

Briefing Note for Rt Hon Desmond Swayne TD MP

Latchmore Brook stream “restoration” project

Prepared by the Friends of Latchmore (28 March 2012)

Key Questions

- a) **What precisely are the actual ecological benefits that the project is intended to achieve ?**
- b) **What is the evidence that the works proposed will achieve these benefits ?**
- c) **What is the evidence that the expected benefits would outweigh the ecological damage ?**

Major points of Concern

- 1) **There is no clear statement of the actual purpose of this project.** It is one of a large number of wetland restoration projects being carried out as part of the New Forest Higher Level Stewardship scheme¹. The stated objectives have varied over time (and continue to do so)². Any intention **“to restore the stream to its natural state” is ambiguous and unrealistic**, since the valley has been managed (largely for grazing) for centuries. Its truly natural state would probably have been heavily wooded and boggy, and could not now be realistically attained, even if it were considered desirable.
- 2) **No assessment of the specific problems in the Latchmore valley that may require “restoration” has been made.** The area has been assessed as “unfavourable” but no evidence has been presented to support this. In fact the brook is now stable and mature and many of the objective indicators that would make it “favourable” are already present. The “restoration” work is simply not needed.
- 3) **No analysis of what work would actually be required to the whole brook to address any problems has been undertaken.** In particular there is an extensive network of drainage ditches and culverts upstream in Alderhill Inclosure. This has a massive impact on the hydrology of the brook, and will not be included in this work (because the HLS funding does not cover this area). The brook cannot be meaningfully “restored” without including restoration to all this upstream area.
- 4) **No site-specific assessment of the environmental and ecological impacts of the scheme has been undertaken.** The only assessment is a generic EIA (for the whole New Forest, dating from 2006) that simply asserts that there are general benefits from “wetland restoration”. The likely extent of ecological damage to any specific location is simply not known – but the available evidence is that the environmental damage caused by the proposed work here will be extensive.
- 5) **It is claimed that no EIA is required because the work is “restoration”.** It is highly debatable whether importing 10 000 tons of gravel is restoration or construction. In any case standard practice is for government agencies to work to the highest standards even if they are not obliged to do so.
- 6) **The impacts of the traffic required to import 10 000 tons of gravel will be massive.** This would involve disruption and damage (e.g. construction of tracks within and leading into the valley).
- 7) **No analysis of the balance of benefits, costs & risks of this specific project has been prepared or published.** Other locations that have been “restored” are still in a very poor state. The intended benefits are extremely uncertain, while the damage to the environment is certain and will be extensive. An objective analysis is required to determine whether work on the scale proposed is necessary (and if so, why), and whether this project is worth doing or not.

¹ The New Forest HLS is a partnership of the Verderers, the Forestry Commission and the New Forest NPA (with Natural England as non-voting members). In an “unusual” arrangement (designed to avoid EU restrictions on dual funding) DEFRA & EU funds are paid to the Verderers who contract with the Forestry Commission to carry out the wetland restoration component of the Scheme.

² E.g. whether or not any mires are to be recreated, or grazing is to be improved (which are in any case conflicting objectives)