Appendix A

Public Petitions and Questions – Transport, Regeneration and Climate Policy Committee– 11th December 2023

N.B - Please note that a period of up to 30 minutes shall be allocated at meetings of Policy Committees and other appropriate bodies for members of the public to present ordinary petitions or to ask questions of Members and officers present.

Petitions Received from Members of the Public x 3

	Petitions - Name, email, petition text	Officer Prepared Response:
1	Lyndsey McLellan	Thank you for coming along today.
raye -	area of the 20mph zone. Six serious/fatal injuries have occurred in collisions in the proposed 20mph area over the last twenty years. But over that time, fifteen occurred on Fulwood Road, within 1/4 mile of the two schools. But this stretch of dangerous road has been specifically excluded from the planned 20mph area. 20mph areas, when introduced onto main roads, have been shown to substantially reduce the number and severity of road casualties, and for children in particular. The 20mph speed limit will also reduce noise and air	Before I answer your question today, I should say that we need to see a national change in approach about how we deal with 20mph zones. I favour the approach taken by the Welsh Labout government, in reducing the speed limit from 30mph to 20mph on roads where there are streetlights no more than 200 yards apart. At present, introducing these schemes is unnecessarily costly and time consuming for local authorities and needs a national approach. It is also worth noting that your local MP Olivia Blake has been been making the case with me about more 20mph schemes in her constituency and is in support of many of the issues that you have raised today. In direct answer to your question, we are in the consultation stages of the Fulwood 20mph scheme so no final decisions on the scheme boundary have yet been made.
	pollution, which are a particular concern for the junior school, as it is so close to the road.	After reviewing some additional speed data, we are looking at the possibility of including Crimicar Lane in this scheme.
	We urgently need the roads to be safer. A 20mph limit would go a long way towards reducing the number of children injured on these roads. We specifically ask that the stretch of road from the Redmires Road junction	The 20mph speed limit strategy that was first adopted by the Council in 2012 and updated in 2015. The current policy gives the following criteria for roads:
	with Crimicar Lane to the Hangingwater Road junction with Fulwood Road be included in the proposed 20mph area.	 A and B classified roads, major bus routes, and roads with an existing speed limit of 40mph or more will not be made subject to a 20mph speed limit and that there will be a presumption against including C-class roads

(generally local distributor roads) within new 20mph speed limit areas.

• Speed limits should both reflect the character of the road to which they apply but be realistic. The relevant Department for Transport guidance notes the importance of existing speeds when designating new speed limits: *"If the mean speed is already at or below 24 mph on a road, introducing a 20 mph speed limit through signing alone is likely to lead to general compliance with the new speed limit."* (DfT Circular 01/2013.

This strategy applies to residential "sign only" 20mph schemes only and we are not saying that we cannot lower speeds on more major roads. However, to do this, additional speed reduction measures such as speed humps or camera enforcement would be required, and the Council does not have the budget to do this on all major roads within Sheffield. In my view, we need a change in approach nationally to give council's the ability to lower speed limits on these streets without the need to install constly engineering solutions.

It may be useful for you to know that South Yorkshire Police have made it clear that they would object to any speed limit order for a sign only scheme on roads that do not meet the above criteria as well as criteria in relation to average speeds. We cannot progress with any speed limit order without the support of the Police. This may be something that you wish to speak to the Chief Constable or Police and Crime Commissioner about. It could also be something that you wish to raise with our new Deputy Mayor for Policing, when they are appointed this summer.

Following the receipt of the petition, the Senior Transport Planner has been working with the road safety team and Police as well as requesting some additional speed surveys to be carried out to see whether anything can be taken forward in relation to Fulwood Road. I hope that this is positive, as I want to see speeds reduced on more streets in Sheffield.

Subject to the further development of the scheme in response to both the feedback we have received, and the further investigations that officers are undertaking, we will consider the scope of the final scheme at TRC Cttee.

		Thank you for your petition today.
2	David Cronshaw	Sheffield City Council (SCC) and Rotherham Metropolitan Borough Council (RMBC)
		are jointly under a Ministerial Direction from HM Government to implement a
	We the undersigned petition the council to exclude the Ring Road from the	local Clean Air Plan to reach legal limit of $40\mu g/m^3$ for nitrogen dioxide (NO ₂) in the
	Clean Air Zone in Sheffield	shortest possible time and within 2023.
	By having the Ring Road as part of the clean air zone you are diverting traffic	Environment Act 1995 Sheffield City Council and Rotherham Metropolitan B
	through residential areas, for example, yesterday, I came past the Sheffield Childrens' Hospital and was going to Barnsley so turned left at the	orough_Council_Air_Quality_Direction_2022.pdf (publishing.service.gov.uk)
	roundabout to avoid the camera.	The legal requirements include the implementation of the Clean Air Zone as set
		out in the CAP Business Cases approved by HM Government. The technical studies undertaken in the development of the proposals demonstrated that including the inner ring road was essential to achieve legal levels across the wider Sheffield area
		within the shortest possible time - the Business Case documents approved HM
		Government, Joint Air Quality Unit can be found on the Council website More information about the Clean Air Zone Sheffield City Council.
г age о		Whilst a small number of vehicles might re-route to avoid the CAZ area, traffic monitoring data shows no discernible re-routing is occurring as a result of the CAZ. Traffic volumes and behaviour trends before and after the CAZ was implemented are consistent, volumes are approaching pre-pandemic levels.
3	Ruby Nimmo We the undersigned petition the council to immediately review the proposed parking scheme in the Kelham Island and Neepsend area. The residents of these areas object to the proposed scheme by the Sheffield City Council. This petition objects to the new proposed parking scheme for Kelham Island	In line with the City Council's Transport Strategy 2019 to 2035, there is a priority action of 'Introducing a programme of new Controlled Parking Zones, with the priority being uncontrolled areas adjacent the city centre'. Managing the supply of spaces by permits or price is a method of demand management employed by local authorities as the availability of parking is an important factor in congestion management.
	and Neepsend. This petition is from those residents whom are concerned about the implications of the new parking scheme in the Kelham Island and Neepsend community. Some residents will be eligible for the permits, however feel the pricing is unfair and they are concerned there is a possibility they may not be granted	The current draft Sheffield Local Plan includes a number of sites allocated for housing development within the Kelham Island and Neepsend areas. In total, land for around 1,500 - 2,000 new units has been proposed to be made available for development up to 2039. It is prudent to plan for this scale of change in advance of

the required number of permits per address.

Other residents live in newer complexes that have been tied into the 'car free' development scheme. Occupants that live in these developments are either tenants or owners and many require the use of a personal vehicle to travel to and from work or other personal needs. On street parking is widely used by these residents as well as the other residents of Kelham and Neepsend.

Many residents have lived within the community for a significant amount of time. Some of those that moved into 'car free' developments have been subject to a change of circumstances over this time, for example job location, employment, family additions or other personal reasons. This means that residents do require the use of a vehicle and use the on street parking in the area.

Many residents are currently affected by the cost of living crisis, where rents have been raised and mortgage rates have gone up. This means they are unable to buy or secure a new premise elsewhere or find suitable and affordable new tenancy agreements. There is currently a rental crisis and not enough properties available for the demand.

This leaves some residents in a predicament where they are unable to move. Even those that may be eligible for permits are concerned at the cost of these and also how this will impact them. Some residencies, for example, are multi occupancy and have a number of working adult professionals that require the use of their own vehicles.

There are a number of differing situations and reasons that many residents could individually list and this petition certainly does not exhaust those. The residents of Kelham Island and Neepsend object to the proposed parking scheme and would like this reviewed with the below considerations; The parking scheme does not support and consider the lifestyles, commitments and the living positions of ALL of the residents and the community and will have major impactive effects on their finances and daily the development starting. However, this can lead to feedback that there is not a current parking problem.

As well as the policy perspective, other reasons for promoting a scheme in Kelham Island /Neepsend (which does reduce the amount of places where people park) include:

• The major West Bar development is now on site. This includes a new 100,000 sq ft office building, ground floor retail and leisure space, and 368 Build to Rent residential apartments. There is to be no parking within the curtilage, with parking being delivered through a 450 space multi storey car park within the West Bar Square Masterplan area. Although the car park will be available for users of the development – it is assumed that this will be at a cost - so demand for free, all day parking in Kelham Island /Neepsend could increase.

• Moving away from enabling pavement parking – including 'two wheels up', even in areas where walking demand is currently low - and could be the case for a number of years too.

• Wanting to maintain a 3m carriageway for emergency service vehicles on all carriageways

• Wanting to maintain a 4.4m carriageway on carriageways that will be promoted active travel routes to enable safer passage between a bike and a car.

• Improving loading opportunities for local businesses. Loading and unloading can take place on double yellow lines (DYLs). Therefore, information from businesses has been used to include additional lengths of DYLs both to protect entrance to their workplaces and to facilitate loading and unloading near businesses.

• Improving access around the Kelham Island /Neepsend area – especially for larger vehicles – by adding in restrictions at/around junctions within the area. The length of these restrictions will be kept to a minimum.

Objections to the scheme in Kelham Island were considered in July 2023. The recommendation to implement a scheme was approved. Personal affordability was the main reason that objections were made to the scheme. There were 149 responces that said the costs of permits will be a financial burden on

life.

residents/businesses; that the proposals are a moneymaking exercise; and that the costs are additional taxation to motorists/residents. The cost of a first resident's permit within the scheme equates to all day parking at less than 35p per day. However, it is acknowledged that costs will be significantly higher for residents who live in 'no car households' if they chose to pay the pay and display rate to park in the area all day, every day. There are commercially available season tickets available at sites on the edge of the City centre that currently cost around £2,000 per year which may be an alternative for some.

The Council has a number of policies which have the effect of managing parking demand. One mechanism to do this is by restricting access to parking permits for on street spaces from occupiers of new developments which are designated as 'car-free' during the planning process and where the implications of that development are assessed to have an adverse impact on parking demand. It is one of a suite of measures which also have the effect of reducing car use and encourage travel by other means, including walking, cycling and public transport. This use of 'car free' developments and their entitlement to permits was confirmed at the Transport, Regeneration and Climate Change Committee in December 2022.

New residents moving in should have been made aware of the designation of car/permit-free status (as detailed in the planning permission decision notice) through the conveyancing process if purchasing a property, or within the lease if renting. This would enable a more informed decision about whether they wish to move to (or rent) a property where they would not be entitled to purchase a permit for on street parking. Many local responses suggested that this information had not been passed on to them, which is disappointing but the Council bears no responsibility for this failure to communicate car-free status.

Other options available to residents of 'car free' developments will depend on when they would need to park, but drivers have to make sure that they meet their responsibility to adhere to the restrictions wherever they choose to park. Some alternative options that could be investigated include:

	 Private sector parking opportunities – including within car parks within developments in the area. The level of parking provision varies between developments but is generally less than the maximum City council car parking guidelines. Some of the larger developments have 60% to 70% provision per unit (some more than 100%), but a few do have 0%. SCC off street car parks – including those around the Ring Road near Kelham Island On street parking in adjoining parking schemes – days and times of operation do differ between schemes. Details of existing schemes are available here <u>Residents parking permit Sheffield City Council</u> Unrestricted parking beyond the boundary of schemes. It is worth noting that the City council are also developing a scheme in St Vincents, an area near Kelham Island that is currently primarily unrestricted Using permits you could still be able to purchase – more details here <u>Visitor parking permit vouchers Sheffield City Council</u>. Visitor permits can be exchanged between vehicles on their day of use.
Page 6	There were 131 respondents that said the scheme would exacerbate existing parking problems - the assumption being due to the reduction in spaces where people will be able to park or removing their ability to parking on-street as they are not entitled to a permit. The responses were primarily from residents in 'car free' developments (51) but also a much smaller number from residents and businesses (8) highlighting the limited number of permits (initially one resident and two business) available to them.

Questions Received from Members of the Public x 6

	Question from Name, question	Officer Prepared Response:
1.	David Cronshaw Can you tell me, since the introduction of The Arundel Gate Bus Gate, what has the income and expenditure been since this 1st started?	The Arundel Gate bus gate was installed via an Experimental Traffic Order (ETO) at the end of March 2023. There was a period of soft enforcement where warning letters were sent to drivers until early June 2023.
		The income from Penalty Charge Notices for the Arundel Gate Bus Gate from June until November is £1.48 million.

			The capital cost of the scheme to install was £277,118. This includes the cost of the Traffic Regulation process, officer time to develop the proposals, the consultation costs, the cost of the scheme to design and build and purchase of the enforcement camera. The total bus lane account expenditure to date is £821k, this includes enforcement of bus lanes/ gates in Sheffield, and it is not feasible to break this down into the cost to enforce a specific bus gate
2	2.	Roy Morris	Thank you, Mr Morris, for your question.
Page 7)	 "How can we ensure that Connect Sheffield fulfils its purpose and fully serves the people of Sheffield?" I have noticed significant improvements. What final route is planned? Do the stops on the route genuinely serve the needs of the public? What can be done to increase awareness of the service? Would the service benefit from a name change? Freebee?!! Long term, would there be any point in planning a route in the opposite direction? 	I am glad to hear that you are an advocate of the Connect Sheffield city centre bus. The city centre is changing with more of the new Heart of the City development coming on stream, Fargate having a multi-million-pound facelift and a contractor appointed to develop the old Castle site. Our city centre is on the up and that's evident from the increased footfall we've seen around the excellent Christmas markets that are in place now. The connect's bus also important with our ambition to create 20,000 new homes in the city centre. I was pleased to see David Walsh's front page spread on the take off of the city centre. You raise some good questions about the Connect Sheffield city centre bus. I am pleased to say that in the New Year we will be relaunching the service with new zero emission e-buses. Details of the route/s and frequencies will depend on tender costs, so are to be confirmed. We expect more news on this early in the New Year, but I would expect that this would also sit alongside a refreshed communication strategy to make even more people aware of the excellent service.
	3.	Patricia Stubbs on behalf of Friends of the Peak District, the Peak District Green Lanes Alliance and the Peak Horsepower bridleway group	Our experience across a range of traffic restrictions particularly those that restrict or regulate movement is that it is preferable that these are complemented with engineering measures to ensure that where possible they are self-enforcing and not subject to abuse.
		1 The Peak District National Park Authority has made seven Traffic Regulation Orders excluding all types of motor vehicles from byways open to all traffic and other unsealed routes in the national park. To	South Yorkshire Police expect all traffic orders to be, as much as practicable, self- regulating as this then does not put a strain on their limited enforcement resources.

keep prohibited vehicles out, it uses only signage. It does not use barriers. Its monitoring data shows 90 per cent plus compliance with its TROs. Why does Sheffield need barriers to make a TRO on Moscar Cross road effective when the NPA has demonstrated that barriers are not necessary?

2 The committee paper says that one of the reasons that the proposed TRO does not cover motorbikes is because 'there are no physical restraint measures that restrict solo motorcyclists but allow other users through'. Why does the committee paper not mention or show the barriers installed at Wyming Brook - a combination of lockable gate, bridle gate and horse hop that excludes motorcycles as well as 4x4s but ensures access for all legal users?

3 The Moscar route is all grass with no underlying stone or rock and it is on a hill. This makes it peculiarly vulnerable to damage by powerful modern motor vehicles in wet weather, including the traction, gouging and wheel spin of motorbikes revving to get uphill on soft ground. Peak Park monitoring data for the route shows that two thirds of motor vehicles using the route are motorbikes. The committee paper says that motor bikes are damaging the route. This being the case, why is Sheffield willing to tolerate continuing use and damage by motorbikes during the wettest periods of the year?

4 In order to respond to surface conditions deteriorating quickly in unusually wet summers, some highway authorities that have made Orders for seasonal TROs have made the effective start date for the restriction variable. We understand that the Peak District Vehicle Users Group is in favour of this approach. Has Sheffield considered it? Will it consider it?

5 Are members of the committee aware that at the February 22 onsite meeting convened by Sheffield, all the user groups attending agreed to a seasonal TRO covering motor vehicles of all types, and We cannot make any comment on restrictions implemented by another Highway Authority or enforced by another Police service.

We are aware of physical barriers that restrict modes such as motorbikes but we do not have the sufficient evidence on this route to show that solo motorcycles specifically are damaging the route enough to warrant prohibiting their access. The committee report does not specifically state that solo motorcycles are causing damage to the route.

We would be willing to consider consulting on such a restriction should we require it at a later stage. Implementing the restrictions as proposed will mean that we are able to assess the success of this and how much of any damage is related to motorcycles.

Officers that attended the site meeting have stated that whilst those attending may have agreed to a TRO covering all motorised vehicle that the site meeting did not include solo motorcycle user groups.

As we do not have the sufficient evidence on this route to show that solo motorcycles specifically are damaging the route to warrant prohibiting their access officers consider that it would be unfair to promote a prohibition of solo motorcycles at this stage.

Prohibiting motor vehicles except for solo motorcycle allows us to properly understand the direct impact of solo motorcycles. Apart from a small number of motor vehicles requiring access to adjacent land, solo motorcycles will be the only motorised mode of transport with access.

Subject to the decision by Committee on this issue, if it is implemented and in monitoring the scheme Sheffield City Council gains evidence that solo motorcycle use causes enough damage to warrant prohibiting them, then we do believe this is the right process to follow and that the funds and staff time will have been well allocated.

that the organisations agreeing this included those representing motorcycle users?

6 The Peak Park Local Access Forum withdrew its original objection to motorbikes not being included in the seasonal TRO, but only on the condition that Sheffield re-consider the matter if there is damage from continuing motorcycle use. Is making a decision today that will almost certainly mean having to do a second or revised TRO next year a cost-effective use of funds and staff time?

7 In making its decision about the proposed TRO on Moscar Cross Road, Sheffield has a legal duty under S62 (2) of the Environment Act 1995 to have regard to the statutory purposes of the Peak District National Park, which are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public). Furthermore, if it appears that there is a conflict between the two duties, under the Act Sheffield must attach greater weight to the purpose of conserving and enhancing natural beauty, wildlife and cultural heritage. How and where has Sheffield demonstrated that it has had regard to this statutory duty?

8 On 29th Dec 2023 the Levelling Up and Regeneration Act (LURA) will change the current duty on the Authority to 'have regard' to the purposes of the Peak District National Park into a duty to 'further' the purposes of the National Park. Is Sheffield willing to adopt the spirit of the enhanced duty and show in relation to Moscar Cross how its proposal furthers both National Park purposes?

9 At present only one of the eight available legal grounds available for making TROs under the 1984 Road Traffic Regulation Act is being proposed ('to prevent damage to the road'). Has the applicability of the following grounds been considered and evaluated: The different statutory requirements have been considered and from the information available to us we believe that the proposed restrictions do support the aims of conserving and enhancing the national park. However, in considering the removal of access rights we believe that the significant improvement in condition will be from removing 4x4 vehicles from this route. In dry conditions the route can be used by all modes, that it is not to say that this position will be maintained in perpetuity and consequently it may be reviewed at some point in the future.

Additional potential benefits have been described within the committee report, such as, preserving the character of the byway and the natural beauty of the area, and improving the amenities of the area as you mentioned. These are benefits that can be achieved by the proposed restrictions reducing damage to Moscar Cross Road.

Sheffield City Council do not feel that there is a need to reconsult on the current TRO proposals at this stage. The statement of reasons is clear and there is no scope to misinterpret the reasons behind why Sheffield City Council are promoting these restrictions.

We would continue to visit the route each month and take photographs as we have been doing for the past couple of years. We would make a TTRO if at any point we (a) need to safeguard the public because the route has become dangerous to use or (b) need to exclude the public from the route in order to carry out repairs safely.

	 '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 character of the road For preserving the character of the road where it is specially suitable for the use of persons on horseback or on foot For preserving or improving the amenities of the area through which the road runs For the purposes of conserving or enhancing the natural beauty of the area This includes conserving its flora, fauna and geological and physiographical features'. 10 Moscar Cross Road is an ancient packhorse route. What assessment has been made of the value and importance of the route as part of cultural heritage?	
Page 10	11 Have members of the committee made a site visit to see Moscar Cross Road for themselves? How many have done so?12 Why are there no photographs in the committee paper showing the condition of Moscar cross Road?	
4.	 Sally Skelton Archer Lane closure was the key to the success of the NE scheme yet the committee decided to reopen Archer Lane based on the number of objections received. Why were the less successful Crookes and Walkley schemes passed in full when they had greater numbers of objections? Why was child safety not even considered when you decided to reopen Archer Lane to nearly 3000 vehicles a day? The council has said there is a climate emergency yet your committee stopped a scheme that reduced traffic by 5,000 cars journeys a day. Please could you explain? 	Thank you for coming to our meeting today and for the correspondence that you have sent to members of this committee on this issue. As you may know, the council brought in an external contractor to conduct a report into the Nether Edge Active Neighbourhood Scheme. That report came before this committee in September and showed that there was greater support for the schemes in Crookes and Walkley. Crucially, in both Crookes and Walkley there was demonstratable positive behaviour change in the area. With regards to Nether Edge, in response to the trial closure of Archer Lane, only 31% of residents felt positively towards the road closure, compared to 70% positivity for the interventions on Psalter Lane and 71% for Osborne Road crossings. That is why we as a committee opted to end the trial closure of Archer Lane and make permanent two popular crossings. Whilst we are appreciate that you may be unhappy with this, we had to

take an approach that considered those who lived in a wider area and not just in the immediate locality of the trial.

With regards to your second point about safety. The September committee report included some initial data on collisions. Typically for transport projects, personal injury collision data for at least the most recent three-year period would be considered adequate to be able identify collision patterns. However, the Council still made pre and post implementation comparisons of casualty numbers in an around the Nether Edge area between June and December in 2021 ('pre') versus June and December 2022 ('post').

The information available does not suggest the Nether Edge Active Neighbourhood project had a significant impact on personal injury collisions. During its implementation, the overall number of collisions did not change. In relation to Archer Lane, there were no collisions between June and December 2022. This compares with 4 collisions in an equivalent six-month period in 2020 on Crookes Valley Road (between Harcourt Road and Oxford Street) which led to this location being a high-priority site and a Local safety scheme is currently being designed which will be implemented in 2024.

It is important to say that when people in Nether Edge and Sharrow (NES) were asked about perceived impact on the safety of walkers and cyclists of the Active Travel measures; more responses said there had been a negative impact on people's perception of safety of walkers and cyclists due to the trial closure.

We must assess and prioritise locations for measures according to certain criteria. The most important one of these relates to the prevention of collisions, particularly those recorded as serious or fatal. We analyse all the incident data we receive from our partners and using that data we prioritise our budget on schemes in those locations that have a history of previous collisions. Although we cannot know where the next collision may occur, it is more likely to happen at a location having a collision history than one with few or none.

Road safety is of concern everywhere, but it is notable that some of our most pressing road safety concerns are in our most deprived communities.

		Finally, with regards to your point on the climate emergency. I hope that you will stay to hear our discussion later on item 9, which looks at the progress that we have made as a city towards our climate goals. It is important to say that trial closure of Archer Lane did not see an overall reduction of car journeys. It simply dispersed them and created problems elsewhere. People were just taking different routes. Whilst this is not the outcome that you would have hoped for, we hope that you will get behind the council in the many Active Travel schemes that we are introducing at present across the city. Thank you for your question.
5. Page 12	 Alison Teal 1. On the 20th of September, this Committee, except for two Green Party Cllrs, decided to prioritise the voices of drivers living mostly outside of Nether Edge and chose to enable them to drive on narrow residential roads to avoid congestion on arterial routes. However, the officer reports made clear that the closure of Archer Lane had a positive effect, encouraging active travel and making roads safer for children, pedestrians and cyclists. How can members of the committee justify ignoring the officer's technical expertise and vote to reopen Archer Lane, which is the most vital aspect of the Nether Edge Low Traffic Neighbourhood scheme's success? Why did you disregard the empirical evidence in favour of drivers who don't even live in Nether Edge? 2. How is the Council going to meet its climate and nature targets when this committee has caved into a small unrepresentative but loud group of motorists and anti-cycling campaigners against the closure of Archer Lane? It sets a very bad precedent that will prevent any future schemes that will be required to be able to meet the targets. 	Councillor Miskell responded to Sally Skelton and Allison Teal's questions together as detailed above.

6. Diana Mallinson

In paragraph 4.3 SCC have added 3 more of the purposes for a permanent traffic regulation order (TRO) to the prevention of damage purpose given in the proposal, i.e. for the avoidance of danger, facilitating passage of any class of traffic (including pedestrians) and preventing use by vehicular traffic which is unsuitable. And in paragraph 4.4 SCC say that the TRO will preserve the character of the byway and the area's natural beauty, and make the route more attractive to users i.e. improve the amenity of the area – again these are three more of the purposes available for a permanent TRO. Recent guidance from the British Parking Association, endorsed by the Minister of State for Transport, says that the statement of reasons should ideally refer to these legal purposes, because the statement of reasons is what consultees/stakeholders use to work out what the authority is trying to accomplish.

We think that the seasonal nature of the TRO as proposed and the non-prohibition of motorcycles, especially the latter, mean that it will not achieve these additional purposes, especially preventing use which is unsuitable, preserving the character of the byway and the natural beauty of the area, and improving the amenities of the area. Motorcyclists cause some of the ruts on the byway and they also drive off the route onto the adjacent pasture. Wet weather in the summer months, coupled with continued recreational motor vehicle use, will also affect the character of the route and the natural beauty and amenity of the area, as demonstrated by the failure of the levelling and re-seeding you have done annually since 2012. Will you re-consult on the TRO proposal, so that you can explain to consultees how the TRO will meet these additional purposes in your statement of reasons?

Will you also consider re-consulting on a TRO proposal which would allow you flexibility in extending the duration of the seasonal closure Please see the response to Q3 above.

	eriod, if rainfall in summer months increases, as it has done in some ears since 2012/3?
the typ ma col	you decide to accept the recommendation in the report and make the TRO as proposed, will you monitor the surface condition (e.g. the type of ruts, their depth and spread across the route) in the four open nonths and the eight closed months of each year, and see how this prrelates with Met Office rainfall data for Sheffield? Will you make a emporary TRO if there continues to be damage?