

Introduction

Railfuture is Britain's leading, longest-established, national independent voluntary organisation campaigning for a bigger and better railway network for passenger and freight users. This response draws together the views of Railfuture members living in and around the Peak District National Park.

Our response is limited to answering questions or options which we think are relevant to issues affecting transport. These are drawn out from the review paper below with the relevant section or question numbers retained. Railfuture's comments and answers are given in **red text** below. In summary, and recognising that the PDNPA is a planning authority but not a transport authority, we support objectives and policies that seek to minimise the detrimental effects of excessive road traffic, including parking, while promoting good access for residents and visitors to opportunities and amenities by sustainable transport. All this serves the wider objective of adapting to and mitigating climate change.

We see rail as offering a greater potential to support these aims, both by enhancement of the existing network and by expansion, plus greater integration with bus services and active travel.

CONSULTATION RESPONSE

CONSULTATION INTRODUCTION

1.1 National policy and international context

The Environment Act 1995

1.6 The Peak District is a national park for all to enjoy. National park purposes are legally defined.⁽⁴⁾ They are:

- to conserve and enhance natural beauty, wildlife and cultural heritage
- to promote opportunities for people to understand and enjoy their special qualities.

1.7 We also have have (*sic*) a duty in law to seek to foster the social and economic well-being of communities. However, the Government does not expect high levels of development that might otherwise be encouraged in non-protected rural areas. The 'Sandford Principle' has established that where there is an irreconcilable conflict between the statutory purposes, conservation takes priority.

The National Planning Policy Framework

1.10 The Government's National Planning Policy Framework (December 2023) says that landscape and scenic beauty in national parks have the **highest status of protection**.⁽⁵⁾ The scale and extent of development should be limited, and 'great weight'

should be given to conserving and enhancing wildlife and cultural heritage. Major development should not take place unless there are exceptional circumstances and it is in the public interest. Whether or not development is 'major development' is a matter for the decision maker (the National Park Authority), taking into account its nature, scale and setting, and whether it could have a significant adverse impact on national park purposes.

Railfuture comment:

With regard to rail transport, PDNPA has used these statements and others as justification to focus solely on its first statutory obligation. That interpretation has led to a position of opposition to rail development. At the 2016 public inquiry, PDNPA was a formal objector to the Hope Valley Capacity Improvement Scheme. This mindset needs to change in the context of the economic and environmental benefits rail can bring, not least to satisfy the objective below, also extracted from the introductory paragraphs:

Government Vision and Circular

1.12 The Government's Vision for national parks (referred to throughout this report) sets out 5 priorities for action:

- a renewed focus on achieving park purposes
- **adapting to and mitigating climate change** (*Railfuture emphasis*)
- securing a diverse and healthy natural environment, enhancing cultural heritage and inspiring lifelong behaviour changes
- fostering and maintaining vibrant, healthy and productive living and working communities
- partnership working.

The PDNPA must ensure that its policies consistently meet this objective. Rail can provide a significant contribution. For example, from South Yorkshire the Park is not easily accessible by public transport. The frequency of bus services from Sheffield has improved slightly in recent years, but these are still few in number and slow, taking a considerable amount of time to get into and out of Sheffield. The Hope Valley railway line, with its faster, direct train services, is a far more attractive option and has potential for service enhancement. The 'Travel and Transport' section is sadly lacking in rail content. Attempts to increase walking and cycling are laudable but, as a means of transport from South Yorkshire, impractical. In addition, there is a need for the principal railway stations to be public transport (train/bus) and cycling hubs, to enable easier access to those areas that will never be more directly accessible by rail via existing or potentially restored routes. We cite Galashiels, on the reopened Borders Railway in Scotland, as a good exemplar of the potential.

(https://www.youtube.com/watch?v=zAoV_k9hiyk)

2: SPATIAL STRATEGY

2.1: Challenges and spatial objectives: sustainable development in a national park

Issue 1

Spatial strategy: proposed Local Plan spatial objectives for sustainable development in a national park.

To ensure development is managed in a way that:

- delivers the first purpose of a national park to conserve and enhance natural beauty, wildlife and cultural heritage
- delivers the second purpose of a national park to promote understanding and enjoyment of its special qualities
- is responsive to its distinctive landscape character and special qualities reduces consumption of resources
- promotes nature recovery, carbon sequestration, blue and green infrastructure¹² and other public benefits such as clean air, water and flood prevention.

To retain and enable the development of new homes, businesses and community facilities in accordance with the above and in locations that support thriving and sustainable communities, reduce the need to travel and enable travel by sustainable means (low carbon, public transport and active travel.) This will address the duty on national park authorities to seek to foster the economic and social well-being of local communities.

¹² Blue-green infrastructure refers to the use (for example as public space or for walking and cycling) of blue elements, like rivers, canals, ponds, wetlands, floodplains, and green elements, such as trees, forests, fields and parks, in urban and land-use planning.

Question 1

Spatial strategy: proposed Local Plan spatial objectives for sustainable development in a national park

- a. Do you agree with the proposed Local Plan spatial objectives for sustainable development?

Yes.

- b. What is the reason for your answer?

We support the overall objectives, including enabling travel by sustainable means (low carbon, public transport and active travel). Our support for reducing the need to travel, however, is qualified by the need not to weaken economic development nor to weaken the viability of public transport, especially rail.

2.4 Settlement tiers

2.5 Sites for housing development

Option 2

Exception sites plus site allocations in 'Tier One' settlements

The exceptions approach applies, but *in addition*, we allocate sites in those settlements that are the most suitable and sustainable locations for new development. We describe these as 'Tier One' settlements (see [2.4 'Settlement tiers'](#)) being: '*the market town and larger settlements with good services that are well-located for public transport and active travel*'. In all other settlements, and outside of the allocated sites, the exceptions approach would still

apply. Policy would require housing development on allocated sites to meet local affordable need and be phased over the plan period to 2045.

Question 5

Spatial strategy: sites for housing development

- a. What is your preferred option?

Option 2. However, this should apply to all housing development, not just affordable homes.

- b. What is the reason for your answer?

All housing development should be concentrated in locations with adequate services including public transport. Scattered development of small numbers of additional dwellings added to each settlement is generally something that increases car-dependency, since nowhere gets the critical mass for public transport. Concentrating residential development in a smaller number of places provides the possibility for the supporting infrastructure to be enhanced at those locations where such development takes place. An overly restrictive policy on housing development runs the risk of settlements being preserved in aspic but dying as communities.

2.8: Sustainable travel

Policy (Current): Core Strategy T1

- A. Conserving and enhancing the National Park's valued characteristics will be the primary criterion in the planning and design of transport and its management.
- B. Cross-Park traffic will be deterred.
- C. Modal shift to sustainable transport will be encouraged.
- D. Improved connectivity between sustainable modes of travel will be sought.
- E. Impacts of traffic within environmentally sensitive locations will be minimised.
- F. Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted.
- G. Demand management and low carbon initiatives will be sought where appropriate.

Issue 8

Spatial Strategy: sustainable travel

Other planning policies will ensure that new affordable homes, businesses and community services are well located to reduce the need to travel and make sustainable travel more likely.

We need an aspirational *transport policy* to complement this approach. Currently this is Core Strategy T1 (above). Much has changed since this was written and it needs updating.

Conserving and enhancing the National Park's Special Qualities will always be our primary consideration but what else should we consider?

Question 8

Spatial Strategy: sustainable travel

Thinking about current policy T1 (above), is there anything else we should include in an aspirational sustainable transport land-use policy?

We support the stated policy at T1, but we agree that much has changed since it was written. We note especially the significant growth in road traffic between 2012 and 2023, and that "walking and cycling are popular leisure activities but not as a means of transport". In addition, though the aims in Core Strategy T1 are laudable, we see little tangible action to bring them about. For example, the lack of railway stations in much of the Park means existing rail users are driving long distances to those stations that do exist, both from within

and outside the Park but crossing the area in the process. (For example, driving to Grindleford to catch trains to Manchester.) Furthermore, buses are a valuable form of sustainable transport, but they are themselves vulnerable to the traffic congestion that currently occurs. This is a deterrent to usage. A viable rail alternative enables users to avoid this problem. The policy should reinforce the pursuit of improved connectivity between sustainable modes of travel, especially around existing and potential new railway stations. The lack of effective public transport in much of the National Park will have the effect of suppressing latent demand for travel, both from residents and visitors who do not have access to cars. Improvement would unlock at least some of this, to the benefit both of users and the economy.

By way of comparison, we note the *Sustainable travel and transport* section in the Lake District National Park Partnership's Management Plan 2020-2050. This makes direct reference to rail and bus improvements and initiatives plus integration between the two.

<https://www.lakedistrict.gov.uk/caringfor/lake-district-national-park-partnership/management-plan/sustainable-travel-and-transport>

6: RECREATION AND TOURISM

6.1: Challenges and spatial objectives

Issue 23

Proposed Local Plan spatial objectives for recreation and tourism

To direct recreation development towards settlements and certain existing recreation attractions and hubs. At these places development will be focussed on new or improved facilities that promote understanding and enjoyment of the National Park, sustainable travel and significant enhancement of the National Park's special qualities.

To support the change of use of traditional buildings (heritage assets) for visitor accommodation, primarily on farmsteads.

To support temporary overnight tourist accommodation that is well-suited to it's location.

To support work that maintains and enhances the rights of way network.

To safeguard the multi-user recreational trails, and to expand this network.

Question 23

Proposed Local Plan spatial objectives for recreation and tourism

- a. Do you agree with the proposed Local Plan spatial objectives for recreation and tourism?

Yes - in broad terms.

- b. What is the reason for your answer?

Though we support the objective "To safeguard the multi-user recreational trails, and to expand this network", we do not support any policy that would prevent future reinstatement for rail use of the present Monsal and Longdendale Trails. Our view is partly in support of the related objectives of promoting sustainable travel and reducing the impact of car-borne travel. Having said that, any rail reinstatement on these routes must be accompanied by reprovisioning of the recreational trails in ways that allow continued leisure access. Indeed, it could enhance it through greater segregation of walkers, cyclists & wheelers, and horse-riders, who can be a nuisance or even a hazard to each other on shared-use paths. Moreover, improved access by rail would enable users of the trails to arrive and depart without dependence on cars. Further information on this is given at Questions 40, 41 and 42 below.

7: HOUSING

Issue 28

Proposed Local Plan spatial objectives for housing

In the whole National Park, to support the provision of between 960 and 2000* new homes by 2045, distributed across the 3 landscape areas as follows**:

- between 625 and 1,302 in the White Peak (Derbyshire Dales)
- between 199 and 414 in the Dark Peak (mostly High Peak which has by far the biggest population, but also including Barnsley, Kirklees, North East Derbyshire, Oldham, Sheffield)
- between 136 and 284 in the South West Peak (Staffordshire Moorlands, Cheshire East)

To support new uses for valued vernacular and listed buildings, and other buildings that are heritage assets, primarily in settlements and farmsteads.

To support the development of new-build affordable local needs homes in the best locations, taking into account the Peak District's landscape character and special qualities, housing authority boundaries, settlement pattern, settlement population, access to services **and the potential for public transport and active travel.** *(Railfuture emphasis)*

*The rationale for this is:

- i. The lower figure is enough to reverse the population and labour force decline but has least impact on the National Park's special qualities. It is based on Scenario I (dwelling-led, 48 dwellings per annum over a 20 year plan period) of the PPHNA.
- ii. The higher figure aligns with the Government's Standard Methodology.
- iii. It is compatible with past delivery rates. Past delivery rate averaged 72 dwellings per year. Proposal is for between 48 and 100 per year.

**This is an indicative spread based on existing population and may change depending on the preferred spatial strategy. The proposed spatial objectives for housing are aligned to constituent authority areas because this will help us to work together to build more homes. The 3 local authority areas/groups broadly align with the 3 landscape character areas of the Peak District. This is a change from the current plan where housing figures are shown for 'White Peak and Derwent Valley', an area that is split between 2 local authorities.

Question 28

Proposed Local Plan spatial objectives for housing

- a. Do you agree with the proposed spatial objectives?
As far as they go, Yes. However, they do not go far enough.
- b. What is the reason for your answer?
There is recognition in the policy objectives of the need for more affordable housing to counteract the decline in the young and working age population. However, another important factor is access for these groups to amenities, education and employment opportunities. For large parts of the National Park, residents are unable to travel viably to such opportunities because of the lack of effective transport. Expansion of rail services, especially a reopened rail route linking the East Midlands with Manchester via Matlock, would provide significant benefit in this regard. We therefore feel the spatial objectives should more directly recognise lack of transport as a barrier to young and working-age people remaining in the National Park when seeking education and employment.

12: TRAVEL AND TRANSPORT

12.1 Challenges and spatial objectives

Issue 40

Proposed spatial objectives for travel and transport

To deliver a pattern of development for homes, businesses and community facilities that reduces the need to travel and enables travel by sustainable means (public transport and active travel).

To resist proposals, including for new roads, that would lead to an increase in cross-park traffic.

To support facilities and infrastructure for the switch to low/zero carbon transport.

To safeguard and extend the existing strategic multi-user trails.

To protect existing, and create new routes for walking, cycling, wheeling and horse-riding.

At recreation attractions and hubs, to work with highway authorities, landowners and residents to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on Special Qualities, is reduced.

Question 40

Proposed spatial objectives for travel and transport

- a. Do you agree with the proposed spatial objectives?

Essentially, yes.

- b. What is the reason for your answer?

For the most part, development should be concentrated in areas that can support existing and potential new public transport, especially rail but also a network of connecting bus services. We support the creation of interchange hubs at railway stations in accordance with the policy "to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on Special Qualities, is reduced". Galashiels Transport Interchange on the reopened Borders Railway in Scotland is cited as an exemplar here.

This will also support the switch to low/zero-carbon transport.

However, we feel there should be a more flexible approach to the following objectives:

- To safeguard and extend the existing strategic multi-user trails.*
- To protect existing, and create new routes for walking, cycling, wheeling and horse-riding.*

While not opposing the above in principle, where trails occupy former railway trackbeds (especially the Monsal and Longdendale Trails) the possibility of reinstatement for rail use should continue to be specifically provided for. Alternative trails could still be provided in that event, perhaps separating walking, cycling, wheeling and horse-riding, which can conflict with each other on shared-use paths.

12.2 Visitor parking

Issue 41

Visitor car parking

New planning policy for visitor parking will:

- continue to require that there is a demonstrable need for new car parking
- ensure that provision would not adversely affect the special qualities of the National Park
- align to any new approach for designated recreation attractions and hubs.

In this context we need to decide whether overall, policy for visitor parking should be more restrictive than it is currently, less restrictive, or stay the same? We can do this by redefining 'demonstrable need' and whether to consider *new and* enlarged car parks, or just enlarged car parks.

- **current policy** supports new or enlarged car parks so long as there is 'demonstrable need, delivering local benefit'. Local benefit means for example improving amenity for residents, or enhancing the built environment of a settlement.
- a **more restrictive policy** would allow existing car parks to be expanded, but would not allow any new car parks.
- a **less restrictive policy** would allow new or enlarged car parks as long as there was a 'demonstrable need, delivering local benefit or wider environmental benefit'. Wider environmental benefit means for example on landscape, visitor management and the safe and efficient operation of the highway.

Question 41

Visitor car parking

- a. Which option do you prefer?

We express no preference regarding the Options, though would instinctively support the more restrictive policy at Option 2.

- b. What is the reason for your answer?

This is in accordance with the need to reduce motor traffic, coupled with modal shift to public transport. In turn, the public transport alternative needs to be more integrated and attractive, with enhanced and expanded rail and bus services. Reopening the railway north from Matlock to Buxton and Chinley as part of the national network (though perhaps accommodating a heritage rail operation as well), plus shuttle bus links between stations and major attractions such as Chatsworth, would significantly help in this aim and reduce the (increasing) demand for car parking in that corridor.

As a general point, demonstrating a need for extra car parking should include demonstrating that all potentially viable public transport options have been implemented.

12.3 Safeguarding and protecting multi-user trails on former railway routes

Issue 42

Safeguarding and protecting multi-user trails on former railway routes

The Manifold, Tissington and High Peak Trails, and other long distance routes, are protected from development that conflicts with their current purpose (Current Policy Core Strategy T6). We need to decide whether the Monsal and Longdendale Trails should be similarly protected, or whether to continue a 'safeguarding' policy for future rail use.

It is important to note that the effect of these different approaches is the same (protection from prejudicial development) but the current safeguarding policy implies support for future rail use.

It is highly unlikely that we would support future rail use on either of these routes because it is major development and contrary to national park purposes.

Option 1

New policy will continue to safeguard the Monsal and Longdendale Trails for future rail use.

Option 2

New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes.

Question 42

Safeguarding and protecting multi-user trails on former railway routes

- a. What is your preferred option?

We strongly support Option 1.

- b. What is the reason for your answer?

Though we recognise the value of the present recreational trails on the Monsal and Longdendale routes, the potential they offer if reinstated for rail use should not be dismissed or underestimated. The Monsal route, reopened for rail throughout between Matlock and both Buxton and Chinley, would create a high-capacity option for tourists visiting the Peak District from London, the Midlands, Manchester and elsewhere, as well as giving access to the cities for residents of Bakewell and other places along the corridor. This would help to stabilise these communities in terms of young and working-age people currently being forced to leave in search of employment and other opportunities.

It also offers capacity for modal shift of freight from road to rail, especially for quarry traffic. It would also provide relief for the Hope Valley Line by means of diverting existing quarry freight to a more direct route to the south, enabling passenger services on the Hope Valley Line to be enhanced. The Longdendale route similarly offers potential, particularly for east – west freight transits, relieving the parallel roads and railways.

In both cases, we support the re-provisioning of the recreational trails. This could allow greater segregation between ‘boot, hoof and wheel’, as it has been put. It could also give more direct and easy access from the trail routes into the villages and amenities they pass through or near, providing greater passing trade and thereby economic benefit. Combining this with direct rail access from the surrounding cities, especially Manchester, the overall package offered to visitors could be greatly enhanced while reducing the car-borne traffic congestion and the economic and environmental detriment this brings.

14: MINERALS AND WASTE

Issue 48

Local plan spatial objectives for minerals and waste

To resist further proposals for mineral extraction other than in exceptional circumstances.

To allow small-scale building and roofing stone quarries.

To require site restoration that delivers significant long-term landscape enhancement (from current position) and makes a major contribution to nature recovery.

To consider proposals at Hope cement works in the context that operations will cease in 2042 at the latest.

To resist large-scale waste management facilities.

To allow small-scale waste facilities that serve local communities.

Question 48

Local plan spatial objectives for minerals and waste

- a. Do you agree with the proposed local plan spatial objectives for minerals and waste?

Yes.

b. What is the reason for your answer?

We support the general principle of not allowing new large-scale mineral extraction of all kinds within the National Park once the existing sources have been exhausted or permissions have expired. However, we support the use of rail where possible to mitigate the disturbance and damage caused by HGV road traffic, especially medium-distance traffic to the south which is currently carried by road. Any further permissions or extension of existing permissions for extraction should be accompanied where possible by conditions attaching to use of rail for distribution of extracted materials. This is made easier by the main quarry sites already having rail access.

Ends.