



Representing Abstractors in Broadland CAMS & North Norfolk CAMS

Newsletter

2nd December 2016

Dear member

BAWAG AGM 23rd February at Honingham Thorpe Farms.

Theme: upcoming licence reform.

Licence Reform post 2020.

Post 2020 all current licences will be replaced by new style permits. Each licence will have a Hands off Flow condition and be linked to river flow. However, Drought rules will still apply, even though Section 57's will disappear. Current abstractors who currently do not require a licence will be brought within the licencing system. Trickle abstractors who do not currently have an abstraction licence will require a licence within which the HoF will be set at 75% of Q99. This may be a problem in Over-abstracted catchments. Wetlands taking water directly from rivers will also require a permit as will canals.

All licences will become "all year" with current licence conditions being carried forward.

Licence trading will be encouraged by Defra. However there is no indication from Defra as to where HoF's will be set for current licence holders. Should perpetual licence holders get a lower HoF than more recent licences? There is a hierarchy of HoF's in winter licencing, so will there be something similar in the summer? The assumption will be at the same level or lower than trickle permits (75% of Q99). This may restrict trading opportunities if all licences in a catchment have the same HoF.

If licenced quantities are varied on a daily basis, farmers' pumping systems will have to be able to cope with this variability and that means very good data recording to stay within licence parameters. The Environment Agency would like to see smart metering installed to ensure abstractors keep within licenced parameters. Smart metering is being resisted by agricultural abstractors.

We understand that October 2016 will be a critical date when the Environment Agency begins to determine the amount of water a new permit will have post 2020. The volume an abstractor is allocated will be based on their historic use, which is commonly 15-20% of licenced volume. We believe abstractors' volume will be based on the previous 10 years historic records with the peak abstraction over that period setting the new permitted volume. However we do not believe that this is set in stone and lobbying may yet change fine details.

There will be "free" water at high flow rates. Obviously only an abstractor with a reservoir can take advantage of this.

LEADER Grants

LEADER is open for smaller grants and the current system is being tested for compatibility with regards to Article 46. BAWAG met Liz Truss MP back on 1st July to discuss Article 46 and licence reform. Good progress was made but she moved roles soon afterwards and we not sure what progress was actually made.

Countryside Productivity Grants

These are for large projects such as reservoirs and should be available shortly.

There is an issue where irrigated area is increased as a result of the project and RBMP area which is "less than good".

In application of water from a grant funded project "best" practice will be required as opposed to "good" practice previously. We do not know what this means in practice.

North Norfolk CAMS Groundwater licence Renewals

This catchment has a common CAMS end date of 31st March 2017. It seems that licenced volumes are being set at maximum abstraction in the previous licence. For most groundwater abstractors this was 2011. In addition, lower chloride ion trigger levels are being set. We do not believe these different licence volume justification criteria have been used elsewhere and do not appear to have been agreed with anyone outside the Defra family. These changes are minor issues to the abstractors concerned but a precedent is about to be set. The North Norfolk chalk groundwater is almost in balance and the changes in chloride ion levels do make sense if one is considering drinking water standards, however the concern is once these changes are agreed, there could be much larger reductions in Broadland and elsewhere.

Broads Authority Revised Draft Plan Consultation

BAWAG has responded to the Draft Broads Plan 2017 consultation. There is now a revised draft Broads Plan to consult by 30th December 2016 which looks at how the Broads are to be managed. From an agricultural viewpoint this plan has taken into account all the agricultural comments from the earlier draft. However, please take the time to visit this consultation and make your own comments.

<http://www.broads-authority.gov.uk/broads-authority/how-we-work/transparency/consultations/broads-plan>

The worrying elements of this revised draft Broads Plan is what area of land does the plan refer to? Broads Executive Area or The Broads or Broadland etc also the various committees at the Broads Authority which have no farmers. If the area of land is not clear in the plan, then which bits of environmental protection apply? Currently only about 65% of the Broads Executive Area is protected by the Habitat Directive. This is most worrying for abstraction and diffuse pollution issues.

Environment Agency Inspections

The Environment Agency are making more inspections to check abstraction records. Please ensure that all annual returns for summer abstraction are returned to the Environment Agency even if the abstraction is zero. It is a licence condition and potentially a fine on BPS. The Environment Agency have chased a few groundwater abstractors who have conditions on their licences to collect certain data and return that data to the EA. Please take time to read your licence conditions and take action if necessary.

20 cubic/day abstraction.

If you have an abstraction source abstracting less than 20cm/day then you do not require an abstraction licence. However if that abstraction is on a site where there is an abstraction licence then the under 20cm/day source should be included on the licence. It has come to our attention that there are a number of 20cm/day abstractors who are abstracting well in excess of 20cm/day and the Environment Agency have said they will prosecute these abstractors when they are found. We have suggested an amnesty to allow these abstractors to come forward without the fear of prosecution but the EA have not agreed. The advice to these abstractors is to become highly water efficient to get the usage as low as possible, possibly by accessing LEADER grant aide.

Reservoir filling & groundwater levels

Groundwater levels are very high at present following heavy summer rainfall and recent rains. This has resulted in good river flows in November and most reservoirs have started to be filled. Aquifer recharge is something we keep talking to Defra and MP's about as invariably a shortage of water for abstraction can be traced back to some earlier aquifer recharge problem like run off and infiltration issues.

Things to do

Annual returns to Environment Agency for summer abstractors

Look at LEADER grant funded opportunities for water resources projects. Review abstraction licences to check that hourly, daily and annual quantities are sufficient and apply to make the necessary changes. The process is getting more onerous but please abstract within the parameters of your licence.

BAWAG sent invoices to members in the summer. We would like to thank members for promptly paying those invoices, this prompt payment greatly reduces administration costs. BAWAG is not automatically upgraded as to what volumes abstractors hold so if your licenced volume changes, please inform BAWAG.

We value all members' support and look forward to representing you and your water rights in a very difficult year in 2017 for water abstraction.

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