilities exist in these settlements. As a result, the reference to 'limited facilities' is inaccurate and Gladman would recommend that this tier be renamed: **'Accessible Settlements with a good range of services and facilities'**.

8. Furthermore, the evidence base highlights issues relating to circumstances where facilities do not exist and therefore provides a baseline against which to develop a strategy that seeks to maintain and improve the sustainability of those settlements by planning to achieve net gains in the level of facilities that are available.

9. The Policy should be modified to state:

*"They will provide for ~~reduced~~ levels of development ~~in comparison to higher order settlements~~
~~in order to~~ that will safeguard **and where possible enhance the services and facilities that**
they provide, ~~role whilst having regard to any environmental constraints.~~ ~~consistent with~~
~~maintaining or enhancing key environmental attributes~~*

2. Levels of growth within the settlement hierarchy

Should similar proportionate levels of growth be identified for each settlement within a particular tier of the hierarchy?

10. As set out in our earlier submissions, all named settlements within the hierarchy should be provided the opportunity to accommodate growth and contribute towards the overall housing needs of the district. In particular, settlements with a good range of services and facilities that have the ability to accommodate growth should seek to be enabled to do so through the Local Plan. Where the opportunity exists, local plans should seek to enhance the services and facilities that are available to residents by setting a positive strategy that seeks to support opportunities to deliver new facilities alongside the residential and employment development that is required to meet assessed needs. This approach would be consistent with Paragraph 55 of the Framework to promote sustainable development in rural areas and support the intentions of the recent Housing White Paper to support 'thriving rural communities'. The Housing White Paper⁴ further emphasises the need to plan positively for rural areas, setting out that the government will: *"expect local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up."*

⁴ Housing White Paper: Fixing our broken housing market, p.27

3. The requirements of Policy S3 in terms of where development can take place

Is the approach of only having settlement boundaries for the 1st, 2nd and 3rd tier settlements appropriate? Does Policy S3 provide a sufficiently clear and positive framework for dealing with proposals for development related to the 4th and 5th tier settlements and other rural areas?

11. A consistent approach should ideally be applied across all named settlements in the hierarchy.

5. The generic strategic policies S2, S4 and S5

Are these policies positively prepared, effective and consistent with national policy taking into account any proposed modifications

12. Gladman are of the view that each of these policies require modification to ensure that they can be considered positively prepared, effective and consistent with national policy. Gladman's specific concerns are set out in our "Representations on Derbyshire Dales Local Plan Pre Submission Draft (Regulation 19) September 2016".