



Jeremy Graydon,
The Environment Agency,
Iceni House,
Cobham Road,
Ipswich.
By E-Mail

Dear Mr Graydon,

Consultation Response in connection with Impact of Renewal of two Abstraction Licences (Ludham Road Licence, Renewal Reference 7/34/09/*G/0141C and Plumsgate Road Licence, Renewal Reference 7/34/09/*G0144B) on Catfield Fen (the "Abstraction Licences"))

I have been involved with the detailed management of The Catfield Hall Fens since 1977, firstly as Regional land Agent with the Nature Conservancy Council and its successor bodies and then as Land Agent for the Catfield Hall estate. My knowledge extends to detailed management practices and the water control policy adopted since that time.

It is very surprising that no one from EA or AMEC has consulted me or sought my views about the management of Catfield Fen. The Management report produced by AMEC is misconceived, inaccurate and at times partisan - a suggestion made to you by Dr Parmenter and with which I agree. In my view the determination report and attached papers do not cover properly or impartially the issues in the AMEC management report and the response made by myself and Dr Parmenter.

I welcome the minded to decision of the Agency which recommends that the licences referred to above should not be renewed. However I am surprised that the decision appears to be based solely on the concerns raised over Snipe Marsh. While these concerns are, of course valid, it is not acceptable to have ignored the strong environmental arguments which raise concerns over Catfield Fen and the rapid change which has occurred there. The main points relating to Catfield are set out in the following papers:-

- Report by Dr Chris Bradley, Senior Lecturer in the School of Geography, Earth and Environmental Sciences at the University of Birmingham, entitled "Catfield Renewals".
 - Report by Professor David Gilvear, Head of the Catchment and River Science Research Group at Plymouth University.
 - Two reports by Dr Jo Parmenter, Director of The Landscape Partnership (one being an Ecological Summary and the other an analysis of the Schedule of Documents accompanying the Agency's "minded to" decision).
 - Report by Erin Pyne and Dr. Aat Barendregt from Utrecht University dealing with Characterization of the Relationship between Hydrology and Vegetation in Catfield Fen.
- These papers have been sent to you by Nabarro and should be considered by you when making your final decision.

Suggestions have been made that the management of the Catfield Hall Fens has led to the changes on the site. You commissioned Amec to write a paper on management and I attach to the e-mail by which this letter is sent to you, a copy of the paper which Dr Parmenter and I wrote refuting the assertions made in the AMEC report.

The essential points are that:-

- 1 Management continuity has been maintained for well over the 30 plus years that I have known the site. This relates to both cutting practices and water control.
- 2 The suggestion that terrestrialsation is responsible for the change is wrong, management has been focussed on taking off litter from the marsh and it should be noted that the condition assessment done by Natural England in 2013 noted a lower level of litter than the previous survey.
- 3 Burning has never been a widespread management practice at Catfield and in particular Middle Marsh has not been burnt within the period of my knowledge.
- 4 The recent ecological evidence now available clearly indicated that the most likely cause of environmental degradation at Catfield is due to increased acidification due to abstraction.

Natural England have reported that the site is well managed and that management is fully in accord with the current HLS scheme.

The attached paper sets out the details fully and clearly and your final determination report should make it clear that current management is not responsible for the changes that are occurring at Catfield.

Yours sincerely

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