

Consultation Report

Swan and Limers Rakes

D3262F / 001 Revision 1

13/09/2021



ameyconsulting



1. Executive Summary

- 1.1.1 Staffordshire County Council (SCC) intends to carry out repairs to the Swan and Limers Rakes to address issues with severe erosion of the surface of the Rakes which has occurred, through a combination of surface water run-off and general wear from use including by four wheel drive vehicles and trail type motorcycles. SCC aim is to make the route safe and is proposing to bring the Rakes up to the minimum standard of a bridleway or cycleway, with a smooth surface suitable for use by all non-motorised users.
- 1.1.2 Amey were therefore tasked by Staffordshire County Council to carry out a consultation to seek the public view on usage of the Rakes following the repairs. The consultation was carried out in January 2021 and received more than 1600 responses from key stakeholders, relevant groups, and individuals.
- 1.1.3 In June 2021 the SCC Highway Asset and Network Management Team received advice from the SCC Legal Services Team that there are no established motorised vehicle rights on Swan and Limers Rakes.

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Appendix

Appendix A

2. Background

- 2.1.1 Representations have been made to Staffordshire County Council to review the condition of the Swan and Limers Rakes which Staffordshire County Council, as highway authority, is responsible for maintaining. Over the years, severe erosion of the surface of the Rakes has occurred, through a combination of surface water run-off and general wear from use.

3. Consultation Arrangements

- 3.1.1 The SCC database was used to identify postal address within the proximity of the Swan and Limers Rakes and consultation letters were posted to all the addresses within the green area shown in Figure 1. The consultation pack included a map showing the Rakes location and a paper version of the online questionnaire which allowed people without internet access to respond to the consultation. A copy of the consultation letter and email is included in Appendix A.

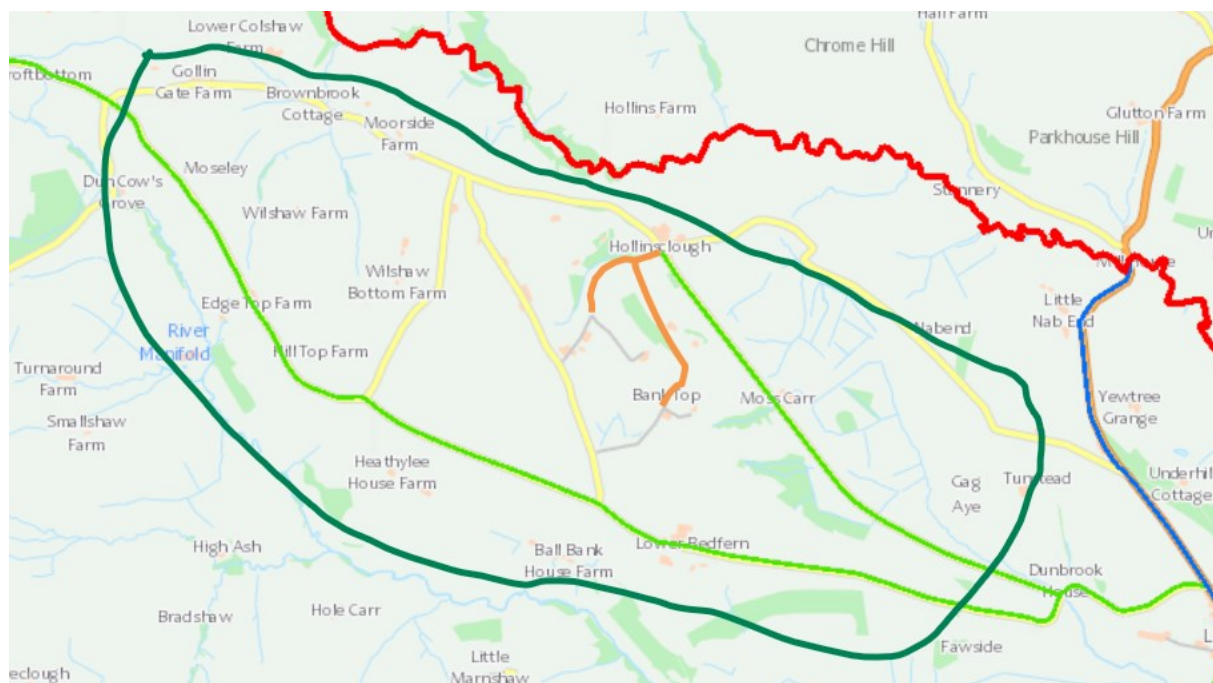


Figure 1 Letter Drop Area Shown in With Green Boundary

- 3.1.2 Consultation emails were also sent out to key stakeholders and groups as well as individuals who contacted SCC in the past in relation to the previous Swan and Limers Rakes Temporary Traffic Regulation Orders.
- 3.1.3 The consultation asked for the respondents personal details and the following questions:
- (1) Do you represent any of the following organisations or groups?
 - (2) Are you a member of any of the following organisations or groups?
 - (3) Who do you think should have access to the rakes after the remediation works?
 - (4) After the remediation works what kind of access to the rakes is important to you?
 - (5) How far do you travel to visit the site?
 - (6) Please provide your views and comments regarding the above proposals
- 3.1.4 The purpose of questions 1 and 2 was to understand the various stakeholders needs and concerns. Questions 3's purpose was to understand which user group the respondents thought should have access to the Rakes following completion of the repairs. The purpose to Question 4 was to understand the importance of different user groups having access to the Rakes. Question 5 was aimed at understanding if the distance of the respondents had an impact on their preferences. Question 6 gave the respondents an option to provide further feedback and comments to the proposals.

4. Consultation Responses

4.1. General Overview

4.1.1 More than 1600 responses by stakeholders, individuals and interest groups have been received using the online questionnaire and by post. The groups represented different interest groups such as walking, cycling, equestrian, motorbike and vehicle user groups and the summary of the comments of some of the key stakeholders and groups is included below

- Hollinsclough Parish Council
- SCC Rights of Way
- Local Police
- Green Lane Association
- British Mountaineering Council
- Peak District National Park Association
- Friends of the Peak District
- Hollinsclough CE Academy
- British Horse Society
- Local National Farmers Union

Hollinsclough Parish Council

4.1.2

Parish Councillors have made some suggestions regarding possible strategies that may be considered for use on the Rakes:

- i. a weight limit on S. and L. Rks and on the other lanes and highway tracks in the same area which could be a deterrent to powerful vehicles.
- ii. gates placed at intervals along S. and L. Rks or a staggered fencing system to make the routeways less attractive to motorised transport and bring about a reduction in speed; even sleeping policemen were suggested but these could create even more fun and challenge for certain users.
- iii. the entrance points to the S. and L. Rks. could be narrowed to discourage inappropriate users and
- iv. The countryside code desperately needs to work towards even more positive visitor behaviour to reduce the irresponsible, inconsiderate and dangerous behaviour witnessed not only on S. and L. Rakes but also, on both access points to these Rakes at the 'tops' and 'bottom' which pass residences and indeed, on the three roads approaching the village area of the Parish, which have 'seen' conflict and distress between ^{offenders and} families with children and other walkers particularly noticeable during the COVID 19 Pandemic. This could be one area where the P.D.N.P.A. could contribute enormously.

It is hoped that with a well thought out management plan and the best of repairs that can be provided, both the Parish and visitors to it will enjoy the experience of living here/visiting without compromising the importance of either the Sainsford Principle (pg3) or the Government's ambitions contained within the Landscape Review 2019 (pg4).

Hollinsclough Parish Council would like to be kept fully informed of the progress made by S.C.C. (and hopefully the P.D.N.P.A.) in reaching decisions regarding the future of Swan and Limer Rakes and where it can to work cooperatively with these bodies.

SCC Right of Way Officer

- 4.1.3 *I have been asked to comment by Highways colleagues. I don't know the site or the current usage of the routes so I can only comment from the point of view of pedestrians, horse riders and cyclists that I know use the route. I cannot comment from the point of view of motorised users or local residents. I do know that over the years complaints have been received about vehicular damage to the rakes, particularly motorbike usage and if mechanically propelled vehicles continue to use the rakes the surface will have to be designed to accommodate such usage and ensure the safety of other users.*

Police

- 4.1.4 *I am PCSO 24916 Gorman of Leek Police Station, I cover the Waterhouses patch which includes the area of Hollinsclough.*
- 4.1.5 *I have become aware of Swan/Limers Rake within the last 12 months, following complaints of off road motorbikes at the location.*
- 4.1.6 *I first visited the location 07/07/2020 following a complaint from a local resident in relation to off road motorbikes that had been reported a few days prior. There have been further reports since, of a similar nature where off road motorbikes have accessed the location and have come into contact with local pedestrians using the rakes.*
- 4.1.7 *Whilst at the location I took opportunity to explore the site, there were 'Road Closed' signs at the bottom and top of Swan Rake, at the bottom of Swan Rake there is large boulders that block the path but at the top although there are three large boulders and there is still a large space were motorbike/s are able to pass and access the rake. Having checked the site again yesterday, 04/02/2021 the boulders remain at the top of the rakes and one large boulder at the top of the limer rakes. Although access could still be gained by off road motorbikes.*
- 4.1.8 *I believe that there is a TRO at the site and motorcycles should not be accessing, I feel that the access at the top of the rake needs to be revisited by highways so relevant measures can be put into place to prevent access but still allowing pedestrian access, i.e. another boulder, stile, additional signs, etc The track itself is very narrow and at the time of walking swan rake in summer it was overgrown. My concern is a motorcycle colliding with a pedestrian if no further safety measures are put into place.*
- 4.1.9 *In terms of the survey I have not answered points 7 (Who do you think should have access to the rakes) & 8 (What kind of access is important to you) as I don't feel they are applicable to answer.*
- 4.1.10 *I will continue to monitor the location and feed anything further back that I feel is relevant.*

Green Lane Association (GLASS)

Status of Swan & Limer Rakes

- 4.1.11 *In conclusion, should the investigation into the status of these highways result in the highway authority determining that it would be appropriate to make a modification order(s) to record both of these highways onto the definitive map as BOAT's, that, on the balance of probability, the evidence as to the extent of their use by mechanically propelled vehicles and that of their character would satisfy the definition of a BOAT, it is unlikely that the Green Lane Association would raise any objections. However, should the highway authority choose to attempt to record said highways onto the definitive map as highways of any other description, non-vehicular highways, then the Green Lane Association would strongly object to such a proposal as it is unperceivable, on the balance of probability, that all of the available evidence would support such a conclusion.*

Proposal to Conduct Inappropriate Repairs and Maintenance

- 4.1.12 *The Green Lane Association strongly objects to the proposal to commission inappropriate repairs and or maintenance to these highways, the design of which would not be suitable for legitimate vehicular use and which can only be seen as a pre-cursor to a permanent prohibition of vehicles. The highway authority is under no obligation to provide a 'smooth surface', indeed, such actions, should they be contemplated on such an historic highway, should only be seen as yet another example of what appears to be the desire of many planners, an act of simply flattening-out and smoothing-over the past.*

- 4.1.13 *The Green Lane Association would welcome the opportunity to discuss and develop with SCC, the PDNPA, other user groups and interested individuals, a strategy for ensuring the sustainable future of these highways for all users. Should the evidence support the need for restrictions then management tools such as, for example, night-time and seasonal restrictions, restrictions on the number of vehicles, or the use of permits may be appropriate. Should that be the case and the evidence would support their imposition, it is unlikely that GLASS would not support the imposition of them.*
- 4.1.14 *GLASS would also urge SCC to use their powers in respect of vehicular restrictions more 'Intelligently', through, for example, the introduction of a one-way system for vehicles, whereby vehicular traffic would follow the downhill gradients, which would contribute to reducing the potential for 'wear and tear'. The use of seasonal restrictions, which would also allow SCC the opportunity to undertake annual inspections to identify and programme the implementation of any identified repair and maintenance requirements including addressing the backlog of maintenance accrued over many years.*
- 4.1.15 *Should SCC be determined to impose restrictions on vehicular use then GLASS would also urge SCC to explore the possibility of using other means of restriction that are available to them. For example, a Public Space Protection Order (PSPO) would allow SCC to manage all of the concerns that have been raised, but retain the flexibility to react to any unforeseen issues that may arise through the ability to periodically review and amend the PSPO. Both GLASS and the TRF promote the responsible use of vehicles in the countryside but cannot control use by 'independent users'. Glass and TRF members are subject to their organisations codes of conduct, which they are all expected to comply with. The advice, conditions and guidance contained within them provide proactive responses to many of the 'behavioural' issues referred to within the PDNPA report and those of SCC. Should you not be familiar with it, the GLASS code of conduct can be viewed here <https://www.glass-uk.org/about/our-code-of-conduct.html> it has been referred to when successfully negotiating exemptions for GLASS members with other highway authorities under similar circumstances. GLASS would be happy to discuss the details as to how such exemptions can be agreed whilst achieving the objectives of the highway authority.*
- 4.1.16 *In addition, as you will be aware, GLASS has in the past offered to provide voluntary working parties to assist in repair, maintenance and improvements. Whilst you have previously rejected all such previous offers we would nevertheless advise you that the offer remains open and we would also give consideration to the making of financial contributions in respect of repairs, improvements or maintenance to the Swan and Limer Rakes.*

British Mountaineering Council (BMC)

- 4.1.17 *The BMC is the national body representing the interests of climbers, hill walkers and mountaineers in England and Wales. The organisation has over 80,000 members, with a dedicated volunteer network supported by more than 30 members of staff from its head office in West Didsbury, Manchester (M20 2BB). The BMC is very familiar with path repairs through its Access and Conservation Trust and having led the Mend Our Mountains campaign which has helped to improve routes in most National Parks including, in the Peak District, Ringing Roger on the slopes of Kinder Scout and the on-going improvements to Cut Gate, on the Derwent Moors, and the Great Ridge between Hollins and Lose Hill.*
- 4.1.18 *The proposal to repair Swan and Limer Rakes is very much welcomed as is the timescale for the works of summer 2021. The Rakes are long standing routes for movement and help provide contiguous access from the moors south of Hollinsclough, and the nearby settlement of Longnor, through the village to routes towards Cheshire, across into Derbyshire and nearby access land e.g. High Edge, Thirkelow and Hollins, Chrome & Parkhouse hills, and vice versa. Without access to*

the Rakes the Highway Authority's preferred alternative represents a significant diversion for users, particularly for our hill walking members.

- 4.1.19 *The consultation provides no detail of the construction to which the Rakes will be repaired, other than the intention that it will be "to the minimum standard of a bridleway or cycleway, with a smooth surface suitable for use by all non-motorised users".*
- 4.1.20 *It is noted that in recent years a TRO has been put in place at nearby Washgate, prohibiting the use of motorised vehicles. However, those routes approaching Washgate Bridge still suffer from significant erosion and washout as the routes are not maintained to an appropriate standard, even without, as you have referred to 'what might be termed ill-considered use by motorised vehicles'. With this in mind it is essential that the Rakes are repaired to a suitable, durable and safe standard for users and that the highway authority put in place appropriate inspection and maintenance regimes to ensure the routes remain safe and usable.*
- 4.1.21 *It is noted that there is to be an investigation into the 'exact nature of the public rights on these highways which will better inform the way forward'. In this respect the BMC would not want to pre-judge who can use the Rakes in advance of the outcome of that exercise and would expect that, ultimately, access to the routes would be for those who are legally allowed to use them. If it is determined that motorised vehicles do have access rights then that will impact upon the standard the route is intended to be repaired to and it will be for the highway authority to decide on the best way forward in consultation with users.*
- 4.1.22 *You will note in the introductory paragraph that the BMC has a lot of experience associated with repairing routes, particularly in the Peak District. The organisation has been invited to site visits as proposals to such repairs have been developed and delivered. If the Highway Authority do involve users in further consultation and site visits for the Rakes or other similar rights of way within Staffordshire then the BMC would be grateful to receive invites to these events (via office@thebmc.co.uk).*
- 4.1.23 *In conclusion the BMC:*
- (1) welcome the proposed repair to the routes in summer 2021 and request that the highway authority ensure that an appropriate inspection and maintenance regime is put in place;*
 - (2) look forward to hearing the outcome of the highway's investigation into the nature of the public rights and request that the BMC (via email to office@thebmc.co.uk) are informed of any further consultation into this matter and the outcome of the investigation;*
 - (3) consider that the outcome of the investigation as to the exact nature of access rights should inform the answer to question 7 and 8 of the consultation i.e. those who can legally use the route should be able to access it; and,*
 - (4) should the investigation determine that motorised vehicles are allowed to use the route then the highway authority will have to decide how that impacts upon the repair and how to take this issue forward in consultation with users.*

National Farmers' Union, West Midlands Region, Southwater Way, Telford, Shropshire.

- 4.1.24 *The NFU has supported adjacent landowners with access and runoff issues around Swan and Limers Rakes for many years. Over time the condition of the routes has deteriorated to the extent that they struggle to access adjacent land by vehicle in order to perform essential agricultural operations. The surrounding stone walls have also been damaged by 4x4 vehicles and water erosion is causing flooding concerns.*
- 4.1.25 *It isn't possible to use the rake for agricultural access. It would not be possible to use a tractor or trailer on the route and it is not possible to use a quad bike due to health and safety concerns of using a quad on such a surface.*
- 4.1.26 *The route has been accessed by recreational 4x4s, however a farmer going about his business (possibly with materials or livestock in the vehicle) is not able to use the rake for business purposes.*
- 4.1.27 *Woodland near Limer rake requires management which is not possible without vehicle access to take materials and machinery in or take timber out.*
- 4.1.28 *If works are undertaken to make good the track surface and address the drainage issues our priority would be to facilitate access to the farmland and woodland for management purposes with restrictions on recreational 4x4 use to prevent erosion and damage to the new surface.*

NFU Office, Rear of Newspaper House, Brook Street, Leek

- 4.1.29 *Due to reckless use of the green lanes in question they have become impassable for all users, which is sad for locals and land owners in particular. The NFU has supported local farmers and landowners for a long time to try and resolve the issues that were occurring with these green lanes, as they are unable to gain access to their land due to the treacherous conditions of the lanes, which was exaggerated by motor vehicles using them as a play ground, with no consideration for anyone else. The boundary walls were recklessly dismantled by these people and used to throw onto the lane to try and make it passable. This cannot be allowed to take place again. The landowners were promised access to their fields many years ago by Staffordshire Highways, but this has never been allowed to happen. The lanes are so bad the farmers cannot get to the land even when using tractors or ATVs and this needs rectifying, with a system of access to restrict who uses them, as the fields and woodland are in urgent need of maintenance and it makes the land worthless as things stand.*

British Horse Society

- 4.1.30 *The British Horse Society is the UK's largest equestrian charity, with over 116,000 members representing the UK's 3 million horse riders. Nationally equestrians have access to just 22% of the rights of way network and this is increasingly disjointed by roads which were once safe rural routes but now busy thoroughfares.*
- 4.1.31 *Local British Horse Society volunteers have been consulted for the purposes of this response.*
- 4.1.32 *Whilst it is recognised that Swan and Limers Rakes are on the List of Streets and have been used by motorised vehicles previously, the 'severe erosion of the surface...through a combination of water run-off and what might be termed ill-considered use by motorised vehicles' has excluded equestrians from using and enjoying the Rakes. Therefore, it is suggested that the remedial work should include the laying of a solid surface to enable pedestrians, cyclists and equestrians to enjoy the routes safely and for adjacent landowners to access their properties. We would suggest a surface that would enable drainage and be non-slippery (ie NOT tarmac) considering the*

gradients. Whilst rubber crumb may be appropriate as it is porous and non-slip, materials such as crushed stone or pitch stones may be more in keeping with the natural surroundings.

- 4.1.33 *The British Horse Society guidance on surfaces can be found via <https://www.bhs.org.uk/advice-and-information/free-leaflets-and-advice>*
- 4.1.34 *Thank you for consulting with the British Horse Society on this matter; we would welcome further consultation and discussion as this progresses.*

Hollinsclough CE Academy

- 4.1.35 *Over the years since I have been at Hollinsclough School. I have witnessed the ruination of the two tracks, 95% which has been down to 4x4's and motorbikes. Some of these activities have taken place in the early hours of the morning coupled with loud engines and foul language.*
- 4.1.36 *With regard to the damage, no amount of pedestrian traffic and the occasional horse would have ever created the level of damage present. Walls have been torn down by the 4x4 drivers to provide traction and when challenged abuse as followed and one occasion a camera was smashed, police called and nobody attended. We were unable to report registrations as the vehicles and users in question did not have registration plates.*
- 4.1.37 *In terms of the proposal - the returned surface should be little more than a footpath of tarmac or some other compacted surface with substantial and immovable restrictions at either end and at several points along the route to prevent access and to impede the progress of any form of motorised vehicle. If this can be achieved then it would be a satisfactory outcome.*
- 4.1.38 *I'm not aware of any landowner access requirements, especially as it has been closed for several years and the surface is barely passable on foot.*
- 4.1.39 *Provision of suitable drainage will be important and will need to be carefully thought through. Due to the damage caused to the tracks, the current situation leads to a great deal of spoil being blown out into the centre of the village, blocking roads etc. This spoil consists of mud, stones varying in size up to 12 to 18" in diameter. Vehicles cannot pass and tractors are required to remove. It should not be overlooked that several decades ago the stream passing through the village burst its banks and destroyed a farmhouse, this is why I say drainage will need to be a key feature in any final solution.*

Peak District NPA, Aldern House, Bakewell

- 4.1.40 *Comments on the use of the Rakes following completion of the repairs*
- 4.1.41 *The National Park Authority fully supports the carrying out of repairs to allow the rakes to be re-opened. The routes are an important part of the network linking in with other rights of way and providing a means of access to areas of Access Land and to adjoining farmland.*
- 4.1.42 *We welcome repairs to a standard appropriate for use by cyclists, horse riders and those on foot. This should include consideration of the sustainability of the route for the use identified, drainage requirements, and ongoing maintenance.*
- 4.1.43 *We have carried out monitoring of motorised vehicles to determine the amount of use taking place, but do not hold any evidence to indicate that this route carries motorised vehicle rights.*
- 4.1.44 *In relation to the historic motorcycle event, the Bemrose Cup, which we understand to have taken place here, we would have no objection to the continuation of this managed event, subject to conditions requiring the mitigation and redressing of any impacts arising.*

4.1.45 *We would be pleased to provide comments on the scheme of repair in terms of suitability from a National Park perspective. Details on the conservation interest of the area are set out below.*

4.1.46 **Ecological Interest**

4.1.47 *The route passes through semi-improved acidic and neutral grasslands, grass-heath and gorse scrub, with areas of woodland. The narrow verges and banks contain bilberry and other neutral and acid grassland species such as heath bedstraw, tormentil and hard fern.*

4.1.48 **Archaeological Interest**

4.1.49 *The routes run through land characterised as enclosure of unknown date, with irregular fields. A Scheduled Monument - a Bronze age barrow - lies 70m upslope, at its closest point.*

4.1.50 **Landscape Interest**

4.1.51 *The route lies within the South-west Peak Landscape Character Area (LCA) as set out in the Peak District National Park's Landscape Strategy. The overall strategy for this area is to protect and manage the distinctive historic character of the landscapes through sustainable landscape management, and seek opportunities to value the diverse landscapes of the South west Peak whilst managing recreation opportunities, woodlands, wildness and the diversity of remoter areas.*

Hollinsclough Community Group

4.1.52 *Hollinsclough Community Group comprises residents of Hollinsclough, directly impacted by the Rakes, living and/or working either adjacent to, or within close proximity of, them. The issues raised can be summarised as follows:*

1. *Consultation*
 - a. *SCC to ensure weighting of responses towards local people, those most affected by the Rakes, whatever their opinion.*
 - b. *SCC to confirm planned repairs will be published and consulted on.*
 - c. *SCC to detail the cost of these to tax payers.*
2. *Nature of repairs*
 - a. *Restore the Rakes to their original condition (detailed in this document), befitting a Conservation area within a Category V designation (IUCN).*
3. *Environmental impact of repairs*
 - a. *Only environmentally sensitive materials to be used.*
 - b. *Go beyond SCC's statutory requirements on bio-diversity to reflect status of Rakes within a Conservation area with a Category V designation (IUCN).*
 - c. *Involve the PDNPA, PLAF, Environment Agency and Staffordshire Wildlife Trust*
4. *Sustainability of repairs: Drainage and Future Use*
 - a. *Repairs must address significant drainage issues, which extend beyond the Rakes and include other metallised roads, and lead to flooding.*
 - b. *Repairs must be protected through a TRO banning MPV's, as described by PDNPA in 2018.*
 - c. *Failure to do both will make any repairs a waste of taxpayers' money.*
5. *Appropriate barriers*
 - a. *A TTRO in place since 2017 has kept out 4x4's but failed to prevent motorcycle use, due to ineffective barriers.*
 - b. *Alongside a TRO, SCC must implement appropriate and robust barriers to prevent future use by all MPV's.*
6. *Safety and liability.*
 - a. *The PDNPA identified the Rakes as being unsafe for multiple user groups in 2018.*

- b. A TRO is required to protect walkers or other non-motorised users from MPV's.*
- c. The local primary school is unable to access a valued resource for 54 children.*
- d. Evidence of two near misses and one accident have been provided to SCC.*
- e. SCC's planned repairs must attend to resolving the foundations and, in places, structure of the dry-stone walls which pose a safety risk.*
- 7. Illegal use and liability.*
 - a. a. SCC to clarify its liability should injury arise to legal users.*
- 8. Quiet enjoyment of cultural heritage and nature within a conservation area*
 - a. A TRO, supported by appropriate barriers, is also required for the purpose of conserving or enhancing the natural beauty of the area, and to enhance the study of nature of the area*

4.2. Quantitative Analysis

4.2.1 The analysis of the responses, see Figure 2, showed that as expected the majority of the respondents did not represent any organisation and were making their own comments. The second highest number of responses were from the Trailriders Fellowship which is a motorbike trail riding interest group. It is worth noting that the respondents might not have always selected correctly the organisation or group they are representing; this was observed to be the case as four selected Police, but they have not used a Police email account.

Do you represent any of the following organisations or groups?

County Councillor	1
Local Councillor	1
District Borough	0
Parish Council	2
Police	4
Fire Service	0
Ambulance Service	2
Walkers/Ramblers	36
Cycling group	67
Equestrian club	15
Off road vehicle group	125
Green Lane Association	81
Friends of the Peak District	9
Trailriders Fellowship	213
Residents Group	1
Local Resident	90
None	856
Other	144

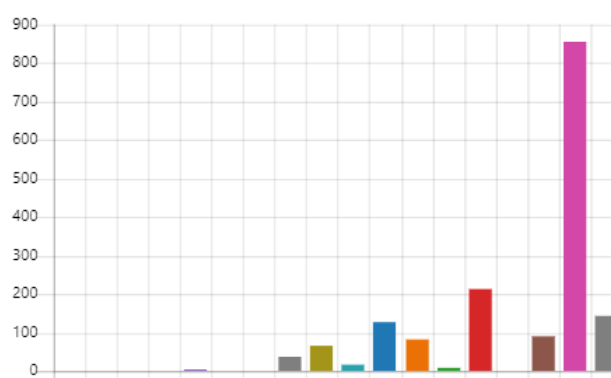


Figure 2 Do you represent any organisation?

4.2.2 Figure 3 was a multiple-choice question where the respondents could indicate the organisation or groups, they were members. Figure 3 shows once again that approximately one third of the respondents were members of the Trailriders Fellowship and approximately one quarter indicated that they were members of no group. There also seems to be a near equal number of respondents who are members of a Cycling group, Off-road vehicle group and Green Lane Association which is 4x4 vehicle user group.

Are you a member of any of the following organisations or groups?

Equestrian club	58
Cycling group	238
Off road vehicle group	226
Walkers/Ramblers	148
Residents Group	11
Green Lane Association	225
Friends of the Peak District	55
Trailriders Fellowship	521
Local resident	69
Adjacent landowners	12
None	446
Other	133

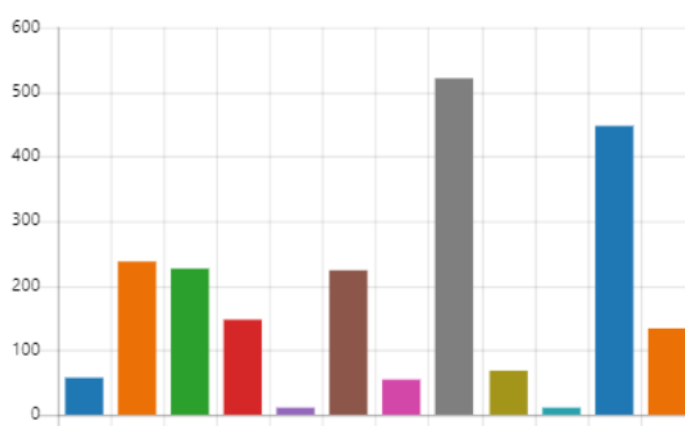


Figure 3 Are you a member of any of the following organisations or groups?

4.2.3 The next question was a multiple choice question and the respondents were asked "Who do you think should have accessed to the rakes after the remediation works?" There seems to be an almost equal spilt amongst the different user groups as shown in Figure 4 and therefore there is no clear preference.

Who do you think should have access to the rakes after the remediation works

Pedestrian users	1268
Motorised	1275
Equestrian	1141
Cyclists	1201
Adjacent landowners only	240



Figure 4 Who do you think should have access to the rakes after the remediation works

4.2.4 The next question aimed at understanding the importance of the different user groups to the respondents. Figure 5 shows that equestrian access was voted as the least important and pedestrian access was the most important. It is worth noting that the motorised vehicle access had the most "Not at all Important" votes from all the user groups. However, there is no user group that appears to have been voted for as not important.

. After the remediation works what kind of access to the rakes is important to you?

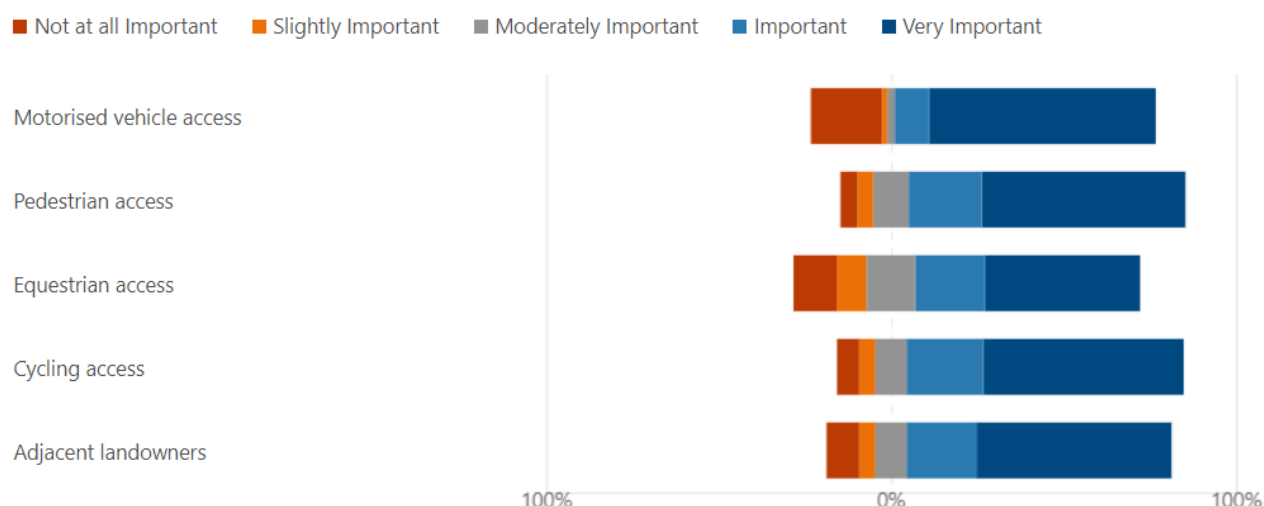


Figure 5 After the remediations works what kind of access to the rakes is important to you

4.2.5 The next question asked the respondents about their travelling distance to the site. As it can be seen from Figure 6 most respondents were from a distance of "Over 20miles" from the site. This suggest that the Rakes are of interest to users who travel to use the Rakes or have been requested to respond to the consultation by the user groups they are part of.

How far do you travel to visit the site

Under 5miles	110
5-20miles	453
Over 20miles	1071



Figure 6 How far do you travel to the site

- 4.2.6 In order to understand better the location of the respondents the postcodes were plotted on a map, see Figure 7, in a heatmap format. This shows that the respondents were from all over the UK and some were from other European countries however, a large majority of the respondents were from in and around Staffordshire.

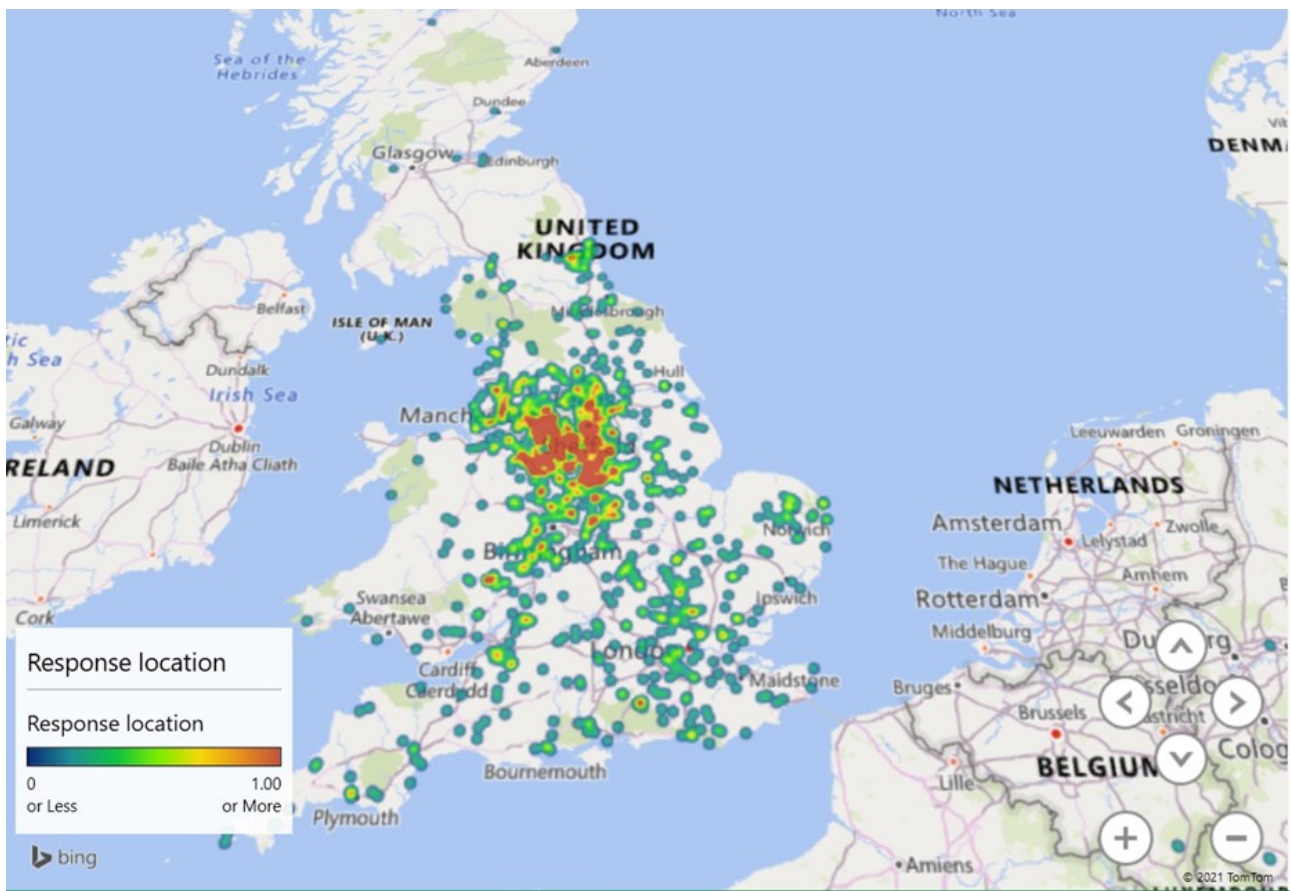


Figure 7 Respondents location heatmap

4.3. Qualitative Analysis

4.3.1 Further analysis of the data shows that Motorised vehicle access to the Rakes is "Very Important" to the respondents if they live "Over 20 miles" from the Rakes, see Table 1. Closer investigation of the data shows that the majority of the respondents who live "Under 5 miles" from the site believe that Motorised vehicle access is "Not at all Important". Moreover, the data shows that Motorised vehicle access becomes more important to people who live further away from the Rakes. Further examination of the results it appears that a significant proportion of the respondents who said that "Motorised vehicle access" was "Very Important" are members of a Motorised Group as shown in Table 2.

How far do you travel to visit the site	Motorised vehicle access	No of responses	% of Responses Per Distance
Under 5miles	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Important		
	5.Very Important		
5-20miles	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Important		
	5.Very Important		
Over 20miles	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Important		
	5.Very Important		

Table 1 Distance from site and motorised vehicle Importance

Motorised vehicle access	Are you a member of any of the following organisations or groups?	No of responses	% of responses per importance
1.Not at all Important	Cycling group		
	Cycling group;Walkers/Ramblers		
	Equestrian club		
	Motorised Group		
	None		
	Resident Group		
2.Slightly Important	Walkers/Ramblers		
	Cycling group		
3.Moderately Important	Motorised Group		
	None		
	Cycling group		
4.Important	Motorised Group		
	None		
	Cycling group		
5.Very Important	Cycling group;Motorised Group		
	Equestrian club		
	Friends of the Peak District		
	Motorised Group		
	Motorised Group;Cycling group		
	Motorised Group;Friends of the Peak District		
	Motorised Group;Walkers/Ramblers		
	None		
	Walkers/Ramblers		

Table 2 Motorised vehicle access and organisation members

4.3.2 Table 3 shows that "Pedestrian Access" is "Very Important" to respondents who travel "Under 5 miles" to visit the site and that the majority of the respondents who travel "5-20 miles" and "Over 20 miles" find it also "Very Important". When examining the importance of the pedestrian access to members of different user groups in Table 4 it can be seen that majority of the respondents who did not answer the question or answered "Not at all important" were members of a Motorised Group which the same group members also answered that "Pedestrian Access" is "Very Important", although in lower numbers, which appears to demonstrate a difference of opinion with that group.

How far do you travel to visit the site	Pedestrian access	No of responses	% of Responses Per Distance
Under 5miles	(blank)		
	1. Not at all Important		
	2. Slightly Important		
	3. Moderately Important		
	4. Important		
	5. Very Important		
5-20miles	(blank)		
	1. Not at all Important		
	2. Slightly Important		
	3. Moderately Important		
	4. Important		
	5. Very Important		
Over 20miles	(blank)		
	1. Not at all Important		
	2. Slightly Important		
	3. Moderately Important		
	4. Important		
	5. Very Important		

Pedestrian access	Are you a member of any of the following organisations or groups?	No of responses	% of responses per importance
(blank)	Cycling group		
	Motorised Group		
	None		
1. Not at all Important	Motorised Group		
	None		
2. Slightly Important	Cycling group		
	Motorised Group		
	None		
3. Moderately Important	Cycling group		
	Motorised Group		
	None		
4. Important	Cycling group		
	Motorised Group		
	None		
5. Very Important	Resident Group		
	Cycling group		
	Cycling group; Motorised Group		
	Cycling group; Walkers/Ramblers		
	Equestrian club		
	Friends of the Peak District		
	Motorised Group		
	Motorised Group; Walkers/Ramblers		
	None		
	Resident Group		
	Walkers/Ramblers		

Table 4: Pedestrian access and organisation members

4.3.3 Table 5 shows that "Equestrian Access" is "Very Important" to the majority of respondents who travel "Under 5 miles" to visit the site and that the majority of the respondents who travel "5-20 miles" and "Over 20 miles" find it also "Very Important". When examining the importance of the equestrian access to members of different user groups in Table 6 it can be seen that majority of the respondents who did not answer the question were members of a Motorised Group which the same group members also answered that "Equestrian Access" is "Very Important" which appears to demonstrate a difference of opinion with that group.

How far do you travel to visit the site	Equestrian access	No of responses	% of Responses Per Distance
Under 5miles	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Important		
5-20miles	5.Very Important		
	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
Over 20miles	4.Important		
	5.Very Important		
	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Important		
	5.Very Important		
	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Important		
	5.Very Important		

Table 5 Distance from site and Equestrian Access Importance

Equestrian access	Are you a member of any of the following organisations or groups?	No of responses	% of responses per importance
(blank)	Cycling group		
	Motorised Group		
	None		
1.Not at all Important	Cycling group		
	Motorised Group		
	None		
2.Slightly Important	Resident Group		
	Walkers/Ramblers		
	Cycling group		
3.Moderately Important	Motorised Group		
	None		
	Resident Group		
4.Important	Walkers/Ramblers		
	Cycling group		
	Cycling group;Walkers/Ramblers		
5.Very Important	Motorised Group		
	None		
	Resident Group		
	Cycling group		
	Cycling group;Walkers/Ramblers		
	Equestrian club		
	Motorised Group		
	Motorised Group;Walkers/Ramblers		
	None		
	Resident Group		
	Walkers/Ramblers		

Table 6 Equestrian access and organisation members

4.3.4 Table 7 shows that "Cycling Access" is "Very Important" to the majority of respondents who travel "Under 5 miles" to visit the site and that the majority of the respondents who travel "5-20 miles" and "Over 20 miles" find it also "Very Important". When examining the importance of the cycling access to members of different user groups in Table 8 it can be seen that majority of the respondents who did not answer the question were members of a Motorised Group which the same group members also answered that "Cycling Access" is "Very Important" which appears to demonstrate a difference of opinion with that group.

How far do you travel to visit the site	Cycling access	No of responses	% of Responses Per Distance
Under 5miles	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Importance		
5-20miles	5.Very Important		
	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
Over 20miles	4.Importance		
	5.Very Important		
	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Importance		
	5.Very Important		
	(blank)		
	1.Not at all Important		
	2.Slightly Important		
	3.Moderately Important		
	4.Importance		
	5.Very Important		

Table 7 Distance from site and Cycling Access Importance

Cycling access	Are you a member of any of the following organisations or groups?	No of responses	% of responses per importance
(blank)	Motorised Group		
	None		
1.Not at all Important	Motorised Group		
	None		
2.Slightly Important	Resident Group		
	Walkers/Ramblers		
3.Moderately Important	Motorised Group		
	None		
4.Importance	Equestrian club		
	Motorised Group		
5.Very Important	None		
	Resident Group		
	Cycling group		
	Equestrian club		
	Motorised Group		
	None		
	Cycling group		
	Cycling group;Motorised Group		
	Cycling group;Walkers/Ramblers		
	Equestrian club		
	Motorised Group		
	Motorised Group;Cycling group		
	Motorised Group;Walkers/Ramblers		
	None		
	Resident Group		
	Walkers/Ramblers		

Table 8 Cycling access and organisation members

4.3.5 Table 9 shows that "Adjacent Landowners Access" is "Very Important" to the majority of respondents who travel "Under 5 miles" to visit the site and that the majority of the respondents who travel "5-20 miles" and "Over 20 miles" find it also "Very Important". When examining the importance of the adjacent landowner access to members of different user groups in Table 10 it can be seen that majority of the respondents who did not answer the question were members of a Motorised Group which the same group members also answered that "Adjacent Landowner Access" is "Very Important" which appears to demonstrate a difference of opinion with that group.

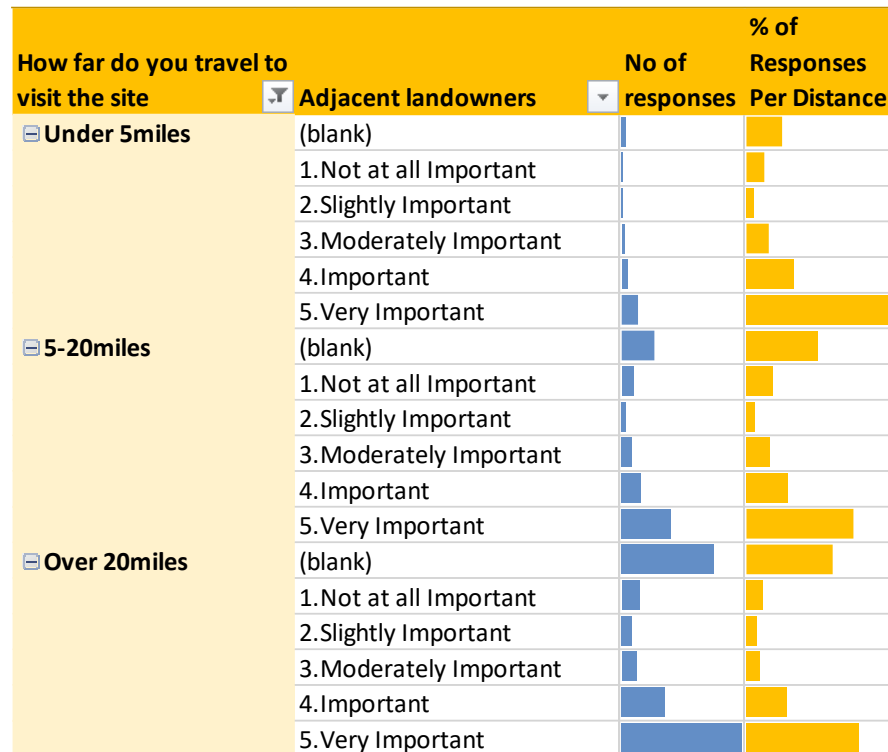


Table 9 Distance from site and Adjacent Landowners Access Importance

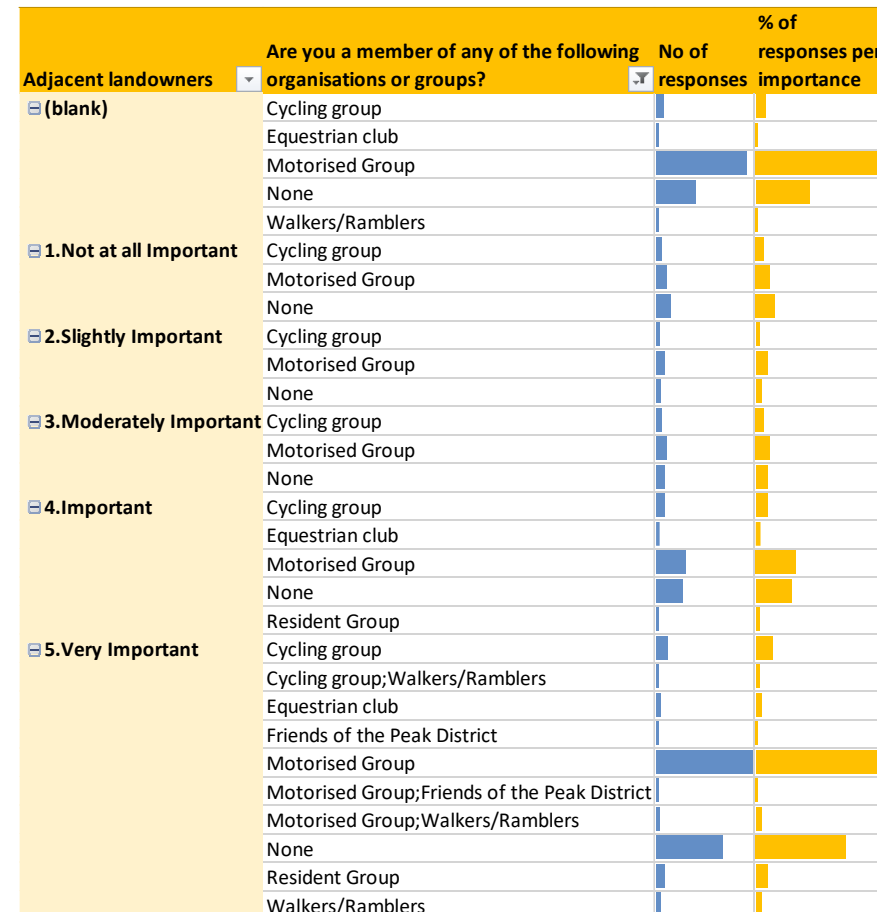


Table 10 Adjacent Landowners access and organisation members

- 4.3.6 Question 6 invited the respondents to provide their views and comments regarding the above proposals. As this was a free text question the answers were reviewed and grouped in themes. Table 11 show the number of responses referring to each theme. It can be clearly seen that 831 (approximately half) of the respondents wrote that the Rakes need to remain open to all users whilst 157 mentioned that the Rakes should be closed to Motorised users. 110 of the respondents asked that minimal repairs should be carried out and 84 stated that the surface should match the area. Issues with drainage were mentioned by 87 of the respondents.
- 4.3.7 It was clear within the comments that motorised users along with mountain biking respondents prefer that only minimal repairs and/or essential repairs are carried on the Rakes as one of their attractions to the Rakes is the challenging terrain.












Theme summary from open comments	No of responses	Responses
Surfacing to match area	84	
Drainage	87	
Rakes open to everyone	831	
Minimal repairs	110	
No motorised	157	
Permit system	7	
Restrict 4x4	6	
Seasonal TRO	2	
Supportive	8	
Waste of money	18	
Blank	396	

Table 11 Theme Summary from Open Comments

5. Conclusions and recommendations

- 5.1.1 Staffordshire County Council (SCC) intends to carry out repairs to the Swan and Limers Rakes to address issues with severe erosion of the surface of the Rakes which has occurred, through a combination of surface water run-off and general wear from use by traffic. SCC aim is to make the route safe and is proposing to bring the Rakes up to the minimum standard of a bridleway or cycleway, with a smooth surface suitable for use by all non-motorised users.
- 5.1.2 Amey were therefore tasked by Staffordshire County Council to carry out a consultation to seek the public view on the Rakes following the repairs. The consultation was carried out in January 2021 and received more than 1600 responses from key stakeholders, relevant groups, and individuals.
- 5.1.3 There was an almost equal split on the responses as to "Who do you think should have access to the rakes after the remediation works?" and therefore there is no clear preference for a single user group to have access.
- 5.1.4 Approximately one third of the respondents were members of the Trailriders Fellowship and approximately one quarter indicated that they were members of no group. There was also near equal number of respondents who are members of Cycling group, Off-road vehicle group and Green Lane Association which is a 4x4 vehicle user group. We understand that the motorised user group canvassed their members to respond to the consultation, hence the high number of responses and the large geographical spread.
- 5.1.5 A significant majority of the respondents who would travel "Over 20 miles" to access the site would like "Motorised Access" to be given after the remediation works.
- 5.1.6 A significant majority of the respondents who would travel "Less than 5 miles" to access the site would not like "Motorised Access" to be given after the remediation works.
- 5.1.7 Analysis of the open comment question showed that the almost half of the respondents wanted the Rakes to be open to everyone whilst the second main theme was to close the Rakes to Motorised Users. Further comments were to only carry out minimal repairs as the attraction to the Rakes is their condition and the challenge it creates navigating them.
- 5.1.8 Following the advice given to the SCC Highway Asset and Network Management Team in June 2021 by the SCC Legal Services Team that there are no established motorised vehicle rights on Swan and Limers Rakes we recommend carrying out further consultation with the remaining relevant groups and key stakeholders to inform the design process.

Appendix A

THE OWNER / OCCUPIER

«ORNAME» «NO»

«BUILDNAME»

«STREET»,

«DLOCALITY»,

«POSTTOWN»,

«POSTCODE»

Staffordshire County Council

1 Staffordshire Place

Tipping Street

Stafford

ST16 2DH

Date: 07/01/2021

Enquires: www.staffordshire.gov.uk/reportit

Website: www.staffordshire.gov.uk/Highways/roadworks

Our Ref: D3262F Daniel Vale

Swan and Limers Rakes Consultation

Dear Sir or Madam,

Representations have been made to Staffordshire County Council to review the condition of the Swan and Limer Rakes which Staffordshire County Council, as highway authority, is responsible for maintaining. Over the years, severe erosion of the surface of the Rakes has occurred, through a combination of surface water run-off and what might be termed ill-considered use by motorised vehicles. Alongside the exercise referenced below we will be taking steps to ascertain the exact nature of the public rights on these highways which will better inform the way forward.

Staffordshire County Council intend to carry out repairs in Summer 2021 to make the route safe and is proposing to bring the Rakes up to the minimum standard of a bridleway or cycleway, with a smooth surface suitable for use by all non-motorised users. We are now seeking the public view on the use of the Rakes following completion of the repairs.

Please see the attached location drawing showing the route.

If you have any comments you would like to make regarding the proposals for this scheme or would like to put forward any suggestions, then please fill out the survey by scanning the QR code below, visit the URL below or by post to the above address by **Sunday, 31 January 2021**.

www.staffordshire.gov.uk/Rakes

If you have no access to the internet, please complete the attached response form and return to the address above, marked "For the Attention of Daniel Vale".

Yours faithfully,

Georgios Theodorou
Senior Transport Planner
Staffordshire County Council



Swan and Limers Rakes Consultation

Period for response ends Sunday, 31 January 2021

Do you represent any of the following organisations?

County Councillor	<input type="checkbox"/>	Local Councillor	<input type="checkbox"/>
Parish Council	<input type="checkbox"/>	District Borough	<input type="checkbox"/>
Walkers/Ramblers	<input type="checkbox"/>	Police	<input type="checkbox"/>
Cycling Group	<input type="checkbox"/>	Fire Service	<input type="checkbox"/>
Equestrian Club	<input type="checkbox"/>	Ambulance Service	<input type="checkbox"/>
Off Road Vehicle Group	<input type="checkbox"/>	Friend of the Peak District	<input type="checkbox"/>
Green Lane Association	<input type="checkbox"/>	Trailriders Fellowship	<input type="checkbox"/>
Residents group	<input type="checkbox"/>	Local Resident	<input type="checkbox"/>
None	<input type="checkbox"/>	Other- Please state below	<input type="checkbox"/>

Are you a member of any of the following organisations or groups?

Walkers/Ramblers	<input type="checkbox"/>	Friend of the Peak District	<input type="checkbox"/>
Cycling Group	<input type="checkbox"/>	Trailriders Fellowship	<input type="checkbox"/>
Equestrian Club	<input type="checkbox"/>	Residents group	<input type="checkbox"/>
Off Road Vehicle Group	<input type="checkbox"/>	Green Lane Association	<input type="checkbox"/>
Residents group	<input type="checkbox"/>	Adjacent Landowners	<input type="checkbox"/>
None	<input type="checkbox"/>	Other- Please state below	<input type="checkbox"/>

Who do you think should have access to the rakes after the remediation works?

Pedestrian Users	<input type="checkbox"/>
Motorised	<input type="checkbox"/>
Equestrian	<input type="checkbox"/>
Cyclists	<input type="checkbox"/>
Adjacent Landowners only	<input type="checkbox"/>



After the remediation works what kind of access to the rakes is important to you?

	Not at all Important	Slightly Important	Moderately Important	Important	Very Important
Motorised vehicle	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pedestrian	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equestrian	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cycling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adjacent Landowners	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

How far do you travel to visit the rakes?

Under 5miles	<input type="checkbox"/>
5-20miles	<input type="checkbox"/>
Over 20miles	<input type="checkbox"/>



Please provide your views regarding the above proposals:

This image shows a full page of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

Name _____

Email _____

Address

.....

.....

Signed _____ **Date** _____

Please return this form to: Daniel Vale, 1 Staffordshire Place, Tipping Street, Stafford, ST16 2DH



Dear,

Representations have been made to Staffordshire County Council to review the condition of the Swan and Limers Rakes which Staffordshire County Council, as highway authority, is responsible for maintaining. Over the years, severe erosion of the surface of the Rakes has occurred, through a combination of surface water run-off and what might be termed ill-considered use by motorised vehicles. Alongside the exercise referenced below we will be taking steps to ascertain the exact nature of the public rights on these highways which will better inform the way forward.

Staffordshire County Council intend to carry out repairs in Summer 2021 to make the route safe and is proposing to bring the Rakes up to the minimum standard of a bridleway or cycleway, with a smooth surface suitable for use by all non-motorised users. We are now seeking the public view on the use of the Rakes following completion of the repairs.

Please see the attached location drawing showing the route.

If you have any comments you would like to make regarding the proposals for this scheme or would like to put forward any suggestions, then please fill out the survey by visiting the URL below by **Sunday, 31 January 2021**.

www.staffordshire.gov.uk/Rakes

If you have any questions, please do not hesitate to contact me.

Regards

Georgios Theodorou

Senior Transport Planner

Amey Design Hub | 3rd Floor No. 1 Staffordshire Place | Tipping Street | Stafford | ST16 2DH

