**From:**

**To:** trafficteam.west@cumberland.gov.uk

**Bcc:** [campaigns@cyclinguk.org](mailto:campaigns@cyclinguk.org)

**Subject:** Traffic Regulation Order - Keswick and surrounding area consolidation order 2023,  FORMAL OBJECTION

Dear Cumberland Council

I wish to object to the following sections of the above proposed order:

**Reference:  KTRO/23/PNG**

**Paragraph 44A & Schedule 33A - Prohibition of all Traffic, U7003 Thirlmere Western Road.**

I believe that the proposed closure is unnecessary and premature for the following reasons:

1. The authority has failed to fully consider the wider safety issues of risk created by closing the route and forcing cyclists on to the busy A591 instead.  Any risk analysis needs to look at the total picture of risk and how it affects users, not just potential risks from falling trees and rocks.
2. The authority has recently stated that “*Further assessments are scheduled to gather more information relating to the condition of the hazardous area”.* As a result, the use of a permanent closure is premature.
3. The authority has failed to fully explore alternative solutions, including the use of netting or fencing (measures already in use on the A591 on the opposite side of the lake) in order to protect highway users from potential risk via falling rocks.
4. The authority has failed to demonstrate that permanent closure is the only realistic option available.
5. Both the authority and the landowner (United Utilities) have failed to have regard to National Park purposes in accordance with Section 62 of the Environment act 1995.
6. The closure conflicts with the legal duties of United Utilities to maintain the route under Section 68 of the Manchester Corporation Waterworks Act 1879.
7. The closure would remove a key safe route without delivering any form of practical, safe alternative route for vulnerable road users.

As a result, the decision to close this route is unacceptable, and fails to fulfil the authority’s legal duty to secure the expeditious movement of traffic on the authority's road network. The authority should instead redouble its efforts to secure the reopening of this important route in order to allow vulnerable road users to fully enjoy the National Park.

Yours faithfully