

PRESENTMENT
to the Verderers' Court, 18 November 2015

I am Dr Fiona Macdonald, veterinary surgeon, with a special interest in fish and I am an Honorary Life Member of the Fish Veterinary Society.

My concerns in respect of the Wetland and Stream Restoration planned for Latchmore are as follows:-

1. With respect to work itself, the import of large quantities of gravel and hoggin which are proposed bring a risk of the introduction of disease, alien species not to mention the addition of massive quantities of silt and silicates to be leached into the water, which is a serious if not fatal risk to the gill function of fish and other water dwellers such as amphibians (newts etc.), and other invertebrates.
2. The plan is to re-connect the existing stream with the adjacent mire by introducing shallow meanders in place of the existing watercourse. There has already been substantial tree felling around this area, with more planned during the project to allow construction vehicle access, which when combined with the new meander creation will inevitably lead to a combination of high water temperatures during summer and no adequate shade – this habitat will be unsustainable for fish life – this was highlighted in a recent study by the University of Southampton.
3. Currently the brook is inhabited by some protected fish species which are likely to find the proposed engineering works uninhabitable. These are:-
 - Bullheads – which are protected as Special Area of Conservation (SAC) listed species (Annex II). They live on the bottom of fast-flowing, clear, stony, rivers and streams. There is no provision for this in any of the proposals.
 - Sea Trout – which are listed under the BAPS priority fish species. BAPS stems from The Convention on Biological Diversity (Rio 1992) which produced The

UK Biodiversity Action Plan now superseded by the Biodiversity Framework, but this still affords protection for listed species.

- Let's just examine the Sea Trout and the consequences to this rare and protected fish. It is the same species as Brown Trout. After hatching in fresh water gravel beds the immature sea trout remain in fresh water for 2 or 3 winters. Once they are about 6 inches long they undergo a metabolic change to adapt to life in sea water - this is seen by them turning silver. They then migrate to sea, returning in late summer/autumn to where they were spawned to in turn lay eggs and so the cycle is completed. The problem is that they are programmed genetically to return to where they were spawned, and if this route is seriously disrupted, as would happen as a result of the 'Restoration' works, then they cannot complete the cycle and so the valuable genetic material will be lost.
- The third important species which will certainly be impacted by this proposed work is the European Eel.
- The European Commission has initiated an Eel Recovery Plan (Council Regulation No 1100/2007) to try to return the European eel stock to more sustainable levels of adult abundance and glass eel recruitment. Each Member State is required to establish national Eel Management Plans (EMPs). These plans aim to achieve an escapement of silver eel to the spawning population that equals or exceeds a target set at 40% of the potential biomass that would be produced under conditions with no anthropogenic disturbance due to fishing, water quality or barriers to migration.
- Each Member State is required to develop and take the management actions that are necessary to achieve or maintain compliance – since eels have been found in both Latchmore Brook and the stream that comes down from Thomson's Castle Mire, how can the proposed works achieve or maintain compliance with the section that requires 'no barriers to migration'? I can see no provisions for eel passes in particular, or even any reference to eels in general.

My final concern relates to horses and ponies – not only the Forest run ponies, but also all of the equines within and around the Forest. Equine Exotic Diseases are becoming increasingly important – the main ones are

- African Horse Sickness
- Equine Infectious Anaemia- 'Swamp Fever'.

These diseases have some important features in common:-

1. They are fatal – 90% death rate in the case of African Horse Sickness
2. There is no specific treatment
3. There is no vaccine available
4. And, ...they are spread by midges and mosquitoes.

The over-riding question is – has a risk assessment been made as to the likely effect of dramatically increasing midge and mosquito breeding grounds in the Forest as a result of Wetland Restoration? Has this been taken into account – one of DEFRA'S recommendations in the face of this very real threat is 'Habitat Control' to try to keep insect vector breeding to a minimum.....and with global warming the risks of the import of these and other emerging diseases is ever increasing – African Horse Sickness is already in Spain and parts of Italy are already declared 'endemic' for Swamp Fever.

Is it worth the risk?