

## **Wildlife and Countryside Act 1981**

### **The Kirklees Council (Huddersfield Public Bridleway 231 Sandy Lane to Nether Moor Road, South Crosland) Public Path Modification Order 2018 (“Order”)**

**PINS Reference: ROW/3202859**

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### **Supplemental Proof of Evidence of Robert Edward Bradley on behalf of the Objectors, Mr and Mrs Bradley of Nether Moor Farm, Sandy Lane, South Crosland, Huddersfield HD4 7BX**

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#### **1. Introduction**

- 1.1. My name is Robert Edward Bradley and I am the fourth generation owner/occupier of Nether Moor Farm, Sandy Lane, South Crosland, Huddersfield HD4 7BX (“Farm”).
- 1.2. I have prepared this Supplemental Proof of Evidence in support of my objection to the Order, and which I will rely upon at the inquiry in addition to my first proof of evidence dated 10 January 2019 (“Original Proof”).
- 1.3. I intend to attend the public inquiry into whether the Order should be confirmed.
- 1.4. The facts and matters set out in this proof of evidence are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified. Any facts and matters derived from other sources are true to the best of my knowledge and belief.
- 1.5. Where I refer to documents within this Proof of Evidence, these are to documents taken from the Objectors’ document list or which are attached to this Proof of

Evidence. Unless stated otherwise, a reference to a page number within this Proof of Evidence is to the corresponding page of the Objectors' document list (e.g. OBJ/1).

## 2. My Further Evidence

- 2.1. I wish to draw the Inspector's attention to a further series of physical interruptions of any use of the Order Route which have taken place on a regular basis between 1952 and the present day.
- 2.2. The Huddersfield Falcon Motorcycle Cycle Club ("Falcons") have used the Farm's land for motor bike trials from 1952 to present day with the express permission of Mr Arthur Bradley (dec'd) and now myself as one of the current owners. There is now presented to me a letter from Mr Michael Washington, general secretary of the Falcons, confirming this arrangement (attached to this Proof of Evidence).
- 2.3. They hold 2-3 trials each year. On the days of the motorbike trials the Order Route is closed to all users other than members of the Falcons.
- 2.4. The trials are always held on a Sunday and the Falcons team usually start laying out the course in Dean Wood on the Friday, completing it on a Saturday. The dates chosen by the Falcons are arranged usually a year in advance. They are normally at the Farm by 9am on the Sunday morning and start taping the track across at this time for the duration of the day's events. The taping of the track has always been done upon the explicit instructions of Mr Arthur Bradley (dec'd) and now myself as one of the current owners.
- 2.5. The purpose of the tape is two-fold:
  - 2.5.1. In the first instance it is to indicate to all users of the track that on that particular day it is closed.

- 2.5.2. Secondly it is use to indicate to new visitors to the trial on that day that they need to turn into the car park area and not attempt to access the track any further west or east.
- 2.6. At the end of the day the people from the Huddersfield Falcons team have to remove all the flags on the course in the wood and take down the tape across the track when they leave at approximately 6pm.
- 2.7. There is now presented to me two maps (attached to this Proof of Evidence) which I have prepared showing the specific positions of entrances, the tape, the car parking area and the route to the trial. The Falcons accessed the Farm in the manner described in Map 1 between 1952 and January 2009. After 20 January 2009 it became necessary for the Falcons to access the Farm via the Sandy Lane entrance (Point Z on the Plan at **OBJ/1**) due to me blocking access to the Nether Moor Road entrance (Point G on the Plan at **OBJ/1**) at all times save for when I, my family or employees required access to that entrance.
- 2.8. Map 1. 1952 – 2009**
- 2.8.1. Point A – Entrance to the Farm’s from Nether Moor Road.
- 2.8.2. Point B – Position of tape across the Order Route to stop all users from accessing it. The car park entrance is also at this point to the north.
- 2.8.3. Point C – Access from car park to Dean Wood for trial.
- 2.8.4. Point D – Yard end farm gate (Point C of the Plan at **OBJ/1**) shut with tape on.
- 2.9. Map 2. 2009 – present day**
- 2.9.1. Point X – Entrance from Sandy Lane. Motorbike Trial is signposted here.



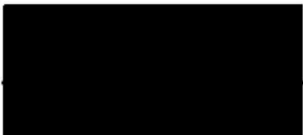
2.9.2. Point Y – Tape across the Order Route and access from car park to Dean Wood for trial.

2.9.3. Point Z – Tape across the Order Route to stop all users from accessing it.

2.10. Since 2009, when the Falcons have been accessing the Farm as shown on Map 2, the Falcons have also displayed signs near the start of the Order Route abutting Sandy Lane (Point Z on the Plan at OBJ/1) to indicate that the trials are taking place that day. There is now presented to me a document containing a copy of a Twitter post dated 18 October 2015 (attached to this Proof of Evidence) by Helen Smith (who has submitted a User Evidence Form in support of the Council) showing photographs of one of the Falcons' events and some of the signage that was displayed.

2.11. The same document also includes a separate Twitter post by her brother Richard Gilliland dated 9 October 2015, in which he suggests that my house should be blown up due to my opposition to members of the public trying to use the Order Route as a public right of way. This post is also an example of the kind of malicious comments made unjustly about myself and my family on social media as a result of this dispute with the Council.

I believe that the facts stated in this Supplemental Proof of Evidence are true.

Signed: .....  


Name: ..... RE BRADLEY .....

Dated: ..... 28 01 - 2019 .....



**GENERAL SECRETARY: Michael Washington, 11 Park Drive, Shelley,  
Huddersfield, HD8 8JE**  
**Tel: 01484 612802 (Mobile: 07730 572683)**  
**E-Mail: [mikewashington@sky.com](mailto:mikewashington@sky.com)**

TO WHOM IT MAY CONCERN

24<sup>th</sup>. January 2019

Re: Mr. & Mrs. E. Bradley, Nether Moor Farm, South Crosland, HD4 7BZ

Dear Sirs,

The Huddersfield Falcons have been holding motorcycle trials at Nether Moor Farm since 1952 with the above land owners permission.


In order to direct our members into car parking fields and then towards the woodland used for the trial we use tape across the farm access track.

This also prevents anyone accessing the track when the trial is taking place.

We hold 2 – 3 trials per year on this land.

Mr. Arthur Bradley (dec'd), and now Mr. Edward Bradley, have always been aware of this practice and have given us their explicit permission to block the track in this manner.

Yours Sincerely

  
M J Washington  
General Secretary

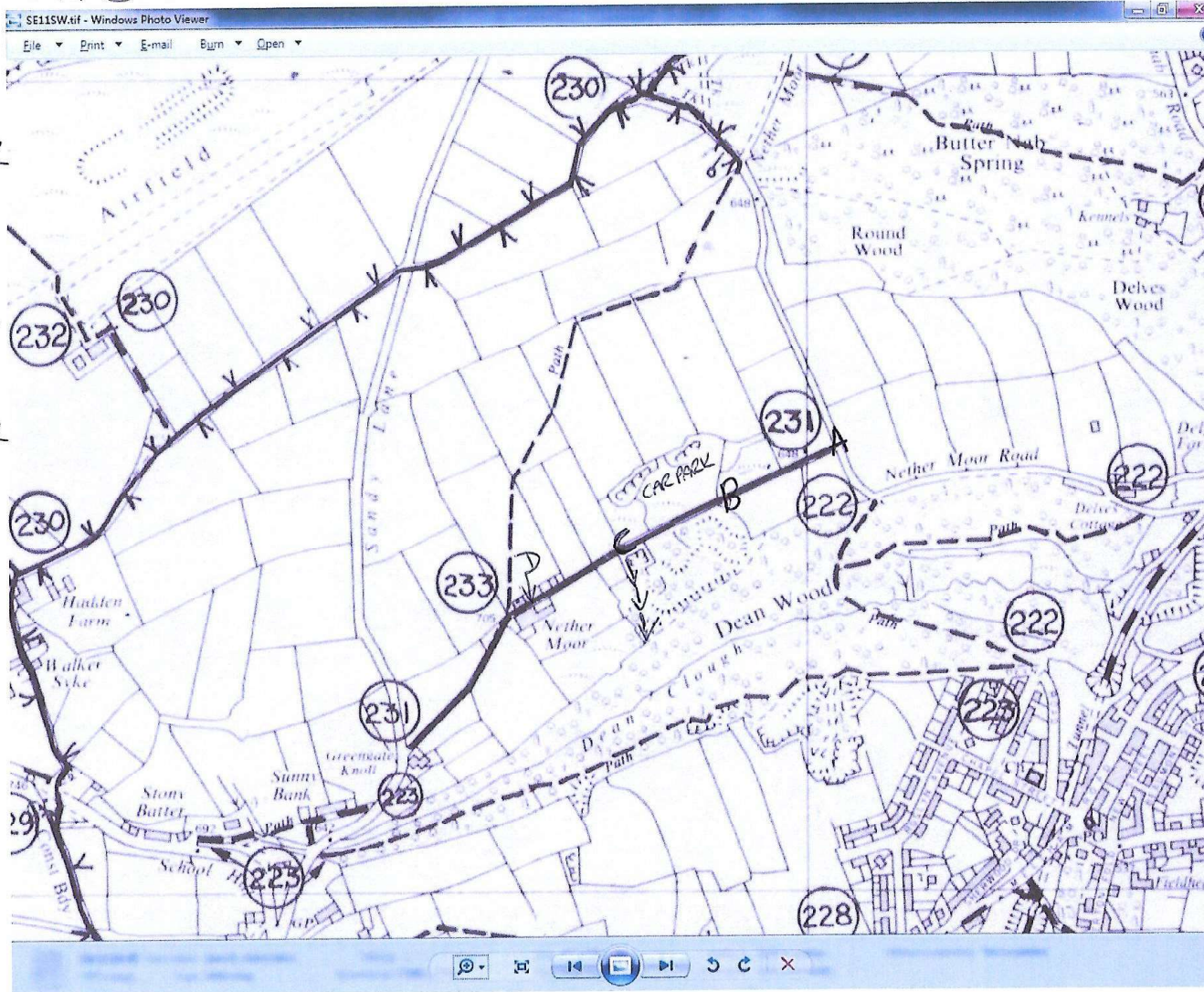
1952 - 2009 - MAP ①

A = ENTRANCE FROM NETHER MOOR ROAD

B = POSITION OF TAPE ACROSS TRACK TO STOP PERMISSIVE USERS AND ANYONE ELSE USING TRACK ENTRANCE TO CAR PARK

C = ACCESS FROM CAR PARK TO DEAN WOOD FOR TRIAL

D = FARMGATE SHUT WITH TAPE ON.



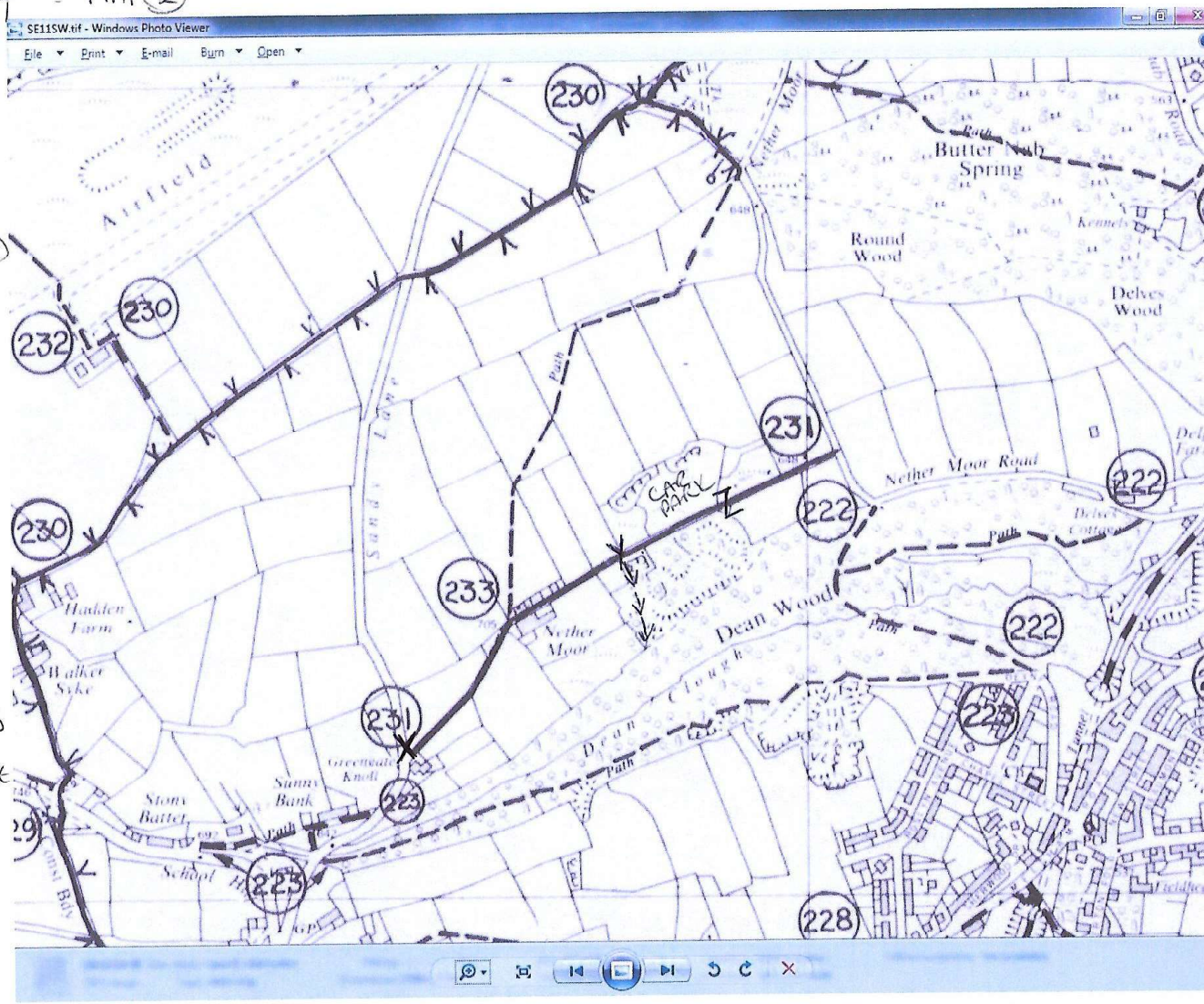


2009 To Present - MAP 2

X = ENTRANCE FROM SANDY TRIAL SIGNPOSTED

Y = TAPE ACROSS TRACK & ENTRANCE ACROSS TO DEAN WOOD FOR TRIALS. ENTRANCE TO CAR PARK.

Z = TAPE ACROSS TO STOP PERMISSIVE USERS AND ANYONE ELSE USING TRACK



Browser window: <https://twitter.com/rgilyscania68> | Twitter, Inc. | richard gilliland (@rgilysca... x

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**Jurgen Klopp**

richard gilliland @rgilyscania68 · Oct 9  
Just blow his house up! Boom he's obviously a knob

Helen Smith @dnhsmith62003  
Kirklees Bridleway Group fights for 'public right of way' at Nether Moor Farm to be re-opened [examiner.co.uk/news/west-york...](http://examiner.co.uk/news/west-york...)

richard gilliland @rgilyscania68 · Oct 3  
That was crap

Huddersfield Town @htafc dotcom  
FULL TIME. #wwfc 3-0 #htafc. Wolves well worth the win after dominating the second half, Benik Afobe (2) & Kevin McDonald the scorers (DTS)

richard gilliland @rgilyscania68 · Oct 3  
Have htfc spent the last 9 days in bed zZz zZz zZz

Have an account? Password Remember me - Forgot password? Log in New to Twitter? Sign up


Windows taskbar: 17:16 02/11/2015

Browser window: <https://twitter.com/dnhsmith62003> | Twitter, Inc. | Helen Smith (@dnhsmith62... x

File Edit View Favorites Tools Help


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Helen Smith @dnhsmith62003 · Oct 18  
Farm that doesn't want mbikes on byway thru farm, hosting a Falcons mbike trials today @Examiner @KirkleesCouncil



Helen Smith Retweeted

Huddersfield News @Examiner · Oct 15  
Children in Need: Huddersfield insurance firm LV to run call centre for BBC telathon [goo.gl/mTYfL6](http://goo.gl/mTYfL6)



Windows taskbar: 17:27 02/11/2015