

THE Cambrian Caving Council newsletter (55) for October and the *BCA Newsletter* (31) for November announced the creation of Twll Du (Black Hole), a new entrance to Ogof Draenen. Both articles presented the news as something of a challenge to the Pwll Du Cave Management Group, the body created to 'promote the conservation, management, scientific study and exploration of the caves of the area and access to them'. As trustees of the group, on that much at least we can agree. The creation of this new entrance is highly controversial and raises a number of issues that we feel necessary to bring to the attention of cavers.

When Morgannwg CC discovered Ogof Draenen in 1994, rather than exercising their explorers' prerogative, MCC made other clubs welcome in those early weeks of exploration. In 1996 MCC proposed the establishment of a democratic body to manage the inherent tension between access and conservation for the entire catchment area of the cave, and to handle relations between cavers and landowners. All clubs active in the system were invited to join the Pwll Du Cave Management Group (www.pdcmg.org.uk) with a vote for each club; it was formally constituted in October 1996. Currently comprising representatives from fourteen clubs, the PDCMG is the most representative and democratic cave management group in the UK.

At around the time that the newly-formed PDCMG was negotiating an access licence to Ogof Draenen with the Coal Authority, a second entrance was covertly dug, also on Coal Authority land. After a democratic vote this entrance was capped by PDCMG volunteers drawn from a number of clubs. Shortly afterwards, on 4th April 1997 the Coal Authority proposed a draft license containing the following clauses:

The Licensee shall take appropriate precautions/ action to prevent unauthorised persons from entering into the cave system underlying the Pwll Du Site and shall notify the Coal Authority immediately on each occasion that such trespass occurs.

No additional entries into the cave system shall be created on land owned by the Coal Authority without its prior written consent. The Coal Authority shall be notified immediately if entries to the cave system are created on neighbouring land.

Negotiations continued at some length but it was not possible to get the license approved before the Coal Authority sold the land to Pwlldu Conservation, a private limited company incorporated in 1998 and owned by locals. PDCMG began negotiations with the new landowners who had received the draft license from the Coal Authority and who required the meaning of these clauses to be retained. The final access licence http://www.pdcmg.org.uk/PDCMG_lic_red.pdf was signed in 2000 by the landowner and the PDCMG trustees, and has enabled access through Ogof Draenen's original entrance for all cavers ever since. This entrance is gated as part of the agreement, with keys readily available.

In 2009 another entrance, Drws Cefn (Backdoor Cave), was dug into Ogof Draenen. This also lies on Pwlldu Conservation land, but - unlike the other two entrances - it is also on CRoW open access land. Although CRoW status confers the 'right to roam', under the law it does not permit unauthorised disturbance of the land (ie. digging). When the PDCMG discovered the location, the landowner was informed and he again requested assistance to close it. This has not yet been achieved due to ongoing issues relating to the presence of bats, so that any work requires the approval of Natural Resources Wales. Our efforts to carry out the request of the landowner and fulfil the terms of our access licence have also been impeded by cavers who used Drws Cefn as a case with which to challenge the current interpretation of the CRoW Act by both DEFRA and NRW. As a direct result, NRW has reaffirmed its position in very clear terms: the CRoW Act does not apply to caving. Clearly then, digging a new entrance without the permission of the landowner is illegal.

It was thus with great sadness that the first task of the new secretary elected at the PDCMG meeting held on 15 October 2017 was to tell the landowner that this fourth entrance, Twll Du, had been dug into Ogof Draenen. There were already clues that another entrance existed, based on reports in social media, from meeting cavers who had not signed into the logbook (another condition of access), and - most unfortunately - the growing visible effects of uncontrolled access on a sensitive part of the cave which contains many unique and fragile formations. Subsequent to the reckless enlargement of the Last Sandwich crawl as reported in issues of Descent for August and October, we had to report to the PDCMG meeting that a number of the short grovels through the fragile gypsum-encrusted Midwinter Chambers had also been enlarged.

Neither the Cambrian nor the BCA reports indicate that, like the other entrances that were secretly dug into the cave, Twll Du is also on Pwlldu Conservation land; it is not far from Drws Cefn and directly adjacent to the tramroad, a Scheduled Monument protected by law for which the landowner is legally responsible. Nor do the reports reveal when the entrance was created, though social media suggests this was some months ago, nor the person or persons responsible (though there are strong hints online). Unfortunately, this is not an isolated incident - similar activities on the Black Mountain, an SSSI, antagonised the NRW and the Dan yr Ogof showcave owner to such an extent that access to Dan yr Ogof was put at risk for all cavers. It is also particularly regrettable that this new entrance to Ogof Draenen was reported with such a fanfare in both publications.

The BCA's new Minimal Impact Caving Guidelines state that:

Modification of cave entrances and passages [...] should only be undertaken after all possible effects have been assessed and the appropriate permission obtained from the landowner. Any modifications must be the minimum required. The long term impact of any work and materials used must be considered. If the site is designated as a Site of Special Scientific Interest or a Scheduled Monument, a 'Consent' will also be required from the Statutory Conservation Body.

It would appear that officers of the CCC and the BCA are applauding actions that directly contravene their own guidelines and values. The action also, of course, again contravenes the licence which grants access to Ogof Draenen to all cavers via the legitimate, original entrance. Although the BCA has just passed a constitutional amendment to remove its recognition of a landowner's right to grant or withhold access, this requirement is still part of the CCC constitution. For a legal challenge to be made to the NRW to claim access to a cave via a covertly dug entrance to enter a cave with established access undermines the existing negotiated agreement - it also risks alienating other landowners towards cavers generally and cave diggers in particular. It would have been much more helpful to make a legal challenge to the government departments' interpretation of the law in order to gain cavers' access to an area where there is currently no access to caves or currently no known cave passage, but where there are a number of dig sites that cavers would like to explore. Digging a new entrance as a shortcut into previously remote cave passage explored by others is not cave exploration.

Alongside the cavers who are breaking the terms of our access licence, the PDCMG has been subject to a relentless and poisonous campaign of intimidation and misinformation. We understand that most cavers will not want to become involved in such a bitter dispute and may wish to adopt a neutral stance. However, we ask people to accept that there is no equivalence between a properly constituted, representative and democratic body that acts within the law, and a group of renegades who act unilaterally and covertly without any regard towards the expressed desires of the landowner, conservation of the cave

or risk to access for others who abide by the rules. The lack of respect to other cavers and in particular to the landowner is staggering.

We certainly have been presented with a challenge. If you were the landowner and were not a caver, but had a deeply ingrained concern for conservation, what would you do?

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