Peak District Rural Green Lanes Alliance – written evidence (NER0036)

Summary
1. Our response has been arranged as follows:
   • Terminology used (paragraphs 2-6). Information about the Peak District Green Lanes Alliance (paragraphs 7-8). Background information about the Peak District National Park (paragraphs 9-14).
   • Response to question 4 describing our generally positive experience of Natural England (NE) and proposal that NE should be consulted on all Traffic Regulation Orders involving amenity and conservation issues on green lanes (paragraphs 15-26).
   • Response to question 5 advocating NE be more assertive and proactive on countryside issues after Brexit (paragraphs 27-29).
   • Response to question 6 stating that NERCA was a missed opportunity to improve access to the countryside (paragraphs 30-31) and some economic consequences of this. The reasons for this are elaborated in our response to question 11.
   • Response to question 11 explaining why the List of Streets exemption in Section 67 (2) (b) failed to prevent more Byways Open to All Traffic being created (on the basis of historic “horse and carriage” rights) for a major class of green lane. This was the reverse of Parliament’s intention. At the same time, the number of recreational motor vehicle users has increased resulting in more damage to these routes and non-vehicle users being discouraged from using them. We believe that new legislation is needed to remedy the situation (paragraphs 32-37). There is also a problem with the continued existence of green lanes with rights to use mechanically propelled vehicles. The problem can be handled only by the imposition of Traffic Regulation Orders (paragraph 38). Although not directly related to NERCA, we believe that changes may also be needed to the Traffic Regulation Orders process and that DEFRA should give stronger guidance to those authorities able to make them (paragraphs 39-51)
   • Rebuttal of DEFRA’s apparent belief that generally the public are satisfied with NERCA (paragraphs 52-64)
   • Photographs illustrating matters referred to within the text.

Terminology used in our response
2. BOATs are Byways Open to All Traffic. Walkers, cyclists, horse riders, carriage drivers and motor vehicle users can legally use these routes (unless there is a TRO or TTRO on it).
3. UUCRs are Unsealed and Unclassified County Roads generally shown as ORPAs (Other Routes with Public Access) on OS Maps. They are routes where it is believed
there is a right of way for some users but exactly who can use the route has not been legally determined.

4. “Green Lane” is a general term for a route which is not part of the normal communication system of sealed tarmac roads. It is primarily used for recreation and is characterised by having a surface not designed to sustain significant vehicle traffic. It may be genuinely green when it has a grass surface but is often superficially surfaced with loose stone. In terms of legal status it could be a footpath, bridleway, restricted byway, BOAT or UUCR.

5. “Green laning” is a term used by participants to describe the recreational use of motor vehicles like trail motorcycles, 4 wheel drive vehicles and quad bikes on green lanes. It is legal only on BOATs. On UUCRs its legality is unknown until the status of the UUCR is determined.

6. TRO is a Traffic Regulation Order – made by a Highway or National Park Authority.

Introduction and Background

7. The Peak District Green Lanes Alliance (PDGLA) is an umbrella organisation co-ordinating the efforts of a number of local organisations and individuals worried about the damaging effect green laning is having on the natural environment and its diminution of the enjoyment of non-vehicle users of “green lanes”. This diminution results from the inability to appreciate nature and experience tranquillity away from the presence or expectation of vehicles. We focus mainly but not exclusively on the Peak District; members also draw on their experience of other areas of the country. Members are Friends of the Peak District (CPRE); The Peak and Northern Footpath Society; 14 Ramblers Association groups and one independent walking group; Peak Horse Power bridleway group; some local parish councils suffering acute problems from off-roading; and individuals.

9. We have arranged our submission under the specific questions raised by the Committee and also from DEFRA’s summary and review of NERCA.

General points about the Peak District National Park

10. National Parks have two statutory purposes which have to be considered when discussing green laning in them:-

• Conserve and enhance the natural beauty, wildlife and cultural heritage
• Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public

All of the National Parks list tranquillity as one of their special qualities. Green laners themselves claim they come to experience it, not apparently appreciating how their very presence destroys it.

10. The Peak District National Park (PDNP) is popular with walkers, cyclists, horse riders and green laners. Users can be local, day trippers from the surrounding
conurbations, or longer staying tourists. Green laners also come to the Peak District from the EU.

11. The Peak District National Park Authority (PDNPA) estimate its green lanes network at approximately 220 green lanes. It includes both BOATs and UUCRs and is important to all the users listed in paragraph 10. However there is discord between green laners on the one hand and non-vehicle users, residents and landowners on the other. This discord is centred on the damage caused to lanes; danger due to the speed of vehicles and the width (Photograph 1), gradient, limited visibility and loose surface of the lanes; and the loss of tranquillity as well as the noise and fumes emitted by motor vehicles. These factors lead some non-vehicle users to stop going on lanes where vehicles may be present with consequent loss of amenity. Farmers suffer gates left open; damage to walls (Photograph 2) and dew-ponds; encroachment on to fields; loss of usable agricultural land; disturbance of stock and in some cases actual intimidation.

12. Many of the routes have a long and documented history as ancient trackways and all pass through attractive countryside where field patterns, dry stone walls, buildings and land usage reflect the history of the area and the special qualities of the National Park.

13. PDNPA’s approach to managing the problems caused by green laning has been to identify priority routes and ban recreational vehicle use on them through TROs where it believes other measures are inadequate. There are currently 27 priority routes and PDNPA has implemented on average about 1 TRO per year. At this rate it will be nearly the middle of the century before all priority routes have been addressed assuming nothing changes. We know however that continuing green laning results in new lanes becoming priorities. A UUCR near Wetton in the Manifold Valley, Staffordshire is a prime example of how quickly a route can deteriorate. (Photographs 3, 4 and 5)

14. A number of Highway Authorities cover the National Park. Derbyshire County Council is the only one currently processing Definitive Map Modification Order (DMMO) applications which seek to add UUCRs as BOATs to the definitive map.

Question 4: How well has Natural England fulfilled the mandate it currently has? How well do its wide ranging functions fit together, and does it have the appropriate powers and resources to perform these functions?

15. Natural England’s (NE) statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development (NERC Act s1.2). The responsibilities of Natural England (NE) include inter alia:-

• promoting nature conservation and protecting biodiversity
• conserving and enhancing the landscape
• securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment
• promoting access to the countryside and open spaces and encouraging open-air recreation

16. These **countrywide** responsibilities reflect very closely the statutory purposes of National Parks. However with respect to discharging them, we consider NE’s performance to be variable as described in paragraphs below.

17. PDNPA’s TROs have been based on conservation and amenity grounds, again issues very relevant to NE’s responsibilities. However NE is a statutory consultee only for TROs where the route concerned is within or partly within a Site of Special Scientific Interest (SSSI) and the TRO is proposed by a National Park Authority. This may be a deficiency in the process and perhaps it should be asked to comment on all TRO consultations grounded on conservation and amenity. If this is too onerous, it should at least be consulted on ones on green lanes applying to the National Parks, Areas of Outstanding Natural Beauty and for National Trails whether proposed by a National Park Authority or a Highway Authority.

18. NE has responded to all but one of the consultations where it has been asked. It has supported the TRO where SSSIs are involved, even where the road is adjacent to the SSSI rather than traversing it. It has quoted other relevant land designations (Special Area of Conservation SAC, Special Protection Area SPA) and protected species where relevant. It has even quoted scheduled monuments where it has knowledge although these are the responsibility of English Heritage (who are not a statutory consultee).

19. We were surprised and disappointed that NE did not respond to the latest TRO consultation on the route near Wetton in Staffordshire which passes through the Hamps and Manifold Valleys SSSI and whose lower section is also in the Peak District Dales SAC (Photographs 3,4,5). We cannot believe that NE would be unconcerned about the damage being caused by recreational vehicles and if the lack of response is due to inadequate resources, it is clearly no longer able to discharge its responsibilities.

20. NE’s consultation responses have been particularly good where it has detailed knowledge and has been involved in conservation efforts (eg fencing, gulley repairs), as on Long Causeway, or major expenditure, as on that part of the Pennine Bridleway national trail known as the Roych, which had been badly damaged by motor vehicles.

21. However its knowledge appears patchy and we wonder if its responses are sometimes written from map information rather than from detailed local knowledge. For example it offered no view on the TRO for Brushfield because the adjacent SSSI was separated by a boundary wall/fence and appeared unaware of the damaging “off-piste” motor vehicle activity over the scheduled ancient monument on Putwell Hill.
22. Similarly on Chertpit/Leys Lane, Great Longstone it was largely neutral because the nearest SSSI was on Longstone Edge away from the lane. It knew of the presence of Great Crested Newts (a protected species) in the vicinity but had no evidence of impact. It noted that the lane did not form part of a recognised long distance trail but did not appear to understand its importance as an amenity for local residents. Finally it seemed unaware of the destruction of dry stone walls flanking the lane, which are not a scheduled monument but contribute to the special qualities of the Peak District National Park. (Photograph 6)

23. In the recent consultation on a TRO over the route known as Washgate, NE supported the initial consultation because of an adjacent SSSI but did not contribute to the subsequent consultation considering an exemption for two historic motor vehicle trials. The possible presence of native crayfish (an endangered species) in the River Dove had been identified as an issue in the exemption. Historically the two motor cycle trials had test stages actually in the River Dove. In 2017, before the TRO came into effect, PDNPA persuaded both trials to omit the river stages but entrants had still to cross it through the ford. We would have expected NE to have had a view on this because contamination, damage to habitat and transmission of the eggs of the invasive American species are recognised dangers to native crayfish. However the fault may lie with PDNPA for not involving NE again.

24. Another well established vehicle trial (Northern Experts) has stages on the Leek Moors SSSI and entrants drive across the moor at one point to reach a stage on a stream feeding the Cumberland Brook. Competitors ride up the stream, jumping over small waterfalls. We were told by one of the marshals that experienced competitors prefer to go last “when vegetation has been stripped off the stones in the stream”. There is a further stage climbing a steep gulley cut into the peat moorland near the watershed. We do not know whether NE has made any attempt to discourage the landowner from allowing this use of the SSSI.

25. Overall we feel NE is generally good on designated areas like SSSIs, SACs and SPAs but has less interest in non-science protected areas within National Parks and Areas of Outstanding Natural Beauty let alone the countryside generally. We are not able to comment on whether these deficiencies result from lack of powers or resource constraints but we suspect both.

26. In 2015, the coalition government promised the establishment of a stakeholder working group on motor vehicle use of green lanes, mandated to produce majority and minority recommendations if necessary, followed by public consultation. This promise has not been fulfilled. Instead DEFRA convened a one day forum, chaired by NE. This forum is continuing on a voluntary basis, mainly because participants such as PDGLA feel unable to withdraw and leave the field to the opposition, rather than in expectation of any meaningful result. NE’s chairing has been characterised by a desire for unanimity rather than concern for the responsibilities noted in paragraph 15.
Question 5: Are there any changes to the remit and responsibilities of Natural England required, either as a result of Brexit or of other significant developments in the period since 2006?

27. If Brexit takes place, we foresee the following developments:-
   - There will be increased numbers of green laners coming from Europe to take advantage of falls in the value of Sterling.
   - Some food production will move to Eastern Europe to capitalise on cheap labour.
   - There will be increased financial and social stress as the economy declines (at least in the short to medium term).
   - There will be pressure to water down the high EU standards for managing the environment.

28. The above developments will increase the importance of the countryside as a resource for exercise, recuperation and finding tranquillity as described in paragraph 30.

29. We consider it crucial for Natural England to become much more assertive and proactive in its advocacy of environmental issues.

Question 6: Do the provisions for enabling and managing access to the countryside remain appropriate? How effective have Natural England and other partners been in promoting better access?

30. The importance of access to the countryside was underlined by a 2011 command paper to parliament from the Secretary of State for Environment, Food and Rural Affairs entitled “The Natural Choice”. The paper emphasised the importance of protecting and improving the natural environment and re-connecting people to nature and the importance this had for improving mental and physical health. There is general recognition of the benefits of providing green spaces in urban areas but there seems much less effort being devoted to protecting the largest green space of all – the countryside at large. NERCA was a missed opportunity to improve people’s enjoyment of the countryside by eliminating recreational vehicle use of green lanes and stop the insidious creep of urban characteristics into the countryside. Since then we and other environmental organisations have been struggling with DEFRA and NE to remedy the situation but without success.

31. If people are discouraged from using the countryside for exercise and finding tranquillity there then not only will there be increased health costs but a loss of revenue in the economy. It seems likely that individual walkers and off-roaders spend similar amounts (on clothing, equipment, refreshment, accommodation, fuel etc) but the greater number of walkers means their aggregate contribution to the economy is much greater. A Ramblers Association report in 2008 “Economic and Social Value of Walking in England” estimated this aggregate expenditure at between £5-6 billion.

Questions 11: Are there any parts of the Act which are currently in force that need to be re-considered as a result of developments since 2006?

There are three problems with the operation of NERCA:-
The Problem of UUCRs

32. One of the objectives of NERCA was to prevent the creation of motorised vehicle rights on green lanes simply because the public had rights to use a horse and cart. This objective was undermined by the exemption in Section 67 (2) (b) of routes on the List of Streets. The List of Streets is a list of routes maintained at public expense. It includes the “ordinary tarmac road network”, UUCRs and BOATs. According to DEFRA this exemption was made to avoid possible disruption of rights on the ordinary tarmac road network. However the effect has been to leave UUCRs open to use by green laners and liable for conversion to BOATs because of the existence of historic horse and cart rights ie a whole class of green lanes has been excluded from protection. In many counties and in the Peak District this class comprises a large percentage of the BOAT and UUCR green lanes.

33. Most UUCRs are unsuitable for recreational motor vehicles because the surface is unable to sustain such use without frequent expensive repairs. In addition width, gradient, loose surfaces and restricted visibility often lead to danger for non-vehicle users and make passing difficult without one party reversing or climbing the sides (Photograph 7).

34. The increase in popularity of recreational motor vehicle activities on unsealed routes means use of these routes is heavier than in 2006 and many are deteriorating. We suspect some routes within the Peak District National Park are beyond economic repair now. For example, the two Hollinsclough Rakes in Staffordshire, where local people can remember one of them being grassy and suitable for use with a push chair, are now unusable by any but the agile because of recreational vehicle damage to the surface, drainage and flanking walls. In fact the county council has now closed the Rakes by a temporary TRO on safety grounds. (Photographs 8 and 9)

35. Under the Countryside and Rights of Way Act 2000, Highway Authorities were originally supposed to have completed the legal determination of the public rights on UUCRs and other potential BOATs by 2026. However there seems no chance of the date being met since most Highway Authorities are not processing DMMO applications or determining public rights under their duty to keep the Definitive Map under continuous review. Presumably this is because of resource constraints. DEFRA has now said this legislation will not be commenced for UUCRs. Green laners made some DMMO applications for UUCRs before the NERC Act in 2006 but are not making any more because they fear that some will not become BOATs and prefer to leave them unclassified and undetermined forever. Similarly non-motorised users are not making applications because they fear the UUCRs will become BOATs because of the section 67(2)(b) exemption in NERCA.

36. There are three ways of resolving this unsatisfactory situation:
   • The determinations could continue until completion (which would result in most UUCRs becoming BOATs inappropriately).
• A blanket determination could be enforced by further legislation. Such a blanket determination could define UUCRs as any of the rights of way on the Definitive Map ie footpath, bridleway, restricted byway or BOAT.
• The as yet unproven vehicle rights could be extinguished by further legislation.

37. We would favour:
• either extinguishing unproven vehicle rights with specific exemption for “invalid carriages” (an archaic term but defined in legislation). This would allow them to be used by disabled people using mobility scooters.
• or completing the determinations but with additional legislation to restrict the highest category allowed to restricted byway ie extinguishing motorised vehicle rights but again with specific exemption for invalid carriages.

The Problem with BOATS

39. Many of these routes are unsuitable for use by recreational motor vehicles for either same reasons as given for UUCRs above. The legal definition of BOAT emphasises that the main use is not for vehicle traffic. However we believe Parliament is unlikely to remove proven motor vehicle rights on these routes and the only way to protect them is through TROs. (Photograph 10 showing the condition of a BOAT near Holmfirth). Whilst deriving from different legislation than NERCA, we feel compelled to offer some observations on TROs because the problems with them are inextricably linked to the deficiencies revealed in NERCA.

The Problem with TROs

40. PDNPA is the only authority currently using permanent TROs to protect UUCRs and BOATs within the Peak District National Park. The main users of TROs within local authorities are Highway departments who think primarily in traffic terms and are reluctant to use grounds like conservation and amenity.

41. Local Authority Rights of Way departments seem reluctant to get involved at all. In spite of support from councillors (including cabinet members for highways) Derbyshire County Council rights of way officers have prevaricated for 23 years over repeated requests for a TRO on Jacob’s Ladder, Stoney Middleton. (Photograph 11)

42. Currently there is no redress available to communities who are meeting institutional intransigence of this magnitude. The local government ombudsman will only get involved in cases of maladministration affecting individuals and refuses to take up cases involving groups. We believe communities should have the right to appeal to the Planning Inspectorate but there would need to be a formal process to avoid claims with no foundation.

43. In spite of their statutory duty to support National Parks purposes, we believe Highway Authorities are reluctant to use permanent TROs on BOATs and UUCRs because of the cumbersome, resource intensive process and the fear of legal challenge.
44. PDNPA has struggled to handle the replies to some TRO consultations and we know green laning groups use this as a tactic to frustrate the process.

45. The resource constraint was discussed extensively at the May 2017 meeting of PDNPA’s Audit, Resources and Performance Committee when responding to requests from the public to implement more than one TRO per year. We understand that similar problems with resources and the fear of legal challenge occur elsewhere in the country.

46. There is a strong case for new legislation extending the grounds for a TRO. The most obvious one is “sustainability” in the sense of avoiding continual repairs because the green lane is subject to traffic which really needs solid foundations and a sealed surface. We understand why cost is not allowed to be an issue in avoiding repairs to the normal road network but believe it should be an issue for a recreational route particularly where less extensive repair would meet the needs of non-vehicle users.

47. Further additional grounds for TROs could be to prevent off-piste activity especially that threatening ancient monuments or SSIs (Photograph 12) and to protect other routes. An example of the latter would be a TRO on Brough Lane, Shatton, Derbyshire where the desire of green laners for a round route causes them to illegally use a restricted byway as a connection.

48. The protection of ancient monuments would be further enhanced by making English Heritage a statutory consultee.

49. Most importantly the TRO process needs **streamlining**.

50. DEFRA needs to publish stronger guidance to **encourage** National Park Authorities and Highway Authorities and to make TROs. This guidance should emphasise grounds outside conventional traffic considerations, for example conservation, amenity and preserving character. However without streamlining such encouragement is unlikely to be effective.

51. In particular authorities need to be encouraged to initiate TROs at an **early stage** when problems are still remediable and **before repairs** are carried out because the requirements may be less onerous once vehicles are excluded.

52. The guidance should also **assist** authorities to make TROs difficult to challenge by drawing on the experience of those National Park Authorities (Yorkshire Dales and the Peak District) and Highway Authorities who have experienced legal challenges and those who have successfully made TROs to protect UUCRs and BOATs.

**Comments on DEFRA’s assessment of the NERC ACT in paragraph 117**

53. The sub-text of paragraph 117 seems to be “the fanatics on both sides are equally unhappy, ergo all reasonable people must be content ergo nothing further needs to be done.” The logic is erroneous and reasonable people are not content (as we show
In spite of its responsibilities for the environment DEFRA seems to be treating the concerns of green laners and non-vehicle users as equivalent and making no attempt to consider damage to the environment or the inappropriateness of certain leisure activities in the countryside. Particularly with regard to the National Parks, DEFRA is ignoring its own advice in its “Guidance for National Park Authorities making Traffic Regulation Orders under Section 22BB Road Traffic Regulation Act 1984”:-

- “The Government considers that in many cases a level of recreational vehicle use that may be acceptable in other areas will be inappropriate within National Parks and incompatible with their purposes.”

- “The reference in legislation to understanding and enjoyment of special qualities [of the National Parks] suggests a focus on quiet outdoor countryside recreation, associated with the wide open spaces, wildness and tranquillity to be found within the National Parks.”

54. We disagree that Part 6 of Act has achieved its primary aim which was to limit recreational vehicle use of green lanes by reducing the opportunities to create vehicle rights on them. A major class of green lane was exempted; the use of off-road vehicles has increased; and nothing has been done to improve the ability of Highway Authorities and National Park Authorities to manage this use through TROs.

55. The wording in paragraph 117 implies all use of mechanically propelled vehicles on rights of way is contentious. The use of rights of way by farmers and others involved in land management; for access to residential property; and by the emergency services is not, in our opinion, contentious. Nor is the use by “invalid carriages”. PDNPA has made an exemption for “invalid carriages” in all their TROs. We support such an exemption but would not wish to see it extended to allow disabled people to use such routes with the type of vehicles normally associated with green laning. This is both because most green lanes cannot sustain such use; and because invalid carriages users, wheelchair users, and people with impaired sight and hearing should not be expected to share such lanes with 4x4s and trail motorcycles.

56. We agree the majority of stakeholders and the public broadly support the measures of the Act (although probably few understand it). However we believe they want control of recreational off-road vehicles to go further. Our experience is that there is much opposition to the use of BOATS and UUCRs by green laners. Examples of this opposition are given in paragraphs 56 to 64.

57. Parish councils and individuals have approached PDGLA for advice on how to oppose effectively a claim for BOAT status on a UUCR. Where it is feasible to challenge BOAT status on historical evidence, residents and landowners have, on our advice, compiled and submitted user evidence to counter that from green laners. They have followed this up by giving evidence in person and subjecting themselves to cross-examination at public inquiries held by the Planning Inspectorate. This significant local effort has meant that the user evidence of recreational motor vehicle users has
been successfully challenged on a number of routes. It has at the same time revealed the extent of the stress and anger in local communities about what is happening to their local lanes.

58. Residents of Great Longstone, Derbyshire fought a public inquiry against Leys/Chertpit Lanes becoming BOATs. Having lost, and in the face of indifference from the parish council, they then ran a successful campaign to encourage PDNPA to impose a TRO on the lanes.

59. The above effort has been surpassed by Stoney Middleton Parish Council and residents who has been seeking a TRO for 23 years on the route known as Jacob’s Ladder. They submitted another formal written request for one in December 2013 to Derbyshire County Council. The council subsequently held a superfluous consultation canvassing views but outside any formal TRO process. No results from the consultation have been released and the request remains unanswered.

60. Residents of Pilsley on the Chatsworth Estate pressed Derbyshire County Council for 20 years for a TRO on the route known as Bradley Lane because motor vehicles were destroying the route and putting residents in danger. Despite overwhelmingly clear evidence of damage and danger gathered by local residents no action was taken by the Highway Authority. (This route is now a bridleway following Public Inquiries.)

61. We know of two other Peak District parish councils, supported by local residents, actively seeking permanent TROs banning recreational motor vehicles on BOATs in their parishes. Residents, landowners, disabled users, parish and district councillors have submitted petitions to PDNPA and attended meetings of its Audit, Resources and Performance Committee for a number of years asking for a TRO on Hurst Clough Lane, Derbyshire. Great Hucklow Parish Council wants a TRO on School Lane, Derbyshire to protect children using the village primary school from speeding green laners.

62. Fifteen walking groups (14 belonging to the Ramblers Association) have joined PDGLA because they are concerned about the use of UUCRs and BOATs by off-road motor vehicles.

63. Around 2010, Derbyshire Constabulary responded to public concern about green laning by launching an initiative called Operation Blackbrook. This had a number of strands. Police worked with responsible green laner groups to repair damaged routes and offer “information and education” to casual green laners on illegal routes. The police had a number of checks of casual green laners on the normal road network and of white vans bringing groups of green laners to known meeting points. These checks revealed a number of uninsured off-road vehicles and ones not meeting requirements to be on the public highway (licence plates, silencers etc). The police also organised a number of public meetings in Bakewell town hall to discuss the problems associated with green laning. The panel assisting the police had representatives from PDNPA, Derbyshire County Council and local and national green laner groups. The meetings were animated and increasingly well attended by
the public (eventually becoming almost standing room only). No-one who attended them could be in any doubt about the strength of feeling against green laning by local residents and their frustration at the perceived impotence of the authorities. Local farmers were particularly vociferous and were offering to repair routes themselves if only TROs were put on them.

64. The only national opinion poll on the issue (ICM 2004, carried out for the Ramblers Association prior to NERCA) found that 79% of respondents thought that 4x4s and trail bikes using rights of way in the countryside meant increased danger for walkers, cyclists and horse riders and that these vehicles were affecting the environment by introducing noise and pollution into the countryside and damaging habitats. 87% said that off-roading should be banned in the national parks and areas of outstanding natural beauty.

65. The evidence covered in this section does not indicate a public at ease with off-roading and content to leave NERCA unfinished. We believe that new rights of way legislation to address the problem of UUCRs and guidance to Highway Authorities and National Park Authorities on making TROs is urgently needed.

Christopher and Susan Woods for Peak District Green Lanes Alliance

10 September 2017
Photograph 1: Charity Lane, Cheshire: A UUCR where a narrow sunken lane without refuges shows the problem of meeting a green laning vehicle. March 2015

Photograph 2: Beeley Hilltop, a BOAT in Derbyshire where coping stones were removed from the wall by green laners to fill ruts in the route. September 2013

Photograph 3: Wetton, Staffordshire in November 2011 showing little sign of green laning.
Photograph 4: Wetton, Staffordshire in February 2014 showing the effects of increased green laning

Photograph 5: Wetton, Staffordshire in February 2017. Markedly more damage although PDNPA vehicle monitoring shows relatively light use of this route.

Photograph 6: Leys Lane, Derbyshire in February 2013 after DCC repairs. The dry stone wall was destroyed by green laners. Lane now protected by a TRO.
Photograph 7: Three Shires Head, Staffordshire. A UUCR with an historic TRO so only used by motor cycles. But still a poor surface and narrow width. June 2015

Photograph 8: Limer Rake, Staffordshire. Closed by a temporary TRO because of fears of walls collapsing. These have been undermined by green laning and subsequent water erosion. July 2015

Photograph 9: Limer Rake, Staffordshire. Once a grassy path, the surface now makes the UUCR unusable for many non vehicle users. July 2015
Photograph 10: Ramsden Road Kirklees. A BOAT where green laners have created an alternative route to avoid the "step". April 2016

Photograph 11: Jacob's Ladder December 2016. Local people have been asking for a TRO for 23 years

Photograph 12: Off-piste damage on How Grove Lead Mine, Castleton, a scheduled monument beside Pindale, a UUCR. August 2017