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THE COUNTY COUNCIL OF CUMBRIA (C3042 POOLEY BRIDGE) (KNOWN LOCALLY AS HOWTOWN ROAD) (MAIN CARRIAGEWAY CLEARWAY AND PROHIBITION OF STOPPING ON VERGE) EXPERIMENTAL ORDER 2021 - Ref KB/4.4.1060/15.001712 - (abbr. - ETO)

At the Martindale Parish Meeting held on 27 January 2022, it was decided by a vote of 19-2 of residents on the electoral roll **to object** to the ETO. Five others were in attendance, including the Chairman of the neighbouring Parish, Mr MacInnes.

I am writing as the elected volunteer Clerk to the Parish to inform you of that decision

As we understand it, unless an objection is made about the ETO within its first six months then it could be made permanent. Minor amendments may be made during the next six months, and the experimental order must then either be ended after 18 months or made permanent.

The most important of the Parish Meeting objections is to ensure that farmers, who have been able to use the Howtown Road and the adjacent commons over centuries, can continue to do so without suffering any new actual or potential disadvantage. The Highway Code deals with how farmers may move their animals along a public road. Such a movement may cause vehicles to stop others on the road. As the ETO is currently drafted, this opens up the possibility of an enforcement penalty charge. The Parish would therefore like an immediate change to the ETO.

A charge may also be applied if farm vehicles need to park on the road because a field is too wet to enter. A livestock transport vehicle may be too large to pass through a farm gate to enable animal moving to take place. Hay or silage bale loading or unloading may need road parking. Those restoring a stone wall or trimming a hedge may require a vehicle in the road so that their equipment is easily available. CCC enforcement officers have already said this is unacceptable.

It was suggested at a recent Parish Meeting that a ad-hoc waiver of a penalty charge might be possible. This is not adequate.

To a lesser extent, similar problems could occur with other users of the road. The ETO imposes 24 hour restrictions all-year round on parking, waiting or unloading. This is far more restrictive than many red routes in towns and cities. During winter months and at night-time the number of users of the road is usually very small. Any short period of congestion is one-off eg the movement of a very large vehicle. Direct public benefits from the ETO restrictions are small or non-existent.

Because the Howtown Road runs by the side of Ullswater, there may be parked cars owned by a small number of wild swimmers, those who fish, or dive, or propel themselves on Ullswater on various types of craft, or naturalists or photographers, or those simply enjoying the view. Many visit Ullswater or stay in other parts of the Lakes to pursue these interests. The number, compared with visitors in summer, is also small. The objection is therefore to not being able to find a way to enable such parking in a National Park with a statutory objective of increasing access.

The objection also wants to ensure the ETO exists for at least a full 12 months before a decision on its future. Traffic on the Howtown Road has always been highly seasonal, with the busy months being March to August. The Rural Clearway approach to traffic control should have a proper trial. This demands assembling objective evidence about volumes and costs, and not relying on anecdotal evidence. The statement of reasons for the ETO includes avoiding danger to persons or other traffic: therefore personal accident and collision figures are also needed.

We are aware of only two other very short Rural Clearways in this National Park. Visitors may not know what clearway signs demand of a driver. That may be why there are currently over large and over intrusive signs that are contrary to the amenities of the area and not in keeping with a National Park and World Heritage Site. The Martindale Traffic Working Group is writing to you separately about appropriate signage changes.

We would welcome a meeting when convenient, perhaps in a month.
Martin Brimmer

Annex - Objections to the current draft of:

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- there are two articles that are designated “7”. There are consequential implications.

Article 2 - meaning of “lay-by”. We are confident that in Martindale there are no traffic signs of the type shown in diagram 801 to the TSGD 2016. Nor have we seen any “P” signs in the rest of the road. We object to giving an unfettered discretion to a traffic authority to introduce such a lay-by or to place such sign.

- meaning of “main carriageway”. There is, of course, no “through traffic” in Martindale because every vehicle moving to an end of the three valleys must retrace their journey. It is therefore not clear what is meant by “includes any carriageway of a slip road”. The meaning would be clear in the context of a dual carriageway, but this is, as the next substantive definition makes clear, “the narrow road”.

- Articles 3 and 6 refer to “a Civil Enforcement Officer”, but this term is not defined.

- “General Directions” as defined distinguish between “stopping” and “waiting”. The ETO is for the prohibition of stopping on verge, but the erected signs for the ETO show no waiting.

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EXPERIMENTAL ORDER 2021
Ref: KB/4.4.1060/15.001712**

The Martindale Parish Meeting on 27th January 2022 voted overwhelmingly to submit a formal objection to The Experimental Rural Clearway / No Waiting on Verges Traffic Regulation Order. A traffic working group (TWG) was appointed with the remit to suggest improvements to traffic signage and to consider other traffic concerns.

The TWG met on 4th February 2022 at 10:30 in The Bobbin Mill Village Hall, Howtown.

Signage

As the entire length of this Experimental Rural Clearway is in a National Park and World Heritage Site, the TWG was concerned to protect the area from the visual intrusion and adverse impact on the landscape of the 41 newly erected signs on this 4 mile stretch of rural road. The LDNP Character Assessment and Guidelines (Revised April 2021) has numerous references to rural road character e.g. *'prevent cumulative urbanisation of rural landscape and loss of rural roads character'* (p.97).

The TWG was also of the view that the signage associated with the Experimental Order should not be considered in isolation and should be viewed in the wider context of the newly installed additional signage on the stretch of road beyond the Clearway (extending up The Hause and into Martindale Valley).

The attached document *'Howtown Road Signage 03 Feb 2022'* of 39 photographs was used as a basis for suggesting changes to the siting and the number of signs.

The group was mindful of the guidance in The Department of Transport's publications when suggesting changes to the signage (direct quotes in italics). For example:

Traffic Signs Manual (TSM) (2018) Chapter 1 Introduction

Golden Rules

2.1.1 *Signs should only be provided where a clear need has been identified, and should be minimal and sympathetic to their environment.*

2.3 Reducing sign clutter

2.3.2 *The overuse of traffic signs blights the landscape, wastes taxpayers' money and dilutes important safety-critical messages.*

2.4 Duplication of regulatory signs

2.4.1. *Terminal signs indicating the start of a restriction...should not necessarily be duplicated on each side of the carriageway. Provisions that previously required signs to be paired have been removed from Traffic Signs Regulations and general Directions (TSRGD). Designers should actively consider this flexibility in order to reduce environmental impact.*

Traffic Signs Manual (TSM) (2018) Positioning of Signs

5.4 Mounting heights

5.4.1 Signs should be mounted such that the lower edge of the sign is generally between 900 mm and 1500 mm above the highest point of the adjacent carriageway

Traffic Signs Manual (TSM) (2019) Chapter 3 Regulatory Signs

7.2 24-hour rural clearway

7.2.4 In order to reduce environmental impact, there is no requirement to provide two signs, one on each side of the road ...

...It is recommended that repeater signs, which may alternate from one side of the carriageway to the other, are placed along the length of the road such that the distance between successive signs is equivalent to a travel time of approximately 60 seconds. As a guide, where the speed limit is 60 mph or more, it is recommended that repeater signs are placed at intervals of approximately 1600 m in each direction. Where the speed limit is 30, 40 or 50 mph, the recommended spacing is 800 mm, 1100 mm and 1350 mm respectively.

7.2 Backing boards ... can sometimes result in over intrusive assemblies, so should be used sparingly

Suggested changes to signage (To be read in conjunction with attached documents: 'Howtown Road Signage 03 Feb 2022' and 'Howtown Road TWG: Appendices A to C')

Numbers correlate with those on the attached documents.

Figure in brackets is mileage of sign from the Pooley Bridge Start sign driving to Howtown End sign.

Glossary / abbreviations:

CW/V - Clearway / no waiting on verges

PP - Passing Place

LH - Left Hand side of road when travelling in Pooley Bridge to Howtown direction

RH - Right Hand side of road when travelling in Pooley Bridge to Howtown direction

TSM – Traffic Sign Manual

1. (0.0 miles) Pooley Bridge junction / RH

- remove first blue 'Single track road etc' sign (size - 125cm x 95cm) - *too much to read and large vehicles need to access both Park Foot and Waterside*
- drop height of Start / End sign – *due to height of bank, it is approx. 39cm higher than TSM guidelines for maximum height above road surface*
- remove the backing board - *increases its visual intrusion on landscape*
- keep white sign - 'No Through Route beyond Martindale' and place it more prominently

2. (0.0 miles) Pooley Bridge junction / LH

- remove this Start / End sign - *to reduce Start / End signs to x 1 as now permitted by TSRGD*
- if retained, lower this sign – *it is 66cm higher than TSM guidelines for maximum height*

3. (0.0 miles) Pooley Bridge /RH (close-up view of sign 1- see comment under 1 above)

4. (0.0 miles) / LH

- keep PP sign

5. (0.0 miles) / RH
 - remove CW/V sign - *too close to Start sign*
6. (0.1 miles) / RH
 - keep PP sign
 - remove CW/V sign
7. (0.2 miles) / RH
 - keep PP sign
8. (0.5 miles) Park Foot / RH
 - remove CW/V sign
9. (0.5 miles) Park Foot /LH
 - keep but lower CW/V sign
10. (0.6 miles) Park Foot/ RH
 - remove second blue 'Single track road etc.' sign - *x 3 signs here which is overbearing*
 - keep CW/V sign
11. (0.8 miles) Waterside /RH
 - keep CW/V
12. (0.9 miles) Waterside/LH
 - remove CW/ V sign
13. (1.1 miles) Waterside Farm / LH
 - remove third blue 'Single track road etc.' sign - *sign protrudes into road / driveway; move to Ullswater Yacht Club passing place (see photo 19)*
14. (1.2 miles) Waterside Farm / RH
 - keep PP sign
15. (1.4 miles) Bell's Silage area / LH
 - keep 'No waiting on verge' sign
 - remove redundant March - October 'No Parking' sign just before it
16. (1.5 miles) Cross Dormant / LH
 - remove CW/V sign
17. (1.5 miles) Seat Farm / LH
 - remove CW/V sign
18. (1.5) miles Seat Farm /LH
 - remove CW/V sign
19. (1.6 miles) Ullswater Yacht club passing place / wide section of road / LH
 - **add new** blue sign - 'Single Track Road unsuitable for large vehicles' here to replace x 3 similar ones suggested for removal (see photos 1, 10, 13)
 - keep 'No Thro' Route beyond Martindale/ No Camping or Caravans beyond this Point' sign

- keep PP sign
- keep CW/V sign - *NB this sign has now fallen over*
- remove redundant 'No Parking March to October' sign on RH side of road.

20. (2.1 miles) Sharrow Bay Hotel (back gate) / RH

Preparatory to being designated a parking bay for boat permit holders with new suitable signage:

- remove PP sign
- remove CW/ V sign - *NB this sign has now fallen over*

NB TWG consensus was new parking should not be urbanised with kerbstones, tarmac surface etc.

21.(2.2 miles) Sharrow Bay lakeshore/ RH & LH

- RH side - remove CW/V sign
- install new PP sign
- LH side- remove CW/V sign

22. (2.3 miles) Sharrow Cottages / RH

- remove redundant 'No Parking March – Oct' sign

23. (2.4 miles) Sharrow Cottages/ RH

- keep CW/V sign

24. (2.6 miles) / RH

- Remove CW/ V sign

25. (2.7miles) Swarthbeck Farm / LH

- remove CW/ V sign

26. (2.7 miles) Swarthbeck Point/ RH

- remove CW/V sign

27. (2.8 miles) Black barn / LH

- keep 'No waiting on verge' sign

28. (3.0 miles) Bonscale / LH

- remove CW /V sign
- remove redundant metal post adjacent

29.(3.2 miles) Passing Bay One / LH

- keep white sign ('Passing Place Only / No Parking')
- remove wooden post from bay area and put CW/V sign above wall at same height as white sign - *wooden post is in centre of bay approx 30 cm out from the wall reducing useful passing space*

30. (3.2 miles) Passing Bay Two / LH

- keep white sign ('Passing Place Only / No Parking')
- remove wooden post from bay and put CW/V sign above wall at same height as white sign - *post approx 29 cm out from wall with sign at right angle reducing passing space by approx 1/6th*

31.(3.2 miles) Bank House Drive / RH

- keep PP sign

32. (3.4 miles) Below Bank House / LH

- keep PP sign

33. (3.5 miles) / LH

- keep PP sign

34.(3.5 miles) Bank Field gateway / RH

- remove CW /V sign
- keep PP sign

35. (3.5 miles) Howtown Bay /RH

- keep CW/V sign
- keep CW/ V sign on short post beyond Outward Bound Jetty/ RH (not very visible in photo)
- **add new** CW /V sign to LH side of road, past Outward Bound drive / opposite landing bay

36. (3.8 miles) opposite Martindale Noticeboard/ Post box / LH

- remove CW /V sign

37. (4.0 miles) – Cattle grid/ Hause LH & RH

- remove one Start/ End Sign (preferably the LH) - *TSRGD permit one Starter / End sign*
- lower the remaining sign – *currently, the signs are approximately 1800mm from their bottom edge to ground level. TSM guidelines say signs should be mounted such that the lower edge of the sign is generally between 900mm and 1500 mm above the highest point of the adjacent carriageway. Furthermore, the present posts are mounted on the adjacent banks 400 mm and 600 mm above the road surface which adds to their excess height above the road*
- remove backing board and reduce size of sign – *currently, the sign is intrusive in the landscape and reduces the visual amenity of the LDNP*

NB - End of Rural Clearway Experimental Order

38. Just over cattle grid / LH

- remove PP sign
- remove blue 'No Parking' sign

39. (4.1 miles) beyond the Rural Clearway Experimental Order / RH

- remove x 2 PP signs from the large flat area
- remove x 2 blue 'No Parking' signs from the large bay and verge area on right of photos 38 & 39
- replenish hardcore

No photo - Hause bends

- remove x 4 new PP signs added to old blue 'No Parking' signs

No photo - School Bridge /LH

- remove PP sign

No photo Toby's Field / LH

- keep PP sign

In Conclusion

The TWG reviewed the signage associated with the Experimental Order, The Hause and linked issues.

1. The number of signs associated with the Experimental Order is unnecessary and has an adverse visual impact; removing suggested signs would reduce their number from 41 to 22.
2. The size and height of the signs that are retained should be reviewed to reduce them to minimum height and address their current overbearing and adverse visual impact.
3. TWG consensus is the wooden poles on CW/ V signs (as currently in place) are preferable as they fit better into the landscape than metal poles.
4. If signs are placed parallel to the road, glare will be reduced making the road safer for drivers, cyclists and pedestrians.
5. There is too much information to process at the Pooley Bridge junction. Moving the RH blue 'Single Track Road' sign and adding one to the passing place near The Ullswater Yacht Club would better describe where the road narrows. Vehicles can also turn back at that point.
6. It is essential that drivers are made clear there is no through road after Martindale. Every journey made in error to the end of one of the three dead end Martindale valleys is a wasted double journey; it adds needlessly to the volume of traffic on this narrow road and has an adverse impact on the environment, and also on visitors.
7. The recently added signs on The Hause have moved parking from the flat area adjacent to the cattle grid (see photos 37/38) to St Peter's Church. Removing the x 7 Passing Place signs, together with the x 3 older blue No Parking signs from the lower area of the Hause, would allow parking in the lower flat section of the road without detriment to passing and the free flow of traffic. It would also reduce the adverse visual impact of the signage. The sign further up the valley Boredale Valley adjacent to The School Bridge was also recommended for removal as it is unnecessary.
8. Howtown Bay is a pinch point and problems in this area persist. The TWG suggest moving one of the 3 CW/V signs (photo 34) from the RH side to the LH side of the road just beyond the foot of the Outward Bound drive (i.e. opposite the landing bay). This would help to clarify the restrictions in this challenging area. However, this needs to be supported with enforcement.
9. A scheme without proper enforcement is a loss of visual amenity for no purpose.
10. As there are no verges in the 1.2-mile Martindale Parish section of the Clearway on which a car could wait/stop without also being also on the carriageway it could be argued that all the signs in this section of the road are redundant.
11. Evidence-based, not anecdotal, evaluation of the experimental scheme is essential. Evaluation should include issues such as: number and size of vehicles on the road at peak times; frequency, costs and benefits of enforcement; knock-on effects.
12. Increases in visitor numbers and the rise in popularity of camper vans and motor homes presents a challenge to the LDNP as a whole; a challenge that cannot be addressed by adopting piecemeal strategies confined to discrete stretches of road. The LDNP stresses the importance of planning for sustainable transport.

APPENDIX A:**SUGGESTIONS FOR CHANGES TO CLEARWAY/ NO WAITING ON VERGE (CW/V) SIGNS****A.1 SUGGEST RETAIN /ADD CW/V SIGNS**

Photo	Position (and distance from Pooley Bridge Junction)	Side	Distance from previous retained sign	Distance to next retained sign	Comments
1	Pooley Bridge Junction (0.0 mls)	RH	Start	0.5 mls	
9	Park Foot LH (0.5 mls)	LH	0.5 mls	0.1 mls	Reduce height
10	Park Foot RH (0.6 mls)	RH	0.1 mls	0.2 mls	
11	Waterside field (0.8 mls)	RH	0.2 mls	0.8 mls*	
19	Ullswater Yacht Club Passing Place (1.6 mls)	LH	0.8 mls*	0.8 mls	Fallen down - replace
23	Sharrow Cottages (2.4 mls)	RH	0.8 mls	0.8 mls**	
29	Passing Bay One (3.2 mls)	LH	0.8 mls**	0.0 mls	Move above passing bay
30	Passing Bay Two (3.2 mls)	LH	0.0 mls	0.3 mls	Move above passing bay
35	Howtown Bay #1 (3.5 mls) Howtown Bay #2 (3.5 mls)	RH RH	0.3 mls	0.0 mls	
Add at 35	Howtown Bay #3 (3.5 mls)	LH	0.0 mls	0.5 mls	
37	Cattle grid End Sign (one of two) (4.0 mls)	RH	0.5 mls	End	

* Section includes a 'No Waiting on Verge' sign (i.e. sign without additional Clearway warning) at Bell's silage area (LH) (Photo 15): 0.6 mls from previous sign (photo 11) & 0.2 ml to next sign (photo 19)

**Section includes a 'No Waiting on Verge' sign (i.e. sign without additional Clearway warning) at Black barn (LH) (Photo 27): 0.4. mls from previous sign (photo 23) & 0.4 mls to next sign (photo 29)

A.2 SUGGEST REMOVE CW/V SIGNS

Photo	Position(and distance from Pooley Bridge Junction)	Side	Creates distance between signs of ...
2	Pooley Bridge Junction (0.0 mls)	LH	Start
5	0.0 mls from start (0.0 mls)	RH	1 to 9 = 0.5 mls
6	0.1. mls from start (0.1 mls)	RH	1 to 9 = 0.5 mls
8	Park Foot (0.5 mls)	RH	1 to 9 = 0.5 mls
12	Waterside (0.9 mls)	LH	11 to 19 = 0.8 mls*
16	Cross Dormont (1.5 mls)	LH	11 to 19 = 0.8 mls*
17	Seat Farm (1.5 mls)	LH	11 to 19 = 0.8 mls*
18	Seat Farm (1.5 mls)	LH	11 to 19 = 0.8 mls*
20	Sharrow Bay Hotel (back gate) (2.1 mls)	RH	19 to 23 = 0.8 mls
21	Sharrow Bay lakeshore (2.2 mls)	RH	19 to 23 = 0.8 mls
21	Sharrow Bay lakeshore (2.2 mls)	LH	19 to 23 = 0.8 mls
24	Beside wooden fence (2.6 mls)	RH	23 to 29 = 0.8 mls**
25	Swarthbeck Farm (2.7 mls)	LH	23 to 29 = 0.8 mls**
26	Swarthbeck Point (2.7 mls)	RH	23 to 29 = 0.8 mls**
28	Bonscale (3.0 mls)	LH	23 to 29 = 0.8 mls**
34	Bank Field gateway (3.5 mls)	RH	30 to 35 = 0.3 mls
36	Opposite Notice board/ Post box (3.8 mls)	LH	35 to 37 = 0.5 mls
37	Cattle grid End Sign (one of two) (4.0 mls)	LH	35 to 37 = 0.5 mls

* Section includes a 'No Waiting on Verge' sign (i.e. sign without additional Clearway warning) at Bell's silage area (LH) (Photo 15): 0.6 mls from previous sign (photo 11) & 0.2 ml to next sign (photo 19)

**Section includes a 'No Waiting on Verge' sign (i.e. sign without additional Clearway warning) at Black barn (LH) (Photo 27): 0.4. mls from previous sign (photo 23) & 0.4 mls to next sign (photo 29)

APPENDIX B:

SUGGESTIONS re PASSING PLACE SIGNS

B.1 Passing Place signs (white)

Photo	Distance from Pooley Bridge Junction	Side	Position	Suggestion
4	0.0 miles	LH		Retain
6	0.1 miles	RH		Retain
7	0.2 miles	RH		Retain
14	1.2 miles	RH	Waterside Farm	Retain
19	1.6 miles	LH	Ullswater Yacht Club Passing Place	Retain
20	2.1 mls	RH	Sharrow Bay Hotel (back gate)	Remove
ADD (at 21)	2.2 mls	RH	Sharrow Bay lakeshore	Replace CW/V with Passing Place sign
31	3.2 mls	RH	Bank House drive	Retain
32	3.4 mls	LH	Bank House field	Retain
33	3.5 mls	LH		Retain
34	3.5 mls	LH	Bank Fields	Retain
	4.0 MLS		End ERTO	
38	4.1 mls	LH	over cattle grid	Remove
39	4.1 mls	RH	over cattle grid	Remove x 2 signs
None			Hause bends	Remove x 4 signs attached to blue old No Parking signs
None		LH	School Bridge	Remove
None		LH	Toby's Field	Retain

APPENDIX C: SUGGESTIONS RE ALL OTHER SIGNS

C.1 Start / End signs

Photo	Position	Side	Suggestion
1	Start: Pooley Bridge junction	RH	Lower; Remove backing board
2	Start: Pooley Bridge junction	LH	Remove; If retained, lower and remove backing board
37	End: Cattle grid	RH	Lower and move to attach to cattle grid fence post to compensate for removing other sign; Remove backing board
37	End: Cattle grid	LH	Remove; If retained, lower and remove backing board

C.2 Single track road unsuitable for large vehicle signs (blue signs)

Photo	Position	Side	Suggestion
1	Pooley Bridge junction	RH	Remove
10	Park Foot	RH	Remove
13	Water Side Farm	LH	Remove
ADD (19)	Ullswater Yacht Club passing place (1.6 mls from start) (see photo 19)	LH	Add/ move sign here

C.3 Remaining signs (some pre-date ERTO)

Photo	Sign	Side	Suggestion
1	No through road beyond Martindale	RH	Retain; place more prominently
15	No waiting on verge	LH	Retain
15	No Parking March to October	LH	Remove
19	No Parking March to October	RH	Remove
19	No Thro' Route beyond Martindale/ No Camping or Caravans beyond this Point	LH	Retain
22	No Parking March to October	RH	Remove
23	No Parking March to October	LH	Remove
27	No waiting on verge	LH	Retain
28	Redundant metal post	LH	Remove
29	Passing Place Only No parking	LH	Retain
30	Passing Place Only No parking	LH	Retain
	End Experimental Order		
37	No parking (blue sign)	LH	Remove
	Passing place (white sign)	LH	Remove
38	No parking (blue sign)	RH	Remove
	Passing place (white sign)	RH	Remove
39	No parking (blue sign)	RH	Remove
	Passing place (white sign)	RH	Remove
Hause bends	Passing place (white) (new) attached to original blue No Parking x 4		Remove attached Passing place signs