



# British Caving Association

Natural Resources Management Team  
Welsh Government  
Cathays Park  
Pillar J08, East Core  
Cardiff  
CF10 3NQ

My ref. 17D1798

26 September 2017

Dear Sirs

## Welsh Government Consultation Document WG31811

I am writing in support of the submission of the Cambrian Caving Council to the above consultation ([www.cambriancavingcouncil.org.uk/WG31811response.pdf](http://www.cambriancavingcouncil.org.uk/WG31811response.pdf)).

BCA is the National Governing Body for caving in the UK and represents over 6000 individual members and 200 clubs across the UK and Eire. Many of our members are Welsh residents or are members of caving clubs with a base in Wales and a high proportion engage in regular visits to Wales to visit the superb caves and historic mines there.

We seek to improve access to caves and are mandated by our membership to campaign for the recognition that rights of access given under the Countryside and Rights of Way Act 2000 apply to caving. In particular, there needs to be statutory recognition that caves are part of the outdoors and that caving is just as much an open-air, outdoor recreation as walking and rock climbing. It would help if the statutory code of practice mentions caving explicitly like the Scottish code does to ensure consistency of opportunity and equality of access.

BCA recognises that some caves are a fragile environments which require appropriate conservation measures, including potentially restrictions on the numbers of visitors. Mechanisms already exist to protect the most sensitive sites and clarification of access arrangements should sit alongside an effort to consistently apply appropriate conservation controls. However, as stated in the CCC submission, the presumption should be in favour of open access to caves on Access Land unless more restrictive conditions are deemed necessary.

Yours faithfully

Nick Williams  
Acting Hon. Secretary  
For and on behalf of the British Caving Association