



Dear BAWAG member

It's been a while since our last Newsletter, so we have a few things to update you on.

Since last November, we've had the election and a change Government, with the new Labour team at Defra determined to improve the way we manage our rivers, lakes and seas. While much of this will be about water companies and uncontrolled sewage discharges, farmers will also come under scrutiny on abstraction, water quality and flood risk. Closer to home, in Norfolk, the Environment Agency are pressing ahead with the Broads Plan and with investigations into the Norfolk valley fens. Both of these will result in licence changes, and some could be for BAWAG members. A redacted example of the kind of letters the EA are sending out is attached. Fortunately, through our Norfolk Sustainable Abstraction (NSA) programme, we're well placed to meet the challenge. The headlines for September 2024 are:

- **Ant Broads & Marshes:** The Planning Inquiry was held in May and resulted in a draft settlement that gave the appellants what they were asking for. We're now waiting for the new Secretary of State to confirm details and for the EA to process the remaining appeals and determinations.
- **BAWAG Norfolk Sustainable Abstraction (NSA) programme:** The Committee has approved the next stage of the NSA programme. This will involve workshops with members in the New Year and preparation of 25-year Water Resource Management Plans. To support these, we're working on a "smart water management" project in the Broads, including the construction of water level monitoring boreholes (see picture below)
- **EA Broads Plan:** Our work for the Planning Inquiry has changed the way spray irrigation is modelled by the EA, to our advantage. We're now waiting for the EA to update NEAC before we continue with our work on the Broads Plan.
- **Norfolk Environment, Food and Farming:** Prospective new Board members will meet in November to work on the business plan and a new brand logo.



- **Broads Water Level Management project:** Work is progressing with our partners the Broads Authority, Cranfield University and Norfolk FWAG, with peat re-wetting opportunities mapped and work on options progressing. The next stage for BAWAG is to model local scale water level management effects using NEAC.
- **Water for Food:** Through work with the “Water For Food” group, BAWAG continues to influence the National Framework for Water Resources. Based on monthly meetings with senior staff from the EA & Defra, this involves preparing for the next round of regional planning. This will coincide with the transition to permits, loss of compensation rights for licence revocations and progress towards the preferred “environmental destination” for catchments. Our job is to make sure that members interests are properly accounted for in the process.

Details are below, starting with a message from our Chair:

Dear member,

During our last committee meeting it was brought to our attention that several businesses have recently received letters from the EA regarding an on-going process to determine sustainability and the future of licences abstraction in the east.

As a committee we decided to update you on the various events that have occurred recently to illustrate how we have been working on your behalf, and of the progress made to date. Please take time to read the newsletter as I believe it illustrates the progress we have made. It is still a question of two steps forward, and at times, one back, however with expansion of the Broads plan to the Bure, Waveney, Thurne, Yare and recently added the Wensum. It's been said before, but does need repeating, we must continue to support and work together to find sustainable and cooperative solutions for the continuation for abstraction in the county as a whole NOT just east Norfolk where the attention has been. The net is continuing to spread wider and now the attention is starting to appear in the west of the county, with an ongoing investigation into the Norfolk valley fens. If you have a neighbour or friend who abstracts, they need to be aware that we are here to help and that, given recent results, a "joined up" approach is the way forward.

*Best wishes
Benny*

Ant Broads and Marshes

We were notified in December that a Planning Inquiry to determine the fate of the Ant Broads and Marshes (ABM) appeals would be held in the New Year. In the event, the Inquiry opened on Tuesday 14 May and closed a few days later, when the EA agreed a draft settlement with the legal team representing BAWAG members. In this, our members were able to retain a proportion of the licenced volume that the EA proposed to remove. To get the agreement, we used the EAs northern East Anglian chalk (NEAC) regional groundwater flow model to show that we could abstract the reduced quantities without compromising flow and other targets for the SSSIs in the lower Ant valley. We're now waiting for the new Secretary of State to confirm the settlement and for the EA to progress the remaining appeals and determinations.

Since the hearing in May, we've completed a lessons-learned exercise with our members, their legal team, the NFU Legal Assistance Service (LAS) and our technical consultants. The results will feed into our work on the EAs Broads Plan and the NSA programme. Key points include:

- *We need to collaborate; we need the best people, and we need to be fully aligned with the NFU LAS (BAWAG Chair)*
- *Timescales need careful management, right from the start of the process to the inquiry (BAWAG Treasurer)*
- *Need to work together, and with the EA. We need to be proactive on the Broads Plan and appreciate the value of the NFU LAS (BAWAG member & LAS regional representative), and*
- *If farmers can work together, positive results can be obtained (BAWAG member & appellant)*

Norfolk Sustainable Abstraction (NSA) programme

We've spent around a third of the NSA budget on preliminary work with NEAC, and on developing a template for agricultural Water Resource Management Plans (WRMPs). With this we have:

- Changed the way that the EA model spray irrigation "return flows". As a result, there is now more water in the model during critical dry periods and in future, this will reduce members vulnerability to licence changes.
- Got the EA to accept partial reductions in licenced quantities, as opposed to the "all or nothing" approach they were using before. Providing that neighbouring abstractors can work together, this will give members extra flexibility in responding to EA proposals to reduce or revoke licences, and
- We have agreed to work with the EA on a "memorandum of understanding" (MoU) to set out how we'll work together in future. The MoU is a big step in building the trust needed to progress issues related to sustainable abstraction.

At the September Committee meeting, £120k of funding for the next phase of the NSA programme was approved, including for the following:

1. Obtaining the new, improved version of NEAC and making sure that it's fit for purpose.
2. Exploring further opportunities to improve the way that agricultural abstractions are modelled in NEAC. As part of this work, we will prepare technical papers summarising the work we've already done on return flows. We're expecting these to become industry "best-practice" and then be applied in all EA modelling of agricultural abstractions.
3. Mapping the vulnerability of members licences to possible future reductions, using the new improved version of NEAC.

4. On the basis of the above, working with the Planning Groups we've set up to prepare 25-year WRMPs. As well as setting out the size and timing of future, water resource related investment need, these will identify the preferred options for meeting these, and
5. Piloting a "smart water management" system, so that we can develop a more modern, dynamic approach to abstraction management in areas close to SSSIs or other sensitive environmental features.

The smart water management work builds on water level monitoring boreholes we've already installed in the lower Bure valley (see photo above). When complete, the system will allow us to collect, store and use abstraction related data, supporting any discussions we have with the EA and Natural England about sustainable levels of abstraction.

To help prepare the WRMPs **we'll start meeting with our Planning Groups in November 2024**, mainly to brief them on the preliminary results of the modelling and to explain why the plans are needed. **In the New Year we'll then run a series of workshops**, from which the plans will be produced. Dates for both will be announced shortly.

EA Broads Plan

Work on the Broads Plan is on-hold until we get the new, improved version of NEAC. In the meantime, we continue to liaise with the EA on the programme and deadlines.

Norfolk Environment, Food & Farming (Norfolk EFF)

Prospective members of the new Board will meet in November to start drafting a business plan, and to agree the new brand logo. The key strategic issues we face in setting up Norfolk EFF can be summarised as follows:

- How best to represent the interests of our members?
- What kind of organisation is needed to do this? and
- How will it be paid for?

The underlying issue is the transition to the new environmental permitting regime (EPR) and the work that the EA will do over the next decade to deal with over-licencing, over-abstraction and the level of environmental ambition that many hold for the Broads and the chalk catchments in Norfolk. Unfortunately, change is inevitable; the only question is what we're going to do about it.

Broads Water Level Management project

One of BAWAGs goals is to deliver enhanced societal and environmental outcomes. Our Broads Water Level Management (BWLM) project is helping us to do this by exploring options for managing water levels in peat so that emissions of greenhouse gases can be reduced. The project is part of the Lowland Agricultural Peat Water Discovery Pilot (LAPWDP) programme and is being delivered in partnership with the Broads Authority, Cranfield University and Norfolk FWAG. To date, Cranfield University has developed and used new tools to map opportunities for peat re-wetting and to explore options for raising and managing water levels. In the next phase of work, BAWAG will engage with members to explore the related, practical issues and subject to funding, this will include modelling local scale peat re-wetting effects using NEAC. The project runs till January 2025 and is funded by the Defra & the Environment Agency.

The picture below shows Ian Holman from Cranfield University presenting the opportunity mapping data at a BWLM workshop in Burgh St Peters in July:



Water for Food Group

To make sure we're connected to senior levels of the EA and Defra, including the new Minister Emma Hardy, we're working with the NFU and Suffolk abstractors ESWAG on a new national organisation for water abstractor groups

(WAGs), the “Water For Food” (WFF) group. WFF has evolved from the old EA/NFU & UKIA discussion forum and is now incorporated as a not-for-profit company limited by guarantee. Our Chair Anthony Seaman is one of the new Directors, along with NFU water specialist Mark Betson. Mark Taylor, from GB Potatoes, is Chair.

Others involved in WFF include ESWAG, the CLA, the UKIA, the Nottinghamshire Time Limited Abstractors and the British Trout Association (BTA).

Most of the work we’re doing with WFF is focussed on the National Framework for Water Resources. This Defra & EA led initiative is tasked with planning new strategic regional options (SROs) for the water companies and increasingly, with a cross-sector approach to managing water resources. As part of this effort, we’ve been supporting/promoting the following:

- Local resource option (LRO) screening studies. There are three BAWAG-member-led studies in Norfolk; two in the lower Bure valley and one in the catchment of the River Nar.
- Supply demand balance assessments at EA operational catchment level. These are being piloted as a means of identifying where investment in new agricultural water supplies should be targeted.
- An update to the UKIA “Why form a WAG” booklet.
- Development of a governance “Toolkit”, to clarify roles and responsibilities for WAGs, the NFU, WFF, the EA and each of the regional planning groups.
- A cost-benefit assessment (CBA) to explore the trade-offs and choices that abstractors and regulators have in terms of balancing environmental need with food security and the rural economy, including growth and new development. This work is being delivered in partnership with ESWAG and will involve looking at case-studies in east Suffolk and Norfolk, and
- A study by the Climate Change Committee (CCC) for the Fourth UK Climate Change Risk Assessment (CCRA4). This will look at water scarcity and risks for agriculture, energy and industry and we have been invited to join the Project Steering Group.

As well as all this, we’re also preparing for a consultation on “future competition for water resources”. Arising from work on the SROs, the EA has pledged to “protect” water resources for these large, new, water company schemes. This raises concerns for us & others, and we will be working hard within the National Framework to protect the interests of our members.

In breaking news, the new Defra Secretary of State, Steve Reed, has commissioned a review to shape future water legislation. Extracts from his speech on the Water (Special Measures) Bill are given below:

The government will carry out a full review to shape further legislation that will fundamentally transform how our entire water system works and clean up our rivers, lakes and seas for good.

We will ensure the framework that underpins our water sector delivers long-term stability, with clear, achievable targets that reflect the needs of customers and the environment at a catchment, regional and national scale, as well as enabling housing delivery and supporting the government's growth mission.

We will invite views from a range of experts covering areas such as the environment, public health, consumers, investors, engineering, economics - as well as campaigners and this will include a public consultation to test the proposals and bring in a diverse range of views.

I will set out further details on the review later during the autumn.

As we learn more, we'll work with the NFU, partners in WFF and others to respond to the consultation. We'll give details in our next Newsletter.

Queries or comments

If you have any queries or comments about the work we're doing or are planning to do please call Steve Moncaster, our Membership & Technical Advisor. Steve's number is (07710) 608710 and he will be pleased to chat with you.