

Mr S. Hodgson
Chief Executive
Forestry Commission England
National Office for England
340 Bristol Business Park
Cold Harbour Lane
Bristol
BS16 1EJ

10th April 2008

Dear Mr Hodgson,

**Ref: Norfolk County Council Minerals and Waste Development
Framework: Extraction sites and Waste Landfill Billingford and
Bintree MIN97/WAS59 (Bintree Woods)**

We are writing to object in the strongest terms to the Forestry Commission proposing land under their stewardship to Norfolk County Council for mineral extraction and waste landfill.

The Forestry Commission have put forward three sites in Norfolk

Billingford and Bintree	- reference MIN97 (minerals extraction) and WAS59 (waste landfill)
Hockham and Wretham	- reference MIN97 (minerals extraction) and WAS59 (waste landfill)
Harling	- reference MIN99 (minerals extraction)

Two of these sites are within Breckland Special Protection Area (MIN98 and MIN99) whilst the third, Bintree Woods (MIN97), directly abuts The River Wensum, a European Special Area of Conservation and a SSSI.

Bintree Woods are an area of woodland central to our five parishes. Our parishioners have valued the amenity it provides and regard it as an outstanding local natural feature in an area surrounded by agricultural land.

Naively the local communities (and no doubt the wider population of the country), assumed that this land was under the protection of the Forestry Commission. We mistakenly believed the Forestry Commission is one of few organisations that could be trusted not to exploit these areas for commercial gain. Your mission statement is

“to protect and expand Britain's forests and woodlands and increase their value to society and the environment”. (Forestry Commission Website)

The Forestry Commission is contributing land that should the proposals proceed through to implementation, will in combination with the adjoining sites MIN103 and MIN106, create a site 1.7 sq miles in area and be the largest gravel extraction and landfill site in Europe. This is inconceivable in such an environmentally sensitive area.

The Forestry Commission is an organisation in which (unusually) every citizen in the country feels some ownership of – as a stakeholder and contributor to through the taxation system and that works for their benefit. The Forestry Commission website clearly promotes access for all and places great emphasis on the recreational opportunities provided by its land to local communities. We welcome these views; our local woodland is highly valued and widely used by our parishioners.

The proposed development is a direct contradiction to the Government's stated environmental and climate objectives. We fail to see the benefit to the general public. You can also understand the hollow ring the following extract taken from the "Considering Your Interests" section of your website now has for our parishioners;

"Trees and forests can connect with communities in many ways. We try to ensure that, when our activities may have an impact on a community or a person, we involve them as soon as possible explaining, listening and taking account of their views". (Forestry Commission Website)

The Forestry Commission has made no effort to consult the local communities directly affected by their proposed change of use of Bintree Woods and has only responded after being questioned by those desperately concerned by the threat to their woodlands.

In view of the lack of communication from the Forestry Commission we would be grateful if you would accept and act upon the enclosed representations.

Yours sincerely,

Chris Langford
Chairman Bintree Parish Council

Chairman Billingford Parish Council

Chairman North Elmham

Chairman Twyford Parish Council
Parish Council

Chairman Guist Parish Council

Chairman Foxley Parish Council

Cc Rt Hon Keith Simpson MP
House of Commons
London
SW1A 0AA

Rt Hon Hillary Benn MP
Secretary of State for Environment, Food & Rural Affairs
House of Commons
London
SW1A 0AA

Representations to the
Forestry Commission

In response to

The Forestry Commissions proposal of Bintree Woods to Norfolk County
Council Mineral and Waste Development Plan

From

The combined Parish Councils of

Bintree
Billingford
North Elmham
Twyford
Guist
Foxley

Address for correspondence

Chris Langford

Introduction

Bintree Woods is an area of 121 hectares of woodland under the stewardship of the Forestry Commission. In late February the local community was informed of Norfolk County Councils Minerals and Waste Development Framework. Within this documentation, the Parish Councils discovered Bintree Woods has been proposed by the Forestry Commission as a possible site for 5,333,000 tonnes of mineral extraction, a concrete batching plant, an aggregate processing plant, a secondary aggregate recycling plant, an inert waste recycling plant and an inert waste landfill site. (Billingford and Bintree MIN97 / WAS59).

The majority of Bintree Woods lays on high ground central to our parishes of Bintree, Foxley, Billingford, North Elmham Twyford and Guist. The woods themselves directly over look the villages of North Elmham and Billingford and to the North the village of Bintree. The River Wensum borders the eastern limit of the wood where a valley from the centre of the wood drains into the River Wensum. Bintree Woods is approximately 70% coniferous plantation 30% broadleaf plantation.

The Forestry Commission's mission statement

"to protect and expand Britain's forests and woodlands and increase their value to society and the environment" (Forestry Commission Website)

We truly believe in the Forestry Commission's role to protect and enhance Britain's forests and woodland. However, their actions in proposing their three sites (totalling 648 hectares of Norfolk's woodland) for mineral extraction and waste landfill contradicts this mission statement. (Billingford and Bintree MIN97/WAS59, Hockham and Wretham MIN98 and Harling MIN99). Whilst we accept this is a small proportion of the Forestry Commission's responsibility:

"as the government department responsible for forestry in England, Scotland and Wales and the largest single woodland manager in Britain", (Forestry Commission Website)

the area is a significant proportion of the local woodland and the Forestry Commission:

"are stewards of a vital natural resource"(Forestry Commission Website)

Further representations outline our concerns for these proposals and illustrate why the proposals are inappropriate and fundamentally contradict many of the strategies and statements made by the Forestry Commission.

Climate Change

“we have championed sustainable management of forests in the UK and turned it from a concept attached to the 1992 Earth Summit in Rio into a practical reality” (Forestry Commission Website)

“contribute to global carbon cycles” (Forestry Commission Website)

Woodland is the world’s most valuable carbon fixing resource. We agree with the Forestry Commission’s promotion of the development and protection of forest and woodland both at home and abroad, in order to combat climate change and reduce our carbon footprint upon our fragile world.

However development of these proposed sites would release carbon in several ways and be detrimental to global carbon cycles:

- The use of machinery to clear the woodland.
- Removal of the trees and their ability to fix carbon.
- Removal of trees before reaching maturity and their full carbon fixing potential.
- Release of carbon from the ground by destruction of the leaf litter and root system.
- Mechanisation and industrialisation of the area with processing plants
- Converting a carbon fixing resource to a carbon producing area.
- Transportation required moving wood, minerals and waste.

As a member of G8, Britain is a world leader in the fight to combat climate change. How can our Government body, responsible for our forests and woodland, promote the protection of forests and woodland in developing countries, when it is proposing the destruction and industrialisation of its own woodland? This is exactly the kind of hypocritical action that deters developing countries from taking steps to restrain their own growing carbon emissions.

Action requested:

- **comment from the Forestry Commission on their responsibilities both nationally and internationally**
- **explanation of the original motivations for the Forestry Commission to put forward land to Norfolk County Council for mineral extraction and why it was felt this type of commercial use was better for the general public**

Ecology

“contain a healthy and diverse ecosystem” (Forestry Commission Website)

We agree with the Forestry Commissions promotion of a healthy and diverse ecosystem in their woodlands and have seen the considerable investment they have made in Bintree woods to develop this.

In recent years there has been extensive planting of broad leaf trees, which have provided new habitats to enhance this diversity. Otters, Water Voles, Kingfishers and other water based species are found in the areas closer to the river. Four species of owl are present with a particularly large Barn Owl population due to the prime hunting grounds available to them. A Goshawk is regularly seen in the area and Ospreys and Honey Buzzards are occasional visitors from nearby Sennowe Park. The clear felled areas on residual heathland are ideal habits for nightjars and woodlarks There is an ancient badger set (reputedly the oldest in Norfolk), bats, wild orchids, numerous roe deer and a diverse range of other species. An internet search shows the diverse range of flora and fauna recorded in the woodland and adjoining areas. A list of some species of conservation concern seen, in the Bintree area, is held by Norfolk Biological Records.

“we are stewards of a vital natural resource” (Forestry Commission Website)

Bintree Woods abuts the Wensum Valley, protected under European legislation as a Special Area of Conservation and under UK national legislation as an SSSI. Bintree Woods also includes an area of conservation within its boundaries.

The proposed uses for Bintree Woods include a concrete batching plant, asphalt plant, aggregate processing and secondary aggregate processing. The major industrialisation of an area so close to the Wensum Valley causes great concern for the preservation of such an important area for Norfolk's wildlife.

Converting the woods would destroy this ecosystem and waste the considerable investment the Forestry Commission has made.

Action requested:

- **justification of destruction of these habitats and potential threat to a SSSI**
- **justification of the destruction of the investment made in development of the woods using public funds**

Landscape

“benefit the landscape”^(Forestry Commission Website)

We support the Forestry Commission’s desire to benefit the landscape. Bintree Woods is situated on some of the highest ground in the region (45 – 50 metres above sea level). It is visible from all the four surrounding parishes and forms a prominent feature on the sky line. Destruction of the woods would cause loss of this feature of the landscape. The elevated nature of the site greatly magnifies the detrimental effect conversion of the woodland to a gravel quarry and processing plants would have. The proposed quarry and processing plants would be visually intrusive to all the neighbouring population and the visiting tourist population that pass through this central area of Norfolk.

“complement other land uses”^(Forestry Commission Website)

Bintree woods is surrounded by high grade agricultural land (grade 2). The grade of land relates to local environmental factors as well as soil composition. Bintree Woods currently complements the local agricultural land use, acting as a wind break and a haven for predators (see ecology). Conversion of the woods to a gravel quarry and processing plants would cause significant dust pollution and remove the natural predators protecting the crops. Large scale water abstraction will be required for the processing plants thus jeopardising the availability of water for irrigation. These factors are likely to reduce the quality of the agricultural land surrounding Bintree Woods.

Scale

The Bintree Woods site is proposed with two adjacent sites totalling 430 hectares. If all these sites are allocated for landfill the area will become the largest gravel quarry and landfill site in Europe. At 1.7 square miles this is almost twice the size of the current largest site at Brogborough. Does the Forestry Commission want to be recognised as instrumental in the development of such a site?

Amenity

"improve the quality of life for communities in and around them"^(Forestry Commission Website)

Bintree Woods is designated as public access land, has numerous paths throughout and allows access to the River Wensum.

The population of the local parishes frequently use this woodland for recreational activities such as; dog walking, walking, ornithology, running, cycling and horse riding. The Forestry Commission issues permits for horse-riding in the woodland.

"contribute to the health of people"^(Forestry Commission Website)

Development of this site would remove this important recreational facility for the population of our surrounding parishes and the tourists attracted to the area.

The scale of the combined sites at Bintree means an estimated 15 million tons of gravel extraction and at least 15 million lorry trips just for gravel extraction alone. The road infrastructure in this rural area means road safety will be compromised.

Bintree Woods is set within an area of unusual tranquillity – a particularly dark area on the CPRE's tranquillity map. The industrialisation and transportation required for the proposed sites will remove this tranquillity and reduce the quality of life of the population of the local parishes for the 60 – 80 years it would take to process the sites. This is in direct contradiction of your stated objectives.

Mineral reserves – land bank

Norfolk Minerals and Waste Development Framework has identified the need for 30 million tonnes of mineral extraction to ensure an adequate landbank until 2021. Minerals Site Allocations Development Plan Document identifies 80 million tonnes within the proposed sites. This discrepancy between need and potential negates the requirement of the Forestry Commission to propose any of its "vital natural resource"^(Forestry Commission Website) for mineral extraction activity.

Inconsistencies in the consultation process

Norfolk County Council Minerals and Waste Development Framework illustrates the timetable for consultation, consideration and implementation of the Minerals and Waste Development Framework. We agree with the need for consultation, consideration of that consultation and transparency of the decision making process to ensure the appropriateness of allocations.

We have recently learnt of the decision to withdraw two of the proposed sites, MIN98 and MIN99, for which we commend the Forestry Commission. However, they are still pursuing MIN97 and the destruction of Bintree Woods.

The environmental status of the land involved has always been known. We do not understand why the decision to withdraw MIN98 and MIN99 has been made prior to the completion of the consultation period, particularly after so much time and investment has been made by the Forestry Commission in preparation for the consultation. **This inconsistency creates gross inequalities and jeopardises the fairness of the consultation process.**

Withdrawal of MIN98 and MIN99 by the Forestry Commission

We understand the Forestry Commission's decision to withdraw the Hockham and Wretham and Harling sites was based upon based upon:

- environmental and ecological grounds
- an acknowledgement that Forestry Commission land carries high environmental constraints
- discussions with the Norfolk County Council
- recognition there is adequate mineral reserves for land banking without including the withdrawn sites.

Comparison of the three sites, using the Norfolk County Councils own – Evidence Base (from the Minerals and Waste Development Framework – Minerals Site Allocations Development Plan) demonstrates only minor differences between them. See Appendix

These minor differences are in part due to oversights in the documentation and are corrected below (references to section numbers in the Appendix):

1.1 The evidence base makes no mention of public access to MIN97, despite the designation of MIN97 as public access land.

1.5 The majority of MIN97 is an area of high ground set within surrounding low land. This makes the woods a prominent feature of the landscape and can be viewed from all the surrounding areas for up to five miles. The villages of North Elmham and Billingford view the southern border of the woods. Five houses on the former county school site are surrounded by and abut the woods.

1.8 MIN97 is also subject to waste allocation like MIN98

2.1 MIN97 abuts the River Wensum which is a SSSI and SAC. SAC's have the same level of protection as SPA under the Habitat Directive. The Western portion of the woods are an area of conservation.

2.2 No mention of the Wensum Valley SAC and SSSI. MIN97 has a valley within it which drains directly into the River Wensum.

2.3 Both MIN98 and Min99 mention Woodlark and Nightjar, but they are not mentioned in MIN97. Both these species favour clear felled areas in commercial plantations, particularly where the underlying soil type is heathland. MIN97 has both these characteristics. Even though woodlark and nightjar have not been identified (since a formal ecological survey has not been undertaken), the BTO have historical records of nightjar in the woods; development of MIN97 will remove this ideal habitat for them and stop any colonisation by them if they are not there already.

2.6 Given the similarity between the 3 sites restoration of MIN97 is likely to be as complicated as MIN98 and MIN99.

2.7 Both MIN98 and MIN99 are proposed as "lots" of potential to create target habitats. MIN97 is listed as lowland mixed deciduous woodland. MIN97 is already underlying heathland and development would remove this heathland habitat.

Given the similarities between the three sites we cannot understand why Bintree Woods MIN97 has not also been withdrawn.

Action requested:

- **explanation of the inconsistency of the decision to withdraw MIN98, MIN99 and not MIN97**
- **under the Freedom of Information Act, provide the information held by the Forestry Commission used for the decision to withdraw MIN98, MIN99 and not MIN97**
- **the Forestry Commission to reconsider their decision not to withdraw MIN97 in light of these representations**

Summary

Proposal of Forestry Commission land for mineral extraction and landfill is contrary to their mission statement and is detrimental to their image as protectors of our natural world.

Norfolk has enough potential minerals reserves without the proposal and allocation of Forestry Commission land.

The Forestry Commission may be complicit in the creation of the largest gravel pit and landfill site in Europe

The three sites proposed in Norfolk by the Forestry Commission have similar environmental constraints, yet Bintree Woods has not been withdrawn.

Summary of actions requested

- **Comment from the Forestry Commission on their responsibilities both nationally and internationally.**
- **Explanation of the original motivations for the Forestry Commission to put forward land to Norfolk County Council for mineral extraction and why it was felt this type of commercial use was better for the general public.**
- **Justification of destruction of these habitats and potential threat to a SSSI.**
- **Justification of the destruction of the investment made in development of the woods using public funds.**
- **Explanation of the inconsistency of the decision to withdraw MIN98, MIN99 and not MIN97.**
- **Under the Freedom of Information Act, provide the information held by the Forestry Commission used for the decision to withdraw MIN98, MIN99 and not MIN97.**
- **The Forestry Commission to reconsider their decision not to withdraw MIN97 in light of these representations.**

Appendix

From: Norfolk Minerals and Waste Development Framework - Minerals Site Allocations Development Plan Document: - Evidence Base

MIN 98	MIN 97	MIN 99
1 Landscape	1 Landscape	1 Landscape
1.1 Site description	1.1 Site description	1.1 Site description
The site is a large area of woodland. It is mostly planted with conifers but there are some areas of broadleaves, particularly on the boundaries of the main rides through the wood and along the boundaries. There are also some small areas of damp grassland and a former quarry now used as a motorcross track.	The site comprises a large upland area of predominately conifer plantation although it includes areas of broadleaf woodland to the west.	The site is a large block of plantation woodland, containing areas of heathland. The sections closest to the boundaries and roads are planted with broadleaves, while the main planting areas are conifers. There is a minor road running along the northern boundary, and another which goes through the eastern part of the site. As the site is managed by the Forestry Commission, there is public access throughout, with a number of rides through the woodland. There is also a Public Right of Way which runs through the western part of the site.
1.2 Landscape context	1.2 Landscape context	1.2 Landscape context
The site forms the southern part of a much larger area of woodland. There are also other large blocks of plantation woodland in the area. In between the woodlands is gently rolling arable countryside, characterised by large fields. It has been defined as D2 'Breckles Heath' in the draft Landscape Classification of Breckland.	The site lies within a wider arable area to the west of the River Wensum and falls within the Settled Tributary Farmland Landscape Type as described in the draft Breckland Landscape Character Assessment.	To the north of the site is another large block of plantation woodland of similar size. To the south and west are predominantly flat arable fields with belts of woodland along their margins. To the east is arable countryside with copses of woodland within it. It is a very well-wooded landscape. Within the Draft Breckland Landscape Character Assessment, the area is categorised as the Quiddenham section of the Brecks Heathland with Plantations landscape type.
1.3 Known landscape constraints (AONB, Broads, Brecks, Conservation Area etc)	1.3 Known landscape constraints (AONB, Broads, Brecks, Conservation Area etc)	1.3 Known landscape constraints (AONB, Broads, Brecks, Conservation Area etc)
None	The site lies within the Wensum Valley Countryside Management Project Area.	None
1.4 Existing landscape detractors	1.4 Existing landscape detractors	1.4 Existing landscape detractors

<p>There is a motorcross course within the site on the western side. Although not an aesthetic detractor, it would affect the tranquillity of the landscape when being used. There are also odours from a poultry unit to the west of the site.</p>	<p>No</p>	<p>None</p>
<p>1.5 Existing viewpoints/ landscape features</p>	<p>1.5 Existing viewpoints/ landscape features</p>	<p>1.5 Existing viewpoints/ landscape features</p>
<p>The A1075 Dereham to Watton road runs along the north-western boundary of the site. At the northern end of it, on the other side of the road is a car park and picnic area for forest users. Few dwellings overlook the site – ‘Pine View is opposite the motorcross track, there are some dwellings to the south-west at Stonebridge, there would be views over the northern tip of the site from the upper floors of Hockham Hall and long-range views over the south-eastern part from the farm and dwellings at Little Hockham. ‘Old Farm’ is directly to the south. All of these views could be screened by leaving a belt of trees along the boundary and only excavating the minerals from the heart of the site. The main viewpoints in this case are the paths which run through the woodland. Most are permissive, but a public footpath runs through the site on a northwest-southeast axis. A public bridleway called Bambridge Lane (which forms part of the Peddars Way Long-distance Trail) runs along the eastern boundary of the site.</p>	<p>The edges of the woodland are visible from surrounding roads. In addition views of the wood can be seen from bridleway Billingford RB1 which runs along the southern boundary of the wood and bisects its south west corner. Housing on the former County School site can view the western fringe of the wood.</p>	<p>No properties overlook the site – the few dwellings to the south are well screened by woodland belts. The main viewpoints are the road on the northern boundary and the road, footpaths and rides within the woodland itself. The area is so large that it would be quite possible to leave buffer zones of screen planting alongside the roads and paths and still find places where excavation could take place.</p>

1.6 Impact of development in landscape terms	1.6 Impact of development in landscape terms	1.6 Impact of development in landscape terms
If the mineral workings were limited to the heart of the woodlands, the visual impact on the surrounding area would be minimal – only the additional lorries in the area would have an impact. There would be some adverse effect on the tranquility of the site, although this is already affected by the main road and motorcross course. There would be an adverse impact on people walking through the woods unless the workings were limited in size at any one time, much like the clear-felling and replanting of individual compartments at present.	The site lies within an area of relative tranquillity as defined by the CPRE and a dark landscape on the county map. The site comprises a large area of conifer plantation and it would be feasible to design a working scheme to minimise visual intrusion of a mineral working although the noise would affect the tranquility of the site. In addition the site is remote from principle roads and any access arrangements could have an impact on the wider landscape. The broadleaf edge to the west should be retained.	Although visual intrusion could be limited by choosing places within the site well away from the paths, there might be some impact on the quiet enjoyment of the countryside. This is particularly true of the open Harling Heath, which forms part of the eastern section of the site.
1.7 Impact of potential restoration scheme	1.7 Impact of potential restoration scheme	1.7 Impact of potential restoration scheme
Returning the site to woodland, possibly with some areas of Breckland heath, would be the most appropriate form of restoration.	It should be possible to design a suitable restoration scheme to fit within the widerlandscape and there may be potential for heathland restoration.	Restoration to woodland or heathland would be most appropriate.
1.8 Specify any other ‘issues’ than those listed above that may be relevant in relation to allocating the site.	1.8 Specify any other ‘issues’ than those listed above that may be relevant in relation to allocating the site.	1.8 Specify any other ‘issues’ than those listed above that may be relevant in relation to allocating the site.
The site is also subject to a request for Waste allocation.	Access arrangements to the site may impact on the wider landscape.	There are campsites in the block of woodland to the north of the site. The potential effect on these businesses will need to be taken into account.

MIN 98	MIN 97	MIN 99
2 Ecology	2 Ecology	2 Ecology
2.1 Is the potential allocation within or in close proximity to any of the natural environment designations and, if so, which?	2.1 Is the potential allocation within or in close proximity to any of the natural environment designations and, if so, which?	2.1 Is the potential allocation within or in close proximity to any of the natural environment designations and, if so, which?
Within Breckland SPA	No	Within Breckland SPA
2.2 Does the potential allocation affect the drainage of any of the natural environment designations and, if so, which?	2.2 Does the potential allocation affect the drainage of any of the natural environment designations and, if so, which?	2.2 Does the potential allocation affect the drainage of any of the natural environment designations and, if so, which?
No but disturbance and habitat loss are the issues here.	Possibility, outline report from KEYGS suggests a need for further monitoring.	No but disturbance and habitat loss are the issues here.
2.3 Provide details of any protected species or their habitats likely to be affected if the site were to be allocated.	2.3 Provide details of any protected species or their habitats likely to be affected if the site were to be allocated.	2.3 Provide details of any protected species or their habitats likely to be affected if the site were to be allocated.
Woodland and nightjar	Bats, and Barn Owl nesting habitats	Woodlark and nightjar.
2.4 Provide information on any Biodiversity Action Plan species or related habitats likely to be affected if the site were to be allocated.	2.4 Provide information on any Biodiversity Action Plan species or related habitats likely to be affected if the site were to be allocated.	2.4 Provide information on any Biodiversity Action Plan species or related habitats likely to be affected if the site were to be allocated.
Possibly some nightjar, linnet and stone curlew on rides.	Unknown without surveying the woodland	Possibly nightjar, linnet and stone curlew on rides.
Is there a need for any surveys to safeguard protected or Biodiversity Action Plan species.	Is there a need for any surveys to safeguard protected or Biodiversity Action Plan species.	Is there a need for any surveys to safeguard protected or Biodiversity Action Plan species.
Yes, but habitats regulations issues take precedent at this site.	Yes, bats, barn owls, badgers, nesting birds if work intended during nesting period. An Environmental Impact Assessment would need to be carried out for the removal of this established woodland.	Yes, but habitats regulations issues take precedent at this site.
2.5 On the information provided what restoration scheme do you think could be proposed in order to minimise impacts to ecology.	2.5 On the information provided what restoration scheme do you think could be proposed in order to minimise impacts to ecology.	2.5 On the information provided what restoration scheme do you think could be proposed in order to minimise impacts to ecology.

Very complex issue here. Heathland would be easy to create and desirable, but SPA birds needs rotational clearfell forestry.	Lowland mixed deciduous woodland could replace the plantation woodland. However there is great ecological value in retaining the established wood.	Very complex issue here. Heathland would be easy to create and desirable but SPA birds needs rotational clearfell forestry.
2.6 Impact of any potential restoration scheme	2.6 Impact of any potential restoration scheme	2.6 Impact of any potential restoration scheme
Complicated		Complicated
2.7 Is there potential to create any target habitats (e.g. heathland).	2.7 Is there potential to create any target habitats (e.g. heathland).	2.7 Is there potential to create any target habitats (e.g. heathland).
Yes, lots	Lowland mixed deciduous woodland	Yes, lots
2.8 Specify any other 'issues' than those listed above that may be relevant in relation to allocating the site.	2.8 Specify any other 'issues' than those listed above that may be relevant in relation to allocating the site.	2.8 Specify any other 'issues' than those listed above that may be relevant in relation to allocating the site.
Restoration and SPA objectives are key to this site. Could be exciting and beneficial in ecology terms however	None	Restoration and SPA objectives are key to this site. Could be exciting and beneficial in ecology terms however.