

## RESPONSE FROM BURLEY PARISH COUNCIL

PLANNING APPLICATION NUMBER: 16/00242/FULL

SITE ADDRESS: Wootton Riverine Woodland, Avon Water, Wootton Bridge, Hampshire

PROPOSALS Restoration of Avon Water to a meandering stream course; infill redundant sections; new and replacement structures

Our views on the above application are:

4. We recommend REFUSAL, for the reasons listed below

### REASONS FOR RECOMMENDATIONS OR COMMENTS / SUGGESTED CONDITIONS

- a) This application envisages Wetland Restoration ('WR') that would involve a 3km stretch of the Avon Water river within a site area of 50 hectares and the introduction of 19,000 tonnes of hoggins, gravel stone rejects & clay etc. from outside sources. The project is intended to change a location popular with visitors on a scale never yet seen in the New Forest ('NF'). It must surely, therefore, require especially careful consideration to ensure the actual results of the planned changes will be fully justified.

***NB Burley Parish Council ('BPC') may be seen to be in a unique position (in relation to other parties) to be able to comment on these new proposals because of the close monitoring we were able to undertake of last summer's WR project at Harvestslade Bottom (PA No. 14/00611), just north of the village. The concerns arising from that operation are still the subject of Freedom of Information Act/Environmental Information Regulation Enquiries of the Forestry Commission ('FC') – The relevant correspondence may be viewed on the BPC website***

- b) The application is made by the FC on behalf of the NF Higher Level Stewardship Scheme ('HLSS') whose partners are the FC, the Verderers of the NF and the New Forest National Park Authority ('NPA') – the latter also being the Local Planning Authority ('LPA').

The reasons for these proposals appear to be based primarily on the contents of routine Common Standards Monitoring (CSM) Assessments of the associated SSSI units as reported by a Natural England ('NE') officer. These make observations on the perceived health of these habitats & particular species found there.

**Significantly, each SSSI assessment concludes that the condition of the units remain "unfavourable recovering" due to the (historic) altered water course. This could indicate a pre-disposition towards accepting a legal need for works to be undertaken to restore these areas to "favourable" condition – regardless of the actual state of the habitats concerned.**

- c) Major deficiencies in the health or diversity of species are not noted within these assessments. Nonetheless, the over-riding assumption is always made that historic stream straightening is sufficient reason for the label of "unfavourable" condition and to justify the dramatic and extensive re-engineering of a watercourse that is well established after 160 years or so in its current format. We would observe that apart from being straight for some distances, the Avon Water stream/small river appears to be remarkably stable (in as far as any watercourse can be). It cannot be described as a deep drainage channel and runs generally close to the top of its bank edges. It is exhibiting much less signs of scouring, erosion and undesirable deposition of stones/gravel than is to be seen in recently completed WR projects.

The surrounding mires/bogs are noticeably very wet all year round and the woodland areas are populated by tree species that would not seem likely to welcome continuous root saturation. Moreover, the proposed plans do not show any proven link with the historical line of the watercourse. Instead, the works are to follow a line only partly indicated by the apparent remains of original meanders. There cannot yet be, therefore, a clear plan of the works to be undertaken since this will be guided by what the contractors find as they progress on site i.e. on the basis established within previous such projects.

**Can this be regarded as a fully reliable and appropriately scientific basis on which to undertake "restoration" works in such an ecologically valuable and fragile environment?**

- d) **The last WR to be granted permission & subsequently completed was at Harvestslade in the period of beginning August to end October i.e. a much longer period than originally planned because of the weather conditions encountered.**

*NB the Environment Agency have reported that the prescribed Fish Removal exercise did not take place until Mid-September which would seem to be in breach of the Project Management Plan and very unfortunate for some of the protected species concerned including Eels and Lampreys.*

A current site inspection there clearly shows the unfortunate effects of the works undertaken last summer with excessive bankside erosion and dramatic washing out of a great proportion of newly introduced materials in response to periods of considerable (but not unusual) rainfall in the wide catchment area.

**The Harvestslade scheme in Burley has shown this type of large Wetland Restoration scheme can produce unpredicted/undesirable results, very damaging to the local ecology and without recognisably worthwhile benefits in clear prospect for the future.**

- e) This makes it difficult to understand how the project's promoters (HLSS) could claim success for that scheme at this stage (i.e. 6 months after its much delayed completion due to adverse weather conditions).

**The post-project completion films so far shown give no proper indication of the current condition of the land involved in the project or the remedial works that will be required to get it back to being the environmentally beneficial watercourse that it was previously. The fish spawning episode taken in November is particularly misleading in view of the inevitable excessively hostile conditions those fish would have encountered at that stage.**

**Such misleading publicity must further undermine confidence in the credibility and integrity of what is now proposed**

- f) The Wootton works are designed in a way very similar to Harvestslade and other similar earlier projects - but very much greater in scope, area and length. The Avon Water tributaries arise in the heath and wetlands lying in the southern part of Burley Parish, particularly in the areas known as Holmsley, Burbush & Shappen Bottom.

The mires here are observed to have been extending gradually over recent years to the point that the height of the water table in winter is causing ground saturation to extend back to the Burley Golf Course and its 4th tees (which now require some re-location, as the Club has been discussing with the FC and NE over many months).

Burley villagers are on record as observing the increasing tendency of the drainage channels feeding the Avon Water tributary in Shappen to back up into the built-up Pound Lane area of Burley. Despite all this, no effort was made by the FC or NPA to join Burley Parish Council in pre-application parish discussions.

**Regardless of these observed trends, no consideration appears yet to have been given to the likely *upstream* effects of this project in these areas but which can be expected to be at least as significant as those *downstream*.**

- g) **Despite the very substantial scale of this project, and the inevitable initial mass destruction to existing stream-related species to be caused by movement of heavy vehicles, industrial scale excavation and huge quantities of hoggins etc. to be discharged, no Environmental Impact Assessment and/or Habitats Regulations Assessment has been undertaken prior to submission of this application. Our solicitors advise that this is required by EU & UK Environmental Legislation in the circumstances now evident.**

- h) Furthermore, it seems likely that Avon Water was especially straightened in the mid-19th century to help drain and stabilise the foundations of the old railway embankment that had to traverse such an obviously difficult stretch of terrain.

**No proper consideration appears to have been given to the possible de-stabilising effects that raising the water level of Wilverley Bog could have on the old railway embankment that now carries a relatively new section of the C10 road, eastwards of Holmsley Bridge.**

It should surely be required that specific professional advice is obtained from Consultant Engineers to ascertain whether an increase in bog water back to historic levels could take place without undermining the integrity of this c.165 year old structure.

- i) The scale of the planned works and the means of access will clearly require very extensive land engineering operations. As witnessed last summer at Harvestslade Bottom, this will involve much early tree felling. There will also be initial habitat destruction / disruption on a very wide scale that will take a great deal of time to recover, regardless of the intentions for the new line of the watercourse.  
**The Biodiversity of the overall environment extant is already remarkably rich but very fragile. Can works with such an inevitably dramatic effect on the attractive and popular Wootton riverine woodland setting really result in a substantial net addition to biodiversity and be in the overall best interests of this site and the New Forest in its wider context?**
- j) It must have been observed that some previous Wetland Restoration projects have gone seriously wrong resulting in the frequent drying-up of altered stream beds and substantial washing out of new deposits that required major remedial works  
**On close reading, the reports recently commissioned by the FC to comment upon the current state of past projects only seem to confirm the predominantly inadequate results achieved to date, despite the passage of time and the selective choice of sites.**
- k) Moreover, despite the use of experienced contractors and in house staff, effective site management and project monitoring has been clearly lacking in the case of the Harvestslade project This has resulted in a “massive” overrun of costs (*see HLSS minutes*), extensive damage to forest tracks by contractors’ vehicles and very poor management of the pre-works fish stocks (as noted by a leading independent fish expert).  
**What guarantees can be secured by the NPA that such sub-standard procedures will not be evident (on an even greater scale) to avoid similar unacceptably poor results occurring again on this site at Wootton?**
- l) Enthusiastic comments by the promoters of the NF HLSS Wetland Restoration programme about its progress to date are to be seen regularly in the press. But these comments are not often borne out by on-going observation of the results to be seen in practice, particularly with regard to the larger projects.  
**Therefore, it is essential for a thorough, truly independent and scientifically rigorous appraisal of the project proposals to be undertaken through an Environmental Impact Assessment and Habitats Regulations Assessment, as required by the legislation, in order to compare these with the HLSS’s original objectives before consideration of this application is completed by the National Park Authority.**
- m) On the basis of the information currently before us together with actually observed execution of recent projects, we do not believe the case for the FC/HLSS’s proposed works on this major site has yet been established.  
**Consequently, Burley Parish Council strongly recommends Refusal of this application at this stage.**

Signed.....*R G C Clarke*.....

Dated...*11<sup>th</sup> May 2016*.....