

Presentment to the Verderers Court

Pondhead HLS Wetland Restoration project: Planning Application Number 15/00294 – Approved 27 June 2016.

Specifically works to Site of Special Scientific Interest (SSSI) Unit 387 Matley Inclosure Bog completed September 2018

My name is Sally Tear and I am writing concerning the above completed HLS works at Pondhead. I am not qualified to comment upon the overall effectiveness of the works across the site, (the lapwings no longer nest on Parkhill Lawn, we have not seen spawning trout since 2018 and the removal of the spoil heaps has made an increasingly well used flat mountain bike track through the riverine woodland), but I write specifically about the works in Matley Inclosure Bog (SSSI Unit 387, also a RAMSAR and SAC site).

Matley Inclosure Bog (SSSI Unit 387) was in “*unfavourable recovering*” condition, and the planning application aim was to “*prevent further erosion and drying out of the mire system*” via works to the Beaulieu River (SSSI Unit 562 – favourable condition) to “*reconnect the stream to the floodplain*”. (Application Planning Statement, Biodiversity Statement etc...) i.e. the standard HLS river bed raising method to slow flow and increase flooding over the open lawns, but also to improve the riverine woodland bog of SSSI Unit 387.

At the time of the application I made my points via presentments, but the application was approved in June 2016, works started in September 2016 on Parkhill Lawn and finally completed in the “*riverine woodland*” of Matley Inclosure Bog in September 2018. I continued to walk past the works throughout. I had concerns and took photographs, but knew from experience that any further comment would fall on deaf ears, any “repairs” would only compound any damage done by the works, and frankly after two years of works, I just wanted the work to finish and the contractors to go.

It has now been almost two years since the works in the riverine bog were completed; it has had time to settle a little. On 1st May 2020, after a night of heavy rain and following a long dry spell I walked alongside the stream and was concerned enough by what I saw to feel I needed finally to query what has happened here.

In September 2018 the works in the bog involved a large digger with caterpillar tracks and significant other related plant. It entered the woodland next to the new stock crossing, (Application Site Plan with description No.004 point 9) and worked its way along the north side of the stream eastwards, downstream to the bridge at Holmhill Passage (Application Site Plan with description No.004 point 13). The digger was therefore travelling along, and manoeuvring within the bog as it worked on the stream to reduce the bed level, remove the old spoil heaps and reinstate the two remnant meanders. There being no exit available at the bridge on Holmhill Passage, it had to make the return journey westwards upstream to get back off site.

Throughout the digger’s journey downstream we were horrified to see that because it was so wet, in order to make its way through the bog, it dug out the actual bog peat and piled it next to its path (Photograph 1). The contractor had therefore dug out the very peat which constituted the SSSI 387 when the works were intended to improve it! I am not an expert, but know that bringing peat to the surface releases carbon into the atmosphere and starts the peat’s decay. It also ruins the integrity of the bog, which is a whole organism, like a sponge. By digging the peat up, even if it is replaced, you have effectively ripped up the bog and once damaged it may take centuries to recover. This cannot have done anything but degrade the SSSI Unit 387 and have multiple seriously negative impacts. However, there was worse to come...

By the time the digger reached Holmhill Passage it had left an impassable river of mud in its wake (Photograph 2), and we wondered how it was going to get out. The incredible answer was that the contractor infilled the cleared and disturbed SSSI bog with the consolidated hoggin (gravel, sand and clay mix) that they had been using to raise the stream bed! (Photograph 3) They then covered the hoggin with the extracted peat, visually replacing the bog initially to appear as it was, but in fact building an underground hoggin wall within the SSSI bog interrupting seepage both vertically and horizontally. These works were unauthorised by the grant of planning permission and were certainly not described in any method statement. The project therefore has wrecked the SSSI bog it alleged it was improving merely in order to enable the movement and extraction of the contractors plant and machinery!!!

At the time I could not believe what I was seeing. All involved in the HLS projects continuously assure us that the contractors are “experts” with high tech equipment. They may be used to the standard HLS stream bed raising, but for them the bog appeared to be a hindrance to accessing the stream, rather than the very thing the works were claimed to improve. Additionally, the works were supposed to be constantly monitored by the Forestry Commission ecologists and Natural England. Where were they? Were and are they aware this has happened?

Two years later there are the usual HLS project stream issues: exposed clay plugs, huge beaches of gravel, banks of the reinstated meanders gauged out etc... However, most concerning is the bog. The photograph taken on 01 May 2020 (Photograph 4) was after heavy rain. The stream is full but there is not and clearly has not been any “*reconnection with the stream floodplain*” as although the spoil heaps have been removed, the ground between the bog and the stream is solid and dry (both above and below ground as we now know). The bog has become a lagoon as it can no longer gradually seep into the stream except over a couple of paths of exposed imported pink clay. The bog contents has become blacker and stagnant with presumably the decaying peat changing its make up.

Matley Inclosure Bog and riverine woodland is not only SSSI Unit 387, but is also a RAMSAR and SAC site. It was therefore the most ecologically significant part of the entire Pondhead HLS project, but has I fear been irreparably damaged.

What does this tell us about the works on other, if not all projects? The intent might be to improve, but the practice falls woefully short. No lessons seem to have been learned from previous projects, the HLS projects just carry on using their “one size fits all” methods and mantras. It is a joke to suggest that “*turning the clock back*” is happening because the Victorians wrecked so much of the Forest with their spades, yet somehow HLS projects are rectifying those mistakes by using massive amounts of imported non-indigenous materials and employing huge and damaging plant and machinery.

It is impossible to “repair” the damage to this SSSI Unit 387 without damaging it still further. So I ask the Verderers:

1. When and by whom was the removal of the peat from the SSSI Unit 387 bog approved?
2. When and by whom was the very significant hoggin infill in the SSSI Unit 387 bog approved?
3. If any monitoring of this operation was done, why were the works not halted when it would have been obvious very early on that it was too wet for the digger to even enter the riverine woodland without digging up the bog and seriously damaging the SSSI Unit 387?
4. If no monitoring was done – why not?

5. What was the original quote for that element of the project and what was the final cost?
6. What was the original quantity of hoggin required and what was the final tonnage?

I doubt very much that you will be able to answer these questions yourselves, but perhaps you should. You are the custodians of the New Forest and are allowing people to continue to work unchecked on open, precious Forest as if they were on a building site. Where else have they done this type of thing and just covered it up, knowing or unknowingly. I suspect your contractors do roughly as they please and the Forestry Commission's theoretical experts know little of how to administer large engineering contracts.

These projects are actively damaging the New Forest.

Photographs:

1. 2018 - September 4th: Piles of the bog peat removed from the bog (SSSI 387) to enable the diggers path downstream
2. 2018 – September 4th: The river of mud left in the wake of the digger through the SSSI bog after the peat was extracted
3. 2018 – September 5th: Hoggin infill into the base of the SSSI bog to enable the diggers return upstream
4. 2020 – May 1st: One of the newly created lagoons where the digger removed then infilled the SSSI bog to enable the works to the SSSI stream!!