

A.1.2. Summary of consultation responses

Made by

Comment

Archaeology

Broads Authority

The BA are concerned that the intended setback works located NW of St Benet's Abbey could affect the setting of the historic causeway. We also require details of protection work to the historic causeway for the duration of the works. The causeway should not be used for access or storage of heavy plant machinery and materials. Also the BA would like more detail of the proposed bank protection works on the St Benet's site, as design is not the standard solution.

The BA would like more information regarding the re-use or re-location of walling material, originally from the ruined Abbey, currently located in the River Bure.

Do BESL intend to set up an Archaeological Watching Brief for potential finds located in the River Bure adjacent to the Abbey?

The BA presumes that an Archaeological Watching Brief will be prepared to monitor the whole work site in this location

The BA is aware that the works area contains many historical features such as old drainage pumps. Can BESL confirm that the hydraulic model does not show any increased flows, which could make any of these structures more vulnerable to flood? The BA would like to take the opportunity to produce a method statement for use when dealing with works adjacent to historic features and would welcome the input from BESL engineers to produce a working document with agreed protocols.

Norfolk Landscape
Archaeology

We are pleased to see the proposals to conserve St. Benet's Abbey and hope that a satisfactory solution can be worked out between all interested parties. As this is a Scheduled Ancient Monument the final decision will be in the hands of English Heritage.

We are pleased to see the change to the setback to preserve Ludham Bridge windpump. However, immediately south of the bridge on the east bank are the remains of another windpump, Bridge Mill, now only a mound. Could the setback be avoided here as well? If not, we would recommend an archaeological excavation beforehand.

BESL response

BESL have worked in conjunction with English Heritage and have acquired Scheduled Ancient Monument consent for works to be carried out at St Benet's. This work is not part of this planning application but will be carried out under maintenance. The ancient causeway in this area will not be used for regular access or storage of machinery, however it may be necessary for machinery to cross the causeway in one location to gain access to the works area once at the beginning and end of the construction period only. In this case geotextiles will be used to protect the crossing point.

No excavation is proposed in this area. BESL's proposals for St. Benet's Abbey involve gabion erosion protection and burying the wall structures of the abbey behind these with backfilled material. This work is part of a maintenance scheme and not subject of this planning application. BESL have prepared these proposals in conjunction with English Heritage and have acquired Scheduled Ancient Monument consent. An archaeological watching brief will be on site at the beginning of the excavation works near the ancient causeway where setback is proposed and will be on call for the remainder of the construction period in case finds are made.

Full hydrological modelling has been undertaken and the results indicate no increase in flow in Bure, Ant or Thurne.

Comment noted.

The amended proposal will keep the piling along Nancy Oldfield Trust quay to the old mill site. From there setback will commence. Therefore the pump foundation will not be affected.

Ecology

British Dragonfly Society

Floodbank strengthening and rollback both involve change to the soke dyke and the removal of material from it. In addition, floodbank setback involves completely infilling the existing soke dyke. These processes will all cause disturbance and destruction to aquatic fauna including dragonfly larvae. Most British Odonata have a one or two-year lifecycle and overwinter as larvae. The timing of the proposed works from October 2004 onwards will affect this crucial part of the lifecycle. Whilst we are aware that the proposed works are necessary, we feel the following needs to be considered: 1) The How Hill area along the River Ant is rich in dragonfly species, including Norfolk Hawker and other key species. In total 20 species have been recorded from this area. 2) 16 species have been recorded along the River Bure, with Norfolk Hawker breeding in the marshes adjacent to the river. 3) Few dragonfly records exist along the Thurne, but the marshes adjacent to Womack Water hold several significant species, including Norfolk Hawker. The importance of unpolluted grazing marsh dykes, including soke dykes, for all of the species mentioned above cannot be overstressed. Work should be carried out with the minimum loss of habitat and with appropriate mitigation procedures to safeguard the aquatic fauna of the dykes that will be affected.

The timing of the proposed earthworks depends on a variety of factors, including suitable ground conditions. For this reason, main earthworks are generally carried out during the summer months, which limits the effect on aquatic larvae. Internal marsh dykes will be bunded off where works are taking place in adjacent soke dykes in order to limit pollution risks. Whilst disturbance to the aquatic fauna in the soke dykes cannot be avoided, the work will be carried out in sections, so that undisturbed sections can provide refuges for invertebrates. No significant effects on the above mentioned species are envisaged. Ultimately the extension of soke dyke area, with suitably vegetated margins, as a result of the works, will benefit the aquatic invertebrate fauna.

Broads Authority

The BA are concerned about the setback back solution could have an impact on the amount of grazing marsh in the Ant, Bure and Thurne currently under ESA. Loss of habitat could be significant enough to some landowners to make grazing un-feasible.

Land loss under ESA will be discussed with landowners on a case by case basis.

The BA is keen to ensure that the potential accumulative impact of the scheme on the integrity of the wider area have been considered. The BA would welcome further information on the hydrological modelling undertaken to evaluate the effect on water levels and saline intrusion on the Ant Broads and Marshes SSSI, Bure Broads and Marshes SSSI and the Upper Thurne Broads and Marshes SSSI.

Full hydrological modelling has been undertaken and the results indicate no significant effects on water levels in the Ant, Bure or Thurne as a result of the proposed works.

Can BESL indicate the timing of the works in relation to potential impacts on bird populations, in particular the wintering bird interest on St Benet's Levels.

Works are scheduled to start between April to June 2005 and are therefore not deemed to impact wintering bird populations.

English Nature

The current scheme for Compartment 5 omits any works on the northern-most section of this unit (Clayrack Marshes). Will works be undertaken? If so, given the fact that this land lies within the European wildlife site we would encourage dialogue with ourselves.

Compartment 4 work is programmed for 2006. We will involve English Nature early in the consultation process.

English Nature

The timing of the works will be critical. St. Benet's Level supports in the winter very significant bird populations, some of which are recognised within the Broadland SPA and Ramsar site.

An evaluation of the impact (flood risk) of implementing the scheme for Compartment 5 should be carried out before undertaking works on the Clayrack marshes section. Furthermore, the possible increased flood risk to Shallam Dyke Marshes SSSI, Ludham-Potter Heigham Marshes SSSI, Alderfen Broad SSSI and Upton Broads and Marshes SSSI should be assessed.

English Nature are disappointed not to have been involved in the early formulation of these works, particularly since parts of the scheme lie adjacent to a European site.

We would wish to see hydrological modelling undertaken to evaluate the effect of this scheme alone and in combination with other planned schemes throughout the Bure catchment on water levels and saline intrusion on the Ant Broads and Marshes SSSI, Bure Broads and Marshes SSSI and the Upper Thurne Broads and Marshes SSSI.

Comment noted. Timing of the works is also dependent on suitable ground conditions.

Full hydraulic modelling has been carried out and no changes in water level are predicted as a result of the scheme.

Comment noted.

Full hydrological modelling has been carried out and the results indicate no significant effects on water levels in the Bure catchment as a result of the works.

RSPB - East Anglian Regional Office

We believe the works could potentially impact either directly or indirectly on the following designated sites: Broadland Special Protection Area (SPA), Broadland Wetland of International Importance (Ramsar), The Broads candidate Special Area of Conservation (cSAC), Alderfen Broads SSSI, Ant Broads and marshes SSSI, Bure Broads and marshes SSSI, Ludham - Potter Heigham Marshes SSSI, Shallam Dyke SSSI and Upper Thurne Broads and Marshes SSSI. We would expect the ecological value of these sites fully assessed and considered during the development of this scheme and these environmental appraisals appended to any forthcoming planning application. We would ask for full hydrological modelling to be undertaken to determine the effects of this scheme on designated sites within the river system both for water level changes and alterations in saline intrusion. St. Benet's Level is known to support significant bird populations including species for which the Broadland SPA and Ramsar sites have been notified. The potential impact of the proposed works on these designated interest features will need to be fully considered. Further, careful consideration will need to be given to timetabling the work programme to avoid issues of disturbance.

The impact on the designated sites and St. Benet's Level will be considered as part of the EIA. Hydrological modelling has been undertaken and indicates no significant effects on water levels as a result of the works. The work will be undertaken outside of the main breeding season (April to July inclusive).

General

Broads Authority

The Broads Authority are concerned about the proposed setback on the River Ant. Rond creation will create new habitat therefore there are obvious conservation and landscape benefits. The River Ant is a narrow channel that is very popular with tourists and therefore heavily used by boat traffic. There are doubts whether a rond would be able to become established and survive exposure to high levels of erosion caused by boat wash.

Erosion will be closely monitored and if excessive erosion is apparent, BESL will install soft erosion protection along the margin of the new rond.

Broads Society

Apart from the frontage of St. Benet's Abbey (please see below), the proposals outlined in the leaflet are acceptable, subject to the following:-

1. We think that work on the R. Thurne and Womack Water should be afforded a lower priority than on the remaining undefended settlements (eg Brundall, Beccles etc.).

2. The R. Ant is, like the Thurne and Womack Water, a narrow waterway which is subject to very heavy boat usage between March and October. We would urge that the proposed bank works be carried out during the winter months only to prevent navigation on any of these waterways being obstructed. In this respect, we were concerned to note from the Consultation Document that"Work is proposed to start in October 2004 and be completed by the end of 2005", the implication being that it will be in progress throughout the summer of 2005. We do not consider this acceptable. We would add that we would object to any proposal by BESL to close these rivers to navigation, even for short periods during the winter months.

3. Where sections of piling are to be retained, any missing walings should be replaced.

4. Arrangements should be made with the Broads Authority whereby the new piling to be provided at How Hill Staithe, and on either side of Ludham Bridge, should be designated for free 24 hour public mooring. This should prevent private landowners charging a fee for mooring where the piling concerned has been provided at public expense.

5. It would appear that there is no public right of way along much of the riverbank subject to the present proposals. The opportunity should be taken, in conjunction with the Broads Authority, to negotiate one with the landowners concerned.

5. The erosion protection to be provided may need to be marked, either temporarily or permanently, to prevent it becoming a hazard to navigation.

1. Work on the undefended properties is currently suspended awaiting Environment Agency review.

2. The majority of the proposed work will be carried out from the land and will not affect navigation. Piling work from the river will be carefully coordinated with Broads Authority (BA) to cause least disruption i.e. in winter months.

3. Retained piling will largely become the responsibility of the landowners or users if it is not required for flood defence.

4. Fees for mooring are up to BA to police

5. BA must lead this

5. We will mark any hazards to BA's requirements

6. The clay generated from the Bittern project will only be used for that section of bank. No transportation to other areas is envisaged.

7. Plastic fendering. BESL are keen to use sustainable materials throughout Broadland but we must take account of whole life costs - materials cost, cost of construction, need for replacement or repair. We are continually looking for new and innovative materials and solutions for our works. We have tried plastic piling and have found problems with it. However, we will look into opportunities for further trials. We are exploring the use of recycled plastic pile capping. Do you have any examples or contacts for this?

8. St Benets Abbey - front line of gabions must be agreed by all parties - Norfolk Archaeological Trust, BA etc.

6. We understand that it is intended to employ the clay currently being stock-piled from the bittern conservation project downstream of How Hill for the bank strengthening and set-back works on the left bank of the R. Ant. We presume that this will be transported by boat to the site where it is required; we would object to any proposal to use the local roads since these are totally unsuitable for heavy lorries.

7. All fendering etc on the piling should be in recycled plastic rather than timber. The former is much more durable than the latter, and its use would be in accord with the EA's responsibility to encourage recycling. This will not happen unless and until there is a market for the product. We have made this point on several previous occasions, and do not accept the reasons advanced by BESL against its employment. In particular, we do not agree that it is any more difficult to use than timber. We would also re-iterate that it has been successfully used by the EA on the R. Thames.

As far as the frontage to St. Benet's Abbey is concerned, we do not object to the use of gabions. However, it would appear that it will not be practicable to set these back into the bank on account of the presence of brickwork etc., and that they will therefore project into the river. The latter is very heavily used during the summer by both motor cruisers and sailing craft, and if, as sometimes happens, the latter are forced to tack behind the present line of posts, they are likely to foul the gabions. Precautions will need to be taken to avoid this happening.

Grange Farm	At the northern end of the proposed works on Womack , the map seems to propose a strengthened bank south-east of a small ditch. This would appear to be the wrong side of the ditch. The existing bank beside the ditch (to the north-west) continues into the wooded area, protecting the drained ditch at the edge of the wood.	Comment noted. The line should be on the north west side of the ditch and link with the bank through the woods.
Land owner	It is a good idea to use the clay from the Bittern II project to strengthen the river banks, however some difficulty may be experienced in transporting the clay now that the marshes in question have been dug up.	The clay from Bittern II will only be used for the floodbank in this section, so no transport will be required.
Ludham Society	The society sees the importance of this work being carried out for the long-term protection of this important landscape and its flora and fauna. We are in agreement with the proposed works, and are pleased to see that the archaeological remains at St. Benet's will be protected from further erosion.	Comment noted.
Smallburth IDB	No problems with the proposals. I would like to draw your attention to the fact that the state of the lane approaching St. Benet's during the winter months is unusable to heavy traffic.	Comment noted.
Upton with Fishley PC	We are concerned about that the proposals will increase the vulnerability of Upton and South Walsham banks. Your comments on this aspect would be appreciated.	Our proposals will have absolutely no effect on these banks

Land use

Carter Jonas	<p>In principal the Crown Estate are keen to support initiative to prevent flooding although we wish to consult carefully where there is likely to be land lost due to secondary lines of defence or disruption to public access which has been established around the outer perimeter of the farm.</p>	<p>Compensation for changes in land use will be discussed with any landowners on a case by case basis.</p>
DEFRA Rural Development Services East	<p>Environmentally Sensitive Areas (ESA) agreements amongst the higher tiers of the scheme. These proposed works will impinge on some existing ESA agreement holders in the area of operations and it will be important that we ensure a consistent and practical approach to agreement holders when their land is entered to carry out these works.</p> <p>Some ESA agreement boundaries may have to be adjusted where, as a result of the FAP works, it has become impossible for ESA management to be undertaken. We would greatly appreciate the provision of GIS-based information on the realigned sections as soon as this becomes available.</p> <p>We welcome the adoption of 'floodbank rollback' and 'strengthening' concepts which have the added bonus in reducing the amount of grazing land lost in comparison with 'setback' options. The adoption of these options helps to minimise the impact on ESA agreement land and we welcome such measures wherever feasible, particularly where it helps to minimise the loss of higher tiers of ESA agreements.</p>	<p>Areas behind the proposed flood defence proposals contain Access issues and compensation will be discussed with landowners on a case by case basis.</p> <p>BESL will provide GIS based information when it becomes available.</p> <p>Comment noted.</p>
Grange Farm	<p>In both your description and diagram of 'rollback' you indicate the retention of piling and say it relies on the adequate remaining life of piles. On the map you indicate the removal of existing piles for the majority of the length of the rolled back bank. Which is it?</p> <p>The loss of land for grazing must be addressed.</p>	<p>The description and diagram of rollback in the consultation document were general and did not exactly match our intentions for Womack Water. In Womack Water we are intending to create a 5m rond in front of the rollback embankment which should be sufficient to protect the embankment in this area without the piles. The piles will not be extracted immediately but when the new bank is established and the piles reach the end of their useful life. That maybe after 2, 10 or 15 years but we do not expect them to last the whole length of our 20 year contract. Initially we were proposing full setback for this section but felt that the land loss was not warranted if we could design an alternative that was still sustainable.</p> <p>There will be compensation for any losses due to our work. We use a private land agent to negotiate on our behalf. Changes of land use are compensated and we also pay for legitimate costs for land agents acting for landowners.</p>
Hall Farm	<p>The proposals seem timely and complete, but a site meeting is required to discuss queries. I would like to be kept in formed about the progress in getting funding for the work next to St. Benet's Abbey. There is permissive access along most of the banks under stewardship, I would like to discuss alternative routes, fencing etc. Grassland margins under stewardship will need to be replaced, at whose expense? Will compensation be paid for loss of land and income?</p>	<p>Compensation will be discussed with landowners on a case by case basis, as will access agreements.</p>

How Hill Trust

We welcome the work in its entirety and strongly hope that it can be fully implemented. We are aware that heavy vehicles are likely to use the How Hill access route throughout the lifetime of this project. To do this they have to cross over land wholly owned by the Trust, which is constant use by groups of small children. The track is unsuitable for heavy use. We would ask to be kept informed about major vehicle movements so as to not compromise the safety of the children or the integrity of our property.

Heavy machinery will use the access track at the beginning and end of the scheme only. We will cooperate fully with the Trust on access issues.

Landowner

I would like a site meeting to hear the exact proposals for my land near How Hill.

We will arrange a meeting to explain our proposals in more detail.

Navigation

Broads Authority	<p>The concept of setback and removal of piling at Bure/Thurne Mouth is a good practical example of where this solution is more practical. It is located adjacent to a block of arable land therefore would increase ecological interest and the river here is wider. However this area is the single most heavily used, in terms of boat traffic, as verified by 20 years of BA Boat Census data. Any removal of piling would require erosion protection.</p> <p>The Broads Authority remains under the impression that the EA own the area, used as informal moorings, at How Hill. The BA would like to confirm this and are interested in progressing a plan to management this area for moorings in the future.</p>	<p>BESL would always consider the long-term necessity for erosion protection if they believed erosion rates to be too high.</p> <p>The EA have confirmed that they do not own this are of land.</p>
Broads Hire Boat Federation	<p>Our Federation would wish to lodge an objection to the proposed setback on the north bank between St. Benets' Abbey and the mouth of the River Ant. This is a long established area for casual mooring and is also used by anglers. I think this length of bank may even be leased to an Angling Club.</p>	<p>Setback and removal of piles is a general issue which must be addressed by all those concerned (Broads Authority, Boating & Angling Associations). BESL are only concerned with flood defence and setback banks offer the optimum sustainable solution. BESL cannot afford to repile all the currently piled areas of the system. Piling will not be removed immediately, but only when it has deteriorated to become a hazard.</p>
Ludham Bridge Services Ltd.	<p>How will the setback linked with piling removal affect mooring - either temporarily or permanently? Will soft erosion protection be used here? How will the engineering works affect local roads and transport? What methods will be used and what are the exact locations regarding works immediately south of Ludham Bridge? How is this likely to affect the boatyard operations and will long advance notice be given? Will the proposals affect our boatyard mooring provision?</p>	<p>A meeting needs to be organised about these details.</p>
Norfolk and Suffolk Boating Associaton	<p>We have a number of concerns with this scheme mainly regarding the change from piled quay heading with adjacent path to sloping reed rond: 1) Cruising boats and boats gathering for regattas cannot easily tie up. Thurne mouth is an important junction in this context. 2) Visitors and families like to use the footpath at the rivers edge to watch regattas and 3) fishermen use the path and access in general and for competitions. 4) The views from boats across the grazing marshes will be lost, being obstructed by a mature reed rond. 5) Replacing the sheet piling may result in additional maintenance and or dredging to properly maintain the full width of the navigable river. 6) Sailing craft tacking up the river have to judge the edge of the bank well to avoid collision. The true edge of the reed rond may not be as easily visible as the sheet piled edge. The following points require clarification: Womack Dyke - is it proposed to remove the existing piling? St. Benet's Abbey - what is the proposed treatment of the frontage? Is the sheet piling retained at St. Benets to Ant Mouth?</p>	<p>BESL have to consider the most sustainable option in terms of flood defence. The condition of the existing piling in Compartment 5 is highly variable ranging from a residual lifespan of 0 to 20 years. Replacing piles is extremely expensive and therefore neither cost-effective nor sustainable. Where setback is proposed BESL consider this option to be the most sustainable long-term solution in terms of flood defence. With regards to your questions: We propose to remove piles along Womack Water along a 215m stretch when they are no longer effective as erosion protection or represent safety hazards. The scheme at St. Benets has been agreed with the County Archaeologist and will consist of backfilled gabions to bury the remains of the abbey walls which are located along the river margin. The piles between St. Benets and the Ant mouth will be removed when they are no longer effective as erosion protection.</p>

Recreation

Anglers Consultative Association

Removal of piling along the River Ant will expose the bank to erosion from downstream flow and will cause sediment to build up on this side of the river, creating shallow water and a possible danger to vessels running aground. Depending on the extent of the reprofiling of the riverbank this may not be an issue for many years. The loss of mooring space by Ludham Bridge where piles are removed is unacceptable. Anglers have the opportunity to and do walk upstream to access the river bank beyond the often concentrated mooring area nearer to the bridge. Removal of the piles will make it unsafe and difficult to fish from the riverbank. If anglers cannot get to fish from areas away from moored vessels they will either have no access because of moored boats or they will fish near the boats with the possible increase in conflict.

Installation of the erosion protection system by St. Benet's Abbey ruins should be sympathetic to the needs of anglers. This is an extremely popular stretch of riverbank that has been available to Norwich & District AA for decades. Day tickets are available for visiting anglers so the access is not exclusive. There is one short area that is piled and is popular for mooring, where, with anglers on board they can moor up and transfer fish from the bank. This facility will be lost if the piling is removed. Removal of piling will make the bank unsafe and difficult to fish from the riverbank. Near the Thurne mouth removal of piling will lead to an extensive loss of mooring areas. This area is used for larger fishing matches.

We strongly disagree with piling removal along the River Thurne. Some of this area has only just been repaired because of the severe erosion that takes place. This is a popular stretch for fishing and mooring should not be lost. The removal of piling and installation of EP will mean loss of mooring.

The opportunity to extend the concrete road and create an improved parking facility as part of the flood prevention works at St. Benet's abbey by use of plant and machinery in the area should not be missed. This would improve access for the disabled as well as for all other members of the public who visit this historical site and for maintenance vehicles for standed boats at the abbey. Installation of kissing gates instead of the present.

Work at Cold Harbour should include improvement to the surface of this area, as on some occasions it is boggy and restrictive for parking. The access route over the floodbank could be improved for able-bodied access and appropriate access improvements for less able-bodied persons should also be considered.

The riverbank from Cold Harbour car park downstream is a popular competition stretch. About 19 pegs can be accommodated along this piled stretch, but the demand is greater. Installing fishing stands with short lengths of walkways (gabions) for access would also help protect the riverbank and ronds.

BESL will take responsibility if piling removal should lead to a build up of sediment in the river. We do not anticipate this to happen. With reference to the loss of mooring and angling space, BESL are concerned with flood defence only and setback banks offer the optimum sustainable solution. The piles will only be removed when they deteriorate to a degree that makes them a hazard to navigation.

See above comments on piling removal.

See above comment on piling removal.

Use of this area for access or as site compound by BESL is not yet certain. BESL may be able to make improvements, pending this decision and funding.

BESL in cooperation with landowners and others (e.g. BA) may be able to make improvements here, depending on funding.

BESL has no funds for the construction of fishing stands.

	Where maintenance is proposed at the mouth of the River Ant, the bankside of the River Bure can support around six to seven swims for fishing. This area has degraded somewhat due to erosion. Installing some form of protection would create fishing stands. Short lengths of gabions for walking on would create access routes to these stands. These would also act as erosion protection and break boat wash thus helping to protect reed growth.	This area will receive detailed consideration.
Broads Authority	The land adjacent to the causeway located NW of St Benet's Abbey is a popular informal angling location.	Comment noted.
	Cold Harbour is a popular casual moorings and angling (NDAA) location. This area of the Bure generates heavy boat traffic during the year. In terms of practicality piling should be retained at Cold Harbour to accommodate recreational use and the future potential to manage the area for 24-hour moorings. A high rond could be accommodated here as used at Rockland.	Piles in this area will initially be retained until they are no longer effective as erosion protection or represent a safety hazard, upon which time BESL would replace them with soft erosion protection. Alternatively the Broads Authority may take on the maintenance of the piling in this area in order to ensure continued use as mooring, as was suggested during a meeting with BA officers on 19th June.
	The Norwich and District Angling Association lease the bank at Cold Harbour. Have BESL contacted the association to negotiate terms of use/exclusion during works?	The EA can only be responsible for the piling as erosion protection for the flood defence and not the recreation that has developed, in time, as a consequence of its presence. The BA needs internal discussion on the issue of recreation and flood defences.
	The footpath along the north bank of the Ant, from Little Reedham to Ludham Bridge is very popular with local people and visitors. Although the BA accepts that footpath closure will be necessary along the main bulk of the footpath further consultations regarding the timing and possible temporary closures of footpath at Little Reedham would be desirable.	During a meeting with BA, BESL and NCC to discuss footpath issues, it was agreed that the footpath between Little Reedham and Ludham Bridge would need to be closed for up to a year whilst setback was implemented. Diversions will be in place following confirmation of routes with landowners.
Broads Hire Boat Federation	Our members are very concerned about the long lengths of setback proposed with the intention of removing the existing piling. It is very difficult to see how a soft bank will stand up to the heavy use of the River Ant which is particularly narrow. There is very little room to spare when two boats pass and a vertical retained bank would seem essential. We also question whether other areas will stand the removal of piling.	See previous comments on piling removal.
St. Benets Marshes Wildfowlers	Shooting rights exist on St. Benets level.	Comment noted. The issue will be addressed in the relevant chapter of the Environmental Statement.