Latchmore Wetland Restoration Project

<u>Summary of Individual Comments Received</u>

Following the Public Exhibition, the Parish Council delivered an information sheet to each household to give everyone in the Parish the opportunity to respond. We asked everyone to email their response direct to the Forestry Commission with a copy to the Parish Council, so that an overall summary could also be submitted.

From 450 households, 38 residents copied their response to the Parish Council. Overall opinion on the Exhibition seems to be frustration that insufficient information had been presented to justify the proposed project and that the focus on the planned works rather than the EIA findings was a missed opportunity for the proposers to engage with residents. To summarise, opinions were:

In favour of Proposed Scheme 2

Neutral 2

Against 34

The input has been summarised below.

Key issues were:

Consultation Process

There was concern that the process was a box ticking exercise as the plan presented appeared to be a fait accompli.

The Consultants present at the Exhibition admitted to having a poor local knowledge, this has not encouraged local support.

There is concern that the process has had inappropriate consultation, provided insufficient information with too short a timescale to review and respond appropriately to a project of this scale.

Evidence to Support the Proposed works

For a scientific-based intervention there appears to be inadequate data to support the conclusions. There appears to be no baseline data to draw on and no proper evaluation or monitoring of previous work.

Where is the evidence that the land is drying out or is out of touch with its' flood plain?

Where is the evidence that changes to the brook flows are due to previous drainage works rather than e.g. climate change?

No one is forthcoming about the certainty and details of the advantages of this scheme

There is concern about lack of care and monitoring of previous projects - without the evidence and data before the works commence, how can the work be sensibly monitored?

There was no detail of what historic drainage work is claimed to have been carried out and when, where exactly this was and the reasons for it.

Proposed Project

Scope

Concern that this type of restoration has not been carried out on a similar site and at this scale?

It has been stated that the SSSI units noted as "unfavourable recovering" are categorised as such due to man-made drainage in the past - surely these works are also man-made and therefore (by logic) would make all the units unfavourable recovering in the future??? Will the restoration change anything?

There was no explanation as to why the project is now many times larger than the project published in 2011, what has altered? Why has Latchmore Shade now been included?

Work on the drainage systems higher up in the inclosure have been left out without explanation.

Can any contamination (from lead, bombs, ammunitions) be noted and removed during the works?

Timing

Will the work be carried out during a normal working week or also at weekends and evenings?

Options

The Four Options identified by the original Scoping Report were not sufficiently explained - specifically why only one option was taken forward.

<u>Methodology</u>

At the exhibition, Fletchers Thorns was cited as an example of a successful Forestry Commission restoration. But topographically Fletchers Thorns is completely different to Latchmore. The steep gradient in almost the entire Latchmore catchment is absent at Fletchers Thorns. Is there evidence from a Forestry Commission restoration anywhere in the Forest that the proposals for Latchmore are appropriate?

Why isn't the herringbone drainage being restored as all upstream work should be completed before commencing downstream activity? Where is the Environment Agency's evidence to support this?

The methodology for stream restoration fails to meet sustainability objectives and imports non-local materials to the forest.

There do not appear to be any plans for restoration of forest tracks and highways after they have been damaged by plant/lorry access

Has the delivery process been properly considered - the use of lorries versus horse and cart?

Where is the evidence that water pollution from importing 50,000 tons of imported materials will be minimal? Has the impact on river species been adequately assessed?

If flood flow observations are inadequate and higher than expected there is concern that flows will destroy this restoration as it has others, has this been taken into consideration?

There is insufficient detail on how the downstream deposits will be prevented and how there can be "no increase in flood risk to properties downstream".

Felling mature trees for machine access is neither insignificant nor short term - are there plans to replant appropriate species? Will habitats re-establish if the ground is more waterlogged after the works are completed.

There is concern about the use of heather bales as these have proved dangerous to stock and riders, and have had to be removed and replaced when used at other sites.

There was no information on what was the expected outcome of the engineering works. Would Latchmore Shade and lawn be flooded and if so, when, by how much and for how long?

There is no indication of the downstream effects of the engineering works, at the moment the stream provides water for downstream paddocks as well as being a valuable habitat for nesting kingfisher and grey wagtails; otter and salmon have been seen and very large trout in the deep pools. What mitigation is envisaged during the works?

Risks

Previous restoration projects do not appear to have been successful and have required rework eg Ditchend, Amberslade to prevent safety issues for stock and riders. What are the provisions for monitoring and review?

If the UK votes to come out of Europe how would this affect the project funding? Assurances are needed that the works will be carried out to the highest standard regardless of funding - no shortcuts must be taken.

Could the work be halted if it becomes apparent that it is damaging the environment - ie the outcome is not as expected?

EIA Findings

Benefits

There is concern that the benefits to justify such a significant project are not fully explained.

Survey and Impact Analysis

Areas of concern not covered at the Exhibition:

The restoration will flood a huge swathe of Pillwort.

The larger pond to the north side of the brook has been labelled a priority pond by the Freshwater Habitat Trust yet this will be drained and will disappear because of the proposed works.

No mention is made of the quaking bog - a rare feature in the landscape, and it is on the route for transporting infill down the streamside.

Up to 200 stock graze "the Shades of Latchmore" - the proposed works could stress the animals, how will this be mitigated?

By how much would the capacity of the stream be reduced? What are the calculations for the effect of this reduction? The waters can reach the track in front of Ogdens Dairy Farm already - where are the calculations to show properties would not be flooded? Are there post-works Environment Agency flood maps?

The effect of long-term pollution on fish and other aquatic species does not appear to have been considered.

Ogdens Mire - the trees adjacent to this site are a valuable bat roost as ecologist Martin Noble's survey showed (submitted to LUC/FC after the scoping report). It appears the area is designated as a stockpile. How will this be mitigated?

Concern about the amount and chemistry of materials being imported (non-native) and the effect on the habitat.

Water Quality

What will be the long term effect of the pollution (noted in the EIA) on fish?

Recreation

Recreational users do not consider the area unfavourable.

There will be reduced accessibility to one of the iconic beauty spots in the New Forest. Local businesses, recreational users and residents will be impacted, this does not appear to have been considered.

There is concern about the removal of wooden footbridges designed for easier access, in area where the NFPA claim to wish to promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. What effect will the water-retention work have on the other small crossings? Will the current footpaths along the stream banks be destroyed by the passage of machinery? What effect will the upstream work have on waterlogging in the Inclosures? All this will impact on walkers and riders and other recreational visitors but we have not been given any information about the after-effects of all the proposed changes. The routing of lorries up the country lanes, the closure of Ogdens Car Park for three summers, and the restricted access to areas where work is being carried out, will all affect local residents and visitors from further afield, as well as the commoners' animals for whom this area is their home. What are the overall benefits of this project for recreational users?

Traffic

"A review of accident records from Hants Constabulary suggests there are no highway safety problems with proposed access routes". The words under normal traffic conditions must be added to this statement. HGVs, tractor and trailers are not normal traffic, has this been taken into consideration and how will this be monitored? It is impossible already to pass a bicycle without going onto the SSSI verges and there are many cyclists, walkers, stock and residents that use this lane.

Cobb cottages would be at risk from the heavy traffic. Is there a surveyors report that refutes this?

Legality

There is concern that the EU Habitats Directive and the Precautionary Principle are being ignored, and that the destruction of SAC species such as the Southern Damselfly is not insignificant, it is unlawful.

Concern about the complete removal of shrubs, trees, gorse along the routes - what will the effect be of this loss of habitat? Will some species be lost to the area forever? Has this been approved by the appropriate bodies?

There is concern that the use of HLSS funding for this project is not legal, confirmation is required that this is not the case.

Is there a conflict of interest between the statutory bodies and the proposed works? How can the NPA be a partner in a project on which they are asked to make a planning decision? Given this situation can an independent body evaluate and rule on the proposal?

<u>Gaps</u>

The works will impact on tourism to the area for a number of years significantly impacting businesses and possibly employment in the area - this does not appear to have been covered. Has a cost-benefit analysis been undertaken? Can this be shared?

Will there be a repairs hotline? Not only for roads but also for vibration damage to Cob Cottages - there is concern that the vibration damage has only been modelled rather than each property. What precautions should householders take - evidence for future proof should a claim be necessary? Will there be a fund/insurance for such claims?

Will HCC have funds and a response mechanism to repair the highways and verges as soon as they are damaged?

More information on the project costs and budgets are needed.