



PLANNING and TRANSPORT COMMITTEE

reply to:

Sent as attachment to Email only

Brookley Farmhouse
Sway Road
Brockenhurst
SO42 7RX
Tel: 01590 623935
nfaplanning@gmail.com

22 August 2016

Ann Braid
New Forest National Park Authority
Lymington Town Hall
Avenue Road
Lymington SO41 9ZG

Dear Ann,

Application 16/00571 Wetland restoration comprising the restoration of meanders, bed level raising (including the main... PART OF THE CATCHMENT AREA OF THE LATCHMORE BROOK INCLUDING STUDLEY WOOD, ISLANDS THORNS INCLOSURE, AMBERWOOD INCLOSURE, ALDERHILL INCLOSURE, SLODENS INCLOSURE AND LATCHMORE BOTTOM. CENTRAL GRID REFERENCE SU 2121113830

1. New Forest Association (NFA) supports this application. New Forest Association (NFA) is dedicated to protecting and sustaining the unique character of the New Forest. Our members promoted the 1877 New Forest Act to secure the future of the New Forest and now we are the voice for the New Forest National Park - its friend and watchdog. We are an independent, campaigning charity based on its membership and volunteers. Further details may be found at newforestassociation.org

2. Unlike virtually all other planning applications, which damage the habitat of the New Forest to a lesser or greater extent, this project is intended to improve it. It is not about improving recreation and recreational facilities - although experience of previous schemes suggests that enjoyment of the *special qualities* increases with the improvement of those qualities. It is not about improving commoners' grazing - although previous schemes seem to have achieved this across the seasons. It is not about preserving archaeological relics - although surveys suggest damage in the case of 16/00571 is not foreseen and there is no evidence of accidental damage in previous schemes. It is not a flood prevention scheme - although there may be benefits to those living downstream. It is not about improving landscape - although past schemes indicate an improvement is likely.

This planning application, like any other, should not be judged against perfection, and neither the cost nor value of the project a matter for the LPA.

The central planning consideration is whether there is an increase in the ecological value of the site and whether the trauma of the works has been minimised both in extent and in method to achieve objectives. NFA does not consider there is cause for objection on either extent or method.

3. The application site is within the New Forest Special Protection Area (a strictly protected site classified in accordance with Article 4 of the EC Birds Directive) and qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting breeding populations of European importance of the species listed on Annex I of the Directive as dartford warbler, honey buzzard, nightjar and woodlark. Attention is drawn to NFNPA unpublished report *Research recommendations relating to impacts of recreation on ground-nesting birds in the New Forest National Park*. At 2.4 it states that there had been a "marked decline" in the population of woodlarks and a "marked decline" in the population of dartford warblers. This report reflects anecdotal evidence from NFA members that numbers of other ground nesting birds (including snipe, lapwing and redshank) have also declined. Such a decline is unacceptable and unsustainable if the Forest is to continue to benefit from the protection of the EU

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Hon Secretary: Keith Braithwaite
01425 621023
secretary@newforestassociation.org



directive. This wetland/riverine restoration will result in an increase in a habitat that is rare in national, European and international terms and will add value to the Forest's stock of fauna and flora. The winners will be the rare and unusual habitats, whilst it is the more widespread habitats, rightly cherished by many local people, that will be the losers. The ecologists within NFA including Clive Chatters and Jonathon Cox agree with those of the Authority, Verderers and Natural England there is a net habitat gain from this work.

NFA considers the work will restore a more natural function to the river corridor which in its current state is marginally, but continuously, deteriorating and that this project will correct this. This river section may never need to be touched again.

5. It remains the view of NFA that an EIA was not justified for these works in terms of the regulation and guidance and the report is of limited value beyond perhaps giving the holistic dimension greater emphasis. This site is currently of very high ecological value and after the work is carried out it will be of very high ecological value. NFA would support more selective and detailed baseline data and proper monitoring of results over several years. NFA believe that greater emphasis should have been placed on this matter in previous projects and failure to do so adequately means the case for wetland restoration is not proven beyond doubt to some sections of the public. In this case NFA is satisfied that sufficient work has been done and is planned in this area. NFA will contact the Forestry Commission directly with any queries or requests regarding individual species before and during the work.

6. The need for gravel stock crossings (the artificial raising of the stream bed for reasons other than ecological benefit) is questioned. NFA believes a built in advantage of such a scheme as this is that stock can cross in a multitude of places. NFA asks FC to investigate the use of crossings installed in previous schemes to judge their necessity and decide whether maintenance is worthwhile.

7. Pressure to improve accessibility should be resisted. Improving and tidying access is improving the area for recreation and thus inviting an increase. In such a sensitive area this is most probably undesirable and would require back up surveys and data not currently provided.

Yours sincerely,

NFA Planning