

Sally Hayward to Emma McWilliam, NFNPA

EMAIL

FAO: Emma McWilliam

.cc Steve Avery, Nick Wardlaw, Richard Mabbut, Kenneth Spiers, Helen Kent, Frank Green, Lyndhurst Parish Clerk

23 February 2016

Dear Emma

Pondhead HLS Wetland Restoration project: 15/00294 -

Archaeology concerning the Park Hill Lawn stream (SSSI Unit 386)

Further to my letter of 05 January 2016, Frank Green, and I met on 10 February 2016 at the Christopher Tower Library in Lyndhurst in order to view old maps of the Pondhead area, specifically the original "Driver's" survey map (we viewed the oldest, 1789, version). **The map shows the stream running across Park Hill Lawn on the same line as it is on all of the subsequent maps and, of course, remains today.**

This establishes beyond peradventure that:

1. SSSI Unit 386 (Park Hill Lawn) cannot be in unfavourable condition **as a consequence** "*of inappropriate Victorian drainage*" (as the application asserts) because the "*artificial channel*", claimed by the application to have been dug 150 years ago, is in fact an ancient stream.
2. the Park Hill Lawn stream (PLS) element of the above application has therefore been conceived, consulted upon and advertised on the entirely false premise that the PLS is a "*straightened*" Victorian drain.

The application proposals in respect of the PLS constitute the largest component of the application work and include infilling the existing stream and relocating it and the existing bridge some 10m southward. (As per Proposed Site Plan Drawing 004 items 1, 2, 3 & 4).

The major part of the works, and hence the application, have been founded and advertised on an entirely false premise. You now know for certain that this is the case.

This research also demonstrates that although this is an HLS funded application, the applicant has not followed the due process to which the HLS partners publically commit. I quote from the National Park Authority's HLS sponsored "Heritage Mapping" exhibition at the New Forest Visitor's Centre (September 2015 – January 2016):

“The New Forest National Park Authority has a duty to conserve and enhance this historic environment for everybody.” (My emphasis)

“As well as being used to identify archaeological features, the Lidar images also provide us with the ability to locate the old winding courses of the streams before they were straightened in the 19th and 20th centuries. This combined with historic maps helps to ensure the wetland restorations are undertaken in the right place.” (My emphasis)

There is no map or Lidar data whatsoever which supports this component of the application. The PLS is, and always has been, on its present line. To infill and relocate it to an arbitrary line is neither “restoration” nor “conservation” nor an enhancement of “an historic environment”. Rather it is wilfully destroying an ancient feature.

In order to demonstrate the extent of the reliance the applicant (and Natural England) has placed on the flawed assumptions, I quote from the application’s Planning Statement: Section 3. ***“Background to application and the proposed scheme”***

Para 3.1 ***“Approximately 150 years ago, Pondhead Inclosure, Parkhill Lawn and Denny Inclosure were subject to significant drainage modifications, specifically the straightening of a watercourse to link in with Matley Bog to improve ground conditions for forestry and grazing.”***

This is now known to be palpably incorrect (see above).

Para 3.2 ***“Across Parkhill Lawn, the artificial channel was not dug into the lowest point of the floodplain...which is considered to have an adverse effect on grazing.”***

This too is palpably incorrect, because the channel is not artificial.

Para 3.5 ***“Consequently, the units (386 and 387) of the SSSI at Pondhead are currently classed by Natural England as being in “unfavourable/recovering” condition, it is understood the assessment of “recovering” is made due to the units’ inclusion within the Forest Design Plan and wetland restoration programme”.***

There can be no relationship between the existing condition of the SSSI Unit 386 and the line of the ancient stream because it has never been altered.

SSSI Units and SACs within a National Park should be afforded the highest level of protection and any works proposed to them should use the best quality research and data available. HLS, in partnership with the NPA, have funded Lidar surveying of the New Forest and have supported the New Forest Trust in keeping the Lyndhurst Reference Library open to all. Unfortunately these wonderful resources were ignored, with the result that this HLS application has been founded on incorrect (and easily avoided), assertion and assumption.

The description of development as *“the replacement of an artificial channel with 388m of restored meander”* is erroneous and materially so. It removes the basis of

the justification of the works and renders the pre-application and application consultation process invalid.

The Parkhill Lawn stream works constitute the largest part of this proposal. The application must therefore be withdrawn as the error is far too great to amount to a minor material amendment.

If the application is not withdrawn, it should be refused because the NPA is now fully aware that the works for which permission is nominally sought do not coincide with what is known to be proposed.

Please let me know how you intend to treat this matter.

Regards

Sally Hayward