APPLICATION FOR CONSENT TO CARRY OUT WORKS ON COMMON LAND

Commons Act 2006: Section 38

Crosby Ravensworth Common, Bank Moor Common and Hardendale Common, Cumbria

APPENDIX 3



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1. Introduction

Crosby Ravensworth Common is situated in the north west of Cumbria to the south of Penrith (see map Annex A). It is an extensive upland area comprising 1990 ha and the predominant land use is livestock rearing.

The Commoners propose to enter into a Higher Level Countryside Stewardship scheme with Natural England. The scheme includes sheep and cattle grazing on the Common, along with the creation of 258 ha of scattered scrub and 168 ha of wood pasture. The wood pasture creation will not require fencing – the trees will be protected by tree guards during their establishment, with stock grazing among them. Much of the scattered scrub creation will utilise existing boundaries to exclude stock during establishment – particularly existing drystone walls and fencing along the M6 carriageways. Protecting the scrub during its establishment will require 15.5 km of new fencing (see proposals map in section 7).

The proposed scheme also covers Bank Moor Common and Hardendale Common. Bank Moor Common is 194 ha and forms the northern section of Gaythorne Plain. Hardendale Common is also 194 ha and is located around Junction 39 on the M6 motorway. Both are contiguous with Crosby Ravensworth Common, with no physical boundaries and therefore the three commons are grazed and managed together. All three Commons are treated as one for the purpose of this report; where the report refers to 'the common' or 'Crosby Ravensworth Common' this covers all three. Referneces to 'Gaythorne Plain' include both Bank Moor aand part of Crosby Ravensworth commons.

The primary purpose of the scheme is to increase the biodiversity of the Common, which is part of the Crosby Ravensworth Fell Site of Special Scientific Interest (SSSI) and the Asby Complex Special Area of Conservation (SAC). The scheme will bring additional public benefits in terms of maintaining rural livelihoods — particularly family farming businesses - enhancing the landscape, capturing carbon and nitrogen, mitigating climate change, reducing flood risk and soil conservation.

This report aims to provide information on this proposal for the consultation process. Section 2 describes the biodiversity interests, impacts and mitigation. The subsequent sections describe the same for the landscape, historic environment, access and wider public benefits. Sections 7 and 8 refer to the consultation process and will be updated after each stage to capture its outcomes.

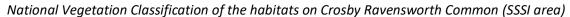
Once completed the report will be submitted to the Secretary of State as part of the application for consent to carry out works on Common Land under Commons Act 2006: Section 38.

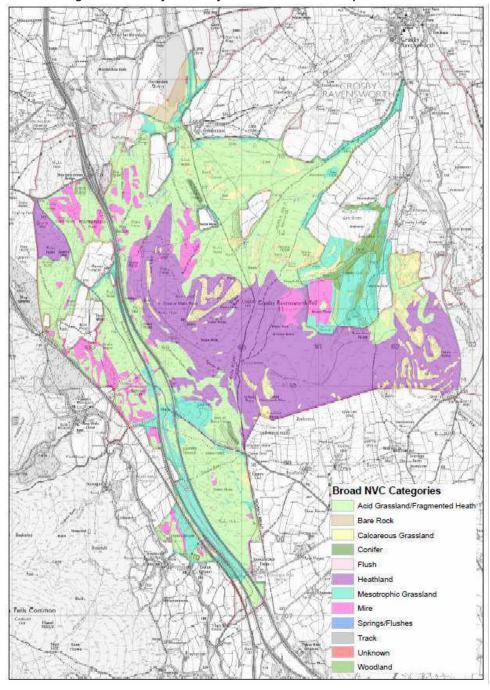
2. Biodiversity

2.1 Biodiversity interests

The Common comprises a complex mix of limestone pavements, upland heath, and calcareous and acid grassland. These diverse habitats are of high ecological and conservation value and are why the area is part of the Crosby Ravensworth Fell SSSI and the Asby Complex SAC (see maps Annex A). A map of the National Vegetation Classification of these habitats is shown below.

The scale of the existing valley woodland and trees, and of the common, provides an exciting opportunity to significantly re-connect and expand the existing woodland network. This will contribute to woodland habitat enhancement and extension, as promoted in Defra's 'Biodiversity 2020' policy statement. Similarly, woodland network expansion and increased connectivity forms part of this national policy direction; these proposals could be a major step in achieving this within the Orton Fells landscape.





Wood pasture

Wood pasture is a UK Priority Habitat which is in serious decline; there is a strong Defra policy focus on extending its extent nationally and securing the future of existing remnants, as part of Outcome 1B in Defra's 'Biodiversity 2020' policy statement, which is to conserve, enhance and extend existing wildlife habitats.

The definition of this broad habitat type includes both lowland and upland variants. Cumbria has upland examples of international importance, including Borrowdale and Glenamara, near Keswick.

Around this common there are remnants of wood pasture on adjacent and nearby allotments and fields. For example, south of Slack Randy in fields above the woodland in the tributaries of Crosby Gill - see Figure 1 below. Crosby Gill itself is a separate SSSI which forms part of the woodland network around the common. The Scheduled Monument remnant mediaeval field pattern in the same gills is part of a historic wood pasture system.



Figure 1 Existing old Wood Pasture habitat directly adjacent to the Common, above Crosby Gill; the photo is taken from the Common.

The planting proposals aim is to significantly increase the area of this habitat type in a way which benefits biodiversity, replicates the existing wooded pattern and historic features, and is in keeping with the landscape and character of the Common. There are areas of Wood Pasture close to the Common and within the same landscape character types – see Figure 2, below, for an example.

The planting will consist of typical local native species – particularly Oak, Rowan, Birch and Gean, as shown in the table below.

As well as Oak, Rowan, Birch and Gean it is proposed to include Aspen, as a replacement for Ash due to Ash-dieback. When mature it can provide similar conditions suitable for lichen and bryophytes.

The planting density will purposefully be varied; on average the trees will be planted at 40-60 trees per hectare, but with wide variation to avoid a uniform pattern and provide differing micro-climate opportunities.



Figure 2 Example of Wood Pasture habitat close to the Common, in similar habitat and landscape character type

Wood pasture species mix	
Oak (Quercus petrea)	Downy birch (Betula pubescens)
Rowan (Sorbus aucuparia)	Silver birch (Betula pendula)
Gean/Bird cherry (Prunus avium)	Alder (Alnus glutinosa)
Wych Elm (Ulmus glabra)	Aspen (Populus tremulous)

Scattered scrub

Like wood pasture, increasing the extent of native scrub is a national policy focus for Defra, as part of Outcome 1B in Defra's 'Biodiversity 2020' policy statement. Achieving this requires the development of new areas of scrub that buffer and extend existing scrub patches, follow the natural pattern of scrub in the specific location and has appropriate species mixes

Scattered native scrub already exists on the Common in some locations, and in allotments and fields adjacent and close to the common (see Figure 3 below). This example includes differing densities of mature scrub — with differing spacing and open space between the individual stems providing both visual variety and micro-climate variations — which benefits different plants, fungi and insects. The planting of the proposed scrub will mimic this variety, with widely varied planting densities, and open space of up to 40%.



Figure 3 Scattered scrub on land adjacent to the Common, north of Junction 39 on the M6. Note the differing density of areas of existing scrub. This variation in density will be mimicked within the fenced scub plantings.

The aim of the proposed scrub creation is to increase the area of this habitat type in a way which benefits biodiversity and is in keeping with the landscape and character of the Common.

The longer term aim of the planting is to create scattered scrub of varying density, with open grassland areas between – and not to create dense continuous scrub cover – following the local example in Figure 3, above. During the establishment phase of 15 years grazing livestock will be excluded. However, once the scrub is sufficiently established grazing will be re-introduced. This will help to maintain the varied density and openness of the scattered scrub as it matures.

The planting will consist of typical local native species, particularly hawthorn, blackthorn, juniper, willows species, hazel and rowan, as shown in the table below. It will be designed to have at least 80% of the eventual scrub and tree cover composed of species with a mature canopy height of less than 5 metres. In addition, high canopy tree species, such as Oak (Quercus sp) and Birch (*Betula* spp.), can be included in a scrub creation species mix, as long as they are not likely to make up more than 20% of the mature scrub and tree area.

Scattered scrub species mix	
Hawthorn (Crataegus monogyna)	Crab Apple (Malus sylvestris)
Blackthorn (<i>Prunus spinosa</i>)	Dog Rose (Rosa canina)
Juniper (Juniperus communis)	Goat Willow (Salix caprea)
Hazel (Corylus avellana)	Grey Willow (Salix cinerea)
Rowan (Sorbus aucuparia)	Eared Willow (Salix aurita)
Holly (<i>Ilex aquifolium</i>)	

2.2 Biodiversity impacts

SAC/SSSI management requirements

The proposals for scrub and woodland planting, along with changes to the grazing of sheep and cattle livestock, have all been designed to avoid any negative impacts to the SSSI/SAC notified features on the common. The grazing changes will contribute to the achievement of the SAC Conservation Objectives for the SAC, while the planting proposals will not significantly impact on these and are entirely consistent with them.

Grazing

Sheep grazing of the common has been in place for centuries, and is legally established through common land grazing rights. The commoners entered the first agri-environment agreement on the common 20 years ago; this implemented sheep grazing at levels that were compatible with the recovery of the notified features of the SSSI/SAC from previous over-grazing.

This first agri-environment agreement was successful in implementing improvements to some habitats, but was less successful at sustaining and improving the condition of the calcareous grassland and heathland habitats. This was due to the lack of cattle grazing to diversify the grazing pattern, and the wintering of sheep on the common between November and March inclusive.

The second agri-environment agreement re-introduced summer-only cattle grazing, with a maximum level of 115 head. It also reduced sheep wintering. These management changes have accelerated the improvement of the condition of the calcareous grassland and heathland habitats. They have also improved the sward of the calcareous grassland for ground-nesting birds.

The next agri-environment agreement is proposed to start in January 2021, and run for 10 years. This will include increasing the cattle grazing in summer, with a maximum of 200 head. Sheep grazing will continue at a similar level and pattern during the summer; all sheep will be removed for 16 weeks during the winter period of November to March inclusive. These management changes are intended to build on the previous 20 years of agreements, and further improve the condition of the habitats and suitability of areas for ground-nesting birds.

These changes to the grazing management have been developed to improve the SSSI/SAC habitats. They are entirely compatible with and positive for the SSSI/SAC notified features and the SAC Conservation Objectives.

Scrub and wood pasture planting

The biodiversity benefits of the scrub and wood pasture planting proposals are outlined in the section above about wood pasture and scrub. The wider public benefits of extending these habitats through planting for habitat creation are explored in section 6 below.

Importantly, the planting to create these habitats on the common must not significantly impact on the existing habitats. This would be detrimental to the existing habitat extent and condition, and to achieving the SAC Conservation Objectives.

The areas identified for planting – see map in section 7 – have been selected either because they are not on areas of SAC/SSSI habitat or because the planting design is compatible with the habitat type. Where the planting has been proposed on SSSI/SAC habitat the compatibility of the proposals on these habitats has been discussed and agreed with Natural England. They are fully supportive of the planting proposals and have confirmed that they are consistent with the SSSI/SAC designation and management. They have provided the National Vegetation Classification (NVC) habitat map in section 2.1, which has been used to identify suitable and unsuitable areas for planting.

Looking at the NVC habitat map in section 2.1, and the planting proposals map in section 7 the following habitats are included within some of the proposed planting areas:

- Mesotrophic grassland not of significant biodiversity interest; not a SSSI/SAC notified feature (e.g. planting Area 2d Slack Randy; Area 3c M6 between the motorway carriageways)
- Acid grassland/fragmented heathland not of significant biodiversity interest; not a SSSI/SAC notified feature. The fragmented heathland has been over-grazed over a very long period and is unlikely to recover so as to become good quality heathland habitat. (e.g. planting Area 3c to the east of the M6 motorway)
- Heathland the planting proposals in Area 2a and 2b (see map in section 7) are on heathland. These areas are dry heath, with underlying limestone, therefore the conditions do not support deep peat where there is peat it is thin and in small 'pockets'; the dry heath is in a mosaic with grassed patches. Most of the planting of these areas will be wood pasture; as set out in section 2.1, the planting will be very spaced with trees at only 40-60 per hectare. The heathland around the trees will be able to continue to thrive, and the trees will be planted on the grassy areas within the heathland/grassland
- Calcareous grassland The planting proposals in part of Area 2c called 'White Hag' NR 36085117 are on an area of calcareous grassland. The scrub planting proposals here have been developed to create a limestone scrub and grassland mosaic, which is a subtype of calcareous grassland that is of high biodiversity and nature conservation value. Planting of appropriate scrub species at varying density and with up to 40% open space will create this sub-type. This is an aim within the SAC Conservation Objectives; the planting will help achieve this aim.

Where the planting proposal areas include isolated small scale patches habitat of biodiversity value these have been identified, assessed on the ground and mapped. These isolated small scale habitat

patches will be left unplanted, with a map of their locations incorporated in to the detailed planting specification. In particular, this will ensure that the planting avoids small areas of base-rich flushes and land that feeds water to them. Larger areas of flushes and wet heath on deep peat (depth over 50cm) have been excluded from the proposed planting areas.

The overall impacts of the planting proposals on wildlife habitats is assessed to be neutral to strongly beneficial.

Breeding birds

The central section of the common, Area 2 Crosby Ravensworth fell and Area 3 east of the M6, has acidic grassland that provides suitable habitat for breeding moorland birds, including lapwing curlew and oystercatcher. The introduction of cattle through the current agri-environment agreement has improved the structure of the grassland for these ground-nesting birds. It is proposed to increase cattle numbers in the next agreement, which should extend the area of suitably grazed grassland for these breeding species

Red grouse breed on the areas of continuous heather in Area 2. There has been an actively managed small grouse shoot on the common until three years ago. The commoners are concerned about the loss of predator control now there is no active grouse moor management, and the impact this may be having on ground-nesting birds.

The areas used where ground nesting birds breed have all been avoided in the design of the planting proposals. These have been identified from an annual bird survey undertaken across the common, farmers and other local observations, and existing biological records.

The impacts of the planting proposals on nesting birds is assessed to be neutral.

2.3 Biodiversity mitigation

The planting proposals have been developed to avoid areas of potential habitat and breeding bird impacts and are therefore there are no outstanding risks to the existing biodiversity of the common. The proposals should provide significant biodiversity benefits through appropriately designed wood pasture and scrub planting. Therefore no mitigation is required.

3. Landscape

3.1 Landscape interests

A Landscape and Visual Assessment (LVIA) has been undertaken to help develop planting proposals that will support and enhance local landscape character. The LVIA report is in Appendix 4. It includes more detail of the landscape character, the positive and negative impacts of the proposed planting, and how the design has been revised to maximise the landscape fit and benefits.

In summary, Crosby Ravensworth Common is generally open, exposed and sweeping, with longdistance panoramic views to the adjacent areas of the Cumbria fells, the Howgills, the Yorkshire Dales and the North Pennines. It sits on a limestone plateau with a complex mix of limestone pavements, upland heath, and calcareous and acid grassland. It is set in a pastoral landscape of enclose fields, trees and small settlements. It is diverse in its landscape character, historic interest and ecological value.

It is a quiet rural area, with the exception of one main north—south transport corridor in the west which contains the M6 motorway and the main West Coast railway line. Except for this corridor, the majority of the Common lies within the Yorkshire Dales National Park.

The aim of the proposal is primarily to improve the ecology of the Common which will enhance the landscape. This will be achieved by creating scattered scrub and wood pasture in appropriate locations across the Common, particularly along gills, and by replacing existing coniferous plantation with broadleaved woodland. The proposals will bring biodiversity and visual benefits by connecting the existing network of native woodlands (some SSSI) along the valley floor and in the gills up on to the Common, which forms the head of the gills.

The existing tree, scrub and woodland pattern is shown on Figures 4 and 5 below. These illustrate the existing local woodland network, its fit within the local landscape and the landscape-scale opportunities to enhance both through these planting proposals.



Figure 4 View from Bank Moor Common looking across the Crosby Gill valley and woodland to the central section of Crosby Ravensworth Common



Figure 5 The woodland network and landscape pattern of the Crosby Ravensworth valley, showing how it connects from the valley floor via the in-bye grazing fields up to the unenclosed common land.

Adjacent and close to the Common are areas of existing scattered scrub, woodland, individual and grouped field trees, and wood pasture remnants. The vision is to replicate and expand these habitat types. The Common also has existing blocks of coniferous plantation which are uncharacteristic of the landscape and ecologically poor. Replacing these with broadleaved woodland will enhance the landscape as well as the biodiversity.

The creation of wood pasture and scrub at the top of the gills will provide low density tree cover which connects the denser valley woodland in a sparse transition to the open areas of the Common.

This better connectivity has landscape as well as woodland network benefits, softening the hard boundary of the fell wall. The sparse nature of the scrub and woodland will maintain the character and views of and from the Common. All planting areas will use local species and topography to ensure they look natural and in-keeping with the local landscape pattern and to function well ecologically.

At fine scale the planting will use differing mixes of the Wood Pasture and scrub planting species lists in section 2.1. in different locations. The selection of which species to plant exactly where within the planting areas will follow the existing local pattern. For example, there is a lot of Wych Elm in the valley floor and lower gill woodlands but it only appears very occasionally on the edges of the higher common land. This reflects the natural niche for Wych Elm, which does not do well in exposed sites. Therefore Wych Elm will be used in the lower areas of Wood Pasture planting.

The final detail of which species to use in which specific planting area will be addressed in the planting specification that will be developed for tendering of the planting capital works. The knowledge of the commoners, other local people and local tree experts will be drawn on to develop a locally appropriate planting mix that will vary with the various planting areas proposed.

3.2 Landscape impacts

A landscape and visual impact assessment (LVIA) of the second draft of the proposal was produced by Jenny Wain, a local landscape professional with extensive experience of undertaking LVIA's in Cumbria. This will be included as Appendix 4 of the final S38 Application.

This identified a number of landscape and visual concerns with the second draft of the proposals and recommended a number of changes to the design to mitigate these.

The table below sets out the mitigation comments on the second draft design, and the design response to address them. These mitigation changes have all been incorporated into the proposals in this application.

Revisions to planting design in response to the LVIA Recommendation

Proposed planting Site		Revisions to planting design following LVIA	
Site reference	Site name	LVIA mitigation comment	Design response
1a	Dina Gill	The design should be amended to reduce the planting along the base of the scarp slope, retaining an area of open space along its length.	Significant reduction in planting area, with a large gap left between the top of the planting and the scarp. The design now follows more closely the topography of the natural drainage towards Dina Gill.
1b (i)	Linglow Hill	The design should be amended by limiting low density planting to the lower slopes of the hill, below the 345m contour line.	Reduction in planting, by limiting the planting to the lower slopes, following the contours of the land as it rises up the hillside.
1b (ii)		The design of the scheme should be amended to significantly reduce the scale of any planting on the south side of the road.	Significant reduction in planting, sited close to the road to maintain a topographical connection with the planting around Linglow Hill.
1b (iii)	Linglow Hill	The design of the scheme could include additional planting behind Gaythorne Cottages towards Coalpit Hill.	Additional planting included to soften the conifer block and better integrate it with the moorland surroundings.

2	Crosby Ravensworth Fell	The design should be amended to remove the strip of planting north of Oddendale Farm.	Planting removed.
3a (i)	East of Hardendale Quarry access road.	Add an area of wood pasture. This low-lying area of rough grazing is open in character, and intersected by a small beck.	Additional planting included to follow the grain of the beck and help to soften the hard edges of the plantation to the south.
3a (ii)	Hardendale Fell/roadside near Jnc 39.	The planting could also be extended along the northern part of Hardendale Fell close to the road to junction 39.	Additional planting included alongside the road to connect with proposed planting further south on the fell. Planting avoids the highest parts of the fell and follows the beck feature.

3.3 Landscape mitigation

The visual impact on the landscape of the proposed fencing will be minimised by using post and wire and the fencing will be positioned where it is least visually intrusive. This includes linking new planting to existing scrub and tree cover on and adjacent to the Common, thereby creating visual and ecological connectivity. Consequently the generally open character of the Common will be retained.

The visual effects are also likely to be negligible/minor for all sites. Many of the sites are partially contained by topography with limited and localised views. Where there are exposed and expansive panoramic views to the dramatic landforms of the Lakeland Fells and the North Pennines, the low density and low height character of the planting will ensure these views are retained.

It is intended that the impacts of this proposal on the landscape will be beneficial in the longer term, with appropriate mitigation in place against shorter term impacts, but comments and further advice are welcome from the various consultees.

Following mitigation, the overall conclusion from the report is that the landscape effects are likely to be negligible/minor and acceptable for all sites. The planting proposals are low density in nature and contained in small pockets across the common. They respect and retain the character of the wide, open and sweeping upland landscape, including its limestone pavements, outcrops, heather moorland and limestone grasslands. The pastoral landscape will be retained with wood pasture complementing the rough grazing and continue to support livestock rearing. Drystone walls will be retained, with space being left alongside them to reflect their historic farming patterns. The scrub planting will maintain the integrity of the SSSIs. The planting will relate to trees planted in small gills and copses around farm buildings, cottages and the fringes of the commons.

4. Historic environment

4.1 Historic environment interests

The Common contains a large number of documented historic interest features (see map in Annex B) and there are many more still to be described and discovered. There are 19 Scheduled Ancient Monuments on or very close to the Common and the details of these are included in Annex B. The locations of some other features of interest from the Historic Environment Record have been kindly provided by Linda Smith, Countryside Archaeological Adviser, Yorkshire Dales National Park and maps of these are included in Annex B. At the request of and in collaboration with the York Dales National Park and Cumbria County Council archaeologists, a Level I Historic Environment survey was completed of the proposed fence lines to identify historic features in the vicinity.

This data represents what is already known from a variety of sources but there has not been a comprehensive survey of the whole common or of the condition of known historic interest features. There are also likely to be additional but currently unknown historic interest features on the Common.

4.2 Historic environment impacts

Historic interest features are highly vulnerable to damage so the aim is to design the planting and fencing to avoid all known areas.

If historic interests are located within fenced areas where stock are excluded, they will become scrub covered and obscured. Therefore the question arises of how to manage these features subsequently. This will need to be addressed if it is found to apply within the final fencing design.

4.3 Historic environment mitigation

The planting areas and fences will be designed to avoid known areas of historic interest. There will be at least a 5 m halo left unplanted around each one. The many features across the Common will be identified even where they do not fall within planting areas, so that they can be avoided by vehicles and to make sure materials are not stored on them during the planting and fencing works.

The intention is to avoid adverse impacts on historic interests. Following completion of the Level I Historic Environment (HE) survey CCC to responded in principle that there are no sites that would preclude the erection of the fencing. The YDNP responded that the survey provided sufficient information for them to respond to the S38 fencing application.

If the S38 fencing application is successful, the HE survey information will be reviewed in collaboration with them before any fences are installed. The Commners are committed to working with CCC and YDNP to avoid damage to HE interests during the planned works, by reviewing the existing historic environment evidence (including the recent survey) and evidence gaps, and utilising watching briefs during erection of the fence if required. Laydown areas for

materials and access routes for contractors vehicles will be identified with them to avoid any vehicle or storage damage.	

5. Access

5.1 Access interests

The majority of the Common is open access land under Section 15 of the CRoW Act (2000). It has an extensive network of Public Rights of Way (PROW) and the popular but not designated Coast to Coast (C2C) route crosses the area (see Annex C). It is greatly valued as a resource for a wide variety of recreational activities by locals and visitors alike. The intention is to maintain the ease and experience of the existing access, whilst enhancing the biodiversity and landscape around it.

5.2 Access impacts

The planting will be designed to maintain clear routes for access where there are existing PROWs and desire lines, which are particularly important across the Open Access land. Fencing to enable establishment of the scattered scrub will be require; while the Wood Pasture planting will be protected in individual 'Cactus' tree guards (see Figure 6 below) and do not require fencing.

All of the planting – both scattered scrub and Wood Pasture - will be set back at least 5 m away from any Public Right of Way (PROW).



Figure 6 Wood Pasture planting using 'Cactus guards' on pasture close to the north end of the Gaythorne Plain section of the Common

For the scattered scrub the vast majority of planting areas do not include PROWs, and have been designed to avoid clear desire lines on the ground where possible. This careful design means that along the 15.5km of proposed new fencing for scattered scrub creation there are only 12 locations where gates will be required to enable continued public access.

At these 12 locations where the proposed fence lines do cross PROWs and clear desire lines appropriate gates will be installed. The proposed locations of gates for PROWs are shown in

Annex C – This has been drawn up following advice and comments on access from the Yorkshire Dales National Park Area Ranger Team, where they fall within the National Park, and David Clare, Cumbria County Council's Countryside Access Officer.

Access will also be required by the Commoners for gathering and moving their stock so in consultation with the farmers a number of locations have been identified where vehicle gates are required. Where these occur on a PROW, a bridleway or weighted pedestrian gate as appropriate will be installed next to the vehicle gate.

The map at Annex C identifies five locations requiring a combination of field gates for stock and farming access plus a pedestrian gate (as requested by YDNPA, there will be no 'dual use' gates), a further 7 locations will require only pedestrian gates. All pedestrian gates will also allow horse and bicycle access, with gate furniture suitable for horse riders (at the request of the Cumbria Bridleways Society and British Horse Society).

No new fencing is proposed across the popular Coast to Coast route, but it will pass through proposed wood pasture in five locations. Again, planting will be stepped back at least 5 metres from this route.

The design of the field and pedestrian gates, plus gate furniture, has been discussed and agreed with YDNPA and CCC access staff. The designs to be used have come from CCC and are attached in Annex D.

The fencing will be sheep stock fencing, 1.2 metres high, consisting of wooden posts, sheep netting with nine inch spacing and a single top strand of barbed wire, erected in straight lines between strainer posts. It is proposed that the fencing is temporary for 15 years to allow the scrub and woodland to become established.

Sheep and cattle grazing are an integral part of the existing livestock practices on the Common and these will continue under the new scheme. There are already 115 on the area and it is proposed that this will increase up to a maximum of 200 cattle at certain times in the summer. These will be spread widely across the Common in similar patterns to the current practices.

5.3 Access mitigation

The planting will avoid PROWS themselves and there will be an unplanted corridor of at least 5 m wide. The trees and scrub will all be at a low density and of a low final canopy height. The tree tubes and fencing will be removed after 15 years or earlier, once the trees and scrub are established. This management activity will be funded by putting aside money from the Stewardship Scheme each year; it will remain the responsibility of the Commoners after the end of the 10-year agri-environment scheme, which is planned to be 1 January 2031.

Should the scheme be agreed and approved, appropriate consent will be sought from Cumbria County Council for all necessary access gates. An application for consent would be made under Section 147 of the highways Act 1980. For consent to be granted its purpose must solely be for the control of livestock and a gate would need to be installed through which the public can pass on the alignment of the footpath.

If consent is obtained, access gates will be installed using the specifications required by Cumbria County Council which are included in Annex D. No fences or gates would be installed before Cumbria County Council have granted consent.

Following close discussions and a site visit, YDNPA and CCC access staff have indicated that they are content with the proposed access mitigation of appropriate gates, and the location of these. Therefore there are no outstanding access issues or mitigation required.

6. Delivering policy and public benefits outcomes

6.1 Contributing to Defra policy delivery

Defra 25 Year Plan

Defra's 25 Year Environment Plan, published in 2018, sets out the government's key natural environment policies in England. It includes ambitious targets for tree planting at a scale not seen in England for over 50 years. This ambition is to radically increase tree planting through securing landscape-scale opportunities for increasing tree cover, with an initial target of planting 11 million trees.

The aim is to do this so that it enhances biodiversity, through expanding existing woodland habitat networks, and enhances local landscape character and distinctiveness. Achieving this fit with the existing local woodland habitat and distinctive landscape character is vital if the expansion of planting – and so trees – is to be positive and sustainable for local communities and local environments.

Upland common land has a significant role to play in realising this ambition, as it offers real landscape-scale opportunities to deliver planting and tree expansion at a significant scale. It can also bring together groups of commoners to work collectively to achieve a scale of tree planting that could not be done individually.

These proposals on the Crosby Ravensworth commons can deliver exactly what the 25 Year Environment Plan is aiming for. The scale of these commons – nearly 2200 hectares – will enable a truly landscape-scale approach, connecting the existing wooded valley bottoms and valley sides on enclosed farmland with the unenclosed common land.

Unusually, the Crosby commons extend down on to the valley floor in a number of locations – such as Slack Randy, which runs from the edge of Crosby Ravensworth village at 200 metres elevation up on to the main open common at 300 metres. These traditional gathering routes are part of the commons, and planting within them can enable the essential connectivity and linkages to the existing tree network.

The 25 Year Plan is clear that tree planting must stick to the principle of 'the right trees in the right place'. Planting must fit with and enhance biodiversity and local landscapes – and avoid any unintended negative impacts or harm.

The planting proposals have from the start been developed with the intention of enhancing the important biodiversity of the Crosby commons – avoiding any unintended negative impacts and maximising the positive opportunities. The majority of the commons are of national and international importance for biodiversity and so designated as SSSI and SAC (see section 2). The proposals have been developed with close involvement of Natural England, who are fully supportive and encouraging of the biodiversity gains they can deliver.

Similarly, these commons and the planting proposals for them are proposed in sensitive landscape or national significance. The vast majority of the Crosby commons - all of the land east of the M6 motorway – is within the Yorkshire Dales National Park. It was designated of National Park quality in 2016 as part of the largest ever extension to a National Park in the UK.

The development of the proposals has again considered landscape benefits and impacts since its inception. Section 3 outlines how this has been achieved, and how the planting design has been

developed with stakeholders and local communities to ensure it supports and enhances the local landscape character.

Therefore, these plating proposals will be a major landscape-scale achievement for delivery of the 25 Year Environment Plan – delivering not only on the tree planting target, but also on the essential principle that new tree planting will fit with and enhance the local environment in the long term.

Contribution to Nature Recovery Network

The Nature Recovery Network is another major commitment in the government's 25 Year Environment Plan, intended to improve, expand and connect habitats and address wildlife declines. It aims to again work at landscape-scale to deliver ecosystem improvements by improving the health of existing habitats, and improving their connectivity through habitat creation that re-connects and strengthens the network. This will provide more and better quality wildlife habitats, and increase their resilience to climate change and other challenges.

Nature Recovery Networks are being developed at county or similar scale. Cumbria is well placed to make a significant contribution to upland scrub, woodland and Wood Pasture improvements through its emerging Nature Recovery Network.

The scrub planting proposals, which are the driver behind this fencing application, have been designed on woodland habitat network principles. The aim of the proposals is to increase the extent of scrub and Wood Pasture habitat, and significantly improve the linkages and connectivity of the valley woodland and trees and those on farmland adjacent to the Crosby commons. Also, to extend that habitat at the higher elevations of the existing woodland network.

The scale of planting for habitat creation and connectivity in these proposals will provide a very significant landscape-scale improvement to the existing woodland network. The creation of 206 hectares of Wood Pasture will be, as far as we know, the largest single-site Wood Pasture creation project in Cumbria and England. Similarly, the creation of scattered scrub habitat on over 220 hectares of the Crosby commons is unparalleled in Cumbria and England.

To deliver at the scale envisaged in the 25 Year Environment Plan, using the principles in the Nature Recovery Network, requires ambitious landscape-scale scrub and tree planting proposals like this if the national policy objectives are to be delivered. These proposals will, to our knowledge, deliver the largest scrub and Wood Pasture contribution to these government policies to date. They will be a very tangible step change towards delivering the Cumbria NRN.

Importantly, this is being delivered by commoners as part of their future upland farming businesses, rather than wildlife charities or other non-commercial land managers.

Natural Capital and Public Benefits

Improving and expanding wildlife habitats is the most direct way to improve the extent and quality of our terrestrial Natural Capital. For trees, scrub and woodland habitats new planting is the key activity to achieve expansion.

The Natural Capital Committee's 'State of Natural Capital Annual Report 2020' identifies that to deliver the 25 Year Environment Plan target for tree planting, and to achieve the UK 'Net Zero' climate change target of 17% of tree cover by 2050, will require a very large increase in tree planting. To achieve he 'Net Zero' target of 17% tree cover across the UK would require 30,000 hectares of land to be planted annually. In 2018/19 only 13,400 hectares was planted.

Planting projects of the scale proposed for the Crosby commons are required if these government policy objectives are to be met. Securing permission for the fencing proposals is a critical step and statutory requirement to achieving this.

In addition, improving the Natural Capital of the Crosby commons through tree planting will provide multiple Public Benefits – or Ecosystem Services as they are also known.

6.2 Delivering Public Benefits – or Ecosystem Services

Defra's agriculture and environment policy post-Brexit is to secure food production through sustainable farming which support the delivery of wider public benefits – 'public payments for public benefits'.

These carefully designed planting proposals, along with the proposed sheep and cattle grazing, offer a range of public benefits - also known as Ecosystem Services – that will be delivered through the sustainable management of the common's environmental assets - known as Natural Capital.

As Crosby Ravensworth common is large, and significant planting is proposed, the scale of the public benefits these proposals can deliver will also be large, making a major contribution to sustaining the Natural Capital of the common and delivering a wide range of public benefits for local and wider communities.

Key public benefits are outlined below.

Commoning, hill farming and rural communities

The proposed Higher Tier Countryside Stewardship scheme is an essential income stream for many of the Commoners who would not be able to continue their agricultural businesses —without the income the next agri-environment agreement could provide. This includes continuation of active commoning with hefted hill flocks. The planting proposals cover 20% of the common, with 12 % being fenced off for scrub creation and not available for grazing.

The farmers consider that the proposed grazing levels of sheep (no summer grazing reduction) and cattle (74% increase from 115 to 200 cattle) can easily be achieved on the remaining 88% of the common, without detriment to the habitats. They have agreed to adjust their grazing to accommodate the planting, particularly the location of their hefts on the common.

The planting proposals have been developed with close involvement of the active graziers to ensure that the planting design does not impact on the gathering of stock from the common, and the design has been adjusted on their advice so that fence lines will avoid creating gathering difficulties. Similarly, the design of the fence lines for scrub creation have had their input, and include 'funnels' in some of the planting areas to assist with gathering – for example, the fence at the top of Slack Randy (Area 2d), and at White Hag (Area 2c).

There is a very real and high risk that without the next agri-environment the number of sheep and active hill flocks on the common would significantly reduce in the next 5-10 years, particularly given the end of area-based support payments. The grazing of cattle on the common without another agreement would fall massively and would probably completely cease.

Therefore this proposal has significant public benefits in terms of maintaining traditional management of the common with hefted hill flocks, and the communal activities of gathering, etc. The planting proposals are a key part of the income that the active graziers would gain from another agreement, which will support their family farming businesses, connected rural livelihoods and the local rural community.

Carbon storage and sequestration/mitigating climate change

As the planted trees and scrub grow they will sequester carbon in their wood and also roots. The scale of this sequestration is very hard to estimate particularly as the design of the planting has purposefully been to plant at low density and include a lot of open ground – for biodiversity and landscape benefits.

The planting will take place alongside the sustainable grazing of sheep and cattle. Removal for all stock for at least 16 weeks over the winter will help ensure poaching and soil disturbance is minimised – see Soil Conservation section below.

The combination of low density tree and scrub with a robust layer of vegetation will be very good at securing soil carbon and avoiding its mobilisation due to water erosion during storm events. This will help create a semi-natural vegetation structure.

The planting of trees and scrub, plus the proposed changes to the sustainable grazing of the common, are likely to secure the existing carbon stores in soils. It will also sequester carbon through the growth of the planted trees and scrub.

The benefits for soil and plant based carbon storage and sequestration are likely to be positive, and will be sustained over the long term as the planted trees and scrub grow.

Reducing flood risk

Tree and scrub planting is known to be extremely important slowing the flow of surface water and increasing percolation of rainwater. These positive benefits will increase as the planted trees and scrub increase in size and their root system expand, changing the soil structure immediately around them.

In the scrub creation areas stock will be excluded; the resulting increase in roughness of the vegetation in these areas will further slow surface water flows and increase percolation rates.

The common is mainly on limestone, and the extensive acidic and calcareous grassland areas are relatively free draining. The proposals are likely to aid this, and assist rainfall in these areas entering the limestone sub-soils and underlying rock.

Reductions in peak flows from the common, which is at the head of the catchments for a number of streams, will have downstream benefits through reduced erosion potential.

Therefore the impacts of these planting proposal on reducing flood risk by reducing surface water flows are likely to be beneficial.

Soil conservation

The benefits of decreasing surface flows from planting described above will also help to reduce surface flows that could scour soil particles. Similarly, the increased roughness of the vegetation in the ungrazed scrub planting areas will reduce surface flows and add vegetation roughness.

The sustainable grazing of the common, and particularly the removal of all stock for at least 16 weeks in the winter will, help avoid poaching, loss of vegetation and exposure of soils. The maintenance of a robust vegetation surface can be a major contributor to soil conservation during storm events.

Therefore the planting proposals and the sustainable grazing of the common are likely to have positive benefits for soil conservation.

7. Fencing and tree + scrub planting proposals

7.1 Fencing and planting proposals

The scrub and Wood Pasture planting proposals are outlined in section 2, alongside the biodiversity case for expanding these habitat through creation of new areas on the three commons.

This package of proposals will require the fencing off for 15 years of areas which will be planted for open scrub habitat. In total the fencing proposed is 15,557 metres. This is distributed in discrete locations across the three commons – Figure 7 shows the location of the fencing.

Fencing is only required to protect the open scrub which will be planted for habitat creation.

Figure 7 also shows the areas of Wood Pasture planting, which is also for habitat creation but does not require fencing; each individual tree will have a tree guard.

Figure 7 is the proposals which were used for the informal consultation with stakeholders and for community feedback, as outlined in sections 8 and 9.

A separate PDF version of the final fencing and planting proposals has been submitted with this application, to show the final design following mitigation in response to stakeholder and community comments.

This will also enable closer viewing of the proposals than Figure 7 can in report format.

7.2 Detailed proposals

The proposed planting has been divided up in to the following planting areas and sub-sections, which are listed and show on the Figure 7 below.

Area 1 - Gaythorne Plain

1a: Dina Gill and surrounds wood pasture planting to expand the existing native woodland planting in Dina Gill towards Orton Scar

1b: Linglow Hill planting at the north-east corner of the common, connecting to woodland to the north

1c: South of Bank Head Farm planting to connect a group of existing field trees (adjacent to the common) to the lower valley woodland network

Area 2 - Crosby Ravensworth Fell

2a: Head of Crosby Gill (south of Robin Hoods Grave and Kings Well. Two areas of planting are proposed, sited close to the head of stream tributaries at the very top of the gill catchment and fringes of the Fell.

2b: West side of Black Dub. Planting will be sited on the west side of the beck.

2c: Blea Beck. Scrub and wood pasture planting are proposed west of the Roman road, next to an enclosure of improved in-bye, with additional wood pasture proposed east of the Roman road on north side of the beck.

2d: Slack Randy, north east of common. An area of scrub is proposed along a ribbon of common that is bordered by inbye.

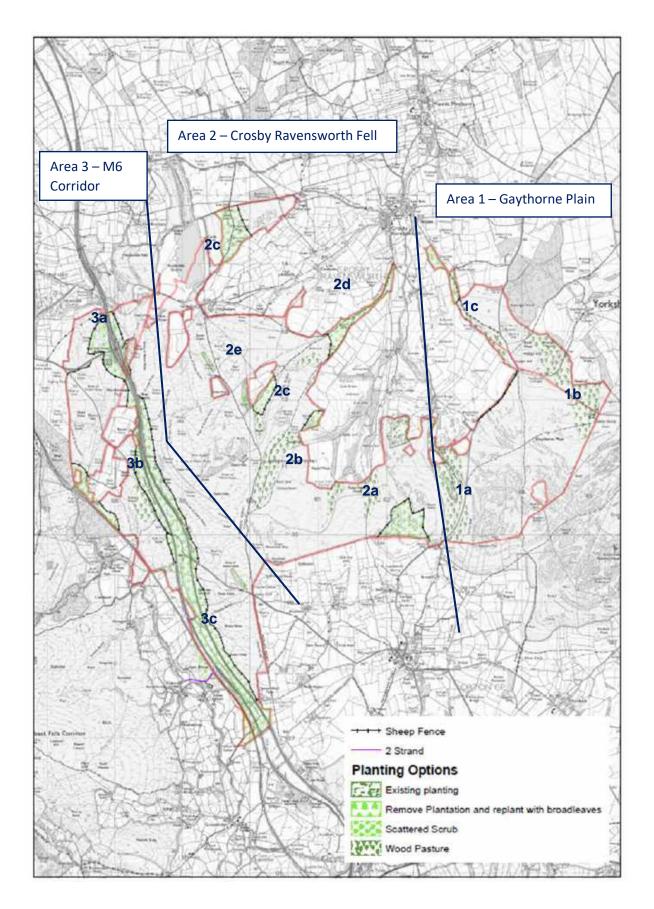
2e: West of Howe Nook Farm and Land around Seal Howe. Two areas of coniferous plantations will be felled and replaced with scrub planting.

2f: Land adjacent to the public road north of Oddendale Farm. A thin strip of planting is proposed along the roadside.

Area 3 - M6 Corridor

3a: Hardendale Fell planting around J39 of the M6, to mimic nearby scrub planting off the common
3b: Galloway Stone west of M6 planting of scrub and wood pasture, connecting and expanding
existing patches of scrub and trees to the woodland network along the lower streams
3c: M6 motorway corridor creation of scrub corridor on low quality habitat to enhance landscape of transport corridor and connect to lower tree and woodland network

Figure 7 — map of proposed scattered scrub and Wood Pasture habitat creation and associated fencing, <u>as used for the informal consultation</u>



8. Consultation

8.1 Consultees

The following relevant consultees were identified for this application, and have all been contacted:

- Lowther Estate Trust (landowner)
- Crosby Ravensworth Commoners Association (this S38 Application is submitted by the Association)
- Crosby Ravensworth Commoners
- Cumbria Farm Environment Partnership
- Crosby Ravensworth Parish Council
- Orton Parish Council
- Shap Parish Council
- Tebay Parish Council
- Eden District Council
- Cumbria County Council
- Natural England
- Historic England
- Yorkshire Dales National Park Authority (YDNP)
- Forestry Commission
- Cumbria and Lakes Local Access Forum (CLLAF)
- Friends of the Lake District (FoLD)
- Council for the Protection of Rural England (CPRE)
- Open Spaces Society (OSS)
- Ramblers' Association
- British Horse Society
- Cumbria Bridleway Society
- Horse Action Campaign UK
- Westmorland Dales Landscapes Partnership
- Cumbria Wildlife Trust
- Woodland Trust
- Crosby Ravensworth Tree Group
- Local residents

8.2 Consultation process

A series of consultation events were undertaken, including meetings, a public drop-in session and site visits, and these are listed below. Additional consultation was undertaken via email exchange and telephone calls and this is also listed below.

The detailed responses to these consultation events and the resulting mitigation are presented in Section 9.

Coi	nsultation Events	Date	Consultees
1.	Meetings with the Crosby Ravensworth		
	Commoners		
At	the Commoners Association meetings and	Various –	Crosby Ravensworth
wit	th individual Commoners	September 2019	Commoners
		to April 2020	
2.	Meetings with Natural England	Various –	Deborah Land, Team
		September 2019	Leader, &
		to April 2020	Tim Nicholson, Border &
			Eden Team
3.	Meetings with the agents for the	Various –	Jo Edwards, PFK & David
	Commoners' Association and the land	September 2019	Bliss, Lowther Estate Trust
	owner	to April 2020	
4.	Meetings with Cumbria Farm Environment	Various –	Paul Arkle (also one of the
	Partnership	September 2019	Crosby Ravensworth
		to April 2020	Commoners)
5.	Meeting with Yorkshire Dales National Park	2 nd December	Steve Hastie, Area
		2019	Manager (Western Dales)
6.	Attending Crosby Ravensworth Parish	2 nd March 2020	Crosby Ravensworth
	Council meeting		Parish Councillors
		1011 1 0000	Eden District Councillor
7.	Attending Orton Parish Council meeting	16 March 2020	Orton Parish Councillors
8.	Briefing paper provided to Tebay Parish	2 nd March 2020	Tebay Parish Councillors
	Council meeting for discussion		
9.	Public Consultation	o=th = 1	
	op-in event 2 – 7 pm at Crosby Ravensworth	27 th February	38 members of the local
	age Hall	2020	community
	Consultation Site Visit 1	a oth = 1	V2012 1 1 1 1
	osby Ravensworth Common – to see the	28 th February	YDNP – Adrian Shepherd,
	ations of the proposed areas of scattered	2020	Head of Land
	ub, wood pasture and fences, and their		Management, & Miles
relation to historic, biological, landscape, visual			Johnson, Senior Historic
	d access interests.		Environment Officer
_	Consultation Site Visit 2	Eth N.4	E-ID 0 CDDE I - D II
	osby Ravensworth Common – to see the	5 th March 2020	FoLD & CPRE – Jan Darrall,
locations of the proposed areas of scattered			Policy Officer
scrub, wood pasture and fences, and their			OSS – Ian Brodie
	ation to historic, biological, landscape, visual		CLLAF – Charles Ecroyd &
	d access interests.		Geoff Wilson
12.	Consultee teleconference		

A follow-up teleconference was held to discuss	12 th March 2020	FoLD & CPRE – Jan Darrall
revisions to the planting and fence proposals in		OSS – Ian Brodie
response to the comments from Site Visit 2		

9. Consultation responses

9.1 Consultation feedback

The informal consultation events, engagement, telephone and email correspondence outlines in section 8 gathered a lot of views from stakeholders and the local community.

In this section stakeholder feedback, requests for amendments to the fencing and planting proposals and an outstanding objection are outlined:

- **Section 9.3 Stakeholder responses** this summarises the feedback from all the stakeholders listed in section 8
- Section 9.4 Detailed feedback and design response this summarises the detailed comments from specific stakeholders who made detailed feedback; plus a summary of comments from the community and their elected representatives. It also outlines the response made to these comments, including changes to the fencing and planting design proposal where appropriate.
- Section 9.5 Outstanding landscape objection this summarises the single outstanding objection from the informal consultation, and the views of other stakeholders on this objection.

9.2 Consultation feedback summary

This section summarises the informal consultation feedback and response. More detail on responses from the stakeholders and the local community are given in sections 9.3 and 9.4.

The extensive informal consultation process received a very good response in terms of interest and engagement from both stakeholder organisations and the local community.

The attendance of 38 people at the community drop-in event was very high compared to similar events held for other commons in Cumbria. There was strong interest and support from the local community for the proposals, with a genuine feeling of excitement and positive interest in the community. Many were keen to be kept informed and involved in the project as it develops and the planting takes place.

Similarly, the interest and engagement form the three Parish Councils was very encouraging. They were very supportive of the development of the fencing and planting proposals with the active graziers of the common, and were pleased to hear that the commoners feel it will enhance the common and also help support their family farming businesses into the future. There was strong support from all the councillors at each of the Parish Councils.

The level of stakeholder engagement and interest during the informal consultation was also very high. The scale of the proposals meant that nearly every stakeholder organisation approached wanted to take up the opportunity to consider the proposals and provide feedback.

This led to detailed discussion over the key potential impacts to the range of topics explored earlier in this document – Biodiversity; Landscape; Historic Environment; Access.

For Biodiversity, see Section 2, the overall response was strongly positive, with the proposed fencing providing the necessary infrastructure to help establish a significant area of scattered scrub habitat, and help link up and increase connectivity of the local woodland habitat network.

For Landscape, see Section 3, the overall response was neutral to positive, except for one outstanding informal objection concerning one section of fence. See sections 9.4 and 9.5 for more details. Apart from that the response from the local community and other stakeholders was supportive of the proposed fencing and the habitat creation it will enable.

For Historic Environment, see section 4, the overall response was neutral. The fencing proposals do not represent any significant risk to the known on-site historic features. An initial survey has been completed of the proposed fence lines, and this alongside a review of the historic environment data and an archaeological 'watching brief' if required during the fence construction works will mitigate the risk of harm to historic environment features.

For Access, see section 5, the overall response was neutral. The inclusion of public access and authorised vehicular access via agreed gate designs will mitigate any obstruction issues from the construction of the proposed fences. The stakeholders were involved in agreeing the locations of these, and they provided the detailed gate access designs. The local public were very interested in the public access use of the commons, and there were no outstanding concerns about the fencing proposals being an obstruction or detriment to public access.

9.3 Stakeholder responses

The table below summarises the response to the informal consultation, covering both the fencing proposals and the planting of scrub and Wood Pasture, from the stakeholders identified in section 8. It is in alphabetical order by stakeholder.

Addional consultation		Comments	Responses to consultation and proposed
Organisation (alphabetical order)	Representative		amendments
British Horse Society	Vyv Wood-Gee, Helen Kelly, County Access Officer	Welcome recognition of the area's importance for informal recreation as well as for wildlife and farming. Request appropriate bridleway furniture is installed where necessary, to ensure ease of use by horse riders.	Comments addressed – CCC PROW furniture specifications to be used throughout the scheme (Annex D) – S147 application to be submitted if the S38 application is successful. See responses regarding access in Section 9.4
Crosby Ravensworth Commoners Association	Gordon Bowness, Chairman	The Commoners Association is proposing this scheme so is very supportive.	No amendments needed.
Crosby Ravensworth Parish Council	David Graham, Chair	Strong interest, engagement and support for the planting proposals from all three Parish Councils - see comments in Section 9.4	See responses in Section 9.4
Crosby Ravensworth Tree Group	Drew Woodward	Supportive of the proposal.	No amendments needed.
Cumbria Bridleways Society	Carol Barr, Lisa Hartley	Welcome recognition of the area's importance for informal recreation as well as for wildlife and farming. Request appropriate bridleway furniture is installed where necessary, to ensure ease of use by horse riders.	Comments addressed – CCC PROW furniture specifications to be used throughout the scheme (Annex D) – S147 application to be submitted if the S38 application is successful. See responses regarding access in Section 9.4
Cumbria County Council - Access	David Clare, Countryside Access Officer	The proposals raise no concerns from a public rights of way management standpoint. PROW furniture specifications were provided (see Annex D). An application for consent for the fence and	Comments addressed – CCC PROW furniture specifications to be used throughout the scheme (see Annex D) – S147 application to be submitted if the S38 application is

		the gates would be required under Section 147 of the Highways Act 1980.	successful. See responses regarding access in Section 9.4
Cumbria County Council – Historic Environment	Mark Brennand, Lead Officer Historic and Environment and Commons	Requested that further information was gathered on historic interests in the affected areas, to ensure these interests were retained and protected.	Comments addressed — Level I HE survey carried out at request of CCC and YDNPA — CCC responded in principle there are no sites that would preclude the erection of the fencing. The Commoners are committed to working with CCC and YDNP to avoid damage to HE interests during the planned works, by reviewing the existing historic environment evidence (including the recent survey) and evidence gaps, and utilising watching briefs during erection of the fence if required. Laydown areas for materials and access routes for contractors vehicles will be identified with them to avoid any vehicle or storage damage.
Cumbria Farm Environment Partnership	Paul Arkle	Very supportive of the proposal	No amendments needed
Cumbria and Lakes Local Access Forum	Charles Eckroyd & Geoff Wilson	Generally supportive of the proposal - provided access is not obstructed and is retained unchanged in the long term – see comments regarding access in Section 9.4	Comments addressed – CCC PROW furniture specifications to be used throughout the scheme (Annex D) – S147 application to be submitted if the S38 application is successful – Open Access decals to be added to fences – tree and fence management/removal to be part of the scheme. See responses regarding access in Section 9.4
Cumbria Wildlife Trust	David Harpley	Generally supportive of the proposal – provided biodiversity interests are retained and protected, particularly peatland areas.	Comments addressed – The proposals for scrub and woodland planting have all been agreed with Natural England to avoid any negative impacts to the SSSI/SAC notified

			features on the common. The planting proposals will not significantly impact on the SAC Conservation Objectives and are entirely consistent with them. This has been confirmed by Natural England
Eden District Council	Name not known	Declined to provide comment on the proposals in a telephone conversation with Bowfell Consulting. An Eden District Councillor was present at the Crosby Ravensworth Parish Council meeting and was supportive of the proposals.	No amendments needed
Forestry Commission	Paul Clavey, Woodland Officer, North and East Cumbria	Generally supportive of the proposal – provided forestry interests are retained and protected.	Comments addressed – see responses in Section 9.4
Friends of the Lake District	Jan Darrall, Policy Officer	See comments in Section 9.4	See responses in Section 9.4
Historic England	Jenny Lee, Heritage At Risk Projects Officer	Requested 10 m buffer zone around heritage interests, also their protection during installation of fencing and appropriate management of these sites in the long term - provided information on Schedule Monuments - supported the YDNP advice on historic interests.	Comments addressed via responses to YDNP and CCC on HE interests
Horse Action Campaign UK	Hannah Gardner	Generally supportive of the proposal - provided access is not obstructed and is retained unchanged in the long term	Comments addressed – CCC PROW furniture specifications to be used throughout the scheme (Annex D) – S147 application to be submitted if the S38 application is successful. See responses regarding access in Section 9.4
Local residents	Numerous	Generally very supportive of the proposal – see comments in Section 9.4	See responses in Section 9.4
Lowther Estate Trust	David Bliss	Very supportive of the proposal.	No amendments needed.

Natural England	Deborah Land, Team Leader, & Tim Nicholson, Border & Eden Team	Very supportive of the proposal – provided all biodiversity interests of the SAC and SSSIs are retained and protected.	Comments addressed The proposals for scrub and woodland planting, along with changes to the grazing of sheep and cattle livestock, have all been agreed with Natural England and designed to avoid any negative impacts to the SSSI/SAC notified features on the common. They will deliver a key outstanding Conservation objective for the management of the Sac. The grazing changes will contribute to the achievement of the SAC Conservation Objectives for the SAC, while the planting proposals will not significantly impact on these and are entirely consistent with them.
Open Spaces Society	Ian Brodie	See comments in Section 9.4	See responses in Section 9.4
Orton Parish Council	Kyle Blue	Strong interest, engagement and support for the plnting proposals from all three Parish Councils - see comments in Section 9.	See responses in Section 9.4
Ramblers' Association	Charlie Shepherd, Countryside Secretary Penrith Ramblers	Generally supportive of the proposal - provided access is not obstructed and is retained unchanged in the long term – also tree and fence management/removal is part of the scheme	Comments addressed – CCC PROW furniture specifications to be used throughout the scheme (Annex D) – S147 application to be submitted if the S38 application is successful - tree and fence management/removal to be part of the scheme. See responses regarding access in Section 9.4
Shap Parish Council	Jean Jackson, Chair	Strong interest, engagement and support for the planting proposals from all three Parish Councils - see comments in Section 9.4	No amendments needed.
Tebay Parish Council	Kyle Blue, Chair	Strong interest, engagement and support for the planting proposals from all three Parish Councils - see comments in Section 9.4	See responses in Section 9.4

Westmorland Dales Landscapes Partnership	David Evans, Hannah Kingsbury	Generally supportive of the proposal - provided all landscape, biodiversity, access and historic interests are retained and protected.	Comments addressed – see responses in Section 9.4
Woodland Trust	Pete Leeson	Very supportive of the proposal.	No amendments needed.
Yorkshire Dales National Park - Access	Steve Hastie, Area Manager (Western Dales) & Paul Wilkinson, Area Ranger	Generally supportive of the proposal - provided all access interests are retained and protected.	Comments addressed – Supportive of the use of the PROW furniture specifications provided by CCC (Annex D) - see responses regarding access in Section 9.4
Yorkshire Dales National Park – Historic Environment	Linda Smith, Countryside Archaeological Adviser & Miles Johnson, Senior Historic Environment Officer	Requested that further information was gathered on historic interests in the affected areas, to ensure these interests were retained and protected.	Comments addressed. Level I HE survey carried out at request of CCC and YDNPA. Fence line then adjusted at the top of Slack Randy to protect HE interests there. YDNPA then responded that the HE survey report contains sufficient information to enable them to make the historic environment response when consulted on the S38 application. The Commners are committed to working with CCC and YDNP to avoid damage to HE interests during the planned works, by reviewing the existing historic environment evidence (including the recent survey) and evidence gaps, and utilising watching briefs during erection of the fence if required. Laydown areas for materials and access routes for contractors vehicles will be identified with them to avoid any vehicle or storage damage.
Yorkshire Dales National	Adrian Shepherd, Head of	Generally supportive of the proposal - provided	Comments addressed – see responses in
Park – Land Management	Land Management	all landscape, biodiversity, access and historic interests are retained and protected.	Section 9.4

9.4 Detailed feedback and design response

The table below summarises the detailed comments from specific stakeholders who made detailed feedback; plus a summary of comments from the community and their elected representatives. It covers both comments on the fencing proposals and the planting of scrub and Wood Pasture. It also outlines the response made to these comments, including changes to the fencing and planting design proposals where appropriate.

The final proposals put forward in this application incorporate all of the design changes to the fencing and planting that are outlined in the right-hand column of the table.

There are two sections to the table:

- a. Over-arching comments
- b. Specific planting area comments -

Location	Comments from Friends of the Lake District & Open Spaces Society	Comments from local community and other stakeholders	Responses to consultation and proposed amendments
a. Over-arching	g comments		
Events, meetings and site visits undertaken – comments below are a summary of the feedback from these	A site visit with the Friends of the Lake District & Open Spaces Society was undertaken on 5 March 20. A subsequent teleconference was held on 12 March 20 to discuss revisions to the planting and fence proposals in response to the site visit comments	Parish Councils – a briefing paper was provided to each Parish Council ahead of their formal meetings. Feedback sessions were held at meetings of the Crosby Ravensworth and Orton parish Councils, each for about 1 hour. Shap PC did not take up the offer of a feedback session	
		Local Community – a community drop-in event was held on 27 February 2020, from 2-7pm in Crosby Ravensworth Village Hall. This was advertised locally.	

Wood Pasture and scattered scrub planting, requiring fencing	Friends of the Lake District & Open Spaces Society were not opposed to the principle of tree and scrub planting on the common. They had concerns over the detailed location and design of some of the individual areas of proposed planting. These are set out in the 'Specific planting area comments' section below	38 members of the local community attended, excluding commoners involved in the propsoals. Yorkshire Dales National Park Authority – a site visit was held with them on Friday 28 February 2020. Other stakehoders – see section 9.3 for details of contacts with other stakeholders Parish Council – there was strong interest, engagement and support for the planting proposals from all three Parish Councils. All three discussed the fencing propoals and asked questions about: - Ensuring PROWs, and desire line routes across Open Access land remained accessible - For local communities to continue to be informed, engaged and involved as the project was delivered - Maintenance of the fences, tree shelters and saplings - Opportunities for local community involvement in the planting and maintenance They were content with the proposals and responses to their questions.	
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	The feedback from Orton Parish Council representatives was that the proposals were not sufficiently ambitious or extensive and could be increased to deliver more public benefits, including landscape enhancement and carbon storage.	
Access and the planting proposals across the common	 Community views at the community drop in event about public access and the proposed fencing were positive so long as there were gates at all PROW crossings, and at least stiles on main desir lines. Parish Council responses were the same – supported the need for fencing to achieve the scrub creation so long as there was priovision of gates and stiles A no-planting buffer was requested for all PROWs and desire lines. All the appropriate access gates were requested in the fences on PROWs and desire lines. A kissing gate (footpath) or appropriate alternative (bridleway) gate were requested on PROWs beside any vehicle access gates, because the latter can drop and be difficult to open. Open Access decals were requested at appropriate intervals along all fence lines, to ensure people are aware that this is an Open Access area and the fences are not there to exclude them. 	 PROW furniture specifications provided by CCC will be used (see Annex D). A 5m wide no-planting buffer is proposed for all PROWs and desire lines. All other access provisions requested will be incorporated in to the scheme. Advice will be sought and followed from YDNP Rangers

It was requested that YDNP provide the locations of the definitive PROWs in the central area of the common before any planting takes place, so planting can be designed to delineate the appropriate routes.	
 Two Parish Councils, and a number of members of the public, raised queries over the management and maintenance of the planted trees, tree guards and fences. They wanted to ensure that the tree and scrub planting was successful, and that it did not fall in to disrepair and look unsightly. Concern was expressed about other planting in the local area which has not had, in their opinions, adequate maintenance. This has led to fallen over tree guards being left for long periods, with some blown away in to field corners, etc 	 Management and maintenance of the fencing and planting, will be the responsibility of the Crosby Ravensworth Commoners Association. The proposals for the planting include the beating-up of saplings, plus maintenance and repair requirements for the 15 year duration of the project. The need for this will vary during the 15 year period of fencing, with repairs more likely to be required from year 8 onwards and following storms. Similarly, the removal of fences and tubes when appropriate, will be the responsibility of the Crosby Ravensworth Commoners Association The Association will allocate funds annually for this purpose, to be held as a reserved 'pot' to fund management and maintenance as required across the 15 year life of the fences, including their removal.

b. Specific planting area comments see proposals map in Section 7

Gaythorne Cottages and Gaythorne Plain -Wood pasture area 1b There was support for:

- creating wood pasture;
- no new fencing;
- low density of planting proposed;
- use of cactus guards;
- planting in irregular clumps, "fingers" and feathered edges.

There was not support for:

- the scale of the wood pasture planting here, because of perceived landscape impacts, and it was felt it should be reduced in extent;
- any blocks and linear planting. It was requested that:
- the planting doesn't go above the line of the pylons by Gaythorne Cottages;
- the small existing coniferous plantation by Gaythorne Cottages is removed;
- the planting doesn't obstruct the view of the Pennines from this location or break the skyline;
- Public Rights of Way and desire lines are maintained by keeping them free of any planting;
- the consultees present are involved in the final detailed design of the planting, by attending site visits with the consultants and contractors implementing the planting, if permission is granted and the scheme goes ahead.

- Parish Councils the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing.
- Local Community at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including the extending the surrounding gill woodlands out on to the common along the Gilts public road.
- The planting design will be altered to accommodate the FLD & OSS comments.
- Areas of geological interests will not be planted.

Diag Oill Mand	Geological interests - It was pointed out that there is significant geological interest in the gill in this location which must be protected in any planting scheme – Sylvia Woodhead is the geologist with information on this site and should be consulted.		
Dina Gill - Wood pasture area 1a	 There was support for: creating wood pasture; no new fencing; low density of planting proposed; use of cactus guards; planting in irregular clumps. Further information was requested: Is there an opportunity to incorporate the existing Dina Gill fencing into that for the conifer plantation, which is to be felled and replaced with woodland? What is the time scale of the permission on the existing fence around the planting? What will happen to that fencing at the end of the permission period? If there is still a need for the fence, to protect the woodland from grazing at the end of permission period, who will obtain permission for it, who will pay for it, maintain it, ultimately remove it, etc? The planting in Dina Gill needs the tubes removing and the trees restaking now, so what is the existing maintainance of this planted area? 	 Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including extending Wood Pasture out beyond the recently planted area 	 The Forestry Commission are being consulted about amalgamating the plantation and Dina Gill in to one fenced unit when the plantation is felled and replanted with broadleaved trees and scrub. The application for fencing will then reflect this change. The permission for the exisiting fencing around Dina Gill was for 15 years from 2010, so permission will be sought for a further 15 years in this S38 application. Management and maintenance of the fencing and planting, including removal of fences and tubes when appropriate, will be the responsibility of the Crosby Ravensworth Commoners Association and funds will be allocated annually by them for this purpose. Management of the Dina Gill planting, including beating up, has been undertaken by the

	The growth of the planting in Dina Gill has been very slow, so what was the provenance of the species used? (Scottish provenance was identified as being appropriate at this altitude and exposed location).		Crosby Ravensworth Commoners. The original planting was undertaken by local contractors – species provenance not known.
Southern end of wood pasture area 1a (at cattle grid at junction of Crosby and Appleby roads)	 There was not support for: Planting on the east side of the Appleby road as you enter the common over the cattle grid from the south, except further down the road towards Appleby where the contours make it more appropriate; Planting in between the two roads immediately after the cattle grid, because the land rises there. Apart from the above, the wood pasture planting up Dina Gill was not opposed, provided it was kept below the skyline and did not obscure the view of the Pennines in the distance. 	 Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including extending Wood Pasture out beyond the recently planted area 	The planting design will be altered to accommodate the FLD & OSS comments, including avoiding the higher ground.
Howe Robin – Scattered scrub area 2a	Appropriate access provisions (described above) were requested for this proposed planting area.	 Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including creating the scrub planting at Howe Robon, which some people commented would be visually unobtrusive 	All access provisions requested (see above) will be incorporated in to the scheme.

Robin Hood's Grave – Wood pasture area 2a	The two areas of proposed wood pasture in this area are located along two lovely paths which it was felt must not be planted or have their views spoilt by the planting.	 Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including extending Wood Pasture out beyond the recently planted area 	This will be accomodated in the detailed design of the planting when it is undertaken.
Gilts existing scrub regeneration area	It was requested that the existing fencing around the existing planting there is removed.	 Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including scrub creation on suitable limestone areas 	 This fencing is still considered by Natural England to be necessary for the recovery of the limestone pavement here. The limestone pavement vegetation is considered to be recovering well but still in need of protection from grazing. Natural regeneration of these pavements is very slow to occur. Approval for extending this fencing permission will be included in this S38 application.
Existing fencing along the road from Orton to Crosby Ravensworth	It was requested that the existing fencing along the road from Orton to Crosby Ravensworth is removed as part of the scheme.		This is being discussed with the Commoners.
Haberwain Rigg – Scattered scrub area 2c	It was requested that there was no planting around the Iron Hill and cairns in this area, and no fencing at this location, because of the open vistas there.	Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the	The scrub creation and associated fencing will be replaced with Wood Pasture planting in individual tree guards. This will avoid scrub growth

		planting proposoals, and associated new fencing. • Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including scrub in this more enclosed section of the common
M6 Corridor – Scattered scrub areas 3 b and c	 There were no objections to: Planting to the west of the M6, and this area could even be expanded; Planting in between the M6 carriageways; Planting to the east of the M6 south of the Orton road, and this area could even be expanded. There was objection to: Any planting or fencing to the east of the M6 to the north of the Orton road; It was felt that the design of the scattered scrub planting should be feathered to reduce and soften the potential linear nature of the M6 corridor proposals. 	 Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, particularly the planting along the M6 motorway. Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Planting areas 3b and 3 c are being discussed with the Commoners to potentially expand the wood pasture there. Areas west of the M6 are floristically rich along Tumble Beck and considered important by NE, so planting cannot be expanded there.
M6 Junction 39 – Scattered scrub area 3a	It was pointed out that there is considerable ecological interest in these areas to the west of the M6 around the Junction 39 including orchids recorded, which should be avoided in any planting.	 Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including around the M6

		junction and feeder road from the	
		A6	
Conifer plantations on the common	 There was support for: Removing the coniferous planting at Dina Gill, as well as the three other coniferous plantations on the common, because they are felt to be incongruous and inappropriate in the landscape; Replacing them with broadleaved woodland, provided the shape and design of the areas are appropriate for the landscape; There was not support for: Planting replacement broadleaves on the same footprint as the coniferous plantations; Fencing the newly planted broadleaved woodland on the same footprint as the coniferous plantations. It was recognised that the felling of these plantations requires a licence from the Forestry Commission, which requires replacement woodland planting with no net loss of trees. It was requested that the Forestry Commission were consulted on the shape and design of the required replanting and fencing. It was pointed that when the conifers are felled, there is likely to be regeneration of conifers from seed which will have to controlled as part to the woodland management. 	 The Forestry Commission were approached to discuss changing the footprint and shape of the existing conifer plantations, so that they would be resocked in a more landscape-sensitive design using a mix of scrub and Wood Pasture. See the response column for more details on the FC response. Parish Councils – the three Parish Council's covering the proposals all supported the proposals for the planting proposoals, and associated new fencing. Local Community - at the drop-in event on 25 February 2020 support was expressed for all the planting proposals, including those concerning the conifer plantations. 	 Final position – remove the felling and restocking of the four conifer plantations from the s38 application and tree planting proposals. This was reached following - a. Revised roposals were put forward for: Restocking the felled conifers with native broadleaves Replacement with scattered scrub and wood pasture to amalagmate the planting in to the wider planting proposals. Revised shape of planting areas. A revised design and landscape assessment. This identified significant landscape and visual amenity benefits of replacing the conifers with scattered scrub and Wood Pasture native broadleaf planting, in softer shapes that better fit the topography and landscape. b. Forestry Commission requirements for felling and restocking existing woodland would not be met by these re-design proposals.

	Discussion with FC Cumbria staff indicated that the expectation is a replacement of felled woodland with a 'like for like' woodland on the same or larger footprint. Species selection can be changed to broadleaves but the restocking density has to be a minimum of 1100 stem/ha – i.e. woodland density.
	This density is far higher than the density of scattered scrub and Wood Pasture proposed.
	Also, the redesigned proposals to address FLD comment did not cover the existing plantation footprints. If it did FLD's issue on the deisgn of the plantations would not be met.

9.5 Outstanding landscape objection

This section summarises the single outstanding objection from the informal consultation, and the views of other stakeholders on this section of the proposed fencing.

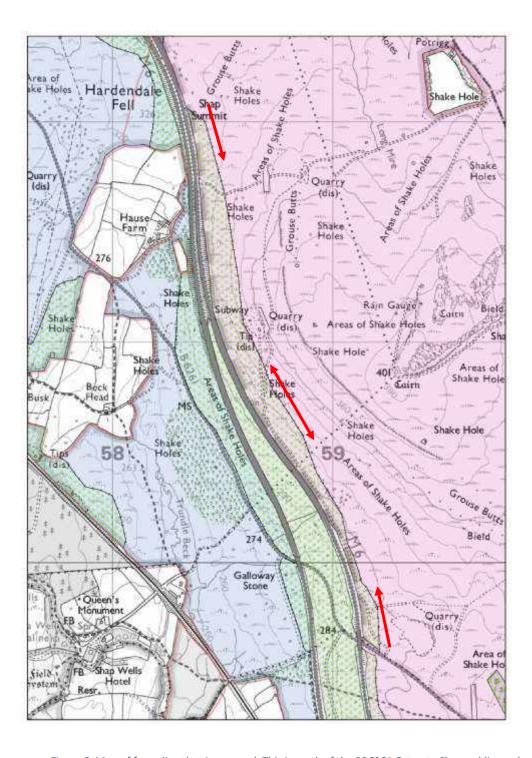


Figure 8 Map of fence line that is opposed. This is north of the BB6261 Orton to Shap public road, and east of the M6 motorway southbound carriageway

The fence line which has not been supported by one consultee as part of the informal consultation which preceded this application is shown on Figure 8 above. It is part of the scattered scrub habitat

creation proposals along the M6 motorway. Specifically, the section of fence proposed north of the B6261 Orton to Shap public road, and east of the M6 motorway southbound carriageway.

Friends of the Lake District and the Open Spaces Society have objected to this section of fence. This follows the completion of a Landscape and Visual Impact Assessment by a landscape professional, a site visit with them and subsequent discussions to try to address their concerns.

Their concerns relate to the impact on views by the public (or receptors) from the B6261 public road of this section of fence, and the associated scattered scrub planting that it will enclose for 15 years. When receptors travel from Orton towards Shap, heading north-west, they will view this section of fence and the associated scrub planting.

For a passenger in a car – who it was agreed will be the main receptors – this view would be visible for 25-50 seconds depending on the speed of the vehicle they are travelling in.

Various alternative designs for the fence were discussed, but these did not significantly reduce the risk and concern identified.

To put this informal objection in context, the same stakeholders did not raise concerns about the proposed fence and associated planting on the west side of the M6 motorway, or south of the B6261 public road on the east side of the M6 motorway. This specific fence and the associated scrub planting is the issue.

In contrast, the views of the local community were strongly supportive of scrub planting along and between the M6 carriageways. This response was echoed by the Parish Councils who were consulted. At one Parish Council informal consultation meeting the challenge was made that there would be greater public benefit from increasing the extent of fencing and planting along the motorway corridor.

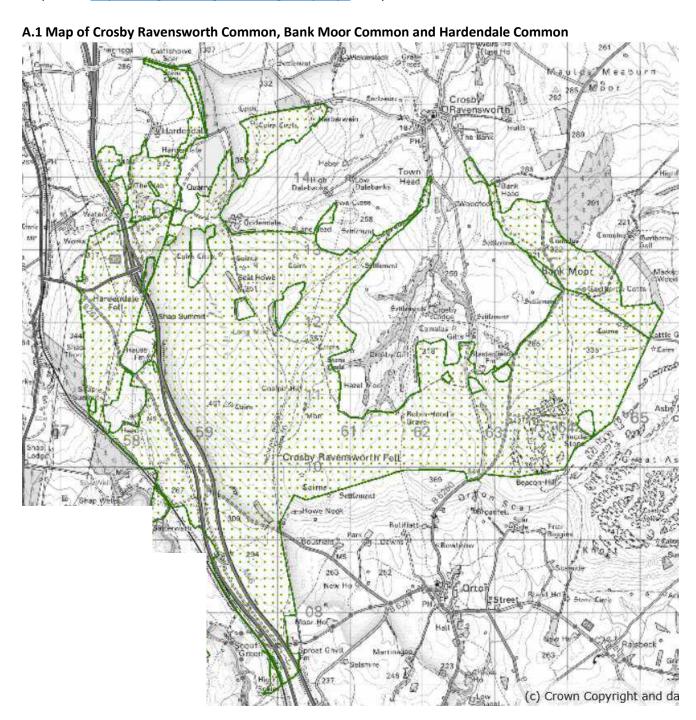
This section of fence and proposed scrub planting is within the Yorkshire Dales National Park. Their informal response was no objection, and they were informally in support of planting to enhance both the biodiversity and visual amenity of the motorway corridor area.

The Landscape and Visual Impact Assessment, undertaken by a landscape professional as part of the development of this application, similarly did not identify any significant impacts or concerns from the proposed fence in this location, or the associated scrub planting.

Natural England have confirmed that the creation of the scrub in this location is an integral and essential part of the proposals for scrub habitat expansion within the Crosby Ravensworth Fells SSSI and Asby Complex SAC. They have confirmed that the location of the fence and the scrub creation it will protect is entirely compatible with the requirements for these designated sites and avoids any risk of damage to the Notified Features of the SAC. The expansion of scrub habitat is a key part of the Conservation Objectives for the site, and the fencing is required to secure this Conservation Objective for management of the SAC.

Annex A: Maps of Crosby Ravensworth Common, Bank Moor Common and Hardendale Common

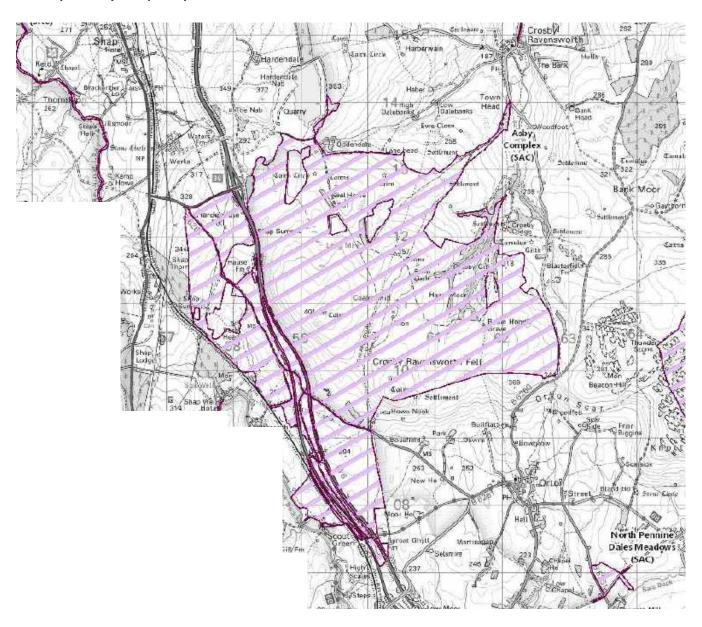
Maps from https://magic.defra.gov.uk/MagicMap.aspx. May 2020



A.2 Map of Crosby Ravensworth Fell Site of Special Scientific Interest



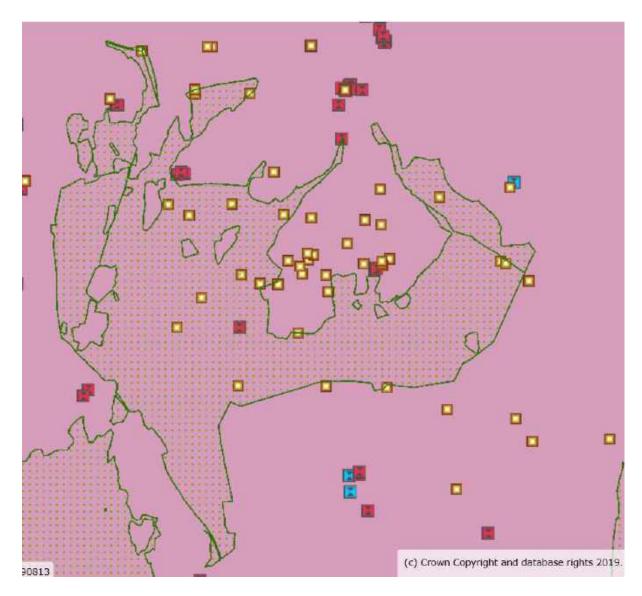
A.3 Map of Asby Complex Special Area of Conservation



Annex B: Historic interest features on Crosby Ravensworth Common, Bank Moor Common and Hardendale Common

B.1 Map of historic interest features

Map from https://magic.defra.gov.uk/MagicMap.aspx November 2019



B.2 Details of Scheduled Ancient Monuments

There are 19 Scheduled Ancient Monuments on or adjacent to the common and details of these are included here:



B.3 Maps of further historic interest features

Maps and a data table of further historic interest features have been kindly provided by Linda Smith, Countryside Archaeological Advisor, Yorkshire Dales National Park from the Historic Environment Record. These are included here:

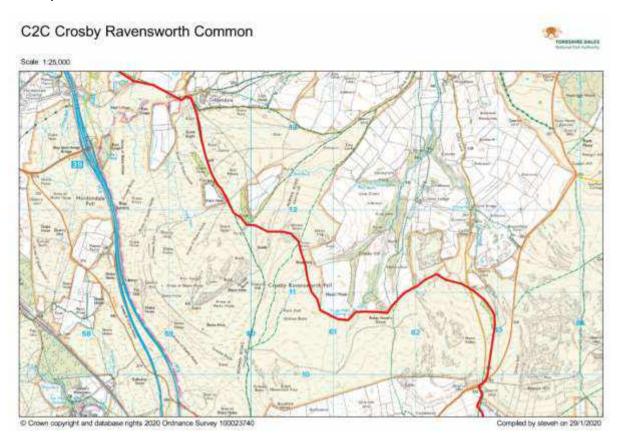


Mon number	Description	
MYD62615	Quarries	
MYD63409	Flint scatter	
MYD62645	Quarry and spoil heaps	
MYD69174	Bield	
MYD69734	Sheepfold	
MYD63080	Enclosure	
MYD69119	Bank	
MYD62760	Ewe Close quarries	
Α	Surface quarrying	
MYD62767	Lime kiln and quarry	
MYD69680	Possible round barrow	
MYD63460	Flints found	
MYD63203	Enclosures	
MYD63255	Platform with orthostats	
MYD62869	Enclosure	
DYD10387	Correct location of Charles II monument	

Cont./

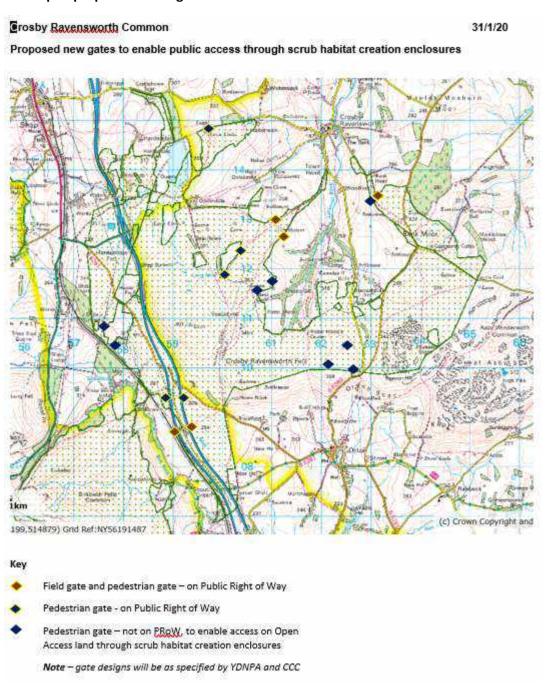
Annex C: Access maps

C.1 Map of Coast to Coast route



Cont./

C.2 Map of proposed access gates



Annex D: Cumbria County Council furniture specifications for Public Rights of Way

