

---

## Wetton Hills – Summary of Regulation 7 Consultation Responses – Organisations

### Statutory Consultees

**Peak District Local Access Forum** – This was considered by the meeting of the Local Access Forum on 15th March. Members had the benefit of the previous Green Lanes Sub Group visit on 14th July, 2017 and further discussion. This led to agreement to confirm our support for a TRO as set out below, with 2 members asking that their previous minority response being included again as below.

- The route in Wetton Parish is 1,420 metres long. It runs along the north-western and western edges of Wetton Hill, from Manor House to a point on the minor road through the Manifold Valley a short way below Wettonmill. Its legal status is a Non-Classified Highway. It links directly to Non Classified Highway cul-de-sac route to Top of Ecton northwards, the southern end links to Manifold Way NCH which is subject to an all vehicle TRO. It follows a shallow dip between Wetton Hill and the slope below the Sugar Loaf on the other side.
- The whole route lies within Access land (being the largest area in the White Peak), and the Hamps and Manifold Valleys SSSI. Continued use by vehicles can be expected to deepen and extend the existing rutting and damage to the track surface as well as encourage spread to the adjacent strip, causing further damage to the grassland in the SSSI.
- The Green Lanes Sub-group first surveyed the route and met in November 2014. The Sub-group expressed their concern about the state of the route, and that opportunity exists to take action before the route further deteriorates, but that action needs to be taken urgently. It concluded then that:
  - The National Park Authority should approach the National Trust and Peak Park Conservation Volunteers (PPCV), with a view to carrying out minor repair works on rutted sections, infilling with appropriate stone materials. (We heard on the site visit that a meeting had taken place between Peak District NPA and National Trust staff, but no work had been carried out).
  - Escalate the monitoring of this route to ensure it does not deteriorate further and that if deterioration continues, actions should be escalated. (We heard on site that monitoring of usage had continued, but was low overall in the case of both 4WD's and Motor Cycles. Nevertheless, the effects on the ground were clear with an increased amount and depth of ruts since the visit in 2014, and some members have mentioned it is worse still in winter).
- Our key findings and conclusions were:
  - The damage and rutting has deteriorated significantly since our 2014 visit with deeper and more extensive ruts - suggested this could be demonstrated by photos taken then and since. There is a metalled surface at either end, but the substantial length of the route is grass and unrestricted vehicular use is not considered sustainable.
  - There is no likelihood of Staffordshire County Council as Highway Authority doing a review of status so use by vehicles is likely to continue to be a problem.
  - Considered that the solution to the current issues needed to be considered in relation to the wider National Park issues to safeguard the landscape, the SSSI and the tranquillity of the Access land - the largest area in the White Peak area.
  - One member thought a downwards one-way TRO restriction might be the answer but colleagues thought this would not be sufficient.
- Recommendation: Share the National Park Authority's concern about the impacts recreational motor vehicles are having on this route in a tranquil area enjoyed for walking, horse riding and cycling. Our agreed approach was to recommend a TRO for all vehicles with the exception of land management and farm usage, and use by emergency services or by any local authority or statutory undertakers in pursuance of their statutory powers and duties.
- Wish to repeat minority response which is attached from Richard Entwistle and Clare Griffin from July last which they reaffirmed at the Forum meeting on 15th March.
- Referring to the 3rd and 4th paragraphs of John Thompson's (JT's) letter would like to use the following Staffordshire CC's official description of the lane; The route in question falls within the remit of Staffordshire County Council. An extract of their description is: NSG Class 0.5-100K:

BACK OF ECTON Maintenance Responsibility SCC (Highways) Maintenance Category NO MAINTENANCE Class Description Green Lane

- The route is in a fairly narrow steep sided valley, where the sides are mainly covered in soft vegetation, not bare rock. The noise footprint of any motorised vehicle is contained within this small area, with any noise being dampened by the natural soft vegetation. These natural characteristics of the route mean that vehicular noise cannot be considered as harmful to the quality of the area.
- No other RoW shares the valley, the only intercepting RoW is Wetton 20, a bridleway coming from Wetton Mill and Farm. The land contours are such that this bridleway comes through a valley or pass of its own, which effectively shields most of the bridleway from any noise on the Wetton route under consideration. Close by is Wetton 40, a footpath, but this joins the tarmac road in front on Manor Farm (D1133), so is not on the route in question (G1133).
- The Wetton route is without width limiting walls, hedges, or fences, so there is plenty of space for users to pass by without constraint.
- The Wetton route is generally straight, with easy curves; there are no sharp bends around which travellers can suddenly appear.
- The Wetton route is gated at both ends, so there is no risk of vehicles inadvertently carrying excessive speed from a sealed surface road onto the Green Road.
- Referring to JT's paragraph 3 propose these comments
  - A road or byway can go through or over a SSSI, but it is not a part of the SSSI itself, and wear and tear to the road isn't damaging the SSSI.
  - Concern about the continued use by vehicles deepening and extending the rutting is exaggerated. There's no evidence of any off-piste driving on the Wetton NCH, which is noted in PDNPA's report and any increase in the depth of existing ruts can be attributed mainly to water run-off. In fact comparing the 2014 and 2017 photographs a notable difference is the vegetation growing in the ruts
- Referring to JT's bullet points
- 1st point - One rut in particular has become deeper since the 2014 visit, but passes close to a ponding area where the adjacent stream goes underground and is easily avoided by users.
- 2nd point - Voluntary Restraint did reduce vehicles usage, but volumes are so low as to make any attempt at statistical analysis meaningless. Actual levels of vehicular use are recorded by PDNPA as follows:-
  - Apr/May 2014: Average 0.05 cars per day, average 0.01 motor cycles per day;
  - Aug/Nov 2015: Average 0.3 cars per day, average 0.8 motor cycles per day;
  - Jan/Mar 2016: Average 0.05 cars per day, average 0.7 motor cycles per day\*; \*denotes VR in place.
  - Mar/Apr 2016: Average 0.02 cars per day, average 0.3 motor cycles per day\*;
  - Oct/Mar 2017: Average 0.05 cars per day, average 1.17 motor cycles per day.
- 4th point - Staffordshire CC's description of the lane says there is not a problem of safeguarding the landscape, the SSSI or the tranquillity
- 5th point - PDNPA members are unlikely to be deflected from their intention to apply TRO and any suggestion that involves management or is seasonal or temporal will fall on deaf ears. Over the years GLASS has advised using this lane downhill (southwards). Nevertheless, for the sake of applying a permanent TRO to minimise any potential damage by vehicles this could be one-way restriction, downhill (southwards) or closed to motorised or horse drawn vehicles between 1st October and 30th April annually.
- 6th point - Recommendation - see point 5 above. Also obtain an expert's assessment about following up the 2014 proposal to effect repairs to the route using volunteer labour.

**British Horse Society (Staffordshire)** – endorse the view of the Peak Park Authority

**Natural England** - Access/Recreation view:

- the National Park needs to ensure sufficient/robust evidence that any identified problems constitute sufficient grounds for a TRO
- Would a re-emphasis on voluntary restraint be a viable/preferable option?

- Subsequent monitoring will be useful whatever approach is taken

**Friends of the Peak District** - welcome the National Park Authority's consultation on the future of recreational motorised vehicular use (RMVU) of Wetton Hills. Strongly supports a permanent Traffic Regulation Order (TRO) restricting all RMVU on the lane.

- Wetton is a delightful grassy unclassified unsurfaced lane joining Leek Road in the south with the tarmacked cul-de-sac at Manor House. This narrow dry limestone valley lies within the Natural zone, is tranquil, has an exuberance of wild flowers in the grassland and offers a link with many other walks that circumnavigate Wetton Hill, including the Manifold Way. It is a key route within and for exploring the Hamps and Manifold Valleys SSSI and Peak District Dales SAC, designated for its ecology and geology. This area of the SSSI is in favourable condition at present. The lane also passes through a range of Historic Landscape Character Areas and lies in the Natural Zone which is designated for its natural beauty, sense of remoteness and seclusion, and its freedom from disturbance.
- The route is a priority route within the PDNPA's Priority Routes Action Plan (2018-19); the impacts of use by the predominant traffic (motorcycles) are well-worn earth ruts evident particularly in the middle section of the lane and even during dry weather use. To address the issues on the lane voluntary restraint by motor vehicle users has been tried through the winter months between January and April 2016 but even though vehicle use is low the code of conduct has been unsuccessful in preventing disturbance and damage. As damage is evident throughout the year the PDNPA should make a pre-emptive permanent TRO banning all RMVU to prevent any further damage as it did on Derby Lane, another grass lane. The condition of Minninglow Lane/Gallowlow Lane provides convincing evidence of the deterioration that can quickly occur if RMVU continues on a vulnerable green lane.
- Reasons for applying a permanent TRO - DEFRA Guidance for National Park Authorities making TROs accompanies the 2007 regulations. The eight grounds for making a TRO on a route include: a) avoiding danger or the likelihood of danger; b) preventing damage to a road; c) facilitating the passage on the road (including pedestrian), d) preventing use which is unsuitable having regard to the existing character of the road; e) preserving the character of the road where it is specially suitable for use by persons on horseback or on foot; f) preserving or improving amenities of the area; g) for air quality (section 87 of the Environment Act 1995), h) conserving and enhancing the natural beauty of the area or of affording better opportunities for public to enjoy the amenity of the area.
- Believe a permanent TRO banning all RMVU would meet b, c, d, e, f and h above. Therefore strongly support the three purposes (d, f, and h) of the proposed order.
- A major concern on Wetton is the potential for damage to the route and surrounding species-rich grassland. A permanent TRO would prevent further and future damage to Wetton (thus meeting grounds (b) and (f)), and facilitate the use of the route by horses, pedestrians and invalid carriages which would be hindered if the surface was to deteriorate (ground (c)). Allowing restricted use of the route by recreational motor vehicles would, given the topography and the grass surface of Wetton, continue to inflict damage and disturbance.
- Wetton demonstrates several of the eight special qualities that underpin the National Park's designation including 'beautiful views created by contrasting landscapes and dramatic geology; internationally important and locally distinctive habitats and species; undeveloped places of tranquillity and dark night skies within reach of millions; landscapes that tell a story of people and industry since prehistoric times; an inspiring space for escape, adventure, exploring and quiet reflection'. The presence of recreational motorised vehicles within the valley are detrimental to all these special qualities. A permanent restriction should remove vehicles that are unsuitable given the character of the route (ground (d)), which would deliver enhancement to the natural beauty of the National Park and afford better public enjoyment of the amenity of the area (ground (h)).
- Given its compliance with six of the eight grounds for serving a permanent TRO banning all RMVU on Wetton Hills throughout the year, support the making of this TRO as a preventative measure.

**Peak & Derbyshire Vehicle User Group** - a group which acts as a single point of contact to reflect the views, needs and concerns of responsible recreational vehicle users in the Peak District and elsewhere in Derbyshire whether they be members of national organisations or local clubs.

- Object to the imposition of a Permanent Traffic Regulation Order and support fully the rebuttals, observations and comments made by the Green Lane Association (GLASS) in its comprehensive response to this consultation, particularly its detailed comments against each element of the Authority's Statement of Reasons. In addition, wish to make several points by way of emphasis to the GLASS comments.
- The Authority has struggled to make a case of any sort for this TRO and has demonstrated no need whatever for such a draconian restriction. The evidence in the Authority's Route Summary Report dated May 2017 delineates the complete lack of an identifiable problem. Verbatim in the Authority's own words, it was stated that:
  - there have been few or no complaints about vehicular use conflicting with other users;
  - the route showed little or no physical damage
  - the route crosses or abuts a SSSI, but is not itself a SSSI; and
  - the free passage of non-motorised users is not being affected, or only affected in a minor way
- Additionally, it was stated that "a small amount of traffic could have a major impact on the route" but this pure conjecture, which is not borne out by the evidence over 4 years.
- The volume of that 'small amount of traffic' has been captured by the Authority's route loggers and is given in Appendix 1 to the Statement of Reasons. On average there has been only around one 4-wheeled vehicle per 5 day week and there is no evidence to indicate whether this was a farm or landowner vehicle or a recreational vehicle. In 2014, there was less than one 2-wheeled vehicle per 7 day week but this did rise to less than one vehicle per day after the threat of a TRO became public and so raised the awareness of the route amongst those who may not have ridden it previously. Such levels of usage have been consistent across the last 3 years.
- This 'small amount of traffic', clearly, has had very little impact on the route year by year, and it is noticeable that the period of voluntary restraint in 2016 had the effect of reducing significantly even the very low level of 4-wheeled traffic.
- The learned paper, submitted by GLASS in its submission to this consultation, by Dr Dover of the University of Staffordshire entitled 'Evaluation of the status and ecological value of green lanes in Cheshire' is an interesting and independent view of greenlanes in the locality. Dr Dover states that recreational vehicle use "does not appear to be a significant factor in green lane condition in the Cheshire lanes surveyed, with farming activities more likely to cause churning of the track."
- His observation correlates with research carried out by a private consultancy, FaberMaunsell Ltd, and commissioned several years ago by Defra, into the impact of motor vehicles on vehicular rights of way across the whole of England and Wales. The report (Defra reference PB 10323) concluded that "there was no evidence of widespread damage to the byway network by recreational network from motor vehicles, whether they were recreational vehicles or using byways for land management or access to dwellings."
- The submission from GLASS makes detailed references to the Special Qualities of the Peak District and explains how continued use by the occasional recreation vehicle would have little or no impact on these qualities. Wish to endorse those comments and ask that the conclusions drawn by GLASS be read together with this submission.
- Recognise that the action of weather and time has changed the visual appearance of this route to one which, now, is barely distinguishable from the surrounding grass covered valley sides. As a result, we concede that it would be in the interests of the ambience of the locality for there to be user restrictions during periods of prolonged inclement weather.
- However, it is not necessary to implement a Traffic Regulation Order, with the incumbent administrative overhead and cost. Instead, recommend periods of voluntary restraint to be implemented in conjunction with the Peak Park Authority to protect the route when weather conditions may leave the current surface vulnerable to user damage. These periods could be brought into play at any time of year and their existence notified to the user community of each recreational activity through social media and the Authority's own website.

- The Authority's vehicle logging data collected during a previous period of voluntary restraint indicates a clear observance of the restriction by vehicle users and hence commend to you this method of route protection to be employed on a long term basis.

**Trail Riders Fellowship** –strongly objects to such a proposal as not being in any way expedient for the statutory purposes mentioned in the notice of proposals.

- Further expresses serious concerns that the Peak District National Park Authority is not exercising its statutory powers on an even-handed basis. Successive chairs of the ARP Committee are associated with a pressure group 'Friends of the Peak District' which campaigns against the lawful use of byways in the park by mechanically-propelled vehicles.
- Refer to our representations dated 14 July 2017 as a statutory consultee, which representations we repeat and should be regarded as incorporated in the present representation
- Statutory framework - National Parks and Access to Countryside Act 1949 - highlight the dual purposes under section 5 NPACA 1949: of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.
- As indicated in earlier representation, trail-riding — which has regularly taken place in the Peak District National Park area since before the First World War (and since before the area was designated as a National Park) — is an important component of the cultural heritage, one which PDNPA is obliged to conserve pursuant to section 5(1)(a) NPACA 1949.
- To prohibit all MPVs from using this route for all time would be highly inimical to the purpose set out in section 5(1)(b). It would prevent the enjoyment of the area for a whole section of the general public, namely those who enjoy accessing the countryside using MPVs.
- Highways Act 1980 - Section 41 HA 1980 provides: '(1) The authority who are for the time being the highway authority for a highway maintainable at the public expense are under a duty, subject to subsections (2) and (4) below, to maintain the highway. ...'.
- Section 130(1) HA 1980 provides: It is the duty of the highway authority to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority, including any roadside waste which forms part of it.'
- In the present case, Staffordshire CC is the relevant highway authority. It has an absolute duty to maintain Wetton Lane. Do not understand Staffordshire CC to have undertaken any recent maintenance or repair to the route. As read the statement of reasons, see no evidence that the condition of the route has not prompted PDNPA to raise any concerns as to its state of repair with Staffordshire CC.
- Road Traffic Regulation Act 1984 - set out the relevant sections of RTRA 1984 1 and 22:
  - 1(1) The traffic authority for a road outside Greater London may make an order under this section (referred to in this Act as a "traffic regulation order") in respect of the road where it appears to the authority making the order that it is expedient to make it—
  - (d) for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or
  - (f) for preserving or improving the amenities of the area through which the road runs..
  - 20(2) This Act shall have effect as respects roads to which this section applies as if the list of purposes for which a traffic regulation order may be made under section 1 of this Act, as set out in paragraphs (a) to (g) of subsection (1) of that section and referred to in section 6(1) (b) of this Act, included the purpose of conserving or enhancing the natural beauty of the area, or of affording better opportunities for the public to enjoy the amenities of the area, or recreation or the study of nature in the area.
- Further set out relevant parts of section 122 RTRA 1984:
  - (1) It shall be the duty of every strategic highways company and local authority upon whom functions are conferred by or under this Act, so to exercise the functions conferred on them by this Act as (so far as practicable having regard to the matters specified in subsection (2) below) to secure the expeditious, convenient and safe movement of vehicular and other

traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway or in Scotland the road.

- (2) The matters referred to in subsection (1) above as being specified in this subsection are
  - (a) the desirability of securing and maintaining reasonable access to premises;
  - (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
  - (bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
  - (c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
  - (d) any other matters appearing to the strategic highways company or the local authority to be relevant.
- Emphasise that a traffic authority or national park authority may not exercise its powers to make a TRO unless it considers it expedient to do so.
  - Further emphasise that a traffic authority or national park authority must exercise its powers *inter alia* to secure the expeditious and convenient movement of vehicular traffic. Naturally, the exercise of powers restricting vehicular traffic is inimical to that purpose. A complete prohibition of mechanically-propelled vehicular traffic of all types for all time an extreme measure which is as inimical to the purpose mentioned as can be imagined.
  - In view of the above, if there are less restrictive measures available to the authority to achieve the purposes under section 1 and/or section 22, an authority will be acting outside its powers or irrationally, if it nevertheless proceeds to make a complete prohibition on mechanically-propelled vehicles.
  - Natural Environment and Rural Communities Act 2006 - refer to the provisions of NERCA 2006 to make the observation that the number of 'green lanes' and such routes which are available to trail riders (and other such users) has been substantially reduced by the extinction provisions of NERCA 2006. The present route, however; is one which falls into one of the specific exceptions in section 67(2). That is to say Parliament when enacting NERCA 2006 intended that routes such as the present route remain available for use by MPVs.
  - Statement of reasons - refer to the statement of reasons and its accompanying appendices. The thrust of the reasoning for making a permanent TRO appears to be based on two propositions: (i) Use by MPVs has caused some damage to the route; and (ii) use by MPVs generally is incompatible with other users' enjoyment of the qualities of the countryside and national park.
  - Bias - consider that the reasoning in the statement of reasons does not represent an open-minded approach by PDNPA to the exercise of its powers. Rather the reasoning is formulaic and reads as being intended to defend a particular desired outcome. This is clear from the face of the statement of reasons but is made abundantly clear from the fact that a very substantial part of the reasoning and appendices is word-for-word identical to a statement of reasons in support of another TRO recently made by PDNPA (Derby Lane).
  - Concerned that two successive chairs of the ARP committee have working relationships with Friends of the Peak District, which campaigns to cause detriment to the Special Qualities of the PDNP that are associated with responsible motorcycling, together with the associated economic and social benefits enjoyed by the wider public.
  - It is evident that discretion was exercised to allow those supporting a TRO to have statements read out during committee proceedings. In exercising that discretion, supporters of the TRO are elevated to a special position by a decision of the chair, who has a working relationship with Friends of the Peak District.
  - Regardless of the motivation for such an exercise of discretion, the task of recovering public confidence is not aided by such events. Further, meeting documents which include written submissions in support of the TRO, have not been published on the PDNPA's website.
  - The PDNPA's institutional culture of anti-motorcycling bias is further evident in its reports and policy, which primarily resolve to draw up perfunctory tick lists of negatives relating to motorcycling, as a means to justify the Authorities' chosen programme of imposing total prohibitions on non-competitive motorcycling.

- The former Chief Executive of PDNPA has set out the PDNPA's aim to "reduce off-roading by reducing the scope for off-roading.". Perceive the continued use of TRO's to cause avoidable detriment to aspects of motorcycling that benefit National Park purposes, as a manifestation of PDNPA's bias.
- Are of the view that PDNPA would more likely recover public confidence by choosing to refer this matter to public inquiry. Making such a referral is not an admission of being unfit for purpose due to bias, but a demonstration of being fit for purpose by identifying and acknowledging the scope for bias, and then taking positive steps to secure public confidence by seeking input from an independent inspector
- Damage to the route - The statement of reasons does not point to any particular damage to the route, save for the mention of wheel ruts on and adjacent to the route. It is clear that the route has been regularly used by both 4-wheeled and 2-wheeled MPVs. There is no evidence that responsible use by 2-wheeled vehicles has had or would have any detrimental effect on the route, especially given that the route has been used by both 4-wheeled and 2-wheeled MPVs for many decades. There is a complete absence of any analysis of the respective impacts of 4-wheeled and 2-wheeled MPVs in the statement of reasons. In the absence of such analysis and evidence, PDNPA cannot rationally conclude that it is expedient to wholly ban 2-wheeled MPVs from the route on the basis of damage or potential damage to the route.
- Moreover; unaware of any repairs or maintenance undertaken to the route. If the route were out of repair; it is the responsibility of the highway authority to carry out maintenance or repair. Do not understand PDNPA to have made any approach to the highway authority in respect of possible repairs. Note, in particular; there are many maintenance options to support sustainable use of unsurfaced roads, short of surfacing the road. Accordingly, consider that PDNPA cannot possibly conclude that it is expedient to ban vehicular traffic on the basis of damage or possible damage to the route. Still less can it be rationally concluded that the route is not capable of sustaining responsible use by 2-wheeled MPVs (whose weight and impact on a route is comparable to equestrian use).
- Use by MPVs is incompatible with other users' enjoyment of the qualities of the countryside and national park - consider that PDNPAs' approach to this aspect is fundamentally flawed. The way is a vehicular route. Moreover; the fact that it is not recorded on the definitive map but is recorded on Staffordshire's list of streets firmly implies that the route has historically not been considered as having been used mainly for the purposes of a footpath or a bridleway. Foot and equestrian users who use a vehicular route in the countryside must be taken to expect to encounter vehicles from time to time. Such users have available many other routes such as footpaths and bridleways.
- The vehicle logging data at Appendix I to the statement of reasons evidences relatively light use by MPVs. There is nothing in the statement of reasons which begins to suggest that such use by MPVs is not sustainable. Moreover; the draft order and statement of reasons contemplates continued private use by MPVs for the purpose of land management.
- The available evidence within the TRO process as to "conflict" appears to be confined to vigorous lobbying and unsubstantiated claims made by pressure groups and a minority of local residents. There is no objective evidence of conflict made available within the process, yet a substantial degree of weight is placed by PDNPA on the reasons of conflict to justify its proposals. Assuming that there is a degree of conflict, this cannot be rationally argued to apply to all users of the road and area. Further; there is objective evidence available to the Authority that a considerable number of local businesses, residents, and visitors to the park derive considerable benefit from motorcycling and encountering motorcyclists on green roads.
- The TRF's proposal - proposed in letter 14 July 2017 a form of TRO which would provide an exemption for use for trail riding that is organised by reputable national motorcycling organisations such as the TRF
- The TRF has a code of conduct to which its members are expected to adhere and which it is in the TRF's interests to enforce. Would welcome the opportunity to address any particular concerns of the PDNPA and/or other users.
- Providing for such an exemption is well within PDNPA's powers. It would also be possible to impose conditions for motorcycle use within such an exemption that limit group sizes, tyre choice, and confine use to a minority of days in the year. The majority of the days in the year

would be free of motorcycles using the road. We would anticipate that the administrative burden of having such a scheme in place would be minimal and would largely fall on the TRF (or other such organisations),

- Such a scheme would more than adequately address any concerns which underlie the proposal to restrict MPVs from this route, while addressing PDNPA's obligations to conserve this element of the park's cultural heritage, promoting (rather than restricting) opportunities for the understanding and enjoyment of the special qualities of those areas by the public and securing the expeditious and convenient movement of traffic. Consider that it would be irrational and improper for PDNPA to proceed to a total ban on all forms of MPVs for all time in the face of such a proposal.
- Restriction of electric motorcycles/mopeds - The PDNPA's claimed reasons for conflict will vary considerably depending on the type of motorcycle/moped that is being used. An electric moped is only readily distinguishable from an electric bicycle by the presence of a registration plate. They are virtually silent in use and have no significantly greater impact than an electric bicycle.
- Electrically powered motorcycles and mopeds should be exempt from the TRO.

**Peak Horse Power** – represent riders throughout the National Park. Have over 300 individual members. Most riding clubs and bridleway groups in the National Park are affiliated to us. Support 100% the proposal to use a TRO to permanently exclude recreational motor vehicles from the Wetton route at all times. Reasons are below.

- The character of the route: Note that one of the grounds for the proposed TRO is to prevent use of the route by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road. Until recreational motor bikes, 4x4s and quad bikes started to use it, this route was pristine, had no ruts, and was grassy all the way. The soft surface makes it inherently unsuitable for motor vehicles. The character of the Wetton valley is open, undamaged, limestone grassland. Use of the route by 4x4s and motor bikes is wholly unsuitable for such a route. It is clear from what has happened to similar routes in the National Park that the character of the Wetton route will be destroyed if recreational motor vehicles continue to be free to use it. We point to the severe damage which has been done by recreational motor vehicles to Beeston Tor, Minninglow, Moscar Cross Road and the route which is now a footpath which links Jacob's Ladder in Stoney Middleton to Riley lane in Eyam. A full TRO is essential to prevent similar damage being done to the Wetton route.
- Preserving the amenities of the area: The Staffordshire Rights of Way Improvement Plan reports that only 4% of rights of way in the Northern part of the county are bridleways. As a result of the shortage of bridleways, riders have to rely heavily for safe off-road riding on unsealed unclassified roads (UUCRs). As one of the few remaining UUCRs in the National Park which still has a good soft surface for horses, the Wetton route is a highly prized amenity for all horse riders in that area. It is particularly valuable because horses need to exercise and work at all paces and only a good surface allows a horse to be ridden beyond walk. Nowadays, even most bridleways in the National Park do not have such good soft surfaces for horses. The Wetton route was 'discovered' by the drivers of off-road motor vehicles relatively recently, but it is already being badly rutted and its value as an amenity to riders is rapidly degrading. If motor vehicles are allowed to continue to use it, the route it is likely to become so badly rutted that it will become impassable on horseback, as has happened with other routes in the National Park which have soft grassy surfaces. It will become impassable because horses cannot be ridden safely in ruts. Therefore strongly support 'preserving the amenities of the area' as one of the grounds for the proposed TRO.
- Conserving or enhancing the natural beauty of the area / affording better opportunities for the public to enjoy the amenities of the area: The Wetton routes passes through one of the most 'special' places, a tranquil and beautiful valley. Its flora, fauna and geological and physiographical features need to be protected and preserved. Overriding concern is safety and access for horse riders and these concerns form the basis of response to this consultation, but our members also value highly the privilege of being able to live and ride amidst the beauties of the National Park. Therefore support the making of a TRO on Wetton on the grounds of conserving and enhancing the natural beauty of the area. The whole route is within the Hamps and Manifold Valley SSSI, a designation which gives the entire area a degree of special



importance. Only a TRO will be able to conserve the natural beauty and tranquillity of this part of the National Park and prevent the noise, intrusion, disturbance and damage which comes with use of green lanes by recreational motor vehicles. The route and the quiet grassy limestone valley it goes through are part of the fabric of the National Park and its landscape heritage. It is part of PDNPA's statutory duty to protect it. Evidence from other routes with a similar character which are or have been used by recreational motor vehicles is that the natural beauty of the area which the route passes through will be increasingly compromised if motor vehicles are allowed to continue to use it. Fully support the conservation of the natural beauty of the area' as one of the grounds for TRO on the route.

**Peak District Green Lanes Alliance** – have read all the papers accompanying the consultation for a Traffic Regulation Order on the route that PDNPA calls Wetton Hills. PDGLA fully support the proposed Traffic Regulation Order and agree that the supporting papers demonstrate the need for the TRO and that the grounds for a TRO are satisfied. Listened to the comments of PDNPA Members at the September 2017 ARP meeting who were impressed with the natural beauty and tranquillity of the valley. Share those views. Believe that even although Natural England does not think that the use of recreational motor vehicles impacts on the SSSI, the route still deserves protection from vehicle damage for all the reasons given in your accompanying papers. Have nothing to add to our response to the earlier Regulation 4 response.

**Green Lane Association** - a national membership organisation and company limited by guarantee, dedicated to protecting and preserving our national heritage of ancient green roads. Represent over 1800 individual members in England and Wales, as well as around 4700 members of affiliated clubs. Owns Trailwise, a national catalogue of green roads, and all members sign up to comply with a drivers' code of conduct. Promote sensible driving in the countryside on legal routes and are opposed to illegal 'off-roading' in any form.

- Wish to confirm objection to the proposed Traffic Regulation Order (TRO). Original letter in response to the Regulation 4 consultation also remains applicable, as summarised herein.
- Action of this kind to limit users' rights must be evidence-based, not founded on prejudice or orchestrated campaigns against a particular set of users.
- The evidence in the Authority's Route Summary Report dated May 2017 indicated:-
  - there have been "few or no" complaints about vehicular use conflicting with other users,
  - the route showed little or no physical damage,
  - The route crosses or abuts a SSSI, but is not itself a SSSI
  - A small amount of traffic could have a major impact on the route in wet weather - your more recent Impact Statement is addressed in our attached response to your Statement of Reasons.
  - The free passage of non-motorised users is not being affected, or only affected in a minor way.
- The Authority's 'Conservation Report' dated February and May 2015 indicated:
  - The track itself and a strip on each side (the only parts used by traffic) comprise "semi-improved grassland".
  - The items of ecological interest are found away from the track, on both of the bordering steep hillsides.
  - The slopes (away from the track) contain high quality grassland and a number of botanical species.
  - The whole route lies within a SSSI [though the highway cannot be a SSSI itself].
  - No vehicle tracks were visible away from the line of the route, except where farm vehicles would have been expected.
  - The route was soft and muddy in places [the inspections were presumably in wet periods] and has been rutted by the passage of vehicles.
  - Walkers, cyclists and motor cycles have deviated up to 1 metre from the track itself onto the side strips to avoid the rutted sections.
  - In one section the bedrock is exposed and a deep hole formed in one rut.
  - The route is not a separate heritage asset in its own right, but there are features adjoining the route.

- 
- A Local Access Forum (LAF) report recommended that minor repairs should be done to prevent deterioration, by filling in of ruts with stone using volunteer labour. This has not been carried out, despite GLASS and PDVUG regularly offering to provide volunteers and/or funding for such work.
  - Visited the site in July 2017, and the track was dry along its whole length. Minor rutting was still present as described in the 2015 report, with no apparent degradation. There was no evidence of 'off-piste' use by vehicles.
  - Actual levels of vehicular use monitored by the Authority are recorded in Appendix 1 to the current consultation. There is no doubt that MPV usage levels are very low, consistently less than one vehicle per day on average. In practice therefore, non-vehicle users will hardly ever see or hear a motor vehicle of any variety on the route.
  - The route is clearly sustainable for the expected level of traffic (at least in dry weather), and as no formal complaints or evidence of conflict are recorded there is no evidential justification for a full-time TRO.
  - The Authority's Route Action Plan states their objectives to be: Promote responsible use, Encourage voluntary action, Improve amenity and safety for route users.
  - Propose as follows:- the evidence provided by PDNPA for this route does not justify a full-time Traffic Regulation Order (TRO) – that option is disproportionate and illogical
  - From the evidence available only the physical condition of the route is of significant concern, as confirmed by the LAF. Rutting of the track that can occur in wet weather due to the lack of natural drainage may be perceived to detract from the natural beauty of the area and could, if it deteriorates further, adversely affect the amenity and enjoyment of all users.
  - Are, in view of the specific circumstances of this case, prepared to support a seasonal TRO for wheeled vehicles.
  - Over the last 20 years there has been a steady trend away from 'all motors' permanent prohibition of driving orders on green roads, towards limited and problem-specific orders, which aim not to restrict lawful traffic more than is essential. In this case, a proportionate TRO would include provision for a seasonal restriction, prohibiting MPVs and carriages in winter months (on the basis that these are wettest). This could be enforced by locking the gates at each end of the route (gates already exist) and appropriate statutory signs. Local residents or farmers could be given a key for access. Would suggest a period of restriction from 1st October to 30th April annually, as practised in other areas of the country.
  - More people who want to go green laning are realising the benefits of joining an organisation which supports sensible and legal driving in the countryside. The vehicle counter figures from Wetton and other lanes over the last few years demonstrate that there is not an increasing number of MPVs using the lanes from year to year, the usage numbers remain fairly stable each year overall and the conclusion is that a greater proportion of users are joining GLASS (and TRF in the case of trail riders).
  - Detailed response to your Statement of Reasons is enclosed, along with associated evidence.
  - "The proposal is to make a traffic regulation order that will have the effect of prohibiting use by mechanically propelled vehicles at any time along the route at Wetton Hills in the County of Staffordshire, subject to the exceptions listed below." - Proposal only - Not a reason
  - "The proposed order would be for the purposes of preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property; preserving or improving the amenities of the area through which the road runs; conserving or enhancing the natural beauty of the area, or of affording better opportunities for the public to enjoy the amenities of the area, or recreation or the study of nature in the area." - As an adopted road which has been used by wheeled vehicles over centuries, submit that the character of the route is suitable for use by recreational motor vehicles in the same way as other remote unsurfaced unclassified roads and Byways Open to All Traffic in the Peak District are generally deemed suitable for such traffic. The "Character" of a green lane may be considered as dependent on physical evidence of the passing of vehicles. Indeed, this is what one would expect to find on a grassy road – just as one would expect to find hoofprints on a bridlepath or footprints on a footpath. The occasional use of the route by MPVs (less than 1 vehicle per day on average) cannot adversely affect the

amenities of the area through which the road runs. The Authority does not provide any evidence of such loss of amenity other than subjective speculation. Where are the facts to back up these statements? The road is itself an important amenity for all recreational road users, and MPV users would suffer loss of amenity if the route is closed to them. A road is a man-made entity, not capable of being part of the 'natural beauty' of the area, whichever types of traffic use it. Legal MPV users on a road cannot logically be said to detract from enjoyment of the amenities or the natural beauty of the area any more than a horse drawn carriage, a bicycle, a family with children, or a barking dog. None of these legal users enhance or conserve the natural beauty of an area. All of these potential users cause an element of wear and tear to the surface, and some form of noise. It is not logical to accuse one particular form of user of being 'unsuitable' when they have been using the route for longer than the national park has existed. To further illustrate the illogicality of your statements, your Appendix 3 makes reference to cultural heritage links to the Leek and Manifold Railway. This link is said in your document to 'contribute to the perceived beauty of the landscape'. The railway in fact utilised noisy steam engine-driven locomotives, and industrial trucks, which would have caused soot, noise and visual disturbance, but there is no suggestion they were unsuitable having regard to the character of the area. It is therefore illogical to suggest a modern motor vehicle (if road legal) is unsuitable for the existing character of the area.

- "The proposal conforms to the Authority's Strategy for the Management of Recreational Motorised Vehicles in their Use of Unsealed Highways and Off-road and the Procedure for Making Traffic Regulation Orders." - Statement only – not a reason.
- "The proposal follows consideration of consultation responses under Regulation 4 of the National Park Authorities' Traffic Orders (Procedure) (England) Regulations 2007. These responses identified various management options and were reported to the September 2017 Audit Resources Performance Committee [www.peakdistrict.gov.uk/committees](http://www.peakdistrict.gov.uk/committees)." - Statement only. GLASS response was contained in our letter dated 10<sup>th</sup> July 2017, which remains extant.
- "The route at Wetton Hills is an unclassified road and green lane which commences from the Leek Road in the Manifold Valley, in the County of Staffordshire (grid reference SK 098 557), proceeds in a northerly direction for a distance of 400 metres or thereabouts and then north-easterly for 1000 metres to end where it meets the tarmacadamed road from Back of Ecton at Manor House Farm, in the County of Staffordshire (grid reference SK 105 566)." - Statement only – not a reason.
- "The route is in a National Park designated for its exceptional natural beauty and within the Natural Zone where it is particularly important to conserve that natural beauty. The landscape, ecological and geological interest in this area is of national and international importance and there are nearby cultural heritage features of national and local importance. These designated and undesignated assets all make a significant contribution to the character of the area." - See our response to (2) above.
- "The route follows the valley bottom below Wetton Hill within an extensive area of open country and links with the Manifold Trail and Wetton Mill. For much of the route there is no surfaced track and an impression of remoteness is created by the seclusion of the valley." - Statement only – not a reason.
- "The historic nature of the route and its setting in the landscape in addition to the variety of natural and cultural heritage features 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." - Your first statement applies equally to MPV passengers/riders, who enjoy the experience of using the historic road. The second statement regarding quietness and tranquillity of the area is true for much of the day, but will inevitably be affected by occasional local noise sources such as aircraft flying overhead, barking dogs, walkers and children, and local agricultural vehicles, as well as HGVs and other occasional traffic on the nearby tarmac roads. The occasional recreational MPV travelling slowly along the Wetton Hills route (less than one vehicle per day on average as demonstrated by your Appendix 1) is unlikely to meet anyone in the few minutes of its presence, and in any case any perceived 'disturbance' would be fleeting, only while the vehicle passes. Have heard apocryphal stories of long convoys of vehicles using the route by day and night, but

your counter statistics in Appendix 1 demonstrate that these reports are merely lies spread by locals and pressure groups opposed to use of MPVs.

- “Appendix 1 sets out the use of the route. Appendix 2 sets out the conservation interests of the site. Appendix 3 sets out the factors which contribute to natural beauty and the opportunities for open-air recreation.” - Statements only – not reasons. Appendix 1 shows that use of the route by MPVs is consistently low, at less than one vehicle per day on average, for each vehicle type.
- “Management problems associated with this route relate to the character of the route and the environmental sensitivity of the route and area. Actions have included logging vehicle use and a period of voluntary restraint over the Winter of 2016. Detailed route management information is available at [www.peakdistrict.gov.uk/priorityroutes](http://www.peakdistrict.gov.uk/priorityroutes)” - The ‘character of the route’ is not a management problem as suggested here. In any case permanent closure is not a proportionate form of management to deal with the perceived issues described. The Authority has given no evidence that the *road itself* is environmentally sensitive (although we accept that the surrounding grassland is), and there is no evidence of any off-piste damage to environmentally sensitive areas in the surrounding areas of natural beauty. Vehicle logging doesn’t reflect your impact statements and, conversely, demonstrate there is very light use by 4x4s and motor cycles. The light wear and tear which has occurred on the road over many years is in the form of minor rutting in the wet sections, which would be easily repaired and maintained if the Authority took up the user groups’ offers of assistance and suggestion of seasonal closures. No maintenance has been carried out by the Highway Authority, even though the road is an adopted highway on the List of Streets maintainable at public expense. A TRO should not be used to avoid the duty to maintain.
- “The presence of mechanically propelled vehicles using the route, and the effect and evidence of their passing have an impact on the natural beauty in this area. This impact and the anticipation of the presence of motorised users can detract from the experience and enjoyment by other users. The reference in section 5 of the National Parks and Access to the Countryside Act 1949 to the purpose of understanding and enjoyment of the special qualities of National Parks suggests a focus on quiet outdoor countryside recreation associated with the wide open spaces, wildness and tranquillity to be found within the National Park. (Defra 2007). The use of the route by mechanically propelled vehicles detracts from this focus.” - Examination of Section 5 of the National Parks and Access to the Countryside Act 1949 reveals that it does not mandate “a focus on quiet outdoor countryside recreation...”. That concept appears to be a later DEFRA interpretation. In fact section 5 (1) gives the purpose for national parks as (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified; and (b) promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public. Submit that reference in (a) to conserving “cultural heritage” should include conservation of the Park’s rich heritage of ancient roads and their rightful users. The road at Wetton Hills has been used by MPVs over a great many years and the route had become an adopted unclassified highway on the List of Streets as a result. Submit that (b) requires the Authority to promote opportunities for enjoyment by the public irrespective of the method of access to the area that they choose, motorised or otherwise. The subjective interpretations of the meaning of the Act employed in your Statement of Reasons are not evidence-based and are therefore liable to legal challenge regarding the original meaning of the Act. For the avoidance of doubt, object to your statement that the use of the route by mechanically propelled vehicles detracts from the focus on quiet outdoor countryside recreation associated with wide open spaces, wildness and tranquillity. “Anticipation of the presence of motorised users” is a concept which does not require management actions, when the reality is that very little traffic exists. The fact is that a country road is expected to be used by various types of traffic, and the Authority’s own admittance that less than one MPV normally uses the road per day demonstrates that this usage will have negligible effect on quiet enjoyment by the public. In addition the Authority’s suggestion that agricultural vehicles would retain the right to use the route all year round is proof that motor vehicles such as tractors and Land Rovers do not materially impact “quiet outdoor countryside recreation” in the way your statement suggests. Above all, the “Character” of a green lane may well be dependent on physical evidence of the passing of vehicles. Indeed, this is what one would expect to find on a road – just as one would expect to find hoofprints on a bridleway or footprints on a footpath.

- “Whilst it is recognised that motorised vehicle users, in undertaking their chosen form of recreation, also appreciate the special qualities of the area, their use of the route by this mode of transport is adversely affecting those special qualities to a more significant extent than other users.” - Are pleased to note that the Authority accepts that MPV users appreciate the special qualities of the area. It follows that, to deprive such users of their existing rights, would be unfair and not in accordance with the Act Section 5 (1) (b) mentioned above. The second part of this statement is wholly subjective and does not reference any evidence or statistics to back up its assertions. What evidence is there that “this mode of transport is adversely affecting those special qualities to a more significant extent than other users”? We submit that a road legal 4x4 or motor cycle is likely to generate less noise than a barking dog or a family of noisy children. The visual intrusion and noise generation of (for example) an agricultural tractor and trailer can be greater than a road legal 4x4 or motor cycle, and agricultural tyres and horses’ hooves create more wear and tear than road legal 4x4 or motor cycle tyres. Your figures show that very few recreational MPVs use the route on any particular day, and are therefore unlikely to affect the area any more than other typical users such as horse riders, dog walkers, picnickers etc.
- “The nature of the route and its location away from major roads is such that mechanically propelled vehicles are visually and aurally intrusive. Vehicle use is defining a route along the grassy trackless sections of the valley bottom and is impacting on the special qualities of the area. Government guidance suggests that ‘a level of recreational vehicular use that may be acceptable in other areas will be inappropriate in National Parks and incompatible with their purposes.’ (Defra 2007).” - As mentioned above, each end of the route is close to unclassified tarmac roads which carry local MPVs and freight traffic, and as noted by the Authority there used to be a nearby railway. Nearby industrial and recreational traffic has therefore been a feature of the surrounding area for many years. The “Character” of a green lane may well be dependent on physical evidence of the passing of vehicles. Indeed, this is what one would expect to find on a road – just as one would expect to find hoofprints on a bridleway or footprints on a footpath. Accept that the enclosed nature of sections of the route gives a feeling of seclusion and tranquillity (subject to comments regarding noise in Section 8 above), but the very low level of use by MPVs experienced consistently on this road is hardly likely to meet or exceed the Government’s intended meaning for a level of recreational vehicular use which is “unacceptable” or “inappropriate” in a national park. For the Authority to suggest an average level of MPV use of less than one vehicle or motor cycle per day is inappropriate to this area would risk legal challenge by the vehicle user groups.
- “Appendices 4 and 5 identify the effects of recreational vehicular use on the special qualities of the area.” - Appendix 4 and 5 appear to be a poor attempt to brainstorm all possible or potential “impacts” of high levels of vehicle usage at Wetton Hills and try to make them fit the route in question. A number of line items in Appendix 5 have no impact by MPVs stated at all, and we fail to understand why these are included unless it is to give the impression that the “impact” is worse than it really is. Where an impact is stated in Appendix 5 it tends to be negated by the actual recorded usage of the route, e.g. “Night driving” occurs extremely rarely and will therefore have no appreciable effect on the public’s opportunities to experience dark skies at Wetton Hills. The potential for conflict with other users is suggested throughout your documents, but there is no evidence presented that such conflict has ever occurred, nor is it likely to. The route is generally wide enough for different users to pass if necessary without conflict, and there are no police reports of collisions of any type on the route. Appendix 1 shows that MPVs are so few and far between that it is highly unlikely that any other users will meet an MPV anyway. Signs could be employed at each end of the route reminding users that the route is a multi-user route, so there should be no surprise to any user if wheeled vehicles (including horse drawn carriages) are occasionally encountered. Other so-called “impacts” in Appendix 5 are less than credible, e.g. “damage to the route” (ruts?) will not significantly affect “opportunities to improve physical and emotional well-being”. A number of the “Possible Mitigation” activities quoted in Appendix 4 have not been tried by the Authority or discussed with user groups, and many of your statements are vague with no evidence provided of likely effectiveness (e.g. what is the effect of “Liaison with [various parties] over maintenance and impacts”? What maintenance has been carried out as a result?) There is no account taken of damage to the surface caused by other users such as horses’ hooves and horse drawn carriage wheels, and no attempt has apparently

been made to maintain or repair the route where minor ruts have occurred, despite previous recommendations by the Local Access Forum and offers of assistance by GLASS and other user groups. There is no evidence to show that surface damage is caused by recreational vehicles rather than agricultural vehicles which are known to use the route. It could be inferred that the Authority has left the existing ruts in place in order to try to blame recreational MPV users for damage. Your report accepts that agricultural vehicles use the route – you state that “Vehicle use, *agricultural and recreational*, has the potential to take a number of routes along the bottom of the dale-side”. It is a fact that ancient highways were often planned such that they were wide enough for wheeled vehicles to avoid using one fixed route, thus allowing carts etc to use slightly differing routes and avoiding excess rutting of a single track. Ruts in unsealed roads were a fact of life, and the road designers mitigated this by allowing extra width where possible, but it was accepted that a level of local maintenance (e.g. “a stitch in time”) was always required. Failure by the HA to carry out its duty to maintain the route is not considered in your impact assessment, and we suggest that this invalidates its use in assessing the need for a TRO. It is a matter of record (not mentioned in your Appendices 4 and 5) that Natural England rate the SSSI condition at Wetton as “favourable” (the best possible rating) with “no identified threat” in respect of the parcels of land through which the road passes. We also note that Natural England’s assessment and survey of the SSSI records no concerns with respect to condition of the road or vehicle impacts. With regard to the practical impact of recreational vehicles on the surface of the route, a study by J W Dover of the Department of Biological Sciences, University of Staffordshire, which was commissioned by the British Ecological Society (Title: Evaluation of the status and ecological value of green lanes in Cheshire - Ref A attached) stated that “*Moderate disturbance of the track is likely to be beneficial for overall botanical species richness and may provide micro-habitats for invertebrates using bare-earth habitats.*” Interestingly, the study also showed that some of the green lanes studied appeared to be threatened by neglect, the conclusion being that if these remain unmanaged they may well become linear woods rather than green lanes. A preliminary inspection of the botanical data from such unused lanes indicated a different, and impoverished, mid-line flora compared with the banks. The importance of this and other similar studies, is that they confirm that moderate usage by vehicles is likely to be beneficial to flora and fauna rather than being some sort of a problem as implied in your report and its Appendices 4 and 5.

- “A width restriction reduces the overall numbers and impacts from mechanically propelled vehicle users (MPVs) but 2-wheeled use is still significant in its extent and intrusive with the potential for conflict with other users. A one-way system would reduce the impact on the un-delineated grassy route by limiting passing between vehicles but conflicts with other users and visual, physical and auditory impacts would still remain.” - have demonstrated above that the impact of the current level of MPV use is not significantly affecting the special qualities of the national park. There is no reason to believe that the MPV usage statistics in Appendix 1 will be exceeded if there isn’t a TRO in place in future years. There is therefore no need for a width restriction or a one-way system as there is no significant intrusiveness or “potential for conflict with other users”, nor is there a need to limit vehicles to a single part of the un-delineated grassy part of the route – this variance in track usage is a benefit as explained above.
- “A seasonal restriction could help in reducing the impact to times when ground conditions are anticipated to be more suitable but would not prevent impacts occasioned by periods of high rainfall and when the grassy sections are more susceptible to damage.” - Here the Authority appears to accept that a seasonal restriction for MPVs and carriages would have a beneficial effect. The benefit of a formal seasonal TRO would be its enforceability (e.g. locked gates or barriers at each end, and ability for the police to prosecute transgressors) which would alleviate the difficulty in achieving 100% enforcement of Voluntary Restraint as tried in 2016. The summer months are usually dry enough to give a sustainable surface, given the proven level of use. Furthermore, if the Authority was to work with GLASS and the other user groups to arrange minor repairs if/when rutting occurs (e.g. after any unusually wet periods) then the route will be in pristine condition all year round. Needless to say, such volunteer labour and potential funding offered by the user groups wouldn’t be available if the route is given a full time TRO. This therefore is the preferred option offered which would recognise the route’s vulnerability in wet periods and allow all types of legal user to retain at least some level of access to the special

qualities of this part of the national park. This will satisfy S.5 (1) (b) of the Act – “promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public” – for all users, not just a select few pedestrians and equestrians. The cost of gates/barriers and signs would be similar to those for a full-time TRO, and fixed dates for opening/closing of barriers would be simple to arrange.

- “In view of the nature of the route and the sensitivity of the area, it is not considered that the impacts could be identified and adequately managed by a more selective TRO, a permit system, or other measures such as a scheme of voluntary restraint to a level which is acceptable. Such measures would also need to provide confidence in protecting interests of acknowledged importance which may not occur through recovery periods or measures to make the route more sustainable. A less restrictive option is therefore unlikely to achieve the outcome of sufficiently protecting the character of the route, and the natural beauty and amenity of the route and area.” – whilst do not agree with the subjective views expressed in this section, accept that voluntary restraint is an uncertain method of restriction, and a permit scheme would be more complicated and potentially expensive to arrange. The terms and time restrictions of access would need discussion bearing in mind the susceptibility to wet weather of the route at Wetton. Other national parks do however employ permit schemes, and GLASS would be willing to participate in providing wardens for such a scheme (as we do successfully in the Lake District) if the Authority was willing to emulate such a scheme.
- “In balancing the duty in section 122(1) of the Road Traffic Regulation Act 1984 to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the factors set out in section 122(2) of the 1984 Act, the Authority believes the need to preserve the amenity and conserve the natural beauty of the route and the area through which it runs outweighs the needs of mechanically propelled vehicular users of the route notwithstanding that such a restriction will affect the expeditious and convenient use of the route by mechanically propelled vehicles. For vehicles seeking to use the affected route as a through-road, there are alternative routes on metalled roads in the area.” - strongly object to this one-sided assessment of the balance of needs for each type of user, and the above responses detail reasoning. Any move by the Authority to impose an illogical and unreasonably restrictive TRO will be strongly opposed. Conversely, a proportionate TRO properly justified on a part-time, seasonal or wet weather only basis, covering MPVs and carriages, will be supported for the reasons given above.
- “Exceptions to the prohibition are proposed for: a) use by emergency services or by any local authority or statutory undertakers in pursuance of their statutory powers and duties b) use to enable work to be carried out in, on, under or adjacent to the road c) use for the purposes of agriculture or land management on any land or premises adjacent to that road d) use by a recognised invalid carriage e) use upon the direction of or with the permission of a Police Constable in uniform f) use with the prior written permission of the Authority” - Agreed (for a seasonal TRO), but note with reference to comments above that this allows unlimited year-round use by vehicles for agriculture and other ‘official’ purposes. Your acceptance of the “visual intrusion” and wear and tear arising from these land management and other large vehicles demonstrates the illogicality of your statement of reasons, given the low level of recreational vehicle use.
- “On balance, it is considered that continued use by mechanically propelled vehicles on this route would have an adverse impact on the archaeological and landscape interests, the natural beauty, amenity and recreational value of the area, and the special characteristics of the route” - Not agreed, given the evidence detailed and explained in our responses above.

#### **Association of Peak Trail Riders - objection to the proposed TRO.**

- Concerns remain to be with the reduction of legal routes available to recreational motorcycles. This ongoing butchery of available facilities goes against the wishes of our 59 local businesses who rely in part or in whole to motorcycle trail riding business. In addition our local rider membership currently stands at almost 2200. These people require legal places to ride.
- Illegal riding is on the increase in cities and towns. The APTR have been in consultation with local MPs and the Police and have offered assistance to Sheffield council. Are in no way associated with illegal and irresponsible riding, however are not surprised by it. These illegal

riders have little or no chance of ever having the option of legal places to ride should they choose to do so in the future. The option to ride a motorcycle on unsurfaced areas is therefore only likely to be illegal if the current reduction continues. The reduction of legal provision cannot possibly reduce illegal riding. Closures such as this are not helping the problem and has cause for public concern. MP's and Government have recently become aware of the situation.

- With this particular lane, would propose an alternative method of management other than a full TRO to all vehicles. invite these to be considered by further consultation with ourselves and any other interested party. Recognise some people don't like motor vehicle use where they are going about their chosen pursuit, certainly don't mind sharing with other users. Are aware of the approximate 98% of rights of way in the Peak District already vehicle free.

**National Trust** - in support of the proposed Traffic Regulation Order on the unclassified road at Wetton Hills, in the Manifold Valley. The route crosses land owned and managed by the National Trust and which forms part of the Hamps and Manifold Valleys Site of Special Scientific Interest (SSSI) and the Peak District Dales Special Area of Conservation (SAC). Part of the Trust's charitable purpose is 'the permanent preservation for the benefit of the nation...of lands of beauty...[and for] the preservation (so far as reasonably practicable)of their natural aspect features and animal and plant life.' It is considered view that the continued use by recreational motor vehicles of the Wetton Hills unclassified road is in conflict with this charitable purpose and the National Park's first purpose in the following ways:

- The Wetton Hills is a particularly tranquil area of the White Peak and the continued use by recreational motor vehicles is detrimental to the appreciation of the area by other users, who are far more numerous.
- The damage caused to this pre-dominantly unsurfaced route is progressive and increasingly damages the beauty and nature conservation interest of the valley. The damage has and is expected to spread further from the track and this will further impact the beauty of the valley, along with the nature conservation interest of the SSSI and SAC.
- For these reasons, support the proposed Traffic Regulation Order.

#### Other Organisations

**Allterrainuk.com** - after having driven this route in the past firmly believe that a seasonal Tro for the winter months would be the best all round solution for it. clearly it's sustainable and serves a useful purpose in terms of access to all including disabled people who can use motor vehicles to reach places that they could never reach otherwise. Also you need to consider that if closed permanently that the remaining row networks are liable to be put under greater pressure. There isn't any issues concerning anti-social behaviour or "off piste "activities so can't see what justification there is for permanently closing it to vehicles. Please note that willing to contribute funding and volunteers to help maintain routes throughout Great Britain.

**Manchester 17 Motorcycle Club** – objection to the proposed vehicular TRO on the route at Wetton. Work closely with GLASS and PDVUG, of which we were a founding Member.

- Appendix 1 - The accumulative use of vehicles, identity and purposes unknown, on the recorded highway highlights that there is less than two vehicles per day, quite simply this limited volume does not justify a Permanent Traffic Regulation Order (TRO). Are very concerned that if the PDNPA continues to close such routes then it will be inevitable that vehicles will be diverted onto those few that do remain open thereby increasing traffic flow on that network. Similarly, we would suggest that illegal usage throughout the network could increase. Only responsible users observe the current TROs, whilst others simply ignore them.
- Appendix 2 - Ecological/Geological Interest - The valley is sufficiently wide so that farm stock may safely graze on the semi-natural dry grasslands and scrubland without interference from vehicles. However, in contrast we do see ramblers walking wide range across the valley through the flora, areas where motorists do not travel.
- There are no straight lines of defined view and no visible evidence of the industrial heritage in the immediate areas of the highway. The route lies solely and almost centrally through the wide meandering valley bottom, along the grass covered bedrock. It does not pass through any semi-



natural woodland, scrub communities, grassland, nor over invertebrates, limestone geology and geomorphology, cave fossil deposits as claimed in the report.

- Understand that there is an SSSI on the area, with the Ecton Mining area having SSSI status underground. Whilst the route under question does pass adjacent to the area of the SSSI, a SSSI cannot be applied to the actual traffic route itself.
- The statement of “close” is subjective and we would argue that the vehicular route does not pass “close” to any scheduled monument, the remains of which are up on the elevated limestone plateau, an area not traversed by vehicles. The “building platform”, of heritage unproven, is not directly on the route, neither are any such claimed caves, fissures nor the slab footbridge.
- The former L&MLR is located across the opposite side of the tarmac covered Leek Road and has no direct bearing to the route under consideration.
- Fail to see the relevance as made to the “Manor House”. It is recorded on the list of Historic England; <https://historicengland.org.uk/listing/the-list/list-entry/1227200> Historic England also states; “Listing marks and celebrates a building's special architectural and historic interest, and also brings it under the consideration of the planning system, so that it can be protected for future generations, covered by the lowest category of graded listed building”. There is no mention of relevance to the buildings regarding local highways. Roads of all descriptions pass by many listed buildings throughout England but such has no effect upon the status of the road nor the building. Such buildings are listed for their construction type and private amenities only.
- The location of this highway is currently predominately agricultural with a history of motorised use. It is not of “wild character” per se nor is it “remote,” it is encompassed by a car park, village, cafe, holiday accommodation and a tarmac highway, Leek Road.
- Appendix 3 - Natural beauty - this is not adversely affected by the highway which is sinuous in nature and forms part of the natural way to pass along the valley bottom.
- Scenic quality - the route passes sinuously along the lowest level, it has an appearance more typical of any farm track type of route. The open nature of the upper sections remains “contrasting” as it is not influenced by vehicles, walkers nor equestrians passing along the ground level route.
- Relative wildness - there is no “extensive open country”, it is a sinuous route along a ‘V’ shaped valley with a high sided valley wall, closed in on the other by scrub and trees.
- Intrusiveness/tranquillity - suggest that the limited number of motorised vehicles is so low and transient that such does not nor would have any adverse effect upon the area. Far more intrusive is the noise of ramblers, who incidentally as a whole do not follow the logical route but walk wide ranging across the valley floor. Any claimed noise from motorised vehicles will more likely come from the Leek Road and its car park, which at weekends often has numerous day trippers purchasing refreshments from a visiting ice cream seller’s vehicle.
- Natural heritage - these aspects have already covered.
- Cultural heritage - again such items are not adversely affected by the few vehicles using the highway.
- Association - the route was partially of industrial dependence, the remains of which are not on the highway. The history contains many years of motorised usage.
- Recreation - the first two items have been dealt with, the use for horse riding and cycling are not hampered by vehicular use and the point regarding the cafe and holiday accommodation implies greater disturbance from those aspects than that of the limited use by recreational motorists.
- Range of outdoor experiences - again these aspects are not impeded upon by the few vehicles that use the highway. It is possible that the recorded vehicle use is actually skewed by those who transport their caving equipment along the route plus agricultural and NT vehicles.
- Fail to comprehend why the PDNPA does not recognise recreational motoring as a positive outdoor experience for the health and wellbeing of those who take part. Various practical and mental skills must be attained to become proficient, all undertaken with genuine respect to the countryside, residents and other users.
- Scope for management - simply preventing use by a PTRO is not “management”, it is purely a Dickensian punitive exercise against one user group. Management requires working with all user groups, inspiring collective acceptance of shared goals through honest leadership, observed by

respect. Offer the following alternative points, but not limited to them, for consideration in the overall management of recreational vehicles in the PDNP;

- introduction of a ‘route warden scheme’ whereby some of our members (and others) are given training, followed by authority, with an official PDNPA identification card, to travel selective routes in order to check the condition of those routes and to report any problems to the PDNPA and/or to undertake direct maintenance actions as might be. This is undertaken in Surrey and a particular example is Buckland Lane
  - that the PDNPA meets with such organisations as LARA and PDVUG to discuss in greater detail all of the routes within the PDPA which are used by recreational motorists
  - to conduct a joint mapping exercise to review of all of the networks of routes as used by all user groups in the Peak District National Park plus reference to adjoining feeder routes
  - to produce a PDNPA booklet and/or website link which would list all of those routes which are currently subject to TROs, recording start and end point locations plus the details of the Regulation
  - review and revise a PDNPA Code Of Practice similar to that, as an example, of Surrey CC <https://mycouncil.surreycc.gov.uk/ieListDocuments.aspx?CId=363&MId=5767&Ver=4&Info=1>
  - to produce an online document which lists the current BOATs and their status within the PDNP; [https://www.surreycc.gov.uk/\\_data/assets/pdf\\_file/0012/110811/List-of-BOATs-and-TROs-2017.pdf](https://www.surreycc.gov.uk/_data/assets/pdf_file/0012/110811/List-of-BOATs-and-TROs-2017.pdf)
  - to produce an online document which lists seasonal route closures similar to that of Northamptonshire CC <http://www3.northamptonshire.gov.uk/councilservices/northamptonshire-highways/rights-of-way/Pages/seasonal-byway-restrictions.aspx>
  - to organise a meeting open to all interested parties e.g.; PDVUG; GLASS; LARA; LAF; TRF; BHS; Ramblers Association; Cycling UK; British Cycling to try and identify a consensus modus operandi for Rights Of Way access in the PDNP
  - imposing no legislative restrictions for a period of three years but within that time frame we would assist with voluntary working parties to the repair and maintain the routes, at the end of the time period jointly then reappraise the situation
  - introduction of an annual Voluntary Restraint, 1st October to 30th April, on selected routes that would exempt ramblers, cyclists and two wheeled motorcyclists
  - introduction of a Voluntary Restraint, 1st October to 30th April, that would address restrictions to cyclists; equestrians plus all recreational motorists
  - introduction of a weather related TRO, e.g. closed to all users under a Met Office issued Amber weather warning
  - introduction of a weather related TRO, e.g. closed to equestrians and to vehicles having more than 2 wheels
  - introduction of a weather related TRO, e.g. closed to equestrians and all recreational motorists
  - introduction of a Seasonal TRO which could be controlled by combination lock gated access, to be monitored or administrated to permissive use by licence, to registered vehicles; named equestrians; to a named event; or to Members of specified recognised Organisations who would be bound by their Code of Conduct, e.g. PDVUG, GLASS, LARA, BHS, TRF
  - uni directional vehicle flow from high to lower ground on selected agreed routes
  - night time curfew of motor vehicles on selected agreed routes
- Appendix 4 - Resurfacing of the route is required in the short term to improve drainage and surface repair to the very limited sections of current wear. The route travelled by motor vehicles is typically limited in width unlike the spreading of footways as evidenced throughout all of the National Parks. Similarly, deviation by all users is possible over any area not restrained by high walls or other physical barriers. Surfacing and maintenance of the route will not automatically change the character, it will retain its current appearance which is typical of a non-tarmac country lane or farm track, however improvements should limit the overall width.
  - Find the claim “Voluntary code has been unsuccessful” offensive and a total distortion of fact. We refer you to the recently requested PDNPA VR over this current winter period which was supported by the vast majority of recreational motorists and which was praised by PDGLA

Newsletter November 2017 plus the Authority itself, ARoW January 2018  
[http://www.peakdistrict.gov.uk/\\_data/assets/pdf\\_file/0015/1147101/1801-ARoW\\_News.pdf](http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0015/1147101/1801-ARoW_News.pdf)

- Appendix 5 - the wording of this appendix we regard as being a selection of exaggerated emotions;
- Beautiful views - the claimed aspects of these “special qualities” have already been covered
- Internationally important and locally distinctive wildlife and habitats - already covered
- Undeveloped places of tranquillity and dark skies - increased tourism will have far more impact on dark night skies than the few vehicles which mostly travel during daylight hours. Please also refer back to Appendix 3, scope for management section.
- Landscape that tells of thousands of years of people, farming and industry - the highway in its current condition has the appearance of a typical farm track
- An inspiring place for escape - we have already disputed the claimed impacts as being exaggerated
- Vital benefits - the few vehicles that have and potentially could use the route will have no recordable negative impact upon any of the points raised. Not aware of any recorded conflict nor deterrence to other users.
- It needs to be acknowledged that the use of any route by any form of user group will cause some deterioration, however need to bear in mind that collectively the recreational motorists have and do continue to offer assistance with maintenance, monitoring and management of this and the other similar non tarmac covered routes within the PDNP.
- In conclusion, respectfully repeat our OBJECTION to the currently proposed TRO at Wetton. However, we would be prepared to continue our support to a Voluntary Restraint request or a seasonal TRO which would exempt motorcycles.

**North York Moors Green Lanes Alliance** - fully supports the proposed traffic regulation order to control the unsustainable and inappropriate use of this route by recreational motor vehicles.

**North Yorkshire Moors Association** – a registered Charity. Details can be found at [www.north-yorkshire-moors.org.uk](http://www.north-yorkshire-moors.org.uk). Main purpose is that of protecting and enhancing the characteristic beauty of the North Yorkshire Moors for present and future generations. Share the concerns outlined in the reasons for wanting to impose a TRO in the area described because we have experienced similar harmful effects from irresponsible off-road vehicular activity in our own National Park. National Parks should have the highest level of protection from activity which harms the special quality of tranquillity which is found in National Parks. Activity which has a harmful effect on the enjoyment of other people should in our view be prohibited. Damage caused by irresponsible off-road vehicular activities carries with it a cost for the other users of green lanes and this is clearly unfair. Support the restriction which is being proposed.

**Doncaster Ramblers** - fully support the proposal to establish a Traffic Regulation Order at WettonHills. Are totally opposed to the use of trail bikes and four by four vehicles doing any off-roading within the PDNP. When they do this they totally destroy the concept of the establishment of our national parks

**Gedling Ramblers** - Many walks are blighted by lanes being churned up by off road vehicles. In muddy conditions it can render a pathway impassable. When the ground dries up the deep ruts introduce the danger of turning an ankle or worse.

**New Mills and District RA Group** - Motor-driven vehicles are now, with advances in technology, able to go along almost any path, track or bridleway except ones with very severe gradients or very uneven surfaces. As they do so they gradually destroy the path itself and severely hinder the use of the path by other users. It is not the motor drivers who have to get out of the way so as to avoid collisions. This situation was never envisaged when National parks were first thought of as places of quiet amenity where people from towns and cities could go to find release from the stresses of crowded urban life. It is to the credit of DCC that in recent years, perhaps a little belatedly, it has come to recognise the utterly destructive effects of unfettered access for motor- driven vehicles on the use and enjoyment of the countryside by other users and has started to use its powers of traffic

control to create a more orderly situation in which the needs of all, not just the wealthy, the thoughtless and the ruthless are taken into account. Support the introduction of this Traffic Regulation Order.

**Rotherham Metro Ramblers** - support the proposal to restrict traffic in the Wetton Hills without reservation on the grounds of damage to the environment and the loss of amenity to other users. Use of this Green Lane by a very few people who wish to pursue their hobby causes untold damage to the surface, huge ruts become filled with water and mud. The damage is not restricted just to the defined line of the lane, it extends laterally over a much wider area where vehicles pass one another and users take more challenging routes - for fun. This causes loss of amenity for far greater numbers of ramblers, walkers and cyclists as the route becomes progressively more churned up. The damage to a sensitive environment of significant importance is incalculable. Birds are disturbed over a wide area, plants of special interest are destroyed and peace of the area is shattered. The alternatives are few, costly and cannot prevent damage to the environment and loss of amenity to other users. In these times of austerity it would not be good use for tax payers to spend money to upgrade the surface to facilitate a hobby pursued by very few people. If the present use is allowed to continue the surface will inevitably be damaged and will require repairs at great expense. This also would be a waste of tax payers money.

**South Yorkshire and North East Derbyshire area of the Ramblers** - Represent 2263 Ramblers' members. Strongly support the proposal to establish a permanent TRO on the 1.4km route in the Wetton Hills area. Believe that there is no place for mechanised off-road vehicles (other than farm vehicles, etc) in any National Park. By definition a National Park is designated as such because of its outstanding natural beauty. The off-road use of trail bikes and four-by-four vehicles for the purposes of a leisure activity are a historical anachronism, totally inappropriate in any of our National Parks. The government guidance stating that "..... in many cases a level of recreational vehicular use that may be acceptable in other areas will be inappropriate within National Parks and incompatible with their purposes' (Defra 2007) is totally appropriate in this case. This particular route is one of the most secluded areas in the Peak District National Park, rare because there is no surfaced track. All or part of this route run through an SSSI, the Peak District Dales Special Area of Conservation and Natural Zone areas. Regular use by mechanised vehicles will undoubtedly destroy this beauty and feeling of seclusion and therefore we totally support the proposal.

**Worksop Ramblers** - This site of special importance is deserving of a TRO to protect its unique characteristics from the damage caused by off-road vehicles of the type that have already caused damage to the existing bridleway. There are sufficient other designated routes within the Peak Park that these users are free to use, where the impact is not as acute as at this venue. Below are reasons for the special nature of this site and why object to the use of off road vehicles. The following identifies how the special characteristics of the area meets the tests for designation as a National Park and the evaluation of opportunities for open-air recreation. Natural beauty Landscape quality i.e. condition, that is the intactness of the landscape, the condition of its features, its state of repair, and the absence of incongruous elements: • Landscape elements and features in good condition; some erosion to rights of way • Landscape unspoilt with no notable incongruous features Scenic quality i.e. appeal to the visual senses, for example due to important views, visual interest and variety, contrasting landscape patterns, and dramatic topography or scale: • Limestone dale and dry valley • Far reaching views along the route and to the skyline • Open nature of the upper sections contrasting with a sense of seclusion along the tree fringed lower parts of the dale Relative wildness i.e. the presence of wild (or relatively wild) character in the landscape due to remoteness, and appearance of returning to nature: • Extensive area of open country • Sense of remoteness • The Manor House is situated at the northern end of the route. Intrusiveness/tranquillity i.e. freedom from undue disturbance. Presence in the landscape of factors such as openness, and perceived naturalness: • Within open country • Within Natural Zone/section 3 Limestone Dale and Limestone Hill and Heath 'Natural heritage features i.e. habitats, wildlife and features of geological or geomorphological interest that may contribute strongly to the naturalness of a landscape: • Dry valley • Semi-natural limestone dale grasslands and scrub • Caves and fossil deposits. Cultural heritage features i.e. archaeological, historical and architectural characteristics or features that may

---

contribute to the perceived beauty of the landscape: • Wetton Hill prehistoric bowl barrow • Stone slab footbridge • Possible site of an early Mill • Caves and fissures • Link to the former Leek and Manifold Railway • Listed building at the northern end of the route. Associations i.e. connections with particular people, artists, writers, or events in history that may contribute to perceptions of beauty in a landscape or facilitate understanding and enjoyment: • Route used to transport copper to Red Hurst Holt on the Manifold and Leek Railway. Recreation Access to high quality landscapes, memorable places and special experiences i.e. opportunities to enjoy scenic quality, relative wildness, and peacefulness etc: • Outstanding views • Access to an extensive area of open country and its hills and dales. • Links to the Manifold Trail and the South Peak Loop for horse riding and cycling • Links to the National Trust's Wetton Mill café and holiday accommodation. Presence of a wide range of natural or cultural heritage features, landmarks and designations that cumulatively enrich the landscape experience: • Important cave fossil deposits • Historic track, scheduled monument, listed building • Wetton Hill and the Sugar Loaf are distinctive • Diverse range of opportunities for access. Range of outdoor recreational experiences which enable people to enjoy the special qualities of the area and do not detract from the enjoyment of the area by others i.e. quiet outdoor recreation: • Easily accessible from surrounding settlements and holiday accommodation • Scope for a variety of walks • Scope to link in with longer trails • A means of access for activities in the area, including caving • Opportunities for nature study. Scope for management of recreation to enhance recreational opportunities or protect the conservation interest of the Park: • Retention of grassland and repairs to the route in sympathy with the area • Restrictions to recreational motorised vehicle users

**Staffordshire Wildlife Trust (Leek Group)** - Destruction of habitat for both flora and fauna. Have done wildlife surveys on behalf of Staffordshire Wildlife Trust which show that rare plants and invertebrates are often found in such areas which need to be protected. Spoils the enjoyment of the countryside for others. Green lanes were never built for such pursuits and consequently, in places, the foundations are ruined. They are part of our national heritage and should be so for future generations and thereby not solely for the enjoyment of the few who wreck them.

**Yorkshire Dales Green Lanes Alliance** - The statement of reasons is entirely cogent, and covers all the points that need to be made. There is nothing that can add. Wish you well with this proposal for the restoration of peace and tranquillity to this fine green lane. 4x4s and trailbikes are entirely unsuitable and out of keeping.