



8th December 2022

Subject: Appeals FAC 128/2021, 129/2021, 130/2021 relating to Licence CN86088

Dear

I refer to the appeal to the Forestry Appeals Committee (FAC) in relation to the above licence issued by the Minister for Agriculture, Food, and the Marine. The FAC established in accordance with Section 14A (1) of the Agriculture Appeals Act 2001 (as amended) has now completed an examination of the facts and evidence provided by all parties to the appeal.

Decision

Having regard to the evidence before it, including the full Department of Agriculture, Food and the Marine (DAFM) record of the decision, the notice and grounds of appeal and a Statement of Fact (SoF) provided by the DAFM, all materials on file, and in particular the following considerations, the FAC has decided to set aside and remit the decision of the Minister regarding licence CN86088.

Licence

Licence CN86088 is for 18.67 Ha. of GPC 3 afforestation in the townland of Fingreagh Upper, Co. Leitrim, and was submitted to the DAFM on the 31st of March 2020 and was remitted to the Minister on the 14th of April 2021 ***“to accurately assess the level of forest cover relevant to the application and to undertake a new assessment to determine whether the application should be subject to the EIA process under the EU EIA Directive before a new decision is made. In addition, should approval be granted it should include an additional condition to adhere with the Environmental Requirements for Afforestation (DAFM, 2016)”***.

On the 24th of September 2021 a new decision approving the licence was issued with conditions including: compliance with DAFM Technical Standards, a minimum setback from the public road of 10m and 10m of broadleaved planting, a minimum setback from dwelling houses of 60m and 15 rows of broadleaved planting; a minimum setback from the nearest water's edge of the stream located on western edge of plot 1 of 20m and 5 rows of broadleaves of native species such as birch, rowan, willow, and oak, to be planted and treated in accordance with Table 5 and Table 6 of the Environmental Requirements for Afforestation; planting by scarp mounding only and no drainage works to take place within 25m of the watercourse; the retention of all trees/hedgerows on site.

Forestry Appeals Committee.

The appeal was considered at the sitting of the FAC held on the 28th of September 2022. The FAC members present were: Mr. Myles Mac Donncadha (Deputy Chairperson) and Mr. Iain Douglas.

Background

The proposal consists of the planting of 18.67 Ha. of GPC 3 forestry (Sitka spruce and Additional Broadleaves) in one plot at Fingreagh Upper, County Leitrim, 15.87 Ha. of which will be Sitka spruce and 2.8 Ha. will be planted with native broadleaved species. The site has a watercourse adjoining the southern section of the western site boundary and there is a public road in close proximity to the same boundary. The Inspector's Certification Report (with a spatial run of 23rd September 2021) indicates that the soil type underlying the project area is predominantly podzolic in nature. The slope is predominantly flat to moderate (<15%). The project area is crossed by/adjoins an aquatic zone(s). The vegetation type(s) within the project area comprise grass/rush.

The licence was not referred to any statutory body or the local authority.

An Appropriate Assessment Screening (AAS) was carried out and is recorded on the file. The screening considered 3 sites within 15km and that there was no need to extend that distance in this case. The European sites considered were Boleybrack Mountain SAC (Site Code 002032); Cuilcagh-Anierin Uplands SAC (Site Code 000584) and Lough Gill SAC (Site Code 001976). The decision of the AAS was to screen out all sites concluding that there no possibility of a significant effect on any Natura 2000 site, and that Appropriate Assessment was not required for a number of stated reasons which included; the location of the project within a separate water body catchment to that containing the Natura site; no upstream connection to another Natura Site; and the position of the project area downstream from another Natura site, and therefore the subsequent lack of any hydrological connection to the sites.

The DAFM prepared an In-combination Statement on the 22nd of September 2021 on the proposal's potential to impact on the three Natura 2000 sites in combination with other plans and projects. The In-combination Statement concludes that the proposed afforestation, when considered in combination with other plans and projects, will not give rise to the possibility of an effect on the Natura sites listed in the AA Screening.

Inspector's Certification Report also contains a new Assessment to Determine EIA Requirement (as required by the decision remitting the licence to the Minister) which indicates that the approximate % of forest cover at present in the applications townland has been revised from 21.69% to 60.87%; the approximate % of forest cover at present in the application's townland 5 years ago remains at 21.69%; the approximate % of forest cover at present within 5 km has been revised from 23.67% to 31.59% and the approximate % of forest cover 5 years ago within this 5 km buffer has been revised from 21.14% to 30.05%.

The new Assessment to Determine EIA Requirement considered the proposed afforestation across a range of criteria and a determined that the proposal should not be subject to the Environmental Impact Assessment process.

The proposed afforestation was Desk Assessed and Field Inspected under the original licence application.

There were four third-party submissions and three appeals on the initial licence application.

Appeal

There are three third-party appeals against the current decision to approve the licence one of whom did not make a submission on the initial licence application.

The grounds of appeal are summarised as follows:

1. FAC 128/2021 Appeal dated 24/09/2021

Administration

- Previous issues/objections/concerns not addressed.
- Failure to comply with the Forestry Regulations.
- Inaccuracy/deficiency of information in the application makes it invalid.
- Site notice not in place.
- Appellant should not have to pay for new appeal as it is the same licence.

Inspectors Certification

- The percentage of forest in the area is not accurate.

Environment

- The licence approval which will result in loss of biodiversity/habitat with is contrary to DAFM policy to protect the environment & biodiversity.
- Lands are High Nature Value and should not be planted.
- Cumulative impact for EIA.
- contrary to DAFM policy.

Appropriate Assessment

- the lands form part of a wider habitat which support the Marsh Fritillary Butterfly and foraging for the Hen Harrier.

Additional Submission dated 22/08/2022

Administration

- Too little time to respond to FAC letter.
- Access inadequate.
- Mapping & Site boundaries are not accurate.
- Biomap inaccuracies/legibility/watercourse not identified.
- The Pre-approval submission report is not accurate.

Inspectors Certification

- Machinery access not possible for woody weed removal & mounding.
- Response to site notice question is N/A which is incorrect.
- The slope is not flat to moderate but steeper than stated.

Environment

- There are archaeological remains on site.
- EIA required because of cumulative forestry in the area is greater than 50 Ha.

Appropriate Assessment

- Hen Harrier is present 1km from this site & Marsh Fritillary Butterfly is present 6.4km from the site.

2. FAC 129/2021 Appeal dated 24/09/2021

Administration

- Denial of legal rights, no notification of licence application.
- Site boundaries are not correct and need to be agreed before planting can commence.

Public Health & Safety

- Risk of landslide is a safety issue for the house & public road.
- Afforestation will block broadband signal needed for instances of emergency.
- Negative impact on health & well-being.

Amenities

- Loss of productivity of smallholding.

- Loss of property value.

Environment

- Loss of daylight & sunlight.
- Impact on biodiversity.

Additional Submission dated 22/08/2022

- Response to DAFM Statement of Fact
- Map of broadband line of sight and & photograph of site notice location.

3. FAC 130/2021 Appeal dated 24/09/2021

Administration

- Why pay for new appeal when still the same licence?
- Biomap is non compliant, drains & hedgerows not shown.

Inspectors Certification

- Q10 Project Description. How is the cumulative effect being assessed given the % of forest cover has changed significantly from previous certification? Q6 forest cover now 60.81% when previously 21.69% in the townland.
- Q.11 Is forestry a significant issue in the area previous answer was S/A now the answer is No.

Environment

- EPA should have been consulted re Water Quality of Lough Allen.
- Access issue has not been resolved.

AA/In-combination

- How can impact be excluded when cumulative not taken into account?

Hearing

At the sitting of the FAC it had before it the full DAFM record of the decision, the notice and grounds of appeal and a Statement of Fact (SoF) provided by the DAFM and all materials on file. Having regard to the particular circumstances of the appeal, the FAC considered that it was not necessary to conduct an oral hearing in order to properly and fairly determine the appeal.

DAFM Statement of Fact provided to the FAC

The SoF provided by the DAFM dated 6th of April 2022 confirms the administration details of the licence application and indicates that the licence application was desk assessed and that a field assessment was carried out on the 12th of May 2020. The SoF states that the DAFM was satisfied that all criteria in its standards and procedures were adhered to in making the decision on this licence application. The SoF included a statement dated the 23rd of March 2022 from the Forestry Inspector confirming that the Appropriate Assessment (AA) process was carried out using the procedures of November 2019, that the standard operating procedures were applied, and contained a response to the grounds set out in the three appeals. The Forestry Inspector's SoF for FAC 129/2021 states that the soil type within the site is predominantly Surface Water Gley, a mineral soil.

Consideration by FAC.

Appropriate Assessment.

In considering the appeal the FAC examined the AAS undertaken by the DAFM. The FAC identified the same three sites as being within 15km from the proposal as the DAFM: Boleybrack Mountain SAC (Site Code 002032); Cuilcagh-Anierin Uplands SAC (Site Code 000584) and Lough Gill SAC (Site Code 001976). The FAC is satisfied that there was no need to extend the 15 Km distance in this case.

The FAC considered the nature, scale and location of the proposal, the European sites identified and their conservation objectives and the reasons for screening out for Stage 2 Appropriate Assessment provided by DAFM. The FAC noted that the DAFM considered each site in turn and provided the reasons for screening out all the sites for AA and that details of other plans and projects were also examined by the DAFM concluding that the project does not represent a source, or if so, has no pathway for an effect on any of the Natura sites listed in AA screening conclusions and the DAFM determined that the project, when considered in combination with other plans and projects, would not give rise to the possibility of an effect on the Natura sites. The FAC considers that the DAFM followed its AAS process and is not satisfied that the DAFM made a serious or series of errors in their AAS.

Environmental Impact Assessment (EIA).

The FAC noted that the DAFM, in advance of making the decision to grant the licence, the Inspector's Assessment to Determine EIA Requirement recorded a consideration of the application across a range of criteria relevant to the proposed afforestation, including water, soil, terrain, slope, designated areas, landscape and cumulative effects, and determined that the project was not required to undergo EIA.

The FAC took particular note of questions 6-9 (incl.) in the Inspector's Certification regarding the percentage of forest cover in the townland and within 5km of the site and referred to the aerial photography of the area in the publicly available Forest Licence Viewer. The FAC noted that the revised figures show a higher estimate of the amount of forest cover in the townland of 60.87%. The FAC is not satisfied that the DAFM made a serious or series of errors in this aspect of their Assessment to Determine EIA Requirement.

The FAC noted in the Inspector's Certification that the proposed afforestation is not located in an area of High Visual Amenity in the Leitrim County Development Plan 2015-2021.

The FAC is satisfied that the range and type of criteria considered is appropriate for DAFM to determine whether an Environmental Impact Assessment Report (EIAR) was required having regard to the nature, scale, and location of the proposal and that the Minister has not erred in the processing of the application in this regard.

Water Framework Directive (WFD).

EPA mapping shows the site lying within Catchment Upper Shannon 26A. The relevant sub catchment is the Owengar[Leitrim]_SC_010. Forestry not identified as a pressure in this part of the sub-catchment. The site adjoins the WFD River water body Diffagher_010 which was of Good Status between 2013-2018 and is Not at Risk. The underlying Ground Water body is the Lough Allen Uplands IEGB_SH_G_002 which was of Good Status between 2013-2018) and is Not at Risk.

FAC Consideration of the Grounds of Appeal.

In the interest of efficiency, the FAC, considered the three appeals together under the following headings:

Administration.

Notification of the public

The FAC noted that the provision for notification of the public of forestry licence applications is set out in the Forestry Regulations 2017 which inter alia requires the DAFM to publish a notice which states the period within which the public can make submissions and the erection of a site notice at

the entrance from the public road to the land to which the application relates. The FAC further noted that the DAFM SoF indicated that the application was advertised to the public on the 20th of April 2020 and that there is a photograph of the public notice in situ on the file. The FAC noted that the public consultation procedure resulted in five submissions made from the public to the initial licence application. The FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Site notice not in place.

The FAC noted that there is a copy of the site notice and a photograph of the site notice in situ on the file and that the location of the site notice is clearly marked on the biomap submitted by the applicant dated 31/03/2020. The FAC noted that none of the appellants who raised this ground of appeal adduced evidence as to what date the site notice was not in place during the five-week period specified in the Forestry Regulations. The FAC also noted that the DAFM inspected the after the five-week period had expired and was required to enter N/A to the question on the presence of the site notice in the Inspection Details section of the Inspector's Certification. The FAC has no evidence to conclude an error has been made regarding this ground.

Appellant should not have to pay for new appeal as it is the same licence.

In relation to the contention in the grounds that the appeal fee (€200) should not apply to a new appeal because it is not a new licence. The FAC finds that the legislative basis for the FAC is set out in Irish law and that the FAC is independent of the DAFM and carries out its functions in an independent and impartial manner in respect of the appeals process, as mandated and required under Irish law. The FAC also finds that where a person wishes to make an appeal under the Agriculture Appeals Act 2001 (as amended) in respect of forestry licencing a €200 appeal fee is payable. The FAC further finds that the said fee is prescribed in Article 10 of the Forestry Appeals Committee Regulations 2020. The FAC therefore concluded that no convincing evidence has been provided by the appellant to substantiate this contention.

Failure to comply with the Forestry Regulations & Inaccuracy/Deficiency of information in the application.

In relation to the maps and information provided, the FAC noted that the DAFM considered that the biomap contained sufficient information to enable it to make a decision and that it regarded that there was adequate access to the site in accordance with Section 5.3.2 of the Forestry Standards Manual 2015. The FAC further noted that the applicant is described as owning the land. The location of the site notice on the public road is marked on the Biomap. The FAC noted that the lands were inspected by the DAFM which required access to the lands. The FAC is satisfied that the applicant has sufficient access to the lands and that the maps and application were sufficient to process and issue the licence.

Property Boundary & Access.

The FAC noted that neither of the appellants who contended there were issues regarding property boundaries and access have adduced any evidence to substantiate such concerns. It was noted by the FAC that the aerial photography submitted with the application does indicate a track leading to the site from the public road. The FAC are not in a position to adjudicate on legal entitlements on ownership of the land to be planted and ownership or use of the track but noted that any decision to grant a licence does not in itself confer any recognition of the ownership of the land or the presence of an access or a right to access to a public road or the right to carry out the project in the absence of a legally available right of access and that it is a matter for the applicant to secure this.

Public Health & Safety.

Slope and Landscape Risk

The FAC noted that one of the appellants contends that there is a risk of landslide and that the risk has not been assessed. The FAC noted that while the Inspector's Certification states that the soil type underlying the project area is predominantly podzols and that the site has a flat to moderate slope <15%. The FAC noted however, that the Inspector's SoF states that the soil type in the area are Surface Water Gleys, a Poorly Drained Mineral soil. One of the appellants contends that the slope is steeper than that described and having examined the publicly available information on the OSI mapping it appears to the FAC that the slope is ca. 16% on average which is classified as steep. The FAC noted that Table 9.1 of the Forestry Standards Manual 2015 indicates that the risk of erosion of gleys (the type of soil least susceptible to erosion) on slopes between 8° and 17° is low. The FAC noted that the licence approval is conditional on compliance with the Forestry Standards Manual 2015 among other standards and therefore concluded that no convincing evidence has been provided by the appellant to substantiate the contention that landscape risk has not been assessed.

Risk to Personal Safety

The FAC noted the contention of one appellant that the proposed afforestation would block their internet broadband connection. The FAC further noted that a condition in the licence requires the conifer plantation to be setback of 60m plus 15 rows of broadleaved from the dwellinghouse. FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Health & Wellbeing

In considering the ground of appeal relating to the impact on health and wellbeing caused by the proposed afforestation. The FAC noted that the site was inspected in the field and that the DAFM SoF for appeal FAC 129/2021 indicates that there are multiple large mature conifer trees already in place on the property boundary. The FAC noted the licence condition requiring the new conifer plantation to be setback of 60m plus 15 rows of broadleaved from the dwellinghouse and that this requirement exceeds the standard set back of 60m set out in the Forestry Standards Manual 2015. FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Amenities.

Loss of productivity of smallholding & Loss of property value.

In considering the ground of appeal relating to the impact on loss of productivity of the smallholding & loss of property value caused by the proposed afforestation. The FAC noted the licence condition requiring the conifer plantation to be setback of 60m plus 15 rows of broadleaved from the dwellinghouse and that this requirement exceeds the standard set back of 60m set out in the Forestry Standards Manual 2015. FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Inspectors Certification.

The FAC considered the contention in two of the appeals that there are errors in the Inspector's Certification. The FAC noted that the initial decision by the Minister was set aside and remitted "to accurately assess the level of forest cover relevant to the application and to undertake a new assessment to determine whether the application should be subject to the EIA process under the EU EIA Directive before a new decision is made." The FAC noted that in Assessment to Determine EIA Requirement in the third and final Inspector's Certification the level of forest cover had been amended and that a number of responses to several other questions were different to the second Inspector's Certification. The FAC has taken those changes as evidence that a new Assessment to Determine EIA Requirement had been carried out.

Two of the three appeals on the original decision were from residents of the adjoining townland of Lisnanorris (FAC 319/2020 and FAC 323/2020). In the current appeals, again, two of the three appellants, (FAC 128/2021 and 129/2021), also appear to be local, based on the addresses submitted. The decision record for the current decision shows a response of "Yes" for Question 40 in the section on the Assessment to Determine EIA Requirement "*Comments and issues from the general public and non-governmental bodies were received and examined?*". Given the opinions expressed in submissions from local residents the FAC considers the assertion that all such submissions have been reviewed to be at odds with the answer of "No" to Question 11 in the in the section on the Assessment to Determine EIA Requirement "*Is the amount and type of forest cover in this locality known to be a significant issue?*". The FAC considers the answer of "No" to Question 11 to be a breach of fair procedure and as such represents a serious error in the making of the decision. An answer of "Yes" may not in itself trigger an EIA but should at least prompt provision of further information as to the DAFM inspector's rationale in respect of this issue.

Environment.

The licence approval is contrary to DAFM policy to protect the environment & biodiversity.

The FAC considered the ground of appeal that the approval of the licence is contrary to the Forest Service commitment to protection of the environment and biodiversity and that the proposed planting will result in loss of species/habitat loss and decline and loss of biodiversity. The FAC noted that the DAFM had carried out an Assessment to Determine EIA Requirement which assessed the application across a range of criteria, including water, soil, terrain, slope, designated areas, archaeology, landscape, and cumulative effects, and determined that the project was not required to undergo the EIA process. The FAC also noted that the licence contains a requirement that the afforestation is carried out in accordance with the DAFM Environmental Requirements for Afforestation and the Forest Standards Manual and that the DAFM uses detailed ecological and species-specific guidance when assessing an application for afforestation. The FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Cumulative impact for EIA.

In addressing the ground of appeal that the cumulative forestry in the area requires EIA the FAC considered, in the first instance, the completeness of the Assessment to Determine EIA Requirement in the Inspector's Certification. In considering this aspect, the FAC noted that the EU EIA Directive sets out, in Annex I, a list of projects for which EIA is mandatory. Annex II contains a list of projects for which member states must determine, through thresholds or on a case-by-case basis (or both), whether EIA is required. Neither afforestation nor deforestation is referred to in Annex I. Annex II contains a class of project specified as "initial afforestation and deforestation for the purpose of conversion to another type of land use" (Class 1 (d) of Annex II). The Irish Regulations, in relation to forestry licence applications, require the compliance with the EIA process for applications relating to afforestation involving an area of more than 50 hectares, the construction of a forest road of a length greater than 2000 metres and any afforestation or forest road below the specified parameters where the Minister considers such development would be likely to have significant effects on the environment. The decision under appeal relates to a licence for afforestation of 18.67 Ha which is sub threshold for mandatory EIA as set in Irish Regulations. The FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

The FAC noted that in the new Assessment to Determine EIA Requirement in the third and final Inspector's Certification the revised data for forest cover was used in the assessment of potential cumulative effect. The FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Lands are High Nature Value and should not be planted.

One appellant contended that the lands are High Nature Value (HNV) farmland and should not be planted. HNV farmland, according to Teagasc 'is typically characterised by low-intensity farming associated with high biodiversity and species of conservation concern'. It is clear from the record that a DAFM inspector did visit the site and did record its characteristics, which did not accord with the Teagasc definition. No evidence was adduced to the contrary and the FAC is not satisfied that the DAFM evaluation of this site contained a serious error.

There are archaeological remains on site.

The FAC considered the ground of appeal that there is a "pre-famine dwelling and in-fields on the application lands". The FAC noted the DAFM Senior Archaeologist's Review that there is no requirement to explicitly identify the ruins of historic dwellings or infields unless they are in themselves designated as a Recorded Monument, as a Registered Historic Monument, or as a National Monument. The FAC further noted that the archaeologist suggested a more explicit condition regarding setbacks for the building remains and infields could be attached to the licence.

In respect of the small ruined rectangular building and the three small nearby infields in the centre of the site, an unplanted buffer zone/setback 10m in width shall be observed around the ruins of the building and an unplanted buffer zone/setback 5m in width shall be observed around the three nearby infields; These unplanted buffer zones/setbacks are not required to be fenced off in their own right.

Reason: *In order to safeguard the vernacular architectural heritage on the site.*

The FAC considered that the addition of a condition to this effect is warranted but to do so without the parties being afforded an opportunity to respond would not be in the interest of fair procedure and a serious error, notwithstanding the desirability of such a condition.

Loss of daylight & sunlight.

In considering the ground of appeal relating to the loss of daylight & sunlight to the dwelling by the proposed afforestation. The FAC noted the licence condition requiring the conifer plantation to be setback of 60m plus 15 rows of broadleaved from the dwellinghouse and that this requirement exceeds the standard set back of 60m set out in the Forestry Standards Manual 2015. FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Appropriate Assessment.

In considering the grounds of appeal relating to the Hen Harrier and the Marsh Fritillary Butterfly. The FAC noted that in the Forestry Inspector's SoF it is stated that that the current data available to DAFM from the NPWS is that there are no "Red Zone" areas (Hen Harrier breeding sites) or Hen Harrier SPAs with 15km of the application the nearest mapped red zone for Hen Harrier is over 50km away. The DAFM Bird Foraging Table (version 6th Jan. 2020) screens out AA for Hen Harrier when the afforestation is over 11 km (the accepted foraging distance agreed with NPWS) from the Hen Harrier SPA. The FAC noted the appellants have provided no compelling evidence to support the ground of appeal the land to be afforested support the presence of the Hen Harrier or the Marsh Fritillary Butterfly (the nearest SAC with Marsh Fritillary Butterfly as a Qualifying Interest is some 22km distant). The FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

The FAC noted that prior to issuing the current licence the DAFM prepared a new In-combination Statement dated 22/09/2021 which included all forestry related projects in the general vicinity of this site. The FAC noted the conclusion of the In-combination Statement that the project, when considered in-combination with other plans and projects, will not give rise to the possibility of an effect on the Natura site(s) listed. The FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Water Quality & Waterbody Status.

In considering the ground of appeal contending that the EPA should have been consulted in relation to the water quality of Lough Allen the FAC noted the following: that, using EPA mapping Lough Allen is located approximately 4 Km. hydrologically distant from the site; that drainage is not required on this site and that planting will be by mounding and slit planting. The FAC further noted that the WFD river waterbody Diffagher_10 adjoining the site on the western site boundary is of Good Status and Not at Risk. The FAC also noted in the SoF the Forestry Inspector indicates that referral to the EPA was not required as DAFM had sufficient information available in its IFORIS Internet system. FAC is not satisfied that the DAFM has erred regarding this ground of appeal.

Conclusion

In considering the appeal, the FAC had regard to the record of the decision, the submitted grounds of appeal and the Statement of Fact submitted by the DAFM. In accordance with Article 14B of the Agricultural Appeals Act 2001(as amended) the FAC is satisfied that a serious or significant error or series of errors was made in the making of the decision on licence CN86088 by breaches of fair procedure and that the decision should be set aside and remitted to the Minister to (a) undertake a new Assessment to Determine EIA Requirement with particular regard to the question on whether forestry the amount and type of forest cover in this locality known to be a significant issue and, subject to the outcome of that determination, to require the submission of an EIAR, if appropriate, before the making of a new decision and (b) that any licence, if issued, shall contain the condition proposed in the DAFM Senior Archaeologist's Review.

Yours sincerely,

Iain Douglas,
On Behalf of the Forestry Appeals Committee