

Objection to the Latchmore “restoration” planning application: Number 16/00571

I was until recently a resident of Blissford, and for 20 years had walked in and around the Latchmore valley almost every day. **I object most strongly to the proposed “restoration” of Latchmore Brook** and its catchment, which would be a massive and very damaging engineering project in a most highly protected area. I have some relevant expertise in such matters, as I chair independent scientific reviews of the environmental impacts of major off-shore developments. My reasons are:

- 1) **The works proposed are unnecessary.** There is very little wrong with the present environmental state of the Latchmore Brook. The problems identified in the application are very minor, and of little ecological significance. A walk along the Latchmore Brook is enough to show that there is abundant and diverse vegetation and wildlife. Yet it is not a natural environment: the main alterations have been the impacts of the clearance of trees and shrubs, and heavy grazing by livestock. It is not disputed that the stream has also been modified at various times, most recently over 60 years ago, to improve the drainage and prevent excessive flooding. There remain some minor visible signs of this, mainly some straightened reaches and barely visible spoil banks alongside the stream. These are the main factors leading to the classification of parts of the area as “unfavourable recovering”. Any assertions that the vegetation is degraded are supposition, since no-one has kept detailed records of its condition before and after those earlier works. These minor signs of human intervention are trivial, and have had no measurable ecological impact. No reasonable person could claim that they are sufficient to require a major engineering intervention involving tens of thousands of tons of gravel, hoggins and clay, as is proposed.
- 2) **There is no reliable evidence that the works proposed would be successful** in achieving any improvement in the environmental conditions. The success of previous restoration schemes has not been adequately monitored, but several recent similar “restorations”⁽¹⁾ have actually achieved no discernable improvement, but have proven to be very damaging. The claims made in the Environmental Statement that the “restoration” works would improve the ecological state of the area are not supported by adequate evidence, for the simple reason that no attempt has been made to monitor the changes caused by earlier attempts at restoration. The recent “New Forest Wetland Restoration Review” commissioned from the River Restoration Centre and Jonathan Cox Associates is a heroic but futile attempt to assemble such evidence after the fact. It fails to provide convincing evidence because no adequate observations (not even matched pairs of photographs) were made before and after the works were carried out. Moreover, no clear (e.g. SMART⁽²⁾) targets have ever been set for any of the restorations: without such targets it is impossible to know whether or not they have been successful. This is scientific malpractice, and a scandalous failure to monitor the value-for-money of work carried out at public expense.
- 3) **The Environmental Statement is seriously defective**, for the following reasons
 - a. Its estimates of the beneficial effects are almost entirely unsupported supposition. The best available evidence for any such effects is in fact the “New Forest Wetland Restoration Review” referred to above. As I have explained, that evidence is extremely flimsy.³
 - b. It concentrates almost entirely on the assumed beneficial effects on vegetation types (none of which is rare). The treatment of effects on animals, especially fish (trout and bullheads) and invertebrates, is cursory and inadequate. In particular, detailed observations by local people,

¹ For example, Ditchend Brook, Amberslade Bottom and Harvestslade

² SMART => Specific, Measurable, Attainable, Relevant and Timely

provided to the Forestry Commission and others, show that the analysis of the Southern Damsel fly, one of the qualifying features for the SSSI status of the New Forest, is grossly inaccurate and seriously deficient.

- c. The hydrological modelling is inadequate and inappropriate, since it is based on atypical (and clearly erroneous) estimates of peak flow rates, and LIDAR elevation data that is highly suspect, given the experience at Pondhead. In addition, since there are no past observations of bank overtopping frequencies, and no targets for what they should be, it is impossible to use the analysis to determine what magnitude of intervention might be desirable.
- 4) **The works would adversely affect the public amenity value of the Latchmore valley.** This is one of the most highly valued and popular recreational localities for both residents and visitors on the western side of the New Forest. It has been a Mecca for walkers, riders, naturalists, families, and artists for generations. If there were clear evidence that the works would lead to an improvement of the ecological state of the valley, that might be sufficient justification to sacrifice the amenity value (although that would be a difficult balance to judge). There is however no such evidence, and the experience from Ditchend Brook and elsewhere shows that the works are actually likely to create a damaged and degraded landscape that will take decades to recover. Indeed, the very purpose of “rectifying” the improved drainage can only be to make the margins of the stream wetter, and less accessible for all recreational users. The NPA would be failing to execute its proper function if it were to allow such a sacrifice of amenity for no discernable ecological benefit. It would be better to leave well alone.
- 5) **The cost of the proposed scheme is enormous, while its benefits (if any) would be tiny, and are anyway highly uncertain.** The proposal would therefore represent a massive waste of public funds, for which the NPA as a partner in the HLS scheme, and Natural England would be responsible. It is repeatedly claimed in the application that the Forestry Commission has a legal obligation to take action to improve the condition of the Latchmore Brook and its environs, and planning authorities often rely on Natural England’s advice that “maintenance implies restoration if the feature is not currently in favourable condition”. However, the legal basis of these assertions is extremely dubious. Such action could only be reasonable and justified if it is clearly (a) necessary, (b) likely to succeed, and (c) can be undertaken at a reasonable cost. None of these conditions are met in this case. There is no legislation that requires disproportionate, damaging and expensive action that is likely to fail. Indeed, the NPA would be culpable if it were to approve such action by a public body, either as a partner in the scheme or as the responsible planning authority.

In summary, while some of the earlier New Forest wetland restoration schemes may have been desirable, I submit that those projects that were reasonably justified with small undesired impacts have been completed, and that the Forestry Commission and its partners are now scraping the bottom of the barrel, and proposing projects that are overall detrimental. To echo the words of the Chilcot enquiry, the conclusions of the application are “presented with a certainty that is not justified”, “the consequences... have been underestimated”, and “the planning and preparations... are wholly inadequate”.

Finally, I note that **the NPA has a serious conflict of interest in this case**, as it is both a partner in the HLS scheme and the responsible planning authority. I sincerely hope that both the responsible officers of the Authority, and its Planning & Development Committee, will be able to set aside the NPA’s role as a proponent of the project, recognize that the application is fatally flawed, and is for a development that is unnecessary, undesirable, and based on extremely flimsy evidence, and reject it accordingly.

Yours faithfully



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Comments on “New Forest Wetland Restoration Review” (Cox, Janes & Aaberg 2015)

- 1) The review is based mainly on short site visits (one or two day walk-overs during November 2014, just after a period of substantial rain) to just 8 selected sites where restoration work had been conducted, in some cases only one or two years before.
- 2) Since there are no records from comparable observations prior to restoration, the review represents a rather heroic effort to assess the success of the schemes in the absence of much relevant information.
- 3) The report suffers greatly from lack of hard evidence (such as before/after photographs or quantitative data on vegetation cover). A brave effort has been made to find and use earlier photographic evidence, and the (usually cursory) NE condition assessment reports. However, most photos are un-dated and in most cases they do not clearly correspond to the same locations, scale or orientations.
- 4) The report is therefore bedevilled by statements that are essentially purely supposition, particularly regarding stated changes of vegetation that are not based on any quantitative observations of vegetation cover (either before or after).
- 5) The overall conclusion is that restoration work has generally contributed positively to the declared objectives, but these are mostly either vague or activity (rather than outcome) based. The basis for this conclusion is therefore weak. It is based primarily on changes to the hydro-geomorphology that are relatively easy to assess visually during a short visit.
- 6) The projects that appear to have been most successful are those involving small low-gradient low-flow rivulets, or where the pre-existing conditions were the worst (e.g. Fletchers Thorns where there was indubitably a long straight artificial channel). Those involving larger flows and steeper gradients (e.g. Holly Hatch) have apparently been less successful.
- 7) The report contains a number of pertinent observations on the basic conflict between promoting wetland vegetation and improving grazing for stock, and on the difficulties involved in re-establishing anything close to the natural dynamic equilibrium between erosion and deposition of a natural stream.
- 8) The report implicitly tends to assume that the ideal state of a stream (for adjacent wetland vegetation) would be close to bank-full throughout its length at all times, which is simplistic because it would be (a) quite unnatural (in both space and time), and (b) deleterious for grazing and for less preferred types of vegetation.
- 9) The conclusions include (p 118) some pertinent recommendations regarding the necessity for extended and quantitative monitoring both before and after works are undertaken, and some useful suggestions of the appropriate methodology.

John Shepherd, 16 November 2015