

From: Judy Webb

Sent: 20 March 2017 15:49

To: Minerals and Waste Plan Consultation - E&E

Subject: RE: Proposed Main Modifications to the Oxfordshire Minerals and Waste Local Plan: Part 1 - Core Strategy- JW comment

Dear Elise Kinderman

In response to this consultation, I have a comment related to this statement which is on page 49, MM21 Policy M4 (4.46):

'in the case of locations within the Corallian Ridge area, it must be demonstrated that there will be no change in water levels in the Cothill Fen Special Area of Conservation;' - this all relies on calculation.

Whilst I am glad that this appears to provide a degree of protection to the water supply to this spring fed internationally important rare fen, it would be safest not to allow any extraction in the catchment. It has, for example, not yet been demonstrated that the on-going extraction of Mineral site SS-13 Upwood Park, Besselsleigh within the catchment and near to the fen is having no effect on water levels in the fen. This will not be known until the extraction is complete, which will not be for some years yet. Calculations may differ from observations. The SAC fen is too dry and this has been identified for some time. Suggested Mineral site SS-11 Great Park Farm Besselsleigh is within the calculated rainwater catchment zone of Cothill fen SAC. This is a large area of the catchment and could present a potential SAC problem if allowed.

I'm also very disappointed that the wording here provides no comment on catchment protection for any fen site that is not SAC designated. There are a number of smaller very important fen sites, SSSIs, for example in Frilford Heath Ponds and fens SSSI and Dry Sandford pit SSSI, Barrow Farm fen SSSI in the corallian ridge and near to the SAC that might be affected by sand extraction in their catchments as they are aquifer fed. Their catchments are not calculated. Also there are a number of relic fen sites that may be LWS or no designation that could be remediated/restored to a rare valuable fen type similar to Cothill SAC. A precautionary approach should be taken to allowing any extraction in their catchment zone or actually over any of these relic fen sites – fen relic Church copse next to Mineral site SS-01 Tubworth barn, Tubney may be affected by allowing extraction here, as maybe the fens on nearby Frilford heath golf course. The Golf Club has currently received an environmental award for starting the restoration process here.

In the Faringdon area, an obvious terrible example is Mineral site SS-09 Buckland Warren, Gainfield. The red line of the suggested site completely encloses a relic fen known in the past as 'Peat bottom wood/Buckland Warren'. It is impossible to recreate a calcareous fen habitat on ancient peat deposits, all such relic sites should be carefully protected for future remediation/restoration – once lost to extraction they can never return. This site should certainly not suffer extraction of the sand.

An Oxfordshire Fens Project is in the process of start-up. One of the aims is to get the important fens in better condition. Another aim is to preserve and restore relic or

'ghost' fens on peat that have succeeded to wet woodland but are still restorable. All such sites need protection and preservation or they will be lost before we even get permission and funding to renovate them. The calcareous alkaline fen habitat is now so rare that every attempt should be made to stop losses.

Anyway please take my views into consideration, I strongly feel the wording in MM21 is just not strong enough to protect into the future our resource of this extremely rare calcareous alkaline fen habitat in the county.

Please let me know this comment is safely received,

Regards

Judith Webb

Dr. Judith A Webb
Ecological Consultant & member of the Oxon Fens Project Group