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Application to Natural England (and/via Bristol City Council) to Carry Out Minor Operations on Morning Slab, Main Area (Great Quarry), Avon Gorge

from ClimbBristol, British Mountaineering Council

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Introduction

This application is that required to seek consent from Natural England to carry out operations within the Avon Gorge SSSI pursuant to the Wildlife and Countryside Act 1981. It limits itself therefore to any relevant matters listed in the SSSI citation. The necessary risk assessments and safety-related methodologies will be attached to a subsequent written request for permission to Bristol City Council, as advised.

ClimbBristol is a locally fostered community-style Project that seeks to improve conditions for climbing in Avon Gorge. Supported by the British Mountaineering Council (BMC), the representative body for mountaineering in England and Wales, the Project is being managed locally by a constitutionally approved ClimbBristol Steering Group. A Project Officer (part-time) has been appointed to spearhead the work of the Project, which is expected to last 2 years.

The Site

The operations are planned to be carried out on Morning Slab, Avon Gorge (Bristol Side). This is the large slab approx 60m wide by 45m high which is situated behind the redundant toilet block in the Main Area (Great Quarry). The area of cliff is defined in **Figure 1**.



General Purposes of the Works

- (a) To test on a readily manageable, low-impact, low-risk part of the site the procedures and methodologies that ClimbBristol will apply to the anticipated substantive Avon Gorge climbing-related application and corresponding cliff-based minor operations.
- (b) To remove safely to the ground flakes or blocks of rock that are so loose or unstable that they have the potential within the immediate future to cause serious or fatal injury to a climber or/and to any person adjacent or below. The material is not expected to be so large or secure that a competent person cannot remove any piece readily with hand tools (i.e. mostly much less than 1 square/cubic metre).
- (c) Under the guidance of a consulting botanist, to remove scrub and ash trees that are impeding the climbs and which do not convey any functional or other benefit to the climbs. Such scrub is invasive to the geo- topographical and landscape character of the site. The consulting botanist expects that this operation will be of significant value to the conservation aims of the Avon Gorge (Bristol Side) Management Plan (see Libby Houston's botanical report at **Appendix 1**).

Note that it is also planned to replace some of the unobtrusive and limited fixed climbing protection on Morning Slab; such renewals are indivisible from the wider recreational climbing activity.

Proposed Date of Carrying Out the Works

The works are scheduled for the weekend of **5&6 January 2013**. In the event of extreme weather including sustained heavy rainfall, which would compromise safety, the works will be rescheduled.

Landowner's/Land Manager's Consent

ClimbBristol's Project Officer has consulted with representatives of Bristol City Council's Highways Department and Conservation Department. The proposal has been marked up in a written representation to the Avon Gorge (Bristol Side) Management Plan Steering Group for its meeting 13.11.2012. While it is understood that this section of the cliffs is owned by the Clifton Downs Charitable Trust, ClimbBristol has been informed that it is sufficient to make such a request for owner's consent to Bristol City Council. The request will attach risk assessments and methodologies covering participants' and third parties safety.

Who will Undertake the Works?

The Morning Slab pilot will be undertaken by members of the ClimbBristol Project Steering Group (CBPSG). It will not be open to the wider body of volunteers attached to ClimbBristol. The CBPSG has been constituted via the BMC, its role being to support and manage the project. There are 15 members including ex officio members of staff of the BMC – its Chief Executive and its Access & Conservation Officer. The ClimbBristol Project Officer, who is contracted to the BMC, will take a key role in organising and running the Morning Slab pilot. The CBPSG members bring with them a variety of relevant skills, qualifications and work experience e.g. rope access, anchor inspection, crag restoration, health and safety inspection, project management, rock scaling, scrub clearance, cliff rescue, first aid, and expert local botanical consultancy. We have attached the CVs of a number of the key volunteers involved in **Appendix 2**.

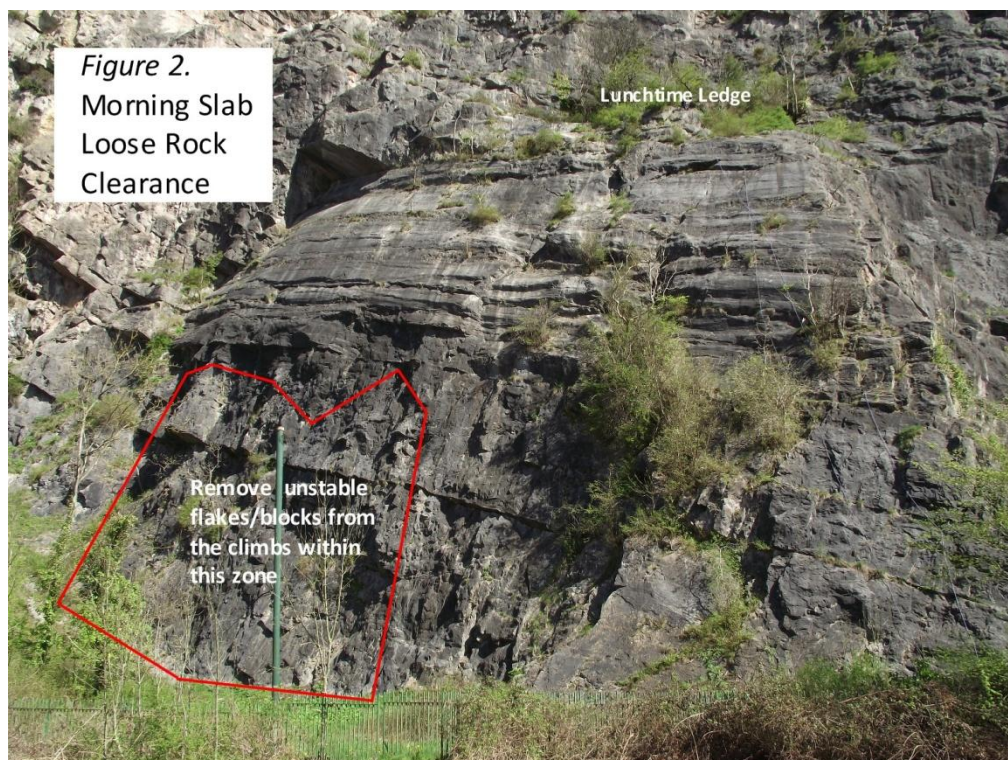
Direction & Supervision in relation to Avon Gorge's Important Botany

Expert local botanist Libby Houston is a member of CBPSG. Libby has advised on this application and carried out a specific site assessment to inform it. She will be actively supervising and advising the CBPSG throughout this process including during practical works on Morning Slab. Consequently ClimbBristol expects there to be valuable conservation gains as a result of this work and enhancement rather than damage to the condition of the Avon Gorge SSSI.

Schedule of Proposed Works & Method Statement: Loose Rock Removal

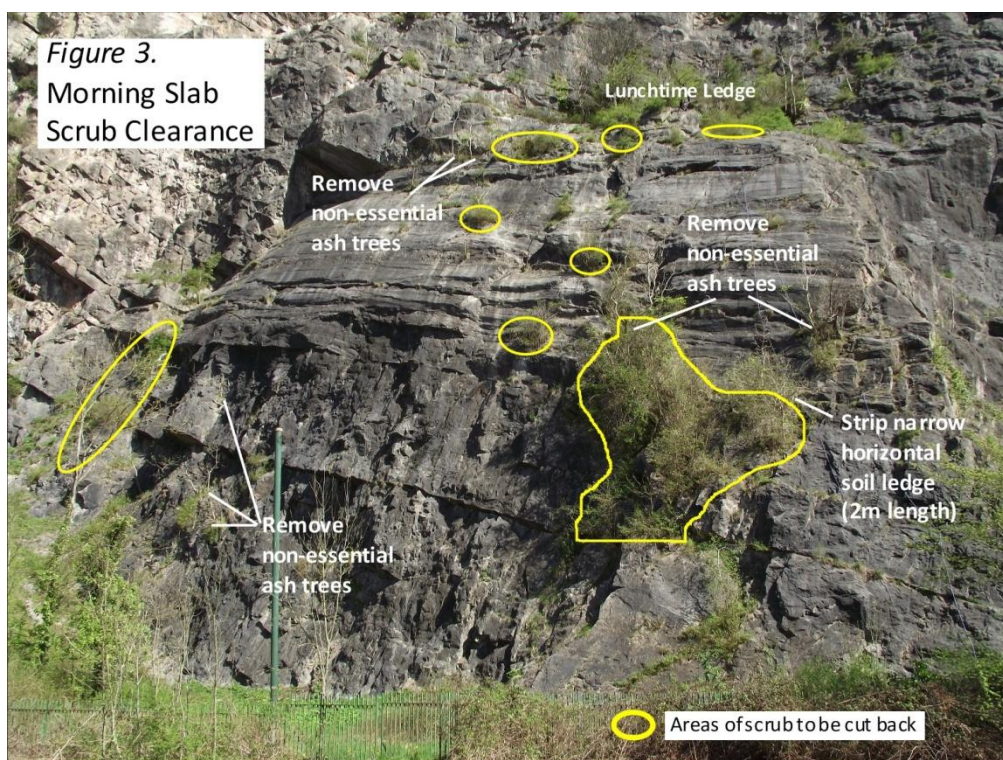
1. It is important to note that for the most part the rock stability on the greatest proportion of Morning Slab is excellent; namely the compact and water-worn slab above the principal half-height bedding-plane. Loose rock tends to be associated with the lower left third of Morning Slab only and directly in many cases with disruptive root action (mostly from ash trees).
2. The zone containing unstable rock is identified in **Figure 2**. It has been assessed by survey.
3. Rope access techniques will be used to gain access to the work areas.

4. Loose rock will be tested (where necessary) and removed by hand using hand tools (spiked hammer or crowbar). It is unlikely that significant forces of leverage will need to be exerted in most cases, since the identified material is mostly detached from the cliff face and already at risk of collapse under normal climbing use.
5. The consulting botanist has considered the potential for any ecological impact that the pre-identified liberated rock might cause. Most of the loose rock to be removed is sited at a relatively low level (up to 15m) and in the bottom left-hand third of the cliff. The cliff and ground within and below the rockfall catchment has been surveyed and no issues that might amount to a significant detrimental ecological impact have been identified.
6. It is likely that a small number of small loose rocks outside the identified zone will need to be removed during operations. Generally these will be so minor as to have escaped or not warranted pre-identification or which will need to be removed for safety purposes as volunteer operatives proceed to abseil down the cliff (e.g. detached stones sitting on ledges).
7. In the event of previously unidentified potentially unstable rock of a size that might cause an ecological impact being encountered the consultant botanist's advice will be sought prior to any action to remove the rock being taken.
8. The operation will put safety first: in the event that action must be taken to ensure any party's immediate safety then that action will take precedence over any other concern. Expertise will be available on site at all times to ensure that any such judgements required are properly executed.
9. All operations will be conducted in accordance with established good practice in equivalent crag restoration projects initiated by the BMC (see accompanying BMC Advisory Note).
10. Risk assessments and procedures covering safe volunteer participation and management of third party safety will be attached to our request for permission from Bristol City Council, as advised.



Schedule of Proposed Works & Method Statement: Scrub Clearance

1. The areas or patches of scrub to be cut back are delineated in **Figure 3**.
2. Rope access techniques will be used to gain access to the work areas.
3. Scrub will be cut by hand using loppers/shears/pruners/hand-saws. Power tools will not be used.
4. Using a suitable hand-saw, non-essential ash trees will be reduced and felled as necessary with the basal cut made as close to the rock surface as possible.
5. Cuttings will be chased to ground level where the material will be transferred to a skip at the roadside provided by agreement with the Downs Ranger Service.
6. No soil or 'grass' sods will be wilfully or specifically removed apart from that listed in 7 (identified in **Figure 3**).
7. A special focus will be accorded the large area of scrub right of centre; this is where much of the physical effort will need to be directed. In relation to this area, all the scrub will be cut back. On its right margin a soil and grass ledge will be removed; this is expected to reveal a bedding-plane rock-ledge and – in combination with removal of immediately adjacent scrub – restore this section of the slab to its original open character.
8. No trees apart from ash are to be targeted. Common Whitebeams will be marked with tape beforehand and the Bristol Rock-cross site marked off to avoid trampling.
9. Holm oaks are to be stem-treated with herbicide by the method developed and used in the Gorge by Rope Works; this work to be undertaken solely by the consulting botanist who holds the appropriate certificate of competence.
10. The consulting botanist will be in attendance throughout and will supervise the operations with the aim of avoiding any inadvertent damage to Avon Gorge's important botany.
12. All operations will be conducted in accordance with established good practice in equivalent crag restoration projects initiated by the BMC (see accompanying BMC Advisory Note).
13. Risk assessments and procedures covering safe volunteer participation and management of third party safety will be attached to our request for permission from Bristol City Council, as advised.



Appendix 1

CLIMB BRISTOL PROPOSED TRIAL VEGETATION CLEARANCE, MORNING SLAB, GT QUARRY **Botanical report with reference to proposed scrub clearance sites shown in Figure 3**

The three highest scrub patches marked in Fig.3 had been surveyed by rope access on 9th July 2009 by myself and Angus Tillotson; I made further observations on 20th May 2012 and carried out a site visit to include the lower patches on 13th November 2012 with Martin Crocker.

BOTANICAL INTEREST

Scrub species are the common species of the Gorge, e.g. Wayfaring-tree *Viburnum lantana*, Dog-rose *Rosa canina*, Hawthorn *Crataegus monogyna*, Traveller's-joy *Clematis vitalba*. Ash *Fraxinus excelsior* occurs throughout and Common Whitebeam *Sorbus aria* is frequent. No rare Whitebeam species has been recorded here. There are several invasive alien Holm Oak *Quercus ilex* saplings.

Rare or notable species have been recorded only in the upper part (i.e. Lunchtime Ledge area). These are Compact Brome *Anisantha madritensis*, abundant in 1999 and locally frequent in 2009. (Survey dates in 2012 were outside this annual's flowering time). One rosette of Bristol Rock-cress *Arabis scabra* (Nationally Rare, Vulnerable) was found at the edge of the top scrub area of Fig 3 in November 2012. The plant is frequent at the cliff-top above from where it can occasionally disperse successfully. Field Garlic *Allium oleraceum* (Nationally Uncommon, Vulnerable) was noted at the south end of Lunchtime Ledge. It is locally abundant south of Morning Slab on the ledges of Central Gully.

A small patch of 'good' common limestone grassland herb species e.g. Wild Marjoram *Origanum vulgare*, Salad Burnet *Poterium sanguisorba* and Bird's-foot-trefoil *Lotus corniculatus* was found in the large lower scrub area, and Common Rock-rose *Helianthemum nummularium* in the scrub edge at the top of the slab. For the most part, however, the vegetation is fairly species-poor. Non-native herbs such as Red Valerian *Centranthus ruber*, Alexanders *Smyrniololus atrum* and Purple Toadflax *Linaria purpurea* were noted throughout. Ledges and soil pockets were often dominated by densely tufted grasses such as Cock's-foot *Dactylis glomerata* and Upright Brome *Bromopsis erecta*: the narrow horizontal soil ledge of the proposal (Fig.3 lower right) is typical of these.

AVOIDING DAMAGE TO IMPORTANT SPECIES

Common Whitebeams will be marked with tape beforehand and the Bristol Rock-cress site marked off to avoid trampling. I will be attending on the day to assist with works.

CONSERVATION BENEFITS OF PROPOSED SCRUB CLEARANCE

This proposal should be very valuable for conservation as well as climbing. No scrub clearance has ever been carried out here as part of a conservation programme, mainly because the botanical interest is less than in other parts of the Gorge which have taken priority. Compact Brome responds to disturbance, and removal of scrub shade should encourage Bristol Rock-cress and the small patch of limestone grassland species; I would suggest monitoring the site in June or July 2013 as part of the exercise. In view of the degree of shade damage caused by Holm oaks and their rampant powers of regrowth, I suggest my marking them with tape beforehand as well so that they are not simply cut back along with the rest of the scrub, and myself stem-treating them with herbicide by the method developed and used in the Gorge by Rope Works.

L. Houston
27 November 2012

Appendix 2: CVs of some CBPSG Members Involved in the Morning Slab Pilot

Martin Crocker, Project Officer ClimbBristol

Relevant Qualifications

BSc Geology 1977
Environmental Health Diploma 1981
Diploma in Management Studies 1993
IRATA Level 1 2006

Relevant Work Experience

25 years in local government as Environmental Health Officer (and authorised HSW inspector) and Service Manager responsible for teams of professional environmental health and licensing staff
10 years geotechnical (rock-scaling) work in Cheddar Gorge, Wye Valley and other sites
Project Manager for four BMC-supported crag restoration projects

Voluntary/Recreational

Avon Gorge Guidebook author (1985 – to date) & freelance writer on regional climbing history
Negotiation of climbing access agreements with landowners and Natural England at various sites in SWEngland
Climbing and pioneering new climbs in the Avon Gorge (and the wider West Country) since 1970

Colin Knowles, Chairman ClimbBristol Project Steering Group

Relevant Qualifications

Level 4 Diploma in Management
PRINCE2 Project Management

Relevant Work Experience

Currently managing 18 technical specialists
20 years experience of managing specialist teams and of major and minor project management in industry and higher education
10 years experience of developing and writing risk assessments
Highly experienced committee/project Chair

Voluntary/Recreational

Climbed extensively in the UK and the Alps for over 30 years.
Led three Himalayan expeditions since 1997
Long-standing involvement with the BMC to National Executive level
Member of the team supporting large raptor chick ringing in venues such as the Avon Gorge i.e. rope access.

Libby Houston, ClimbBristol Consulting Botanist and ClimbBristol Project Steering Group Member

Relevant Qualifications

University of Bristol Certificate in Science (Biology) with commendation (1987)
IRATA Level 1 rope access technician (1999, renewed 2002, 2005, 2008, 2011)
Certificate of Competence in the Use of Pesticides PA1, PA6A (1999)

Relevant Work Experience

27 years botanical surveys and consultancy in the Avon Gorge for e.g. University of Bristol, Bristol City Council, Natural England, National Trust, Forestry Commission, Network Rail, Clifton Suspension Bridge Trust; includes attachment to rope access team, Avon Gorge contamination clean-up Oct-Dec 1995, for English Nature, botanical adviser for Bristol City Council's annual Avon Gorge rock inspections since 1996.

From 1999: practical conservation work at various sites, mainly rope access and including use of herbicide, for Rope Works

Voluntary/Recreational

Nature notes contributor to Avon Gorge, Cheddar and Wye Valley Guidebooks
Botanical supervisor for BMC volunteer scrub clearance days since 2007
Member of BMC Climbing and Conservation Group (2012)
Climbing in Avon Gorge and local area since 1980

Dan Donovan, ClimbBristol Project Steering Group Member

Relevant Qualifications

BSc in Environmental Science (ecology) University of East Anglia 1986
Qualified as IRATA level 3 (supervisor) since 1994

Relevant Work Experience

Worked in Industrial RopeAccess industry since 1990
Worked regularly with Angus Tillotson of Rope Works on conservation projects in the Avon Gorge
Taken part in the Avon Gorge annual rock inspection as team leader/supervisor since 1998

Voluntary/Recreational

Has climbed in the Avon Gorge since 1984, lived in Bristol since 1997

Barry Donovan, ClimbBristol Project Steering Group Member

Relevant Qualifications

Qualified Mountaineering Instructor for 18 years
Member of Association of Mountaineering Instructors No 446

Relevant Work Experience

Professional climbing instructor in Avon Gorge of all aspects of rock climbing for 15years

Voluntary/Recreational

Member of Avon and Somerset Cliff Rescue Team for 8years
(rescue and recovery experience on all climbing areas in Avon Gorge - from Suspension Bridge Buttress to Unknown Area)

Simon Tappin, ClimbBristol Project Steering Group Member

Relevant Qualifications

Trained to IRATA Level 3 (but qualification has expired)

Relevant Work Experience

Worked annually on the Avon rock clearance with Angus Tillotson, Libby Houston & Dan Donovan (for 2 - 3 years under the above qualification)
Cherry picker licence and slinger signaller for crane work
Worked on large building sites in London such as terminal 5 at Heathrow for companies like Laing O'Rourke, and therefore knowledgeable on risk assessments and method statements
Domestic builder

Voluntary/Recreational

Climbing for 22 years