

# *Friends of Latchmore*

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To: Sarah Young (Land Use Consultants Ltd)

20 March 2014

Dear Sarah

## **Latchmore Brook Project EIA**

Thank you for meeting with us to discuss the EIA for this project on 26 February. Following that meeting we wish to make the following observations in relation to the scoping of the EIA:

- 1) There has never been a clear statement of the specific objectives of any restoration scheme: vague goals such as “to restore the site to a more natural state” are hopelessly inadequate. We consider that such a clear statement is an essential prerequisite for any further work: without it there is no hope of evaluating success or failure.
- 2) The intention to complete the ES and submit the planning application late in 2014 or early in 2015 will make it very difficult to undertake adequate survey and monitoring work to inform the ES. We consider that there should be a minimum of three years pre-operational monitoring of the hydrology and fauna. Further monitoring will be needed after the completion of any upstream works, prior to work downstream.
- 3) The impacts on a wide range of species of plants and animals will need to be considered, with especial attention to be paid to the following
  - a) Birds: Kingfisher, Spotted Flycatcher, Dartford Warbler, Wheatear
  - b) Dragon/Damselflies: Southern Damselfly, Scarce Blue Tailed Damselfly
  - c) Beetles: *Agonum sexpunctatum*, *Tritoma bipustulata*
  - d) Other Insects: Rufous Grasshopper:
  - e) Plants: Pillwort (*Pilularia globulifera*), Marsh Clubmoss (*Lycopodiella inundata*)
  - f) Fish: Sea Trout, Bullhead
  - g) Reptiles & Amphibia: Sand lizard, Common Lizard, Smooth Snake, Grass Snake, Adder and Slow Worm
- 4) The Southern Damselfly (SAC species) is of course of particular concern. Our observations show that its current abundance at Latchmore has been seriously underestimated by previous work. This species is likely to be a major constraint on any proposed options for restoration.

- 5) It makes sense to utilize the hydrological information from Dockens Water so far as possible, but local observations over many years show that the flow regime is substantially different to that of the Latchmore Brook, for reasons that are not known. These observations indicate a peak flow of 12 to 15 cu m/sec a number of times per year in the channel below Alderhill Inclosure, compared with the 2-year return volume of 5.1 cu m/sec used by JBA in their June 2013 Options Appraisal for Unit 48. The observations from Dockens Water will therefore need to be interpreted with great care, and any rainfall/runoff model to be used will almost certainly need to be re-parameterised, for which observations on the Latchmore itself will be essential. Further observations and recalibration will be needed after the upstream works have been completed..
- 6) We have been making regular observations of the birds in the valley, and also of the flora & fauna of the marginal ponds. Lists of the species so far recorded by suitably trained observers are attached, and we shall expect these to receive appropriate consideration in the EIA and ES.
- 7) We were pleased to hear that you intend to assess a number of alternative options for any restoration that may be demonstrated to be necessary. In this context we expect that you will pay due attention to the need to conform to emerging best practice in the field, in the UK and elsewhere, by giving due consideration to “light touch” methods that are Reversible, Adaptive and Incremental.

We hope that these contributions will help you to produce a thorough and soundly-based evaluation of the scheme. Please let us know if there is any other information that we may be able to provide that would also be useful.

Yours sincerely



Professor John Shepherd CBE FRS  
Co-chair: Friends of Latchmore

Attachments: list of species and pond flora

Cc: Forestry Commission  
Natural England  
National Park Authority