

Latchmore Wetland Restoration Project

1. What is your name?	Friends of Latchmore	
2. What is your email address?	friends.latchmore@gmail.com	
3. What is your organisation?		
4. Do you have any comments you would like to make about the proposed application?		
<p>If so, please outline here:</p> <p>Please see the additional 9 pages appended to this Feedback Form</p> <p>Please acknowledge receipt of this feedback.</p>		
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Yes	No	YES
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Friends of Latchmore

Feedback to FC/LUC on the Exhibition - 6 October 2015

The following Notes set out the concerns of Friends of Latchmore (FoL) regarding the information and findings on the proposed Latchmore Wetland Restoration Project. These are entirely in response to the information provided on the Boards and Maps at the Exhibition, but do call on other information from the Scoping Report and prior knowledge where appropriate.

Overview

It was the general view that it was disappointing that there was very little on the Display Boards which added "value" to what was already available from the Scoping Report. The most relevant information provided at the Exhibition were the maps. These were not on display, but left loose on a table, making it difficult for many people to realise they were available. This has been remedied and the maps are now available on the HLS Website along with copies of the Display Boards.

The Exhibition indicated that of the four Options, only one, Option 3, was viable. The other three were apparently dismissed for reasons which the FC/LUC must have known at the time of preparing the Scoping Report, without further survey and analysis. Friends of Latchmore have continued to support the need for a comprehensive assessment of Option 1 involving continued natural remediation, but the dismissal in this way of Options 2 and 4 has prevented the assessment of other Options such as that proposed by FoL at the Scoping stage.

In addition, based on the proposals on the detailed maps, Option 3 is also **not** a viable option. Although the new meander routes will create more boggy ground, there will still be flash floods and rapid flows out of the catchment because the proposal does not address the "herring-bone" drainage systems in the Inclosures. Moreover, these major works are creating new forms of "artificial drainage" throughout the SSSIs, which will continue to fail the Natural England condition assessment criteria for favourable condition.

The other main conclusion provided at the Exhibition is that the proposed works and changes in landforms and drainage will result in only one (short term) significant negative effect. Any detailed knowledge of the Latchmore catchment, combined with the effects of the similar methods that have been employed elsewhere in the New Forest HLS Scheme, make this optimistic conclusion of great concern regarding the depth and completeness of the Environmental Impact Assessment.

The following Feedback is set out with sequential comments on the 11 Display Boards, followed by comments on the 10 Maps.

Friends of Latchmore concerns on the information arising from the Exhibition Display Boards

Board 1 - Welcome

It remains unclear what process is being given to the feedback provided as a result of the Exhibition. Will any questions submitted be answered before the ES and Planning Application is submitted? Friends of Latchmore (FoL) are still awaiting feedback on its concerns about the Scoping Report.

"The exhibition provides information on the project and the findings of the Environmental Impact Assessment."

The findings are very generalised and shallow.

Site Location

This should include mention of a healthy and vibrant stream.

Board 2 - Need for the Project

This should include "the why.." it was artificially deepened.

This description makes sweeping, unsubstantiated, and therefore unjustified statements.
The ES needs to be an evidence-based assessment:

There is no data (over time) to justify the statement that "**erosion has increased over time..**"

The "natural hydrological state" of "the Brook" is dependent on the overall geomorphology, vegetation, run-off characteristics and stream profile of the catchment. Many characteristics have been changed over time - and there is no evidence that these proposals "*seeking to restore the brook to its natural, meandering state*" is natural or appropriate.

"The Forestry Commission has a legal responsibility under the EU Habitats Directive/Wildlife and Countryside Act 1981 to restore and maintain Special Area of Conservation (SAC) and SSSI where the habitat has been assessed by Natural England as being in an 'unfavourable condition'. The restoration works are therefore being proposed to restore the SSSI units within the Latchmore catchment back into 'favourable condition'."

This last sentence is incorrect.

Natural England SSSI Condition Assessments include the test for "Indicators of damage due to artificial drainage" which will denote a "Fail" and an "Unfavourable" status. That is the main reason why the SSSIs in the Latchmore catchment are "unfavourable" ("Unfavourable recovering" is only a technical intermediate state when plans are in place for improving an SSSI.)

As all the Works proposed are at least as "artificial" and "man-made" as any of the earlier drainage works carried out by the Forestry Commission - the Natural England assessment can only continue to be "Unfavourable" and therefore the sentence must be incorrect.

"The Proposed Works

The restoration project will involve eight main types of work as set out in the table below:"

The displays indicate that the eight works methods described do not result in any significant negative effects . That is clearly untrue given the evidence observed during recent Restorations Works - at Ditchend, North Sluffers, Amberslade & Broomy, and Harvestslade .

Board 3 - Timescale for Works

These timescales take virtually no account of the need to monitor the effects of the works in Islands Thorns before further works are undertaken. As the proposal does not include any Works on the "herring-bone" and other drainage in the Inclosure, it is not proven that these works are sufficient or appropriate. Monitoring for at least 3-5 years is needed before any further works downstream are considered or permitted. Consequently the Timescales need to be reassessed.

- Material Delivery Routes

These routes involve large, heavy loads through villages with very narrow roads and very basic infrastructure to allow such traffic.

Board 4 - Options Considered

The conclusions on the Options considered indicate, in the views of LUC/FC, that Options 1 and 4 were never Options. Why was this not indicated at the time of the Scoping Report and time used to look at other Options such as that proposed by FoL in its letter of 14 September 2014 ?

Notwithstanding this - the issues identified above concerning Natural England's Condition assessment methodology, it is evident that a "natural" maturing of the Floodplain, as has been progressing over the past 100 years, indicates that "*Option 1 which was to undertake no restoration works*" needs a more rigorous consideration in the EIA .

As pointed out above (comments on Board 2) - Option 3 must be unviable because it is creating a new "artificial drainage" which will fail NE's Condition Assessment process.

Board 5 - Environmental Impact Assessment

" This was undertaken by establishing the existing characteristics of the area likely to be affected by the development, known as the 'baseline', and then assessing the potential environmental effects of the project, noting whether they are positive or negative. Where effects have been identified, the EIA sought to minimise or avoid these (where possible) by amending the proposed scheme.

The Exhibition indicated that there will only be one aspect of the proposal which will result in one (short term) significant negative effect due to the proposed works or the resulting changes in landforms and drainage. Any knowledge of both the Latchmore catchment and the similar works employed elsewhere in the New Forest HLS Scheme makes this optimistic conclusion of great concern regarding the depth and completeness of the Assessments.

It remains to be seen whether the detailed ES includes any of the concerns submitted by FoL on the inadequacy of the Baseline surveys published in the Scoping Report.

Board 6 - EIA Surveys

It remains to be seen whether the detailed ES includes any of the concerns submitted by FoL on the inadequacy of the Baseline surveys published in the Scoping Report.

Board 7 - EIA Findings- Ecology - (plants and animals)

"The key findings of surveys.." provides information that many species were found but no indication of their extent or importance to the ecology of the site. Some of these are SAC protected species, including the Southern Damselfly along with other rare plants and species.

"During the restoration works there will be some short term significant effects (at the site level only) due to disturbance and potential loss on southern damselfly, macro-invertebrates and reptiles."

It is unacceptable for losses of SAC and rare species to be considered expendable, and is contrary to the **EU Habitats Directive/Wildlife and Countryside Act**.

It is also of concern that these are considered to be the only significant effects in the short term.

Observation of recent works indicates that there are many significant short term effects as the existing habitat is destroyed. For example the fish..., felling trees etc.....!!!

"Post restoration there will be significant positive effects at local or site level on habitats, southern damselfly, macro-invertebrates, fish, birds, bats and otter. This will be due to the improvements in the river and terrestrial habitats."

How long is "short term" and how many years is "post restoration" to achieve these positive effects on the stated species ?

The ES must show that the Baseline surveys are fit-for -purpose and that the post restoration outcomes are quantified and based upon realistic evidence from post project monitoring from other sites.

Board 8 - EIA Findings - Water environment

The potential changes to the hydrology is probably the most important aspect of the EIA in assessing the proposed works. This Display Board provides no indication of the importance of the accuracy of the Baseline hydrology including the Return flood flow calculations.

Although not stated in the Exhibition, it was indicated that the modelling produced by JBA has been utilised including the use of Dockens Water as the "local station".

Previous submissions by FoL (Points 74 to 89 in the Appendix to the submission on the Scoping report - 14 September 2014; **and** FoL Comments on "**Latchmore Catchment: Assessment of the Hydromorphic Impact of Potential Restoration Options**"(September 2014) submitted to LUC, FC, NFNPA, NE, Verderers on 9 March 2015) have raised specific concerns about the use of Dockens Water and the calculated figures for Return flood flows compared with more detailed on-site measurements by FoL and observation by local residents over many years. FC/LUC have not answered a number of requests by FoL to discuss these concerns. This oversight by LUC and FC is unexplained.

"Post restoration there will be significant long term benefits in relation to improvements to the hydrological and geomorphological regime. It is difficult to predict the extent of any such benefits and a monitoring and action plan will be implemented. There will be minor beneficial effects arising from a reduction in the volume and speed of water within the brook, reduced erosion rates, an increase in ground water levels and reduced flood risk."

The statement that "***It is difficult to predict the extent of any such benefits....***" is cause for concern. As identified earlier, one of the reasons this caveat may be necessary is that the main causes of the existing rapid flood flows are the "herring-bone" and other artificial drainage channels in the Inclosures. This strengthens the need for monitoring of the works in Islands Thorns before deciding whether works in the lower catchment can be approved.

- Landscape

"Post restoration there will be some changes to the landscape features as result of the meander restoration, bed level raising and infill, knick point repair, spoil bank removal and access structure alterations. However these changes will not fundamentally affect the character of the landscape or have a negative impact on views within any of the affected areas."

The proposed changes to the landscape at Latchmore Brook are significant and will have a major effect on its visual and recreational amenity. Bed level raising at Latchmore Shade is of an even higher magnitude of impact which is not apparent from the last sentence above. The infilling of the wide, braided channel at Latchmore Shade was never included in the 2011/12 Forestry Commission Plans and if implemented will radically alter this iconic landscape.

It also illustrates why the Recreation Survey required visual impressions of what was likely to be proposed (a common occurrence in schemes with high visual impact such as Wind farms) in order to obtain more relevant feedback from User Groups and visitors alike. This approach was requested by FoL at the time - but rejected by LUC.

Board 9 - EIA Findings

- Recreation

(As above under Landscape)

- Archaeology

Most of the evidence for early human activity is found in the valleys, where these works are being proposed. Latchmore is particularly rich in archaeological sites, dating from the Bronze Age, 3 or 4,000 years ago, to the Second World War. Many of these are now at risk. For example, a prehistoric boiling site at Ditchend was largely obliterated during the works there. Once an archaeological site has been destroyed it cannot be recovered.

Board 10 - EIA Findings - Traffic, access and vibration

As with many of the previous Findings, it is of great concern that there appear to be no significant negative effects on this activity. These routes involve large, heavy loads through villages with very narrow roads and very basic infrastructure to allow such traffic. The verges are an integral part of the SSSI and significant damage is likely from lorries, particularly when there is on-coming traffic. Damage to cob cottages is entirely possible, and evidence is needed that this will not occur.

- Next Steps

"Please fill in a comment card: we are keen to hear your views and thoughts on the proposed application."

Board 11 - New Forest Wetland Restoration Review

"The River Restoration Centre and Jonathan Cox Associates were commissioned by LUC on behalf of the Forestry Commission to independently review a sample of past wetland restoration projects to determine whether the projects have met their objectives. Eight sites were selected for detailed review."

"The Study concludes: "All of the sites assessed have shown sustained positive change over the period since their restoration both in terms of improving the quality of habitats and restoring the physical functioning of the mire/ river systems....."

This Display Board is providing a picture which could be interpreted as all such restorations have been successful. In fact, the Review looked at a 'shortlist' of 25 sites with a mix of either predominantly stream or predominantly mire restoration works. These included Ditch End Bottom (2011/12) which was not selected amongst the final 8 sites. The field survey for the Review was undertaken in the autumn of 2014.

By coincidence, Ditch End Bottom was subject to major "remedial" works in July 2014 due to the failure of the 2011 works. It would have been opportune to review such an obvious site to assess the reasons behind the failure and provide some balance to the sites selected. If this had been done - the conclusions might have been significantly different - and the lessons learnt more useful.

Friends of Latchmore concerns arising from the detailed plans for the proposed works

Figure 4.1: Proposed Site Plan

The Scoping Report did not include a number of the SSSIs which were an integral part of the hydrology (white areas on the Scoping map). These included for example Sloden (SSSI Unit 541). These concerns were raised by FoL in their comments, and it is a positive alteration that these have now been included. However the absence of any proposals for the "herring-bone and other drainage in the Inclosures is a major omission.

Figure 4.2: Restoration Works Inset Map

Figure 4.3: Alderhill Inclosure Restoration Proposal Map

The proposed works in Alderhill and Sloden are limited to "bed level raising" of the main channel and straight side drains, apart from one section of "remeander channel".

The NFNPA LIDAR imagery shows extensive evidence of the "herring-bone" drainage in all the main Inclosures which causes most of the rapid run-off. Along with the straight side drains, the flood-flows will continue to be "flashy" and high volume in nature unless these are addressed.

It is therefore essential that any proposal put forward in the ES includes calculations for the Baseline and Option 3 "return flood flow" Tables for the downstream exit point from Alderhill to identify what effect these proposals will have. Currently, FoL observations indicate that flood flows of approximately 12 -15 cu m/sec occur a number of times a year.

Figure 4.4: Amberwood Restoration Proposal Map

In Amberwood Inclosure the main side drains remain untouched, as also applies to any areas of inter-channel drainage. The NFNPA LIDAR imagery shows extensive evidence of the "herring-bone" drainage in all the main Inclosures which causes most of the rapid run-off, and flows will not be significantly reduced unless these are addressed.

The lower section of Islands Thorns Inclosure depicted on this map includes "bed level raising" of the main side drains, but the "herring-bone" drainage remains untouched.

The bottom section of the Eyeworth tributary has "channel infill" (purple) of the "existing channel" (wide blue) implying that there is No channel as a result. What is actually proposed here ?

As there are no other works proposed on this tributary, it is important that the ES provides detailed information on the Baseline observations and predicted Option 3 calculations of the Return flood flow Tables for this junction. Otherwise it is unknown what contribution this tributary is making to the overall flood flows of the catchment.

Figure 4.5: Island Thorns Restoration Proposal Map

In this upper section of Islands Thorns Inclosure there are no main side drains depicted. However, the NFNPA LIDAR imagery shows extensive evidence of the "herring-bone" drainage in this Inclosure which causes most of the rapid run-off, and flows will not be significantly reduced unless these are addressed.

Figure 4.6: Latchmore Shade and Watergreen Bottom Restoration Proposal Map

The proposal to infill the Brook as it travels the first 100 metres downstream out of Alderhill is totally unnecessary as it is already very shallow, and overtops at the slightest increase in water volume. It is also an important part of the overflow of water onto the marshy south bank.

The outflow channel from the eastern section of Latchmore Mire (OS NG 1957 E 1276 N) flows throughout the year including through the summer months, and is an important part of the breeding ground for Southern damselfly and scarce blue-tailed damselfly. Its main route to Latchmore Brook is not as depicted by the "wide blue line" into the main channel, but uses the "thin blue line" depicted as the "Remeander channel" until that channel returns to the Brook. This also contains extensive patches of Pillwort. Any access route along this section, or attempt to create an artificial channel one Excavator bucket wide - as created at Ditchend, North Sluffers, Amberslade & Broomy, and Harvestslade will destroy a perfectly natural mire stream.

Any attempt to infill the existing stream channel along the main section (where all the trees have been cut down) and then "Remeander channel" to the south side at (NG 1915E 1264N) will require very detailed engineering if the drains on the north side are to cross the infill.

Although not mentioned on the map, it is assumed that the Pond recorded by the New Forest Pondscape Project on the north bank with its mire habitat will be retained, along with the drainage route to the west. This depends on retaining the spoil heaps on the north bank which protect it.

The HLS Priority Pond Report 2013 - Para 1.2 states: *" In the Forest, ponds have been created both as a by-product of the historical and modern 'working' of the Forest and as natural features created by the topography and hydrology of the area. Ponds can be as small as 1 m2 or as large as 2 ha in extent and can range from shallow water just a few centimetres deep across the entire pond basin to several meters deep. The naturally formed ponds tend to be very shallow and small and are often part of a complex of ponds in an area of uneven ground.*

Over 1000 individual ponds greater than 1 m2 have now been mapped within the National Park boundary. They are recognised as important features at both national and international levels because many of the restricted species they support are rarely found outside of traditionally managed habitats, such as the New Forest.....

.....In spite of their value, there is still a lack of information on New Forest ponds. It is really only in the last 10 years that attempts have been made to survey and assess their conservation status. Prior to this, individual species surveys were made of a small subset of the total resource. Further regular surveys of the ponds, and more targeted detailed investigations of their communities and important species, will be essential for monitoring the status of these fragile but critical habitats and to determine the effectiveness of management, both at a landscape and individual pond level."

The proposal for " bed level raising" at Latchmore Shade is a new proposal compared with the FC 2011/12 Plan. On enquiry at the Exhibition, it was stated that this would involve raising by 2 to 3 feet. As this is a wide braided channel, this will have a major impact on this iconic feature which has not been raised in the Landscape section of the Display Boards.

In the JBA April 2013 Report it is described as - "A stabilised wandering reach characterised by an inset floodplain and numerous vegetated gravel bars, dissected by a shallow dominant channel and several sub channels all with abundant mobile gravels accumulating as shoals and more permanent riffle zones (Figure 1-4). "

Figure 1-4: Stabilised wandering reach of Latchmore Brook SSSI Unit 48.



At para - **1.6 Design considerations** it states that:

"The channel is unlikely to completely stabilise as a result of re-routing the watercourse back through a palaeo channel that was once occupied, probably at a time when channel and catchment processes and pressures would have been very different from today. However, retaining the dynamism of the channel should be an objective of the restoration plan.

Palaeo-channel entrance and exit elevations must be carefully considered to avoid instigating uncontrolled instability."

It is unclear from the Exhibition map how "Raise bed levels and narrow existing footprint of channel." will be achieved in this unique location.

Figure 4.7: Studley Wood Restoration Proposal Map

At the top of the main channel of **Studley Wood** historic "square Inclosure" (NG - 2274E 1593N) the stream flows through a very wide and deep channel (4m deep x 6 m wide in places) for about 100 metres which may be more ancient than modern. Anecdotal reports indicate that it has been like this at least in living memory. The proposals for "bed level raising" over this first 100 metres will require very large amounts of infill and may be destroying an important feature. Consequently this section needs both large scale topographic survey and historic research to justify any "bed level raising" of this significant feature.

Figure 4.8: Thompsons Castle & Latchmore Mire Restoration Proposal Map

Thompsons Castle : Both of the SSSIs for this stream are in "Favourable" condition. the stream from the mire flows continuously 365 days a year.

All the indicators are that there can be no reason to justify major works on this stream. The proposed "bed level raising" along the whole length is unnecessary as there is no significant threat to the mire.

FoL Comments on the "**Latchmore Catchment: Assessment of the Hydromorphic Impact of Potential Restoration Options**" (September 2014) submitted to LUC, FC, NFNPA, NE, Verderers on 9 March 2015 includes detailed

comments on this mire and stream. Points 44 to 69 under Section 1.5.4 - "**SSSI Unit 43 Thompson's Castle and SSSI Unit 28 - Ecohydromorphic Condition**" of the Report. These points include various photomaps and photos in explanation.

In summary - the mire is well protected by the mound across the bottom of the valley mire and the gradient of the whole mire (about 6 degrees) provides a continuous movement of the vegetation down the slope. Unless detailed monitoring has been carried out over an extended period it is impossible to say that the mire is threatened and such works are necessary.

There may be justification for some minor remedial work at a few points on the stream, but "*Raise the bed level to leave a maximum channel depth of one foot. Remove spoil . On lower gravel stream use hoggin as infill material*" will destroy important habitat in which there are Southern Damselfly, Scarce blue-tailed damselfly, and various fish species including eel. The deeper sections are important refuges for invertebrates and reptiles.

The existing eastern side channel flowing into Latchmore Brook is annotated without any Restoration Works. It is essential that this channel remains untouched but must remain as a continuously flowing stream as it contain Southern Damselfly, Scarce Blue-tailed damselfly, and other essential flora and fauna.

Latchmore Mire

The works annotated cannot justify the multitude of "Proposed access routes" - especially the one down to Latchmore Brook . The watercourses and area of mire is far more complex and extensive than depicted on the map as the "Existing watercourse". The route is depicted on top of the stream on the western side of the mire, which would destroy this heavily protected habitat.

If the lower of the two " bed level raising " sites in Lay Gutter Valley is the pond area - it is a very important habitat for odonata, and should not be touched.

Figure 4.9: Ogdens Mire Restoration Proposal Map

This was the subject of a Report by JBA in April 2013, and published by NE as "**New Forest SSSI Ecohydrological Survey Overview - Annex S: Ogdens Purlieu**" in March 2014.

It is unclear what impact these proposals might have on the properties immediately below this site or whether the owners have been consulted.

Figure 4.10: Sloden Inclosure Restoration Proposal Map

The proposed works in Sloden are limited to "bed level raising" of the straight side drains and a number of pedestrian fords and vented causeways.

The NFNPA LIDAR imagery shows evidence of the "herring-bone" drainage which causes most of the rapid run-off. Along with the straight side drains, the flood-flows will continue to be "flashy" and high volume in nature unless these are addressed.

It is therefore essential that any proposal put forward in the ES includes calculations for the Baseline and Option 3 "return flood flow" Tables for the water from Sloden Inclosure to identify what effect these proposals will have.