

# *Friends of Latchmore*

To: Mr. Dominic May, Official Verderer  
Dr Bob McIntosh, Chief Executive, Forestry Commission  
Miss Alison Barnes, Chief Executive, New Forest National Park Authority  
Dr Helen Phillips, Chief Executive, Natural England  
Dr Graham Ferris, Chairman, New Forest Commoners Defence Association

Postbox Cottage,  
Blissford,  
Fordingbridge,  
Hampshire, SP62HY.

25 February 2012

Dear Mr. May,

## **Latchmore stream restoration project: public concerns**

I am writing to you in your role as the Chair of the Board of the New Forest HLS Scheme, and to the principals of your partner organisations, to inform you that there is still great concern among local residents about the proposed stream restoration works in the Latchmore valley within the New Forest this summer. On 22 February we held a public meeting, which was attended by over 100 people, at the Hyde Village Hall to enable local people to express their views. This letter is to communicate the concerns that emerged at that meeting to you and your partner organisations, and request that you take action to deal with them.

In summary, the major points we wish to make are (a) that the precise objectives of this project have not been clearly articulated, (b) that the problems that the scheme is apparently intended to address have been overstated, (c) that it has not been demonstrated that the work proposed would be effective in solving those problems, and (d) that the damage done by the works would be excessive compared to the possible benefits. A more detailed account of these issues is attached to this letter.

It is clear that any project to restore the stream needs to deal with the whole of its catchment area, and that it would be much more effective and less disruptive to obstruct its tributaries upstream and to minimise intervention to the main stream in the valley floor. **We therefore request that you and your partners suspend any further major works** (especially excavations, import of materials, tree cutting and scrub clearance) until a full and specific hydrological feasibility study and Environmental Impact Assessment of the project have been completed and published, taking these comments into account. This would enable the scheme to be reconsidered, before a decision is taken on whether or not to proceed with it, either in its original form or after modification to reduce the likely damage to the ecology of this highly protected and much loved area.

We should be happy to meet with you and your partners to discuss these issues.

Yours sincerely,



Professor John Shepherd CBE FRS (Chair: the Friends of Latchmore)

Please copy email responses to Friends of Latchmore <friends.latchmore@gmail.com>

cc. see list attached

Copy recipients:

Peter Roberts, Chairman, New Forest Association  
Anthony Pasmore, Elected Verderer  
Andy McDonald, Regional Manager, London & SE, Natural England  
Diana Westerhoff, Natural England  
Cllr. John Penwarden, Chair, New Forest District Council  
Fiona Reynolds, Chief Executive, National Trust  
Dr Mike Clarke, Chief Executive, R.S.P.B.  
Cllr. Bill Dow, Chairman, Hyde Parish Council  
Kevin Penfold, Acting Deputy Surveyor, Forestry Commission  
Simon Weymouth, Head of Planning & Environment, S England District Forestry Commission  
Colin Draper, Manager, NF HLS Scheme  
Tim Greenwood, Chairman, New Forest Consultative Panel  
Debbie Tann, Chief Executive, Hampshire and Isle of Wight Wildlife Trust  
Rt Hon Desmond Swayne TD MP, House of Commons  
John Eyre, Chairman, Hampshire Ornithological Society  
Gary Roberts Chief Executive, British Dragonfly Society  
Henry Curry, Secretary, British Dragonfly Soc.  
Paul Leinster, Chief Executive, Environment Agency  
Chief Executive, New Forest Pony Breeders and Cattle Society  
John Valters, Chairman, Grasslands Trust  
Tony Hockley, Chairman, New Forest Equestrian Association

# *Friends of Latchmore*

## **Latchmore stream restoration project: summary of public concerns**

(following the Public Meeting of 22 February 2012)

### **Introduction**

The Latchmore valley is an exceptionally varied and highly valued landscape. It is heavily protected, being within a Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC), a Special Protected Area for birds (SPA), and a Ramsar site. Any work to be undertaken should moreover comply with the general duty outlined in section 28 of the Wildlife & Countryside Act 1981 (Part II), and Part III of the Countryside & Rights of Way Act 2000 concerning SSSIs. In addition it is an area much loved by commoners, residents and visitors alike. It contains a highly diverse mix of good grazing, a delightful watercourse, a mix of grassy, lightly wooded and heather-covered areas as well as some scrub and thickets that provide cover and breeding habitat for wildlife. It is unusual in the North Western part of the New Forest in having fairly good access for families with children and people with limited mobility via a track to a small car park.

### **Public Meeting of 22 February 2012**

A public meeting was held at Hyde War Memorial Village Hall on 22 February 2012. The meeting was attended by over 100 members of the public, as well as representatives of the Forestry Commission, the Verderers, and Natural England. A wide range of concerns was expressed as detailed below. These representatives were given an opportunity to respond, but by a unanimous show of hands it was agreed that they had failed to allay the concerns. It was agreed *nem con* that the steering group of the Friends of Latchmore should represent the serious issues raised at the meeting to those running the project so that a full analysis of the benefits and risks specific to this project could be carried out and the outcome made public before further damage is done to the site.

### **Concerns**

#### **1) Objectives**

It has not been made clear what the specific objectives of the scheme on the Latchmore Brook are. The most specific purpose stated appears to be “to restore the stream to a more natural state”. Since the New Forest has been a managed environment for centuries, this is (a) hopelessly ambiguous, and (b) not a realistic or desirable target. It has been presented to the various Forest organisations under the generalised benefits of “restoring habitat” and “improving grazing”; but those responsible for implementing the scheme have not been able to explain what habitat would be restored or where the improved grazing would be. Because of the serious risk of damage to the existing habitat by these extensive works, and significant doubts about the effectiveness of what is being planned, **it is essential that the purpose should be more clearly articulated**. So far as we are aware **no specific Environmental Impact Assessment of the Latchmore scheme has been undertaken**, and unless and until one has been prepared, it is impossible to evaluate or compare its possible benefits and disadvantages.

**What are the specific objectives of the project in relation to flow-rates, water levels, habitats to be restored and effects on grazing?**

**What EIA studies specific to this work on Latchmore have been undertaken, and what further work is planned?**

## 2) Monitoring, Assessment & Accountability

It is impossible to assess the success of such projects unless measures of success are defined, pre-intervention and post-intervention surveys of relevant parameters are undertaken, and monitoring of these are continued for several years.

**What criteria of success are to be used, what surveys are planned, what are the measures of success to be used, and how would they be made public?**

**In the event of problems being caused by the project, who would undertake remedial work and who would pay for it?**

**What monitoring is planned of key properties including:**

- Visual & Photographic documentation
- Groundwater elevations and chemistry
- Stream (surface water) temperature & chemistry
- Stream flow (discrete or continuous)
- Stream profiles and cross sections
- Sedimentation & embeddedness
- Benthic macro-invertebrates
- Fish

## 3) Efficacy

From the information made available in writing, at the public meeting and on the Latchmore walk last year, it appears that the intention is to restore the watercourse to a more meandering and “natural” form by intervention **only** downstream of Alderhill Inclosure. In fact the Brook is not heavily canalised in the valley bottom, and already meanders and bifurcates extensively over much of its length. It already floods frequently, and land around the upstream end of this part of the brook is already very boggy. By contrast the waterway within Alderhill Enclosure and for some 6 kilometers above Latchmore Shade is heavily canalised with a network of drains and ditches. These were put in to dry out the area for trees and to protect the gravel tracks which allow access for forestry machinery. During moderate or heavy rainfall there is a rapid run-off from these man-made drains in the Inclosure. This causes the brook to flood quickly, and it would continue to do so after the planned project. The projected work would further obstruct the flow of the stream downstream of the Inclosure and would cause more extensive flooding in the open area. The declared aim of the work is to restore the condition of this stream to how it was before man-made intervention – but unless much of the drainage in the Inclosures is removed, this work to the Latchmore Brook would **not** restore the pre-existing condition. Nor would it improve grazing, since it would actually extend the boggy area which already exists just outside the Inclosure.

**What hydrological analysis has been carried out of the impact of the scheme on flow-rates and flooding during normal, flood and drought conditions ?**

## 4) Gravel stability & movement

The scheme involves the emplacement of up to 10 000 tons of gravel (enough to fill the stream bed entirely over almost all of its length). In the absence of any work to the upstream drainage (see above) it is likely that a significant quantity of this would be carried away by floodwaters, adversely affecting the efficacy of the project, increasing the rate of bank erosion and causing obstruction to the waterway, and to roads and fords downstream.

**What hydrological analysis has been carried out concerning storm-water flow-rates, gravel movement and consequent impacts ?**

5) **Biological diversity and habitat loss**

The Latchmore valley already provides a wonderfully varied mix of habitats (the stream itself and transient pools, as well as long-established grassy areas, heather, gorse, other shrubs, mires, trees and thickets) for a very diverse flora and fauna. These include locally scarce birds such as the kingfisher and woodlark, as well as many which are officially “of concern” because they are declining elsewhere (lapwing, skylark, meadow pipit) and breeding wheatears. Two rare species of “dragonflies” (actually damselflies), the Scarce Blue-tailed Damsel and the Southern Damsel (nationally scarce and protected) are also found here.

**What surveys have been undertaken to establish the abundance and distribution of the flora and fauna (including fish) of the Latchmore, and the likely impacts of the scheme on them?**

6) **Durability of work to be undertaken**

In addition to bulk movement of gravel (see above) observations of sites elsewhere shows that the obstruction and support provided by gravel and clay over heather bales can deteriorate rapidly, degrading their efficacy and exposing stakes, plastic string and beds of soft clay which are unsightly and a hazard to wildlife and stock.

**What evidence is available for the durability of such works, and what are the plans for monitoring the status of the work and taking remedial action (if required)?**

7) **Increased flooding & extension of bogs and mires**

It is inevitable that impeding the stream within the valley without reducing the flow upstream would increase flooding and the prevalence of boggy ground. This would adversely affect grazing, and increase the danger of ponies and cattle becoming mired. According to local residents this was once a common occurrence and was indeed the reason for the additional drainage works which were undertaken some 50 years ago, which the project seeks to reverse. According to the Press Release of 12 January 2012 the intention is both to restore ancient mires and to improve grazing.

**What is the evidence that the project could improve grazing and the welfare of livestock and at the same time restore former bogs and mires?**

8) **Interruption to flow & water supply downstream**

In the event of drought, slowing the flow and holding up water in the open valley would be likely to allow increased evaporation and reduce the water supply to grazing land downstream.

**What hydrological studies of water flow-rates in the stream throughout its length and the effect on supply to grazing land under drought conditions have been undertaken ?**

9) **Damage to grassland habitat**

It would be impossible to reach the areas of the stream involved in this project to emplace gravel (etc) without heavy vehicles travelling over the grassy hummocks (“ant-hills”) which are a distinctive feature upstream of Latchmore Shade.

**Has the nature of the hummocks been determined, and how would damage to this habitat by vehicles & machinery be prevented?**

10) **Source and nature of gravel**

It is normally regarded as essential to ensure that gravel and other material to be used for stream restoration comes from a source having similar chemical properties (acid/alkaline deposits) to avoid altering stream-water chemical properties.

**What is the proposed source of gravel to be used, and what provision would be made to ensure that it is free of incompatible material (e.g. calcareous sands and clays)?**

11) **Archaeology**

The archaeological survey of the valley made available is grossly inaccurate (of 15 sites immediately affected, only one was correctly identified), apparently because of inadequate fieldwork.

**What additional archaeological field work is required to ensure an accurate survey of sites (including those from WWII) ?**

**How would the complex of ~120 prehistoric pits and mounds just outside the Alderhill Inclosure be protected from traffic and disturbance ?**

12) **Recreation**

The lower reaches of the Latchmore Brook and the lawns at Latchmore Shade are an extremely popular recreational area for families with children and people with limited mobility because of the fairly good access via a track to the small car park at Ogdens.

**How would the recreational areas be protected from degradation by increased flooding and the consequent extension of boggy ground?**

13) **Access – Roads & tracks**

The project envisages the import of 8,000 to 10,000 tons of gravel. This equates to approximately 800-1000 movements of 20 ton trucks, entering either via the single-track lane and the narrow, muddy and rutted dirt track at Ogdens, or over forest tracks and the extensive and extremely boggy area just outside Alderhill Inclosure, and subsequently over soft ground throughout the valley bottom. We understand that the build up of material to the site would require a heavy truck every 15 minutes, each and every day for a period of 6 weeks.

Such a volume of heavy vehicle traffic would be a major disturbance to local traffic, to residents, livestock and wildlife which is invariably found along the likely route, and seriously damaging to the physical environment. Passing of lorries going to and from the site would be a particular hazard and would damage the soft verges on these narrow Forest roads.

**What studies have been undertaken of the likely disturbance and damage due to heavy traffic unsuitable for rural roads and tracks?**

**What provision would be made to prevent, reduce or mitigate disturbance and damage?**

**Who would be liable for the repair of any damage caused, especially to dwellings *en route* (some of them ancient cob cottages without foundations), and to roads and tracks with soft verges?**

**Who would be liable for the repair of any damage caused to soft ground within the valley (especially that at the bog outside the Alderhill Inclosure)?**

**14) Timing**

The project has been timed to be carried out in June and July, during the bird nesting season. The reason given for this is that contractor availability is limited and that it would avoid the school holidays. Concern has been expressed that environmental issues should have precedence here over the convenience of contractors or holidaymakers. The original agreement was only given to this scheme by Forest organisations with the provision that it was carried out in late summer.

**What is the optimum timing for any work to be carried out on Latchmore to minimise the environmental impact?**

**15) Environmental Impact Assessment**

Fundamental principles of hydrology hold that (1) every catchment is different, and (2) it is necessary to consider whole catchments. A generic EIA is therefore completely inadequate for a hydrological intervention project. The generic EIA provided for the HLS scheme appears to be the only one available: it is extremely superficial and not fit-for-purpose for such a highly protected and sensitive area. Natural England appears to have failed to ensure that environmental considerations are properly considered. We consider that full, detailed and specific hydrological feasibility and EIA studies, which identify the adverse impact that this project would have on all the flora and fauna to be found on this site, are essential before any further work is undertaken. This issue is fundamental to the whole judgement about whether any benefits that this project might provide are worth pursuing when balanced against the significant ecological damage that it is evidently liable to incur.

**On what grounds has this project within the New Forest SSSI been approved and actioned, without a comprehensive Environmental Impact Assessment, specific to the work at the Latchmore ?**

**When will such an assessment and report be commissioned, produced and published?**

**Will the work at Latchmore be suspended until due consideration can be given to the findings of the site-specific EIA?**