The Countryside Agency lessons learnt review of the mapping of open country and registered common land

Response by the British Mountaineering Council

1. Introduction

The British Mountaineering Council (BMC) has prepared this document in response to a review of lessons learnt during the mapping of open country under the Countryside and Rights of Way (CRoW) Act 2000 conducted by the Countryside Agency. The BMC welcomes the opportunity to contribute to this review process and wishes to be fully involved as this review continues.

The BMC has been a supporter of the CRoW Act since its inception and has been closely involved in its implementation. However, during the process of mapping areas of open country, a number of sites of interest to the BMC have suffered from deficiencies in the process that have led to these sites being erroneously excluded from being designated as open access. In addition to denying outdoors users access to these sites, these errors have resulted in pressure for the BMC to justify its pro-CRoW position from the climbers, hillwalkers and mountaineers we represent.

The deficiencies in the mapping process that have produced these results fall into two categories, those that are inherent in the mapping methodology adopted, and those that are mistakes made in executing this methodology. This document explores these deficiencies in the mapping process with examples from sites the BMC has identified as having suffered errors during the process, see Annex.

2. Background

The Countryside and Rights of Way Act 2000 defines open country as land which appears to the appropriate countryside body to consist wholly or predominantly of mountain, moor, heath or down, s 1(2). This is now routinely referred to as MMHD.

There has never been an expectation that all crags in England used by climbers could or would be mapped as open country under CRoW. Crags and rock outcrops do, however, come within the definitions of both mountain and moor provided by the Countryside and Rights of Way Act 2000, Mapping Methodology for England, version 2, Countryside Agency 2002, (MME).

The criteria for identifying open country, para. 68, provides that:

- Mountain includes crag, scree, fell, or other bare rock in upland areas.
- Moor includes rock outcrops.

The criteria provided in para. 68 are wholly unambiguous. Crags and rock outcrops are as much a part of mountain and moor as any other qualifying ground cover type. The clear requirement of MME is, then, that upland crags and rock outcrops are to be identified in the mapping process on the same basis as other qualifying types of ground cover. They are not simply added extras.

While, as noted above, crags and rock outcrops are integral land cover components of open country MME also identifies cliffs as one of the features that can be used to establish land parcel boundaries, (para. 60). This could be seen as an internal inconsistency within the methodology.

The clear requirement of the Act is that MMHD is mapped as open country so boundaries must follow the para. 68 ground cover criteria to include all qualifying land, including crags and rock outcrops. It would clearly be wrong for boundary selection to be used to amend ground cover criteria to exclude crags or rock outcrops where, for instance they are located at the edge of an area of mountain or moor. Land parcel boundaries should, then, have been constructed so as to properly identify all qualifying land types including crags and rock outcrops.

As crags and rock outcrops are an integral ground cover component of both mountain and moor they must be included in any assessment of the predominant character of both the mountain and moor land parcels in which they occur. The mapping process should, then, have been able to

- identify crags and rock outcrops and
- make the identifications at a stage when they could be included in land parcel assessments.

3. The mapping process in practice

The British Mountaineering Council has identified problems at all stages of the mapping process. The examples below are given not as a full list of problem sites, but are used to illustrate where problems have been encountered.

3.1. Terminology

The terminology used by MME when referring to rock features is, at the least, confusing.

- **Crag** is used in the open country identification criteria for mountain, (para. 68).
- Rock outcrops is used in the open country identification criteria for moor, (para. 68).
- **Cliffs** is used in the section on the selection of boundaries, (para. 60).

It could be that MME intends crags, rock outcrops and cliffs to be identified as different phenomena. If so, what are the differences between them and why was it necessary to make the distinctions?

- When, for instance, does a crag stop being a crag and become a rock outcrop or cliff?
- Similarly, when does a rock outcrop become cliff or a crag?
- Why are rock outcrops in mountain or crags in moor not to qualify as open country?

The other possibility is that the terms all, in effect, refer to the same physical phenomenon. If so, why did MME not use one word or phrase throughout? Could this have been a matter of ill-considered drafting?

It would appear that from the very beginning of the mapping process the Agency did not have a clear picture of what rock features are or how they would be dealt with by the process. The approach adopted by the Agency has caused a considerable amount of confusion and cannot have in any way contributed to the making of high quality decisions. It also resulted in additional work for BMC.

3.2. Identifying crags and rock outcrops

BMC is concerned that MME has not been interpreted and applied in a way that has allowed for the identification of crags and rock outcrops as integral ground cover

components of mountain and moor. There would seem to have been deficiencies in the desk-based approach used in the early stages of the mapping process. As has been established above, crags and rock outcrops are as much a part of mountain and moor as the other qualifying ground cover types. It would appear, though, that the desk study stage of the mapping process did not seek to identify them. This view is supported by the CA letter, Region 5 Provisional Maps: Site Decisions, Sue Cornwell, CA, to Nicky Warden, Ramblers Association, 25 February 2004).

This letter stated in respect of Crag Lough and Peel Crag, Northumberland that:"....the decision not to include the site was based on the assessment of aerial
photography which suggested there was no core habitat for moorland. The
supporting evidence suggests that the site could be mountain. Having reviewed this
area again, it seems clear that this was a difficult site to determine on data alone and
would have benefited from a visit....".

The land parcel incorporating Crag Lough and Peel Crag is some 1.5 km in length and the crags are up to 34 m high, not including the scree below. Had the desk-based approach used allowed for the identification of crags and rock outcrops as components of mountain and moor it is difficult to see that a site of this magnitude would not have been identifiable from the data available.

Establishing the character of Crag Lough and Peel Crag would not have been difficult as the toids representing both are clearly visible on the OS Mastermap. The character of the area could have been identified either visually or by using a filtering process which would not have required the making of value judgements. These approaches could also have been used to identify rock features elsewhere.

From the above extract it would seem that the desk study was using aerial photography to look for core moorland habitat rather than looking for the full range of moor or mountain land cover types that are present in the area around Hadrian's Wall. The MME specifically provides, at para. 69, that MMHD may be applied in different ways across the country. It would not appear that in the case of the Hadrian's Wall area this was done. This begs the question of how this discretion was used in other parts of the country and to what effect.

It is not clear what the term core moorland habitat used in the extract refers to unless it is the phrase "primary vegetation types" found at the beginning of para. 68. In any event it would appear that this descriptor or some similar shorthand was used in the desk study rather than the full para. 68 land cover identification criteria.

If this was the case it was a clear misuse of the MME as some of the qualifying moor ground cover types are not biological in nature and para. 68 states that land consisting of all of the ground cover types within the MMHD descriptions will be mapped as open country. Any approach used should, therefore, have been required to identify crags and rock outcrops as an integral part of moor and mountain.

BMC is concerned that in carrying out the desk study the mapping agency did not seek to identify all qualifying ground cover components of mountain and moor on the same basis as that used for biological land cover types. It would also appear that mountain was not looked for at all as part of this exercise.

This can only be viewed as a fundamental flaw in the conduct of the mapping process. As a result of the flawed approach adopted, Crag Lough and Peel Crag were not mapped as open country and it is possible that other areas of crag and rock outcrops may similarly have been excluded.

3.3. The predominance test

The decision as to whether or not a land parcel is predominantly comprised of qualifying land types is central to its being mapped it as open country. This test can only be properly carried out if all the qualifying land type components represented in the parcel have been identified.

As noted above it would appear that crags and rock outcrops have not been identified in a consistent way as qualifying open country land cover types. Therefore, it is inevitable that they cannot have been included in a consistent way in predominance assessments. This would appear to be another significant flaw in the conduct of the mapping process, and brings into question decisions made on land parcels containing crags or rock outcrops.

3.4. Land parcel boundaries

As noted above, (section 2), there is a contradiction in MME over the identification of rock features and their use as land parcel boundaries. As a result there has been a real potential for inconsistency in the treatment of crags and rock outcrops situated at or near the edge of areas of MMHD. It would appear that the presence of such crags has not been appropriately taken into account in drawing up at least some land parcel boundaries.

Boundaries would, in many instances, appear to have been drawn on a somewhat arbitrary basis rather than so as to appropriately reflect the character of the land parcel on the ground. Boundaries that properly recognised the presence of crags and rock outcrops could have resulted in crags being included in open country, (for example Roaches Skyline crags, Peak District).

Land parcel boundaries drawn along the top of a crag at the edge of moor can result in the crag being put in a land parcel that is not predominantly open country (e.g Beggar's Stile, Nr. Austwick). Rock features are not only an integral land type component of moor but can also, in many instances, contribute significantly to the open character of a land parcel. For both of these reasons boundaries should have been drawn to include rock features rather than to exclude them from open country.

3.5. Inconsistencies in identification

There have been inconsistencies in the identification of moor and heath. In some instances some areas comprising both of these MMHD types have been mapped as open country while others of apparently similar character have not. Examples of areas not mapped include Pallet Crag, Co. Durham and Lindisfarne Heath.

3.6. Inconsistencies between determination sheets and maps

In the case of Cross Stone Quarry, Mapping Area 2 there was an inconsistency between the determination sheet issued following comments made on the draft map and the provisional map. The determination sheet showed the land parcel as open country but the parcel was not included as such on the provisional map. This error was subsequently carried forward to the conclusive map. Despite the parcel being open country and having been determined as such it is not mapped as open country and there is no right of access. This can only been seen as a clear failure in the mapping process.

When errors are made there would not appear to be any provision for their rectification, other than in the specific circumstances where modifications to draft maps are not incorporated in provisional maps or where errors arise in the Ordnance

Survey base maps. This itself is a fundamental deficiency in the mapping process, as it precludes rectifying errors for other reasons, several examples of which are given in this document.

This does not explain why the error relating to Cross Stone Quarry was not rectified under the existing regulations. The parcel contains a crag traditionally used by climbers and this puts BMC in the extremely difficult position of having to try to explain why there is no access to an area that is demonstrably open country in character, has been determined as such, and is one on which BMC made draft map comments.

3.7. Inconsistent use of site inspections

The use made of site inspections and ground proofing to support the desk-based identification of open country has not been consistent. It would appear that decisions on some land parcels were made using only a desk-based approach while other similar ones may have been subject to additional site inspections.

If these two approaches were being used alongside each other it was incumbent on the agency to ensure that they resulted in decisions that were equitable. It would appear, though, that where ground proofing was used to assist in decisions this was not done consistently.

The Cornwell letter quoted above states in respect of Crag Lough – Peel Crag that:"....it seems clear that this was a difficult site to determine on data alone and would have benefited from a visit."

Since Crag Lough – Peel Crag would have benefited from a site visit there should have been one. No visit was made.

In his evidence to access mapping appeal public inquiry CROW/6/M/04/2889, 2894, 2895 given on 25 January 2005, W H Bowen of the Agency at para. 6.3 summarised the determination process and stated that site visits would be made "only where data is inadequate or inconclusive".

Presumably, then, at the time of the desk study, the data on Crag Lough – Peel Crag was both adequate and conclusive. If it had not been, then, under the Bowen criteria, a site visit would have been made. The Cornwell statement being made subsequently was, presumably, made with the benefit of hindsight. If, with this benefit, it was possible to establish this was a difficult site to determine on data alone why was it not possible to establish this at the time, particularly as the Agency has since acknowledged that it should have been?

The quality of decision criteria and data would, then, seem to be at least questionable as would the criteria set by the Agency for the selection of sites for visits. If a land parcel such as Crag Lough – Peel Crag was not picked up they were clearly inadequate, inconsistently applied, or both.

The patchiness of decision making and inconsistent use of ground proofing is clearly a significant failure in the mapping process and one that could, potentially, have affected other land parcels.

3.8. CA draft map response

The mapping agency did not respond consistently to comments made on the draft map, nor were responses always appropriate. As an example, comments were made at draft map stage on Crag Lough - Peel Crag, Lindisfarne Heath and Paddaburn Crag, Northumberland, Pallet Crag, Co. Durham and Castle Street Quarry and Cross

Stone Quarry. In respect of the Northumberland examples the comments were made by organisations such as the Northumberland National Park Authority, the local access forum, BMC locally and nationally and the Ramblers' Association locally and nationally. In respect of the other examples comments were made by BMC.

The following representation was made by BMC on Crag Lough.

"Crag Lough

NY 765679

Draft map ref: NY66 JJ/KK27

Crag Lough crag comprises in itself an upland area of crag, bare rock, scree and associated rough vegetation. It and the surrounding area are shown as moorland on the Defra Moorland Map. The crag and surrounding area should be mapped as Open Country to the edge of the associated rough vegetation, as shown on the attached map. This crag appears as a major crag in the Northumberland Climbing Guide and is a nationally significant climbing location. It serves a useful purpose as a recreational resource."

The representation on Peel Crag which is part of the same land parcel was made in similar terms. These two clear, positive comments were made in respect of what is a highly visible and significant land parcel which the Agency has acknowledged could be mountain, (section 2.2 above). Despite this the Agency failed to ensure that the comments were acted upon.

The inconsistency of the Agency's approach is also demonstrated by the decision made in respect of Castle Street Quarry, Area 2. Representations made by BMC included a reference to the recreational significance of the land parcel and the fact that the quarry is popular with rock climbers. However, it was excluded as being so small that its inclusion would serve no useful purpose, despite the Countryside Agency's own notes recording the use of the site for climbing. Once the error had been made there was no mechanism for it to be rectified.

In all the instances referred to above the determination sheets issued contained the statement that the decision on the land parcel was made "Having considered your representation very carefully...".

The Bowen evidence at access inquiry CROW/6/M/04/2889, 2894, 2895 referred to above stated, at para. 6.2, that

"All comments received during the draft map consultation period of 3 months (as set out in the Access to the Countryside (Maps in Draft Form) Regulations 2001 – SI no. 3301, are subject to this same standard and consistent determination process." In view of the examples given above this statement does not reflect the situation on the ground.

It would appear that, in practice, at least some comments were treated in ways that were far from very careful and that decisions on site inspections were inconsistent and inadequate. The position taken by the Agency at the Vixen Tor inquiry would, then, seem to be at variance with what has actually happened in practice.

Third parties have no formal access to the mapping process after the draft map consultation is completed. As such there must be an expectation that decisions are correct and consistent and that no errors that cannot be rectified will not occur. This has not happened - this represents a fundamental failure in the mapping process.

4. Countryside Agency approach to appeals

The approach taken by the Agency to the handling of comments made by third parties can have an impact on appeals. A third party who has made a draft map comment on a land parcel should be informed if an appeal is lodged in respect of that parcel.

The BMC made comments dated 18/7/03 in respect of a land parcel known as Sharpcliffe Rocks Plantation, East of Cheddleton, Staffordshire. The comments supported the inclusion of this land parcel as open country on the draft map for area 7 and noted its value as a climbing site. Receipt of the comment was acknowledged by a letter dated 18 August 2003. Despite this, the BMC was not notified of the subsequent appeal or discover it in sufficient time to make representations. The appeal was successful and the parcel was removed from the map of open country.

The Agency acknowledged in a letter to BMC from John Bailey, Open Access Customer Enquiry Officer, dated 23 May 2005 that because of an administrative failure the comment was one of a batch of 'Supporting Map Designation' comments not georeferenced. This failure happened despite the Agency acknowledging that it was aware that it was necessary for the author of the comment to be notified of a subsequent appeal. In his letter Mr. Bailey attempted to play down the impact of this failure by stating that

"....the appeal site visit, at which the inspector clearly made a judgment about open character in relation to the site, would not automatically have been open to third parties to attend (this being at the discretion of the landowner)."

This statement completely misrepresents the real position in relation to this land parcel. The parcel has a public right of way along one side and had the BMC been involved in the appeal, a request would have been made to the inspector to accompany him on the site visit as far as the land parcel boundary and along the right of way. If the landowner was unwilling to give access to third parties, the BMC view on the open character of the parcel would have been made from the right of way.

It is a requirement of MME that "All valid comments are georeferenced", (MME para. 92). The Agency failed to meet this requirement because, it would appear from Mr. Bailey's letter, of a failure in the administration and controls of the mapping process. This process failure is made more unfortunate by the subsequent attempt by the Agency to wrongly attempt to down play its impact.

The land parcel concerned is in Mapping Area 7 so this situation arose at a time when the Agency must have had fully developed and tested administrative and control systems in operation. This can only call into question the quality, appropriateness and fitness for purpose of these systems.

5. Management and control

From the examples given above it is evident there were failures at practically every stage of the mapping process. These examples are not comprehensive and only refer to crags and rock outcrops, a number of which have been excluded from open country. Dr L Ainsworth, BMC Access Representative for North Lancashire, has been in correspondence with Alun Michael in relation to a number of these. The correspondence has taken up questions relating to decision making and management and control systems

The mapping process was set up in a way that made no provision for error rectification. There was also no opportunity for formal third party involvement in the later stages of the process. It is clear, then, that the process has been wholly reliant on the quality and integrity of the decisions made and the management and control systems in place.

In these circumstances the Agency must have been aware of the level of care required and the need to take all the necessary steps to ensure that decision making, management and control were robust and able to deliver. As has been shown above decision making has been inconsistent and there have been numerous deficiencies and failures in the system. Deficiencies and failures have been identified in respect of Area 2. These continued into Area 5 and failures occurred even as late in the process as Area 7. Note that the BMC has had relatively little input into the process in Areas 1, 3, and 8 which tend to be lower lying areas with fewer climbing sites and so we are less able to comment on the areas.

It is clear that the management and control systems put in place by the Agency were not fit for purpose. If they had been the failures identified above would not have occurred and continued. This system failure has been a fundamental problem for the mapping process. Some of the consequences are set out in section 6, below.

6. Land that is properly Open Country

It became apparent as early in the process as the issue of the Area 2 conclusive map that, in practice if not in law, an additional category of CRoW land had made its appearance, "Land that is properly open country but is not shown as such on the conclusive map".

It is now more than ever apparent that this category of land exists, that it takes a number of forms and that it includes areas of land of significance to climbers. The examples below are not comprehensive, but are indicative of the range of failures that have resulted in land falling into this category.

- Land excluded from open country because of the failure of CA to properly apply the MME, (for example Crag Lough and Peel Crag, Northumberland).
- Land identified as open country but not included in the provisional map. (Cross Stone Quarry, Area 2).
- Land excluded because of the approach taken to the drawing of land parcel boundaries.
- Land excluded from open country because of the failure of the Agency to respond consistently to draft map comments, (for example Paddaburn Crag).
- Land wrongly excluded as serving no useful purpose, (for example Castle Street Quarry, Area 2).

There is no doubt that when the right of access comes into force BMC members and other members of the public will want to use areas of land that should properly be open country. Organisations such as BMC remain in a difficult position in having to advise recreational users in respect of this.

At a practical level a new climbing guide for Lancashire is in preparation with publication expected within the next year. Cross Stone Quarry and Castle Street Quarry are included in this and the guidebook committee is aware that both are on land that is properly open country. Queries have been raised on the access position, the reasons for it and how to advise climbers.

7. Review of maps

CA has responded in writing to concerns expressed on a number of land parcels in Area 5 indicating that some of these may have been be incorrectly mapped, (letter from Sue Cornwell to Nicky Warden referred to in section 2.2).

The suggestion in this letter in respect of Crag Lough and Peel Crag was:"Action: Site will be added to the database of sites to be reconsidered at decadal review."

It would appear from this that the Agency may be working towards a first fixed decadal review of the conclusive map.

The Act does not, however, provide for fixed decadal reviews but states "....the first review, not more than ten years after the issue of the map in conclusive form", CRoW 2000, s10(2)(a) and "....subsequent reviews, not more than ten years after the first review, CRoW 2000, s10(2)(b).

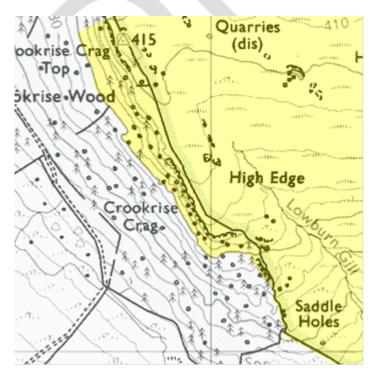
If the right of access is to have the respect and support of access takers it is essential that the mapping process is seen to be wholly credible and that the conclusive map is fully accepted as such by access takers. The considered view of BMC is that the deficiencies in the mapping process are such that a fixed decadal review will not provide this credibility.

The only way in which credibility can be assured is for errors to be acknowledged and to be corrected as soon as possible. This can be achieved by instituting a rolling review process that includes a provision for the inclusion of land parcels identified and brought into the process by third parties. Access takers and the general public would then be reassured that mapping errors have been recognised and are being dealt with.

Good examples

Crookrise Crag, Nr. Skipton.

A good example of satisfactory mapping – the western CRoW boundary has been drawn to include the actual crag faces.



8. Preparation of response

This response has been prepared for the British Mountaineering Council by

W. Renshaw Chairman of the Access, Conservation and Environment Group

G. Keating Access and Conservation Officer (Regions).

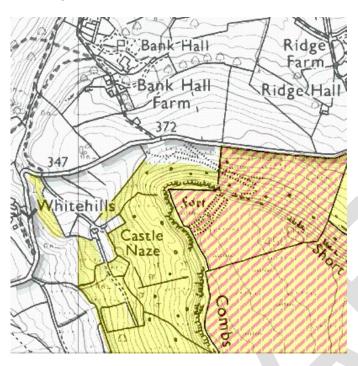


Annex - sites identified by the BMC with mapping deficiencies.

Area 2.

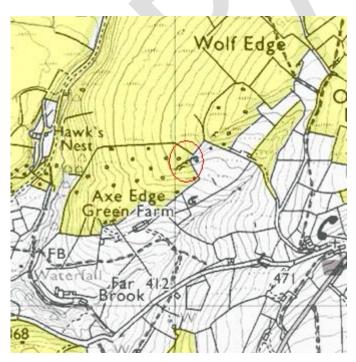
• Castle Naze, Nr. Chapel en le Frith.

Crag not served by PRoW , Non CRoW land between crag and highway requires remapping.



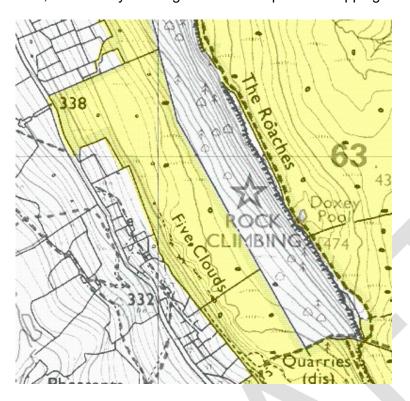
Wolf Edge, Nr. Flash.

Crag and boulders not served by PRoW, proportion of the crag mapped as CRoW land, crag not directly accessible on CRoW land - requires remapping.



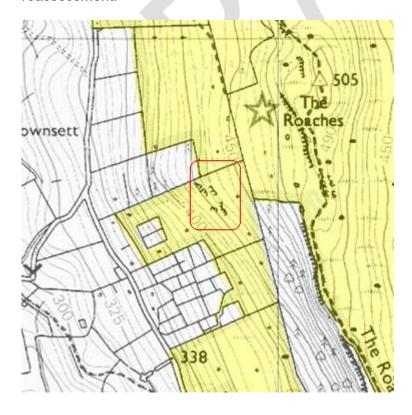
The Roaches Skyline, Roaches Estate

Mapping anomaly. The main Upper and Lower Tier crags were mapped as CRoW land, but the Skyline crags are not – requires remapping.



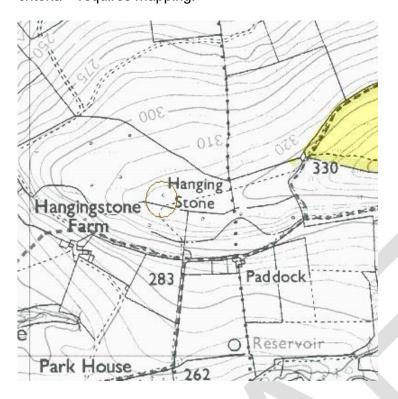
Nth Cloud, Roaches Estate.

Although crag and boulders are situated on CRoW land, the crag is not served by a PRoW and remains isolated from the highway – surrounding land requires reassessment.



Hanging Stone Rock, Danebridge.

Site situated in proximity to mapped CRoW land and displays a numbers of qualifying criteria – requires mapping.



Sharpcliffe Rocks, Nr. Ipstones.

Inquiry decision does not stand up to scrutiny – although site is partially situated in woodland, a significant proportion of the site is qualifying habitat and demonstrates other qualifying criteria e.g. open vistas.



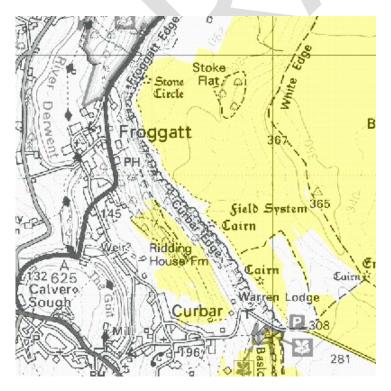
Lawrencefield (Bolehill Quarry), Nr. Hathersage.

The crag is served by a PRoW but demonstrates a number of qualifying criteria – requires mapping.



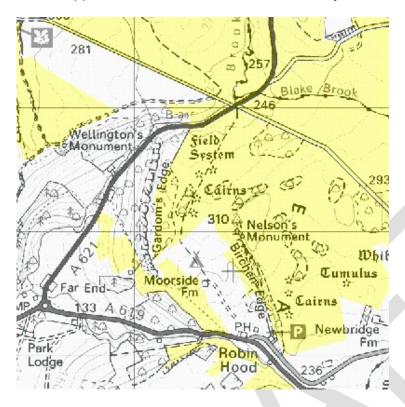
Froggat & Curbar Edges, Nr. Baslow.

A significant mistake. The edges are served by a PRoW above, but the length of the Froggat & Curbar escarpment has not been mapped as CRoW land. The mapping boundary appears to have been drawn at a fence line (parish boundary?) above the edges – requires remapping.



Birchen & Gardoms Edges, Nr. Baslow.

Inconsistent mapping – both crags are very similar in character, but Gardoms has not been mapped as CRoW land and is not served by a PRoW – requires reassessment.



Beeston Tor, Nr. Wetton.

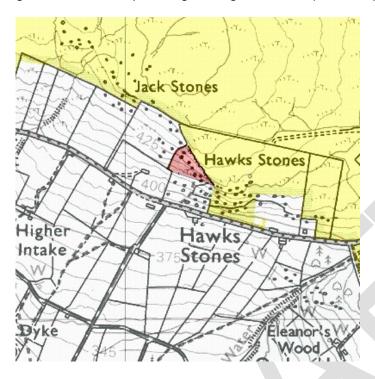
Fulfils a number of qualifying criteria, proximal local areas with similar characteristics have been mapped as CRoW land – site requires mapping.



LANCASHIRE

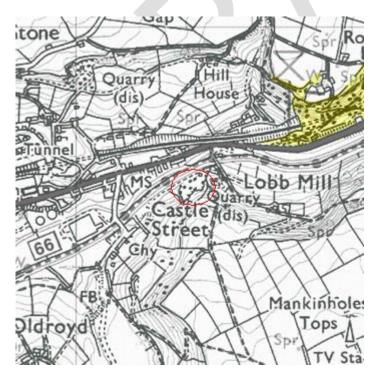
Hawks Stones, Todmorden.

Land parcel west of the main crag (containing the 425 contour) not mapped as CRoW land despite being composed of the same qualifying habitat (moorland and gritstone boulders) as neighboring areas – requires mapping.



Castle Quarry, Todmorden.

Natural England have acknowledged this mistake. The intention was to include the site on the definitive map but an administrative error occurred – requires remapping.



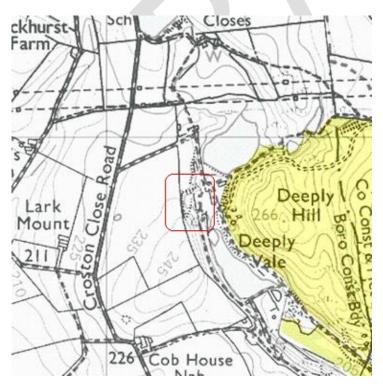
Cross Stone Quarry, Todmorden

As per. Castle Quarry.



Deeply Vale, Ramsbottom.

Quarried site fulfils a number of qualifying criteria, it is also situated in proximity to another area of CRoW land – requires mapping.



Area 4. YORKSHIRE

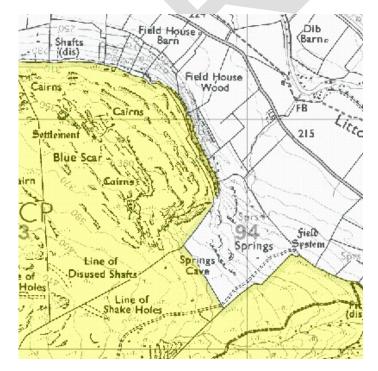
Malham Cove

Located on a PRoW but cliff faces and land immediately below are not CRoW access land – requires mapping.



Blue Scar, Littondale, N. Yorks

Crag face used as CRoW boundary – crag not served by a PRoW, land parcel below (NE) crag is qualifying habitat - requires remapping.



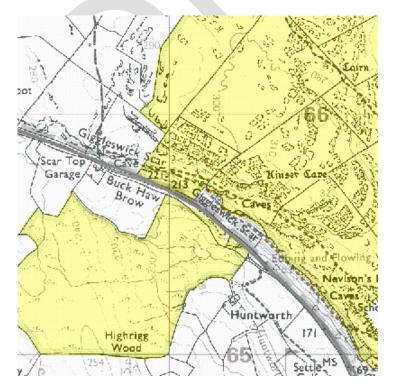
• Raven Scar, Chapel le Dale, Ingleton.

Inconsistent mapping. Parts of the escarpment have been mapped as CRoW land while other sections have not - despite being composed of qualifying habitat.



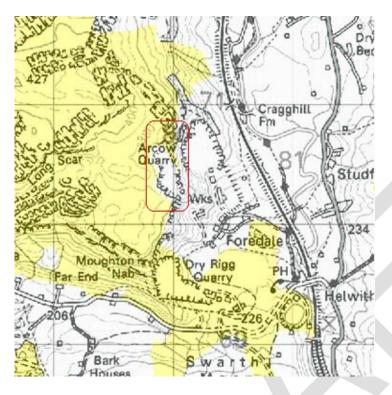
Giggleswick Scars, Nr. Settle.

Northern crag not mapped as CRoW land, Southern crag cliff face used as CRoW boundary – requires remapping.



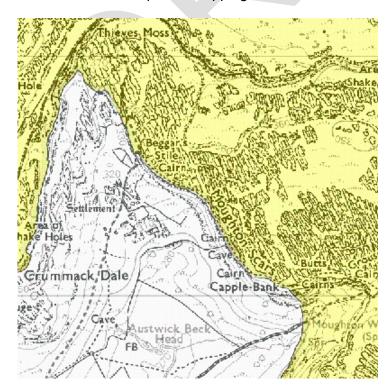
• Foredale (Arcow) Quarry, Nr. Helwith Bridge.

Inconsistent mapping – Foredale quarry not included as CRoW land, but other proximal sites were mapped – requires reassessment.



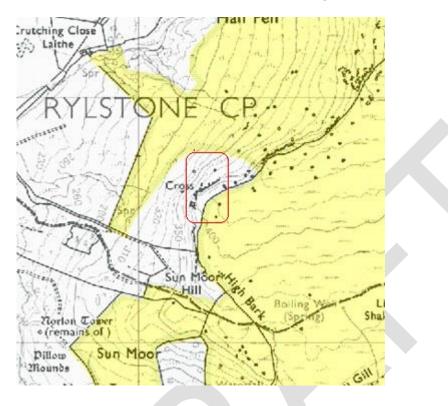
Beggar's Stile & Moughton Scars, Nr. Austwick.

The crags are served by a PRoW, but the crag faces (and land below) is not mapped as CRoW land – require remapping.



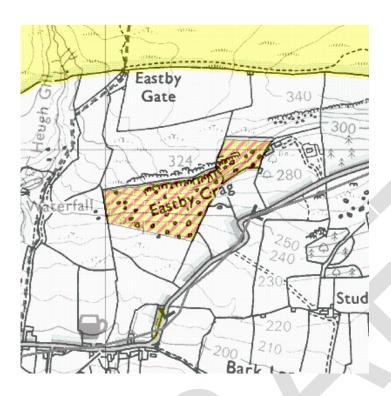
Rylstone, Barden Moor, Nr. Rylstone village.

Inaccurate mapping. In this location the CRoW boundary is been located along the Civil Parish or Community boundary - excluding the main buttress. The remainder of the escarpment is mapped - requires remapping.



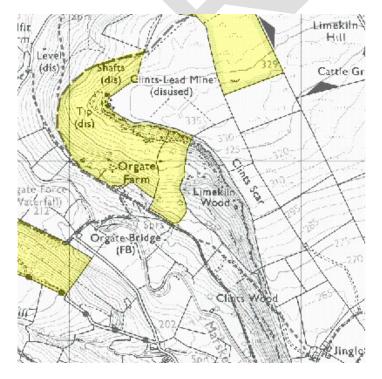
Eastby Crag, Eastby, Nr. Skipton.

Unusual case of an 'island' of CRoW land containing the crag - not served by a PRoW and surrounded on all sides by land with no right of access. Access to the crag is facilitated by agreement between the YDNPA and tenant farmer. Upper tier boulders are qualifying habitat and require remapping, and the surrounding land requires reassessment.



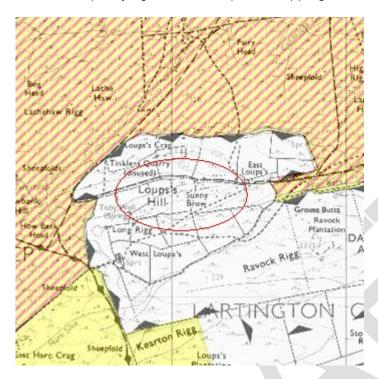
Orgate Scar, Nr. Richmond.

Half the crag is mapped as CRoW land, the remainder is not. Crag is not served by a PRoW – requires remapping.



Sunny Brow boulders, Nr. Barnard Castle,

The area is proximal to CRoW land of the same character and also demonstrates a number of qualifying criteria – requires mapping.



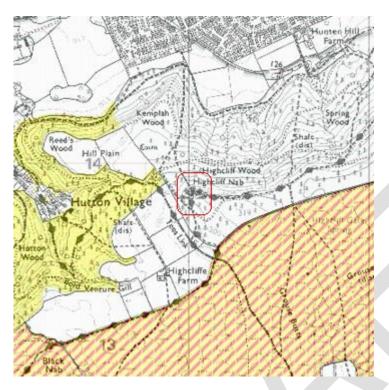
Crag Hill, Nr. Barnard Castle.

Site displays a number of qualifying criteria and is not served by a PRoW – requires reassessment.



• Highcliff Nab, Nr. Guisborough.

Crag is located close to CRoW land and displays a number of qualifying criteria – requires remapping.



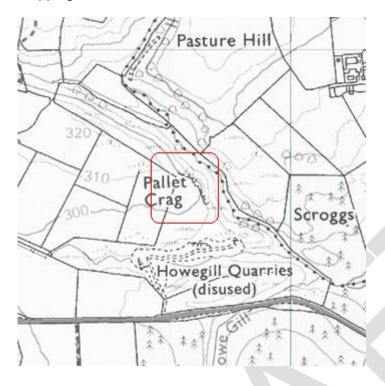
Applegarth Scar, Nr. Richmond.

Site demonstrates a number of qualifying criteria, other proximal escarpments of the same character were mapped as CRoW land. Site requires mapping.



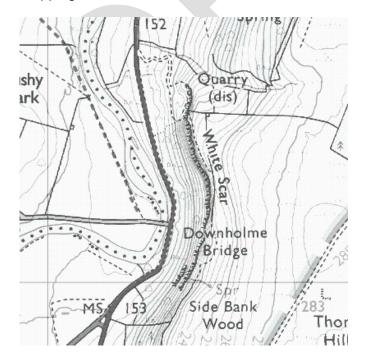
Pallet Crag, Nr. Barnard Castle.

Site displays a number of qualifying criteria, not served by a PRoW - requires mapping.



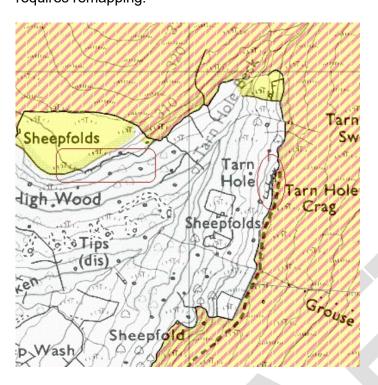
Marske Quarry (White Scar?), Nr. Marske.

Crag displays a number of qualifying criteria and is not served by a PRoW – requires mapping.



• Tarn Hole Crag & High Crag, Tripsdale, Nr. Great Broughton.

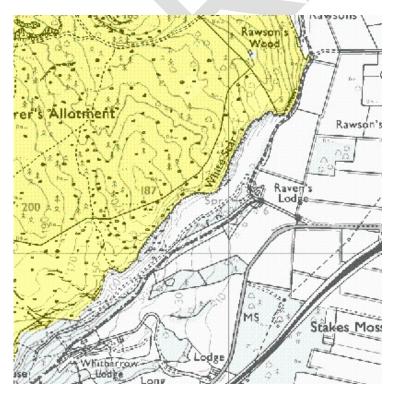
Inconsistent boundaries. Crags are surrounded by CRoW land but not included – requires remapping.



Cumbria

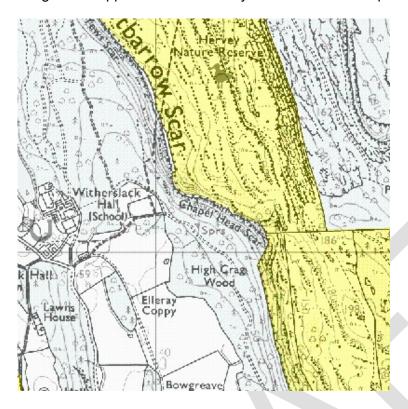
White Scar, Nr. Witherslack.

Land parcel containing the crag demonstrates a number of qualifying criteria, cliff face taken as CRoW land boundary, crag not served by a PRoW – requires remapping.



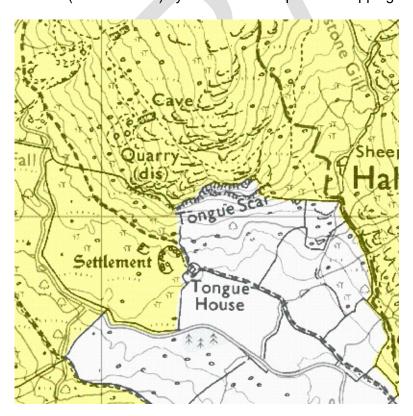
Chapel Head Scar, Witherslack.

Crag face mapped as the boundary of CRoW land – requires remapping.

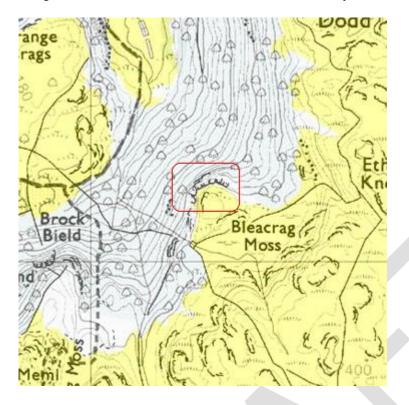


Tongue Scar & boulders, Kentmere.

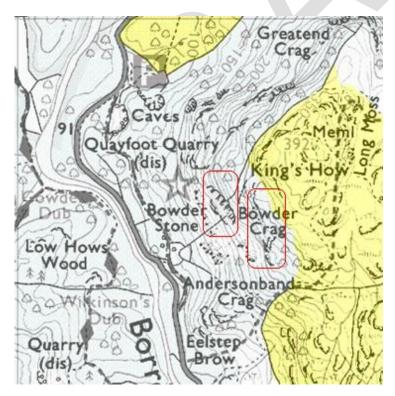
Crag not served by a PRoW, crag face used as boundary of CRoW land, access banned (and enforced) by landowner - requires remapping.



Black Crag, Borrowdale.
 Crag face not included on CRoW land or served by a PRoW – requires remapping.

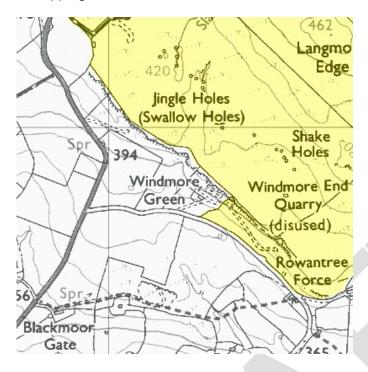


Bowderstone Crag, Borrowdale.
 Crag and Bowder Stone display a number of qualifying criteria – requires mapping.



• Windmore End, Nr. Brough.

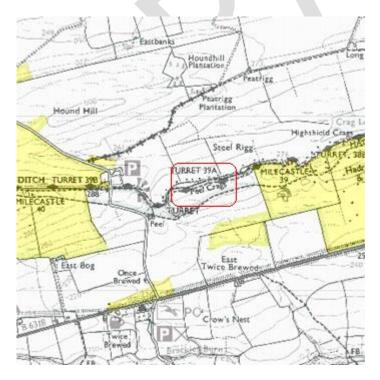
Inconsistent mapping. SE half of the escarpment is situated on CRoW land, the remainder is not despite being situated on land of comparable character – requires remapping.



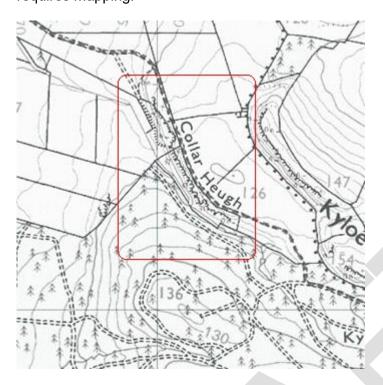
Area 5

Peel Crag & Crag Lough, Nr. Redburn.

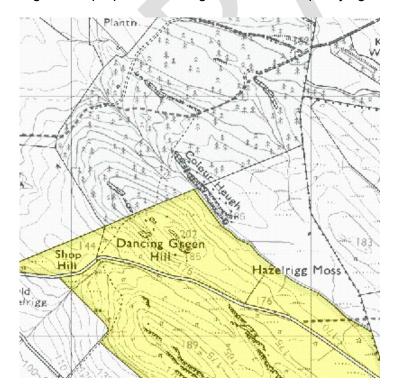
The land parcel demonstrates a number of qualifying criteria, it is also surrounded by CRoW land of comparable character – requires remapping.



 Kyloe Crag (Collar Heugh), Nr. Lowick.
 Crag is served by a PRoW but also demonstrates a number of qualifying criteria – requires mapping.

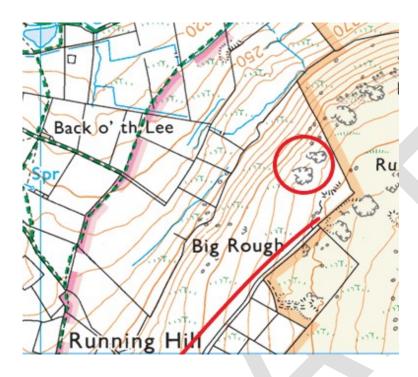


Back Bowden Doors (Colour Heugh), Nr. Belford.
 Significant proportion of crag demonstrates qualifying criteria – requires mapping.

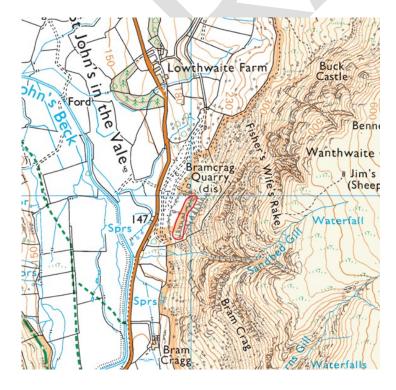


Running Hill Pits

Quarry No 7 & 8 are not on open access land whereas all the other quarries in this complex are mapped. The most obvious means of access is to use the non-ROW track leading from the marked parking to the quarries along the red line – this is not access land and nor is it a right of way so technically there is no legal right to use it. Liaising with farmer for voluntary access has proved difficult.



• **Bram Crag Quarry** – mapped as open access but no ROW into the area – there are a series of tracks but no legal status. Currently informal access but this comes with conditions (no access for groups, children and beginners).



Stanhope Dene and Ashes Quarry: newly developed sport climbing venues in Co Durham for which access has been banned by the landowners. Various escarpments and quarried edges, all of which are relatively close to the edge of existing access land, where mapping could be extended to include the crags and approaches. These venues are in high demand as they provide low-mid grade sport climbing which is a very desirable area of climbing currently, providing a relatively low risk option for people coming out of climbing walls to get outdoors on rock. It is particularly in demand in this area due to the lack of sport climbing venues in the NE on England.

