

### Washgate – Summary of Regulation 12 Representations and Comment

These representations are a summary of the objections and support received and relate to the proposed modification for motorcycle events. Most respondents made several comments as part of their representation. Those representations raising objections to a restriction on motorcycles are reported in Appendix 9 and are dealt with in the summary in Appendix 10 where they cover the same issues made in the Regulation 4 and 7 representations. Individual items of correspondence may be viewed at the National Park offices.

#### **Objections to the Proposed Modification to the TRO**

<u>Representation</u>	<u>Comment</u>
<b>Nature of Events</b> <ul style="list-style-type: none"><li>• Accept that the Bemrose and Reliance Cup trials have used the lane for many years but feel they do cause environmental and ecological damage to this very special area.</li><li>• From my own experience of walking and cycling in the area, from talking to local people and from researching online don't think that the Northern Experts have used Washgate for at least 25 years and the Dave Rowland for at least 10 years. I am shocked that PDNPA would consider an exemption for either of these trials If this happened you would be doubling the number of days and possibly more than doubling the number of motorcycles that use the lane currently. This would greatly increase the environmental damage and would mean two more days when other user groups couldn't use the lane.</li><li>• Have found no evidence from my internet searches and other inquiries to suggest that the Dave Rowland and Northern Experts Trials have used Washgate for many years. I do not believe that those two trials have established a case for inclusion in the proposed exemption. If they are included, the number of days Washgate is affected by a motorcycle trial could potentially double. I accept that the Bemrose and Reliance Cup Trials have used Washgate for many years.</li><li>• Aware that there have been motorcycle trials in the Peak District National Park for many years and the trials can be regarded as part of the "cultural heritage." Only one of the trials uses older motorcycles (The Reliance Cup Trials has different criteria for different classes but all machines have to be pre December 1969 at least.) The others all use modern motorcycles specially built for use in trials. I have tried to balance the "cultural heritage" argument; the enjoyment of those taking part in the trials and watching the trials; and the need for any TRO to be proportionate, against the environmental impact of the</li></ul>	<p>Evidence provided by the consultation appears to confirm that only two of the events identified in the proposed exemption – Bemrose and Reliance – have had a history of using the route.</p> <p>It is accepted that allowing events which have not previously used the route would increase the level of use on the route.</p> <p>Consideration of the use of this route by long-established motor cycle trails will be balanced with their impacts on wider amenity and conservation concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome.</p>

trials. I have concluded that on Washgate, the potential environmental damage caused by allowing any trials to continue to use the route outweighs the "cultural heritage" arguments, enjoyment and proportionate arguments

- We own ground near Washgate and know that only two of the trials use Washgate lane, this is the Bemrose and Reliance Cup Trial. We can see no reason whatsoever to give an exemption for the Dave Rowland or Northern Experts Trial as they have not used Washgate lane for many years, if ever.
- Both the Bemrose Trial and Reliance Trials have a tested section on the river Dove. Note that this involves not just a simple crossing at the "ford" but actually riding in the river (probably for 100-200 yards). The Reliance Trial also uses the "stepped" and rutted section from the river to Tenterhill for a second tested section.
- The term "historic" applied to these Trials refers only to their longevity and does not mean that they are pageants celebrating period costumes and vehicles. The fact that they have been causing damage for so many years is something to be deplored not celebrated and is a piece of "cultural heritage" we could well do without.
- To my knowledge none of the trials mentioned are historic,
- Events such as the Bemrose Trial have a distinguished pedigree pre-dating the designation of the National Park. Nevertheless, the area is included within the boundary of a National Park and it is paramount for the Authority to uphold the principles and purposes which go with that designation.
- The Bemrose and the Reliance cup trials have used Washgate regularly during my tenancy and for the number of years before this and would not object to an exemption for these two trials providing that the draft terms are put in place.
- The Northern Experts trial has not used Washgate Lane at any time during my tenancy and from talking to other members of my family and from my own recollection don't believe that they have used washgate lane for at least 30 years. The Dave Rowland trial has used washgate a number of times since 1993 but not for at least 10 years and is not a historic trial. The order has no effect on these 2 trials as they have taken place every year without using Washgate lane. If an exemption was granted for one or both of these trials it would mean an increase in both days and numbers of trials motorcycles and don't think this is acceptable on such a sensitive route. It would increase problems for other users and greatly increase the risk of damage to the route.

## Impact

- Concerned with the possible frequency of events and the lack of recovery time for the route and also the arrangements for restoring the route to a condition suitable for walkers. Motorcycles even when driven responsibly will cause erosion and hence result in the formation of water obstructions and dangerous loose rocks for walkers.
- Motor bike trials at Washgate will allow the continuous destruction of the very fragile pack horse route. Evidence has been submitted in photo form to show how over the last 30 or 40 years this ancient route has been seriously damaged. Not against motor bike trials per se, but their very nature is of applying a great deal of force to a fragile area, with the inevitable consequences of destroying any repairs carried out.
- Trials motorcycles are chain driven and the chains are lubricated with oil or grease which is bound to wash into the river as they ride through it causing pollution which again is surely unacceptable.
- Inappropriate use by a small group of people is spoiling the benefits of a national park for the majority including residents. Most people go to areas of natural beauty in a national park to enjoy peace and quiet and relaxation/exercise. (usually large) groups of motorised vehicles tearing along country tracks that were only ever designed for horse-drawn vehicles at the most puts people off from visiting the area and therefore has a detrimental effect on the local economy.
- The proposed modified plan could possibly allow an increase in traffic, four trials could be encouraged, when only two have used the Washgates route in recent times. Two of the trials have not used Washgates for a good number of years.
- In a recent report on The Northern Experts Trial, in a newspaper, the number taking part was reported as one hundred and twenty, however they each completed two laps of the circuit, in other words equivalent to two hundred and forty motor cycles. If four trials were allowed and actually took place the possible number of motor cycle journeys over the Washgates route could be as high as sever hundred and twenty, (maximum number per trial =  $180 \times 4$ ), however if there are no restrictions on the number of circuits completed, who can say how high the usage would be?
- This limit allows the Bemrose and Reliance Cup Trials to potentially increase the number of entrants by 60% from the average of the last five years figures. PDNPA is allowing a potential increase in the number of motorcycles using the route during trials.
- If all 4 trials used Washgate with the maximum number of entrants, this could mean 720 motorcycles using Washgate per year. If all four trials used Washgate with the current

The Authority accepts that impacts from motorcycle use undoubtedly occur but that the nature of organised events that have used this route may afford an element of control sufficient to reduce and manage impacts to an acceptable level together with adequate mitigation as required.

The historic nature of the route and its setting in the landscape as well as the variety of natural and cultural heritage features and the physical characteristics of this route adds to the experience of using the route. The route also gives the opportunity for quiet enjoyment and to experience tranquillity, one of the special qualities that people value most about the Peak District National Park.

In cases where there is a conflict between the NPA's two statutory purposes, greater weight shall be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage. Encouragement of a use, notwithstanding that this may be long-standing, will not be supported where it has an irredeemable impact on the special qualities of the National Park.

It is accepted that allowing events which have not previously used the route would increase the level of use on the route.

The terms of exemption identify a maximum allowable amount for each event. It is for each event on each occasion to discuss what would be an appropriate level. The terms of exemption attached to the statement of reason refer to the right to traverse the

<p>number of entrants, this could mean about 430 motorcycles using Washgate per year. Even if only the Bemrose and Reliance Trials were using Washgate with the 2016 level of participants, this would be 242 motorcycles using Washgate per year. Even the smaller number of 242 motorcycles per year is a significant number and they will have an impact on the surface of the route.</p> <ul style="list-style-type: none"> <li>• The Bemrose and Reliance Cup Trials each have an observed section which involves riding for a distance on the river bed of the River Dove. This activity will involve physical damage to the banks where the competitors enter and leave the river. Vegetation and wild life on the banks and in the river will be disturbed. This use will be on private land and should be with the permission of the riparian landowner(s).</li> <li>• Earlier PDNPA consultation documents (where the environmental impact of vehicle use on the route was considered) mentioned crayfish. The native White Clawed Crayfish have been found to be re-colonising the River Dove downstream. The recommendations for conserving these threatened crayfish involve avoiding damage to the river banks and the stream bed; and avoiding transferring eggs and fungal spores from Signal Crayfish to the water. Do not know whether the use of the River Dove in the vicinity of Washgate will jeopardise the native crayfish downstream. But this needs to be considered. If use of the River Dove by any trials would affect the crayfish, the only way that PDNPA can protect them is not to allow any trials to use Washgate.</li> <li>• Volunteers, supervised by PDNPA employees, have repaired the setts on the Derbyshire side of the route. These historic setts were damaged by recreational motor vehicle use (see the Dodd and Dodd book for further information.) have been told that at times volunteers have had to make good damage to the setts caused by motorcycles using the route since the volunteers previous visit before starting laying new setts. Do not have any information on whether this damage to the repairs can be linked to use by the trials. PDNPA should check their own records to determine what effect the trials have on the repairs.</li> <li>• Only a few of the original setts remain on the Staffordshire side. Would not wish to see them damaged by further motorcycle use during trials.</li> <li>• Would not wish to see further damage to the rock “steps” on the Staffordshire side of Washgate. Much of this damage is associated with recreational motor vehicle use.</li> <li>• There is a deep rut in the level part of the track on the Staffordshire side. It will be less likely to heal if the trials continue to use the route.</li> <li>• Allowing four special events each year with a maximum of 180 vehicles taking part in</li> </ul>	<p>route only once in each event.</p> <p>The order is not being proposed on the grounds of preventing damage to the route but instead relating to amenity and conservation. Maintenance and condition of the route is therefore a separate matter to the reasons for making the order. Vehicle use contributes to the route deterioration and the state of disrepair can detract from the amenity of the route and area so that the natural beauty and amenity of the area and of other users is affected by motorised vehicle use on this route. A requirement for reinstatement following events and the potential to rearrange in adverse weather conditions will help to mitigate for further damage that may occur.</p> <p>There is a need to ensure that any adverse impacts on the route and its environs which includes the River Dove can be adequately addressed and monitoring undertaken.</p>
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each leaves this vulnerable route subject to too high a level of use. The numbers taking part in each event will increase as this will offer the only opportunity to legally ride this route so it is therefore reasonable to expect the full quota to be reached in a few years. That means that over four events as many as 720 (180 x 4) motorbikes will use the route. Do not think that this level of use is sustainable.

- Have serious concerns about giving an exemption to the Bemrose and Reliance Trials because of the environmental impact especially around the area near to the river.
- The possibility of entrants only being subject to the statutory maximum of 180 for an event means that there is the potential for a greatly increased number of competitors over those recorded for the Bemrose and Reliance Trials in recent years.
- Whilst waiting their turn at tested sections, competitors tend to bunch up in groups. Some keep both themselves and their engines warm by performing ad hoc manoeuvres, such as “wheelies”, on adjacent land . These activities can and do cause surface erosion.
- The activities performed on the tested sections of Trials are often far more extreme than those observed in casual usage. Some necessitate high revving of engines with the concomitant emission of noise and fumes and the spinning of wheels. These activities are inappropriate within a National Park and damaging to the environment.
- Natural England has found evidence that our native white clawed crayfish has been re-colonising the Dove, downstream of the Washgate ford, after having been wiped out by plague. This is a protected species under threat from the American signal crayfish. Best practice advocates avoiding damage to river banks; not disturbing the river bed or stirring up silt; and preventing the transmission of plague and Signal crayfish eggs from footwear, animal hooves and vehicle tyres. According to their Biodiversity Action Plan (BAP), PDNPA are already protecting it and creating suitable habitats. The continuation and possible extension of vehicle Trials, threatens both the river, its crayfish and the already damaged Staffordshire side of Washgate. This conflicts with PDNPA’s foremost statutory duty and BAP action it is already committed to.
- Use by any powered bike will continue to inflict damages, if the Peak Park permits five trials per year that could still mean hundreds of bikes tearing up the surface.
- There is no evidence that the presence of a small number of motorcycle trail bikes briefly present and in transit along the route have a detrimental effect on the scenic quality, relative wildness, natural or cultural heritage of the route. In fact as motorcycles have been using all unclassified roads in the area for over 100 years they are part of the cultural heritage of the area.

- There is no evidence that the presence of motorcycle trail bikes impede on the opportunity to enjoy tranquillity and quiet enjoyment by other users on the route as they are required by law to be properly silenced in accordance with construction and use regulations. As the route is technically challenging it requires great finesse in terms of throttle control and balance and is impossible to traverse above about 5mph. In any case the number of motorcycles using the route are few and far between (5.7 per day in 2015) and as the route is only short any effect is very transitory.
- Particularly since the width restriction of 1.5 metres was introduced can see no evidence of walls being damaged, historic stone pitching or drainage suffering for motorcycle use. Motorcycle trail bikes have little to no impact as they have to be lightweight to control. Any damage to pitching or drainage is due to heavy water downpours that regularly affect the route, along with frost damage and poorly maintained drainage. The adjacent walls are in poor repair to such an extent that they are falling down. Sheep, deer and heavy weather over time are all helping to push over these walls.
- Have walked this lane with our rambling club, and was enchanted with its feeling of peace and remoteness, and its history as a packhorse route. Even these events would involve a lot of bikes, which would be enough to erode the lane and make walking difficult. If any walkers were on it at the time of the events, they would be put in danger as the lane is very narrow in places and it is impossible to stand to one side – and it certainly should not be closed to pedestrians at these times.
- As have leg and other disabilities rely on green lanes to walk on as they don't have stiles, which find difficult these days. Have problems with rutted terrain and the ruts caused by motor vehicles are a real problem. Against the modification to allow motorbike trials as it send the wrong message of acceptance to a bunch of people, who have no regard for the beauty of the environment, but just see it as a challenge to manoeuvre their vehicles over tricky terrain.
- The Washgate route is an historic packhorse route with stone pitching. This is being irreparably damaged by the wheels of motorised vehicles for which it was never designed or even anticipated. Continued use by motorised vehicles will only accelerate its destruction. Can see no reason to allow any exemptions, even if they have had an historic use of this route. This will only lead to the utter destruction seen elsewhere in the Park.
- Motor-cycling is characterised by noise and fumes, inconvenience to other users of the route, and the generation environmental damage, including destructive wear and tear on the landscape fabric and disturbance to wildlife, all counter to National Park purposes.

<ul style="list-style-type: none"> <li>Exemption for established use along a route which was never designed for use by mechanically-propelled vehicles is not acceptable. In the face of its regular use by four-wheel drive vehicles and motor cycles in the 1980s and 1990s in particular, the original surfacing of the Washgate route was largely destroyed, and in spite of the best efforts of volunteers has scarcely been restored to a satisfactory condition.</li> <li>Recent rains [21 November] have dumped considerable sediment or, alternatively, further washed out sections of the Washgate route. To walk this route requires considerable care.</li> <li>If all green lane motorcyclists had to trial ride washgate on proposed limited days and it just so happened to be a wet weekend when they would have most likely left their bike in their sheds then you will have literally thousands of machines tearing torn ground leaving such a mess that no one would be able to trial never mind walk this particular route for 3 to 4 months.</li> </ul>	
<p><b>Enforceability</b></p> <ul style="list-style-type: none"> <li>The original draft order enabled the PDNPA to consider written applications. It does not make sense to remove this layer of intelligently-applied discretion, replacing it with automatic permission incapable of responding to circumstances at the relevant time.</li> <li>Peak Park Authority, once they have given permission for four trials to take place, would no longer have control over the numbers using the route.</li> <li>The limit of 180 entrants is found in legislation. Have doubts that PDNPA could impose a lower limit if it used the additional exemption route.</li> <li>Do not believe that PDNPA would be able to add additional clauses to the draft conditions to prevent such use of the river. Observed sections involving water are a feature in the routes of all four trials so it is likely that if the Dave Rowland and Northern Experts Trials used Washgate in the future, via any exemption allowing all four trials to use Washgate, they too would have an observed section in the River Dove. PDNPA should be protecting the River Dove, not allowing trials to continue to use it for an observed section.</li> <li>If PDNPA feel that the Bemrose and Reliance should be allowed to use the lane, this should be done using the provision already in Article 4 allowing them to give written permission for use of the lane. If you use this provision, you will be able to control the impact to the environment and if necessary refuse permission. If you give a specific exemption for any named trials, we don't think you will be able to stop the trials using the lane, even when they cause irreparable damage to the lane and environment.</li> </ul>	<p>The proposed additional exemption allows consideration and for authorisation on a year by year and event by event basis having regard to the particular circumstances at the time. It does not provide for additional events to be submitted.</p> <p>If there are concerns over the impacts that may occur from any event then an authorisation may not be provided for that year and on each subsequent occasion until the matters of concern have been resolved to the mutual satisfaction of all parties.</p> <p>Reinstatement is to the condition prior to the event to be undertaken within one month of the event occurring.</p> <p>Specific reference to specified events on this route would not establish a precedent elsewhere in the National Park. To not establish a precedent for other events on this route, it is important to identify the</p>

<ul style="list-style-type: none"> <li>• PDNPA would have little control over any Trials because responsibility for running them has been delegated by the Government to the MSA/ACU. PDNPA seem to recognise this since the long list of purported conditions contains little that is not already contained within the ACU's Standing Regulations. This lack of control is most important in two areas - firstly in the number of entrants and secondly with respect to the activities performed by competitors (especially on the tested sections).</li> <li>• The proposed modification order includes a draft term covering reinstatement. As the route is already in an exceptionally poor state of repair it is difficult to see how agreement can be reached on what is to be reinstated.</li> <li>• Exemption is likely to act as an encouragement to 'unofficial' use by other motor cyclists, together with demands for further exemptions elsewhere in the National Park. The requests should be resisted.</li> </ul>	<p>events which have been considered as part of the consultation process.</p> <p>Making a specific exemption to the TRO for specified historic trials would prevent a precedent being established on other routes in the National Park and other events on this route.</p>
<p><b>Excessive/Discriminatory</b></p> <ul style="list-style-type: none"> <li>• The inclusion in the proposal to allow use for the 4 trial events is nothing more than an attempt by the authorities to discredit the alleged bias they show against the trail riding activity in the Peak Park. There has never been any real attempt by the Peak Park board to work with the trail riders to find a suitable workable compromise. This situation has been proven with all previous TRO applications, as only an outright ban is acceptable to the authority.</li> <li>• Excessive restriction - The aims put forward in the statement of reasons can be achieved with a lesser restriction. By choosing an overly restrictive option, the proposal will needlessly deprive the National Park of the benefits of motorcycling. Unfairness - The proposal is still unfair and unacceptable to motorcyclists, who are equally entitled to responsibly use of Washgate Lane as they have done for over a century. Allowing 4 motorcycle trials a year is not sufficient to properly maintain motorcycling heritage on Washgate. PDNPA are not securing a successful or reasonable compromise.</li> <li>• The proposal to close the RUP known as Washgate for 361 days per year makes no sense. It is historically a Green Lane and used for many decades as such. The direct attack on motorcycles using this and other such is a 'one sided' and 'we know best' act aimed to pander to and pacify selfish activists who want exclusive use of footpaths, bridleways, green lanes and RUPs.</li> <li>• The restrictions to the use of this lane are too restrictive and that the aims really seem to be to stop vehicles greater than 1.5m wide using the lanes. This proposal stops all</li> </ul>	<p>The proposal is to prohibit all mechanically propelled vehicles at all times subject to certain exemptions which include consideration of the continuation of specified motorcycle trials that have had a history of using the route.</p> <p>The Authority will promote opportunities for everyone to understand and enjoy the National Parks' special qualities in a responsible way but where there is a conflict with the conservation of these special qualities then action will be taken including the use of TROs where appropriate.</p> <p>NPA Members are aware that a variety of measures can be used to resolve issues around recreational vehicular use. Where a least restrictive option achieves the desired outcome then this may be a factor for consideration.</p> <p>At certain times on certain sections of the route there may be less impact on the route surface by</p>



<p>motorcycle use on this lane which is not in any way a problem for this lane.</p> <ul style="list-style-type: none"> <li>• The proposal is very unfair and it is unacceptable to stop motorcyclists, who are equally entitled to responsibly use Washgate Lane as they have done for over a century. Allowing 4 motorcycle trials a year is not sufficient to properly maintain motorcycling heritage on Washgate. PDNPA are not securing a successful or reasonable compromise. Where would be my opportunity to ride responsibly on the Washgate?</li> <li>• This proposal is too unjust, unfair and goes far beyond the real reasons for its proposal. Please stop the despoilers of the lanes and countryside but please don't include all motorcyclists, they are not the problem here and it is not fair simply to blanket ban all other motorised users because of the actions of a few.</li> <li>• Although the proposed modification is a step in the right direction, I strongly feel that the road should not be closed to motorcycles at other times. This is an ancient right of way and we are the custodians of it, and therefore must not just react to those who do not understand some of the previous users. Most of the damage is caused by 4x4 vehicles and agree that they should be stopped as they use the unsurfaced roads as a playground. In general motorcyclists use them to access the countryside.</li> <li>• there is already a right of way for off-roaders using this route outside of any organised events so there should be no need to extend it to organised events.</li> <li>• Why are the Peak District Park Authority so opposed to off-roaders? Other areas of the UK have embraced off-road activity and seen it as a new investment opportunity and a chance to re-generate</li> <li>• By allowing motorcycle trials events to take place on Washgate lane annually, the Peak District National Park Authority is accepting that motorcycles are acceptable on the route, have no physical, environmental impact on the route and no conflict is caused with other users by motorcycles. Therefore no TRO banning any motorcycle makes sense.</li> <li>• Restricting legal use to annual 'trials events' clearly discriminates against trail riders. Why?</li> <li>• Please provide detailed reasons why trials bikes are acceptable but trail bikes are unacceptable. Tell us what differentiates the two categories of motorcycle?</li> <li>• The restriction of certain vehicle users with no evidence to substantiate a reasonable argument against them, is discriminative and not inclusive. I feel that this proposal persecutes a minority.</li> </ul>	<p>motorcycles used in a responsible manner but other impacts remain.</p> <p>The proposed exemption from the order for identified motorcycle events does not confer any legal status or any other accrual of rights nor does it supersede any other regulatory requirements.</p>
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## Alternatives

- The frequency of events should be limited to no more than 2 per year and the timing agreed such that the route is in good condition and the events are well separated. In addition the Park Authority should have the authority to cancel or reschedule an event even on the day if conditions would result in unreasonable damage to the route. The rules covering restoration should also be strengthened.
- There is no place for motorised vehicles in this beautiful and tranquil area and that PDNPA should abandon the proposed modification and implement the order as originally proposed.
- Making specific exemptions for particular trials on a particular TRO is the wrong approach. It would be simpler and more logical for the Authority to adopt a policy on motorcycle trials which applies universally to all TROs, current and future. In the meantime, the proposed Order on Washgate provides for a trial to be granted exemption via para 4f "with the prior written permission of the Authority"
- Suggest that the number of events be restricted to two by allowing each event to take place every two years.
- It will be much easier to administer thereby saving cost if motorcycles are allowed at all times.
- The PDNPA should proceed with the original Order and if they felt that the Bemrose and Reliance Cup Trials should be allowed to use Washgate, they should use the provision in Article 4 allowing PDNPA to give written permission for the use of the lane, thus controlling potential damage to the environment and ecology of the area and the lane. Failure to do this will result in irreparable damage to the whole area.
- The Dave Rowland Trial has not used Washgate for 15 years and there is no evidence that the Northern Experts Trophy Trial has ever used it. Thus neither should even be considered for exemption.
- There is a real conflict of interests: the historic and cherished 4 motor cycle trials v the even more historic character of the route and the countryside. Of the two the latter has precedence and should have priority. If continuing the motor cycle trials within the proposed limits does not control the conflict and damage to the Washgate route and wider environment is shown to continue, then, sadly, the motor cycle trials should be stopped from using Washgate permanently.
- I do think that the maximum number of 180 entrance is excessive and would like to see this reduced. It is my understanding that the organisers of The Reliance Cup trial limit the

Consideration of the use of this route by long-established motor cycle trails will be balanced with their impacts on wider amenity and conservation concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome.

The National Park Authority only has a limited role in dealing with motor vehicle events to ensure that due regard is given to National Park purposes. In this case it is entirely appropriate that the Authority when considering a traffic regulation order on a particular route has regard to the use of the route and any provisions that it may take with respect to that. The Authority will however support its constituent Highway Authorities in any policies that they may have.

The characteristics of this route means that it is valued by many different users yet there is evidence of conflict and damage occurring on this area of conservation and amenity interest and the continued use of this area by motorised vehicle users adversely affects the special qualities of the route and area to a more significant extent than other users.

Written authorisation would be required before a specified event could go ahead.

Evidence provided by the consultation appears to confirm that only two of the events identified in the proposed exemption – Bemrose and Reliance – have had a history of using the route.

number of entrants to 120. If the number of entrants is too high it increases the risk of damage to the roots and also extend the length of time when Walkers cyclists and horse riders can't use Olay.	
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### Support for the Proposed Modification to the TRO

<u>Representation</u>	<u>Comment</u>
<p><b>Nature &amp; Importance of Events</b></p> <ul style="list-style-type: none"> <li>• These historic and well regulated events should be allowed to continue. These are tremendous endeavours of skill and endurance and the special stages are essential to them. They are always well run by respected organisations and bring essential visitors and spectators to the park.</li> <li>• These four events, some of which have been held for around 100 years, did once attract international competitors and coverage and introduced the best of the British countryside to a worldwide audience. The events are once again becoming popular and are likely to bring benefit through tourism to the local economy. These trials are held in other world renown sites such as the Isle of Man and Jersey and bring economic benefit to these areas. The trials are not just for the benefit of the riders. Observers, committee members, press, mechanics and spectators all attend and get to experience the best of the Peak District. Also being primarily Sunday events they are attended by families.</li> <li>• Organised motorcycle trials are an important and historic recreational use of the Peak District.</li> <li>• Have been a trials rider for 52 years and first visited Washgate as a spectator in 1963 (and also the nearby Hollinsclough), and have ridden the lane many times in the Reliance Trial and also the Bemrose trial. My most recent ride of the lane was in March of this year and also March of 2015 when I was the outright winner of the Bemrose Clubman Class , when at the age of 68 I became the oldest ever winner of a British National trial. The use of such roads retains the traditions of this fantastic, troublefree sport that has been my lifelong passion, and it's due to the continued use of such roads that continue to take part in trials held in the Peak District despite living a considerable distance from the event so efficiently organised by the North Derbyshire Youth MCC in conjunction with Manchester</li> </ul>	<p>The Authority recognises the heritage value of long-established motor vehicle events.</p> <p>The historic nature of the route and its setting in the landscape as well as the variety of natural and cultural heritage features and the physical characteristics of this route means that it is valued by many different users yet there is evidence of conflict and damage occurring on this area of conservation and amenity interest.</p> <p>Consideration of the use of this route by historical motor cycle trails will be balanced with their impacts on wider amenity and conservation concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome.</p>

<p>17 MCC.</p> <ul style="list-style-type: none"> <li>• This is a very sensible way to proceed and will retain long established events, 3 of which have for 70 years plus and the 4th is a Memorial Trial for one of the best British riders of his era, who lived locally and sadly died at a young age.</li> <li>• There are 2 specific events, The Reliance and The Bemrose Trials, which use this road and in the World of Motorcycle Trials they are extremely prestigious, attracting entries from all over the UK and have to be limited in numbers because of this.</li> <li>• Both these events have their roots in Reliability Trials from the early days of motor cycling and hence their prestige.</li> </ul>	
<p><b>Impacts/Control</b></p> <ul style="list-style-type: none"> <li>• Continues to allow the use of the route in a controlled manner by motorcycles fitted with ' trials pattern tyres which have a minimal adverse effect on the route surface.</li> <li>• The use of these tracks and by ways on four days of the year by solo motorcycles will have a very limited impact on their attributes.</li> <li>• The events will occur unnoticed by the majority of park users as passage is complete in less than 2 hrs on only four days a year. Any added pre-authorised controlled recreational motor cycle runs considered for groups of around 20 riders would pass through in less than half an hour with no significant detriment.</li> <li>• Appreciate some damage has been done mainly by 4 x 4 vehicles. Also the problem is more compounded by more powerful machines ridden irresponsibly by riders who are not part of a recognized club or event.</li> <li>• Hands on experience of riding in the Reliance Trial over the past 15 years and the Bemrose trial over 50 years ago is that courtesy is shown by all competitors to horse riders and walkers as stipulated in the entry form for these events. The trials tyres used are non aggressive and have little or no effect on the track surface. It allows all parties with an interest in using the National park to do so without out conflict or restriction of their chosen pastime.</li> <li>• By limiting the use of Washgates to just four organised events per year any perceived environmental impact is minimised and virtually eliminated</li> <li>• Each event is closely controlled by the Event Organiser, uses the route for a very short period of time and the motorcycles used are fitted with soft rubbered tyres having very little effect on the surface of the route. Because the Events will have known dates, any conflict with other users will be minimised.</li> </ul>	<p>The Authority accepts that impacts from motorcycle use undoubtedly occur but that the nature of organised events that have used this route may afford an element of control sufficient to reduce and manage impacts to an acceptable level together with adequate mitigation as required.</p> <p>Consideration of the use of this route by long-established motor cycle trails will be balanced with their impacts on wider amenity and conservation concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome.</p>

<ul style="list-style-type: none"> <li>• With the advancement of competition motorcycles over the years the average weight of these machines is 70 to 100kg, which is considerably less than their forebears which weighed in at 150kg plus. Their suspension is completely different and tyres used are lightweight, soft walled rubber with special tread pattern. The effect of all these changes makes the bike a much more gentle user of the road and it is unlikely that you will see any deterioration where the bikes have passed.</li> <li>• Because Washgate is used in transit only once in the events, all competitors will have passed through in a very short period of time, around 2 hours. This, in time, equates to less than 0.1 per cent of the total life of the countryside when any disruption might take place.</li> <li>• Motorcycle Trials are run by professionally organised Clubs affiliated to the Autocycle Union (ACU) and/or Amateur Motorcycle Association (AMCA). The clubs ensure that all their members are aware and follow instructions relating to their events. The Clubs are closely involved with many Landowners, who are happy to allow use of their land on a regular basis for events taking place over a long number of years. Care is taken by the Clubs to ensure that riders only use designated routes to ensure there is no lasting damage caused by each event. Final instructions make all entrants aware of this and particularly in road events where other road users are involved, horse riders, walkers or quiet areas for example. Any abuse is reported and action taken for future events. The Organising Club will be happy to discuss with you any particular issues that you require addressing.</li> <li>• A professionally run event will not cause the sort of damage to the area that you refer to.</li> <li>• Support the proposal as it will reduce the number of bikes using these trails. The motorcycles cause considerable damage and erosion seriously impacting walkers, horse riders and mountain bikers.</li> </ul>	
<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>• Continues to allow access to the National Park of groups with diverging interests.</li> <li>• Limits the use of the route to specified occasions thus benefitting Ramblers and other users of the route yet continues to allow access for long established motorcycle trials.</li> <li>• Limiting the use of motorcycles benefits other users yet continues to allow the passage of motorcycles which contribute in a controlled manner to keeping the route clear of becoming overgrown and impassable</li> <li>• In favour of the amended proposal to allow four organised trials per year since this</li> </ul>	<p>The Authority recognises the heritage value of long-established motor vehicle events.</p> <p>Washgate is an important recreational asset for all users. All recreational users are important to the local economy.</p>

<p>preserves the interests of motorcycle trials at no cost to the environment or ecosystems of the area. Also see this as an interesting development and a compromise which could be used in other similar instances around the country.</p> <ul style="list-style-type: none"> <li>• Will allow for the continuation of the long established motor cycling heritage dating back to the beginning of the twentieth century</li> <li>• It will go the majority of the way to allaying the concerns of most consultees by restricting use to light touch trials motorcycles on pre-authorised occasions.</li> <li>• The Bemrose , the Reliance, the Dave Rowland and the Northern Experts trial are historic events controlled by the relevant governing bodies and motor cycle clubs ensuring that these events, run on just four days during the year, will pass with the minimum disruption to the environment and local population.</li> <li>• The continued use by motorcycle trials maintains access to the National Park for many people with other interests besides motorcycling who will return to explore the area for its natural beauty</li> <li>• Many of the competitors are retired and take advantage of this when visiting different areas in the country to stay and explore, so bringing revenue to those areas.</li> </ul>	<p>The Authority accepts that impacts from motorcycle use undoubtedly occur but that the nature of organised events that have used this route may afford an element of control sufficient to reduce and manage impacts to an acceptable level together with adequate mitigation as required.</p> <p>Consideration of the use of this route by long-established motor cycle trails will be balanced with their impacts on wider amenity and conservation concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome.</p>
<p><b>Alternatives</b></p> <ul style="list-style-type: none"> <li>• Modification extended to include pre-authorised controlled green lane recreational motor cycle runs with a limit of say groups of 20 riders. I appreciate that Section 4 (f) of the original Proposed order could be used for this purpose but without it being mentioned as a PDNPA supported option, the officers considering any such request at a later date would feel under pressure from single purpose groups such as the Peak District Green Lane Alliance. Urge you to seriously consider making mention of this option in the modification text.</li> <li>• Support the modification subject to adoption of comments re noise pollution and the assurance that should the NPA find that permitted events are not compatible with purposes it would reconsider the issue. In order to properly implement its purpose with regard to quiet enjoyment, consider that the National Park Authority should make explicit reference in the modification to the maximum permitted exhaust noise that may be made by any motorised vehicle taking part in permitted events. This will enable proper consideration of both current and changing technologies and conditions.</li> <li>• Commend the proposed amendment to permit the four annual Motorcycle Trials events, subject to any agreed terms being open, reasonable, relevant and practicable. By “open”</li> </ul>	<p>At certain times on certain sections of the route there may be less impact on the route surface by motorcycles used in a responsible manner but other impacts remain.</p> <p>The characteristics of this route means that it is valued by many different users yet there is evidence of conflict and damage occurring on this area of conservation and amenity interest and the continued use of this area by motorised vehicle users adversely affects the special qualities of the route and area to a more significant extent than other users.</p> <p>Consideration of the use of this route by long-established motor cycle trails will be balanced with their impacts on wider amenity and conservation</p>

<p>I don't necessarily mean for all members of the public to contribute, but that any queries or concerns you may have are discussed in good time and due course with the appropriate club/s. "Reasonable, relevant and practicable" should be self-evident. Would like to put forward one further small amendment for consideration – that the permission includes motorcycle use, if required, by limited members of the organising team as sanctioned by the Clerk of the Course, both before and after the event and solely in direct relation to its inclusion in the event. I would suggest a minimum of 2 bikes (for safety reasons) and probably no more than 4 per visit would suffice. As those involved may well have other tasks and locations to cover, including visiting farmers and landowners, this would greatly aid them in evaluating conditions and would be appreciated.</p> <ul style="list-style-type: none"> <li>• The proposal to allow four motorcycle trials per year is certainly a welcome modification, but I would prefer it if unlimited access for motorcycles all year round was the outcome.</li> <li>• Keep Washgates Lane open for all legal, lawful, quiet enjoyment by motorcycles, both in the four named trials and for general leisure purposes.</li> <li>• Oppose the introduction of a TRO on "Washgates"/ Long Causeway. If it is applied I agree with the clause permitting key historic events.</li> </ul>	<p>concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome. Regard will also be given to ensuring compliance with noise limits and other regulatory requirements.</p> <p>An authorisation for an event could potentially allow limited access for organising and reporting and any such request would form part of the details to be submitted by an event organiser prior to the event taking place.</p>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Thank the PDNPA for taking the time and strength of purpose to put this modification forward in the face of such focused and often over exaggerated opposition. Hope should the modification be accepted that the Officers tasked with the considering the applications do not withhold or delay such permissions to the detriment of the events.</li> </ul>	<p>Consideration of the use of this route by long-established motor cycle trails will be balanced with their impacts on wider amenity and conservation concerns to assess whether these wider concerns can be adequately addressed to achieve the desired outcome. If an exemption for specified events is adopted on this route would encourage event organisers to provide all the relevant information and respond to requests for information in good time.</p>