The Old Cottage, Furzehill, Fordingbridge, Hampshire. SP6 2PX

Peter Roberts
The Chairman,
New Forest Association
Sirius, Hatchet Close
Hale, Fordingbridge
SP6 2NF

5 April 2013

Dear Peter,

I am writing as a member of the New Forest Association, a local resident and commoner, and a Friend of Latchmore (FoL), to respond to the article by Brian Tarnoff on the "Latchmore Brook Restoration in the Spring 2013 Newsletter.

The New Forest Association states that it aims to "help influence and steer the way to greater <u>protection</u> and recognition of the area that is the New Forest", and "the <u>conservation</u> of the Forest and its tranquil wilderness qualities". The article itself suggests that the "Forestry Commission has steadily learned better techniques for achieving wetland restoration, and commends their efforts to remove past wounds with the minimum of damage to the surrounding countryside."

The reality is that the preparation works already carried out at Latchmore have already caused irreversible damage to the habitat, and the 2011 and 2012 "agreed" planned works were clearly highly damaging to the wider hydrological and ecological systems, and provided no mitigation effects or significant benefits.

It is more realistic to suggest that we should be grateful that the damage has not been further compounded by completing the works in 2012 due to the intervention of the prolonged wet weather beginning in April. This resulted in the opportunity for the Forestry Commission to reconsider its position in the light of overwhelming evidence highlighted by the Friends of Latchmore. The presentments in June were followed by further presentments in July, highlighting the effects of not addressing the upstream hydrology within the Inclosures first, and concerns regarding the interventions using 10,000 tons of imported gravel and clay. (This had been confirmed by Professor David Sear from Southampton University during a field visit with the FC, NE, NPA and FoL).

Consequently, the Forestry Commission decided that the works were, in fact, extensive engineering works which required planning permission, and Latchmore has been postponed until at least 2015/16 in their programme, and not 2013 as suggested. Even more indicative of the recent change of approach has been the decision that all significant "restoration" works will require planning permission, because of their possible significant effects. There are still on-going exchanges on whether these works also require a formal environmental assessment under the Habitats Directive, which the FC and Natural England still wish to avoid, illustrating their cavalier approach, compared with the "Precautionary Principle" which I would assume the NFA endorse.

Brian Tarnoff commends the efforts to remove past wounds with the minimum of damage, but the FoL have overwhelming evidence that this is far from the reality. There is worrying and significant evidence of the damaging effects on previous "restorations" such as Amberslade Bottom and Buckherd Bottom.

At Latchmore, the damage already caused includes:

- Significant areas of trees have already been felled to allow access for plant and machinery, and a wildlife corridor was destroyed.
- Over 200 metres of tree-felling has been carried out by the FC contractors, outside the approved licensed areas. These have completely denuded the stream banks, exposing the water to warming effects, damaging to water life.
- Significant "preparation" works have been carried out during the bird-nesting season.
- Kingfisher nests have been abandoned as a result of these changes in habitat.

 Wheatear nests have been abandoned due to explosions carried out in the bird-nesting season.

Preparations for the main works documented within the Forestry Commission Restoration Plans did not address the costs or potential damage to the environment in a rigorous approach necessary for such an intrusive operation. Issues and concerns include:

- There has been no detailed measurement of the current flooding regime, and impacts of subsequent changes as a result of the proposed works. (The effects are most likely to make much of the floodplain impassable to stock and walkers for increasing periods of the year, and have more serious effects downstream.)
- Proposed meanders on the north side are undefined on the ground and ill-conceived, and not
 an improvement on the current "natural" course. If created, they are only likely to create an
 increased area of bog illustrating the need for an accurate ground survey (which even the
 LIDAR does not provide on such flat ground).
- There has been no assessment of the effect of infilling of the stream with 10,000 tons of imported gravel and clay adding unknown chemical and biological changes to the environment which may contaminate the floodplain.
- There has been no assessment of the effect of the proposed use of 15% log infill, which is likely to produce subsequent subsidence and wash-out of the gravels in future flooding.
- There is no plan for the practical management of fish and invertebrates in "moving to" the new course, which has been of subsequent concern to the responsible Agency.
- Further tree-felling is planned to allow access for plant.
- Protected fish, invertebrates and bird-life will be disturbed or lost, which include over 12 red status and 24 amber status birds; notable A Category beetles; and 20 species of dragon/damselflies.
- Much of the works were planned to take place during the bird-nesting season.
- Spoil heaps were planned for demolition as infill, when in fact they have created natural ponds valued by "Pond Conservation" as important habitats.
- The effects on the SAC Southern damselfly were not being properly addressed.
- Archaeological "evidence" used is inaccurate and likely to cause further damage if the proposed works goes ahead as planned.
- There is, of course, significant evidence of man's intervention, mainly in response to the FC interventions in the Inclosures, but along the floodplain, these are healing naturally.

What may be lost sight of is that the FoL objective has always been to request that a full environmental impact assessment is carried out to assess <u>all</u> the costs and benefits of the works to provide the best solution. The starting point, by necessity has had to be highlighting the unacceptable damage that has already been caused, and the need to pause and review the proposals. We hope that a natural solution is still the preferred option. Indeed, the entire valley is either 'favourable' or unfavourable recovering' (the stated objective of 'restoration' work), with Thompson's Castle mire already being upgraded to 'favourable" in May 2012.

As you may conclude from this letter, I, and others, feel that the NFA has plenty of evidence here to suggest that it needs to provide a more balanced view if it is truly attempting to safeguard the Forest that we all wish to preserve. Perhaps it would be possible to discuss these issues with you in advance of the AGM on 20th April.

Yours sincerely,

Ailsa Farrand

Copies: The President The Secretary The Editor, Brian Tarnoff