



# Newsletter

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Dear BAWAG member

A lot has happened since our August Newsletter, including record amounts of rainfall, and we wanted to update you on progress and give notice of some key dates in the New Year. The headlines are:

- **Ant Broads & Marshes:** a number of Section 52 objections have been sent through to the EA and we are now waiting to hear from the Planning Inspectorate about possible dates for hearings. These are expected sometime next year.
- **BAWAG Norfolk Sustainable Abstraction (NSA) programme:** preliminary technical work using the EAs NEAC model is nearing completion and will be reported before Christmas. Work packages for next year are in the process of being developed.
- **EA Broads Plan:** the EA is proposing late 2026 as the effective date for implementing licence changes from the Broads Plan. We have challenged this, to make sure that affected abstractors have a realistic timeline for making any changes that are deemed necessary.
- **Anglian Water draft 2024 WRMP:** the AW draft 2024 WRMP is now with the Defra Secretary of State, who will determine if it should be directed to a public hearing or inquiry. The plan contains weaknesses that could affect abstractors in Norfolk and we are planning further engagement with the planning process.

- **BAWAG transition to Norfolk Environment, Food and Farming:** work on the draft Articles of Association is complete. We are now working on a Membership Agreement and to appoint Board members for the new company.
- **National Water for Food Group:** working with the NFU, ESWAG & others, we have drafted new Terms of Reference for the WfFG, which are in the process of being finalised. Through WfFG we will seek to influence the next round of regional planning, including the licence reductions required to meet current and future environmental needs.
- **Norfolk Water Strategy Programme:** the Norfolk Water Fund has been launched. This will channel private investment into water-related infrastructure projects in Norfolk. Working with the County Council, WRE, Anglian Water & others we will get more involved with this project.
- **2022/23 Drought:** the end of the drought has been called & we have returned to normal conditions. We're now planning projects that will help avoid some of the problems that droughts bring, and
- **December 2023 Committee meeting & 2024 AGM:** we are planning an AGM in March to formalise the setting up of Norfolk Environment, Food and Farming and approve a plan & budget for activities in 2024/25. Dates to be announced after the December 14 2023 Committee Meeting.

Details are below, starting with a message from our Chair & the drought update:

*Dear member,*

*hopefully everybody now is starting to dry out after what has possibly been one of the wettest autumn for many years. After unprecedented amounts of rain, here's hoping for a dryer normal winter.*

*Please find the attached our Autumn newsletter. As you will see we have lots going on. Our immediate focus has been on the Ant Broads & Marshes and the new Broads Plan and the threat posed to members in east Norfolk. The EA has now moved on with the issuing of section 52's for affected abstractors in the Ant catchment and an appeal process has been initiated by those concerned. We await the appointment of a planning inspector for the hearings.*

*Meanwhile we have also met with the EA to continue "building the relationships" that will be needed in the medium and long term. This included a visit to the area by Richard Thompson who is a*

deputy director of the EA. We talked through our technical programme, showed him the reservoir currently under construction at Neatishead and then followed up with an evening meeting with members from Eswag.

To make sure we don't over commit going forward, we are starting to think about what we need to sustain the current level of effort. Growing membership is a key part of this process so please spread the word among the irrigation community. WE still hear of the odd member who thinks that they are not in the " firing line". Please be under no illusion that once the Ant valley process is done, the next targets will be the Bure, Thurn, Yare and the Waveney. The message really is that the more members we have, the more our funds are bolstered and the more work we can do. Everybody has their part to play.

Hopefully everybody will have a good Christmas and the committee are very much looking forward to seeing you all in March at the AGM

Best wishes  
Benny

### **2022/23 Drought**

The 2022/23 drought persisted in Norfolk longer than any other part of the country, with the EA only just confirming that conditions have returned to "normal". While the recent wet weather has brought its own problems, this means that irrigation prospects for next year are much better than they might otherwise have been.

The UK CEH and National Rivers Flow Archive hydrological summary for October is here: [https://nrfa.ceh.ac.uk/sites/default/files/HS\\_202310.pdf](https://nrfa.ceh.ac.uk/sites/default/files/HS_202310.pdf). This shows the pattern of rainfall over the last 12-months, the recovery from the drought, current flows & groundwater levels and future prospects through to January 2024.

### **Ant Broads and Marshes**

We believe that around 6 no. objections have been submitted in respect of the licence changes in the EA Ant Broads and Marshes Closure report ("Section 52" objections). We continue to support members who have requested assistance with some outstanding technical issues and are working with NFU LAS team to

prepare for the inquiries/hearings, which we expect next year. As yet no dates for these have been announced.

### **Norfolk Sustainable Abstraction (NSA) programme**

We are nearing completion of the preliminary technical work for the NSA programme and will be taking draft outputs to the next Committee Meeting for review & comment. Since starting the project in July we have:

- Run the EAs regional groundwater flow model (NEAC) to determine the effect of abstraction from BAWAG members sources on nearby surface water and groundwater bodies.
- Investigated how the NEAC model represents abstraction from surface water and groundwater in Norfolk, and whether there is any scope for this to be improved.
- Started work to develop the water resource planning tables that will be needed to engage with Defra, the EA, Anglian Water, WRE and others.
- Used the preliminary modelling results and other data to assess members vulnerability to future licences changes. The analysis has been completed using GIS, and
- From the GIS analysis, we have split the membership into a smaller number of Planning Groups. Members will be assigned to these and will convene in the New Year to progress work on their individual parts of the programme.

The overall aim of the NSA programme is to develop 25-year Water Resource Management Plans for each Planning Group. We will then help members to use these to manage their own licences.

The detail of our NSA programme was recently presented to Richard Thompson, Deputy Director of the EA with responsibility for water resources and investment. We spent the day with Richard and his team, and discussed the following:

- EA support for our technical work. The EA will shortly commissioning work that will feed directly into our planning process, allowing us to conserve the funding we raised from members.
- A Memorandum of Understanding (MoU) between BAWAG & the EA, setting out the “ground rules” for how we will work together on the Broads Plan and other initiatives in Norfolk, and

- Working with the EA & Norfolk County Council on an instrumentation & monitoring project to help members retain access to water in droughts and other instances of water scarcity.

The next milestones for the NSA programme are:

1. Develop work packages for completion in 2024/25. These will be presented for review & comment at the December 14 Committee Meeting, with approval to progress subject to authorisation by the Programme Management Board, and
2. March 2024: we're due to have produced Chalk catchment agricultural Water Resource Management Plans for review and comment by the EA, who have given us £10K contribution towards this work.

We continue to explore funding opportunities for the NSA programme, and are currently following up with the EA, the Broads Authority and local authorities in Norfolk. This work has included making a grant application for work in pumped catchments in the Broads on water management strategies.

### **EA Broads Plan**

The EA has recently confirmed that they're working to an effective date for implementation of the Broads Plan licence changes which will be sometime in late 2026. Accounting for the time that is needed to do the related technical work, it's likely that we'll have less than 2-years to replace licences which are revoked or not renewed. We have immediately challenged this and are working with the EA and Natural England to secure a more realistic timeline.

In terms of our Broads Plan technical work:

- Through work on the NSA programme, we are mapping BAWAG members vulnerability to Broads Plan related licence changes.
- We are using our NSA work with NEAC to make sure that any licence changes are based on the best available science, and
- We are re-programming our 2024/25 work to bring forward as much of this as possible, ahead of the late-2026 EA deadline (assuming this doesn't change). Subject to available funds, this will include conducting one or more pumping tests so that we can check that the NEAC model is accurately representing critical features of the Broads Plan hydrology & hydrogeology.

### **Anglian Water draft 2024 WRMP**

As part of our work on the Broads Plan and the wider NSA programme, we are tracking progress with the Anglian Water (AW) draft 2024 Water Resources Management Plan (WRMP). In this, AW has little water to support short to medium term economic growth in Norfolk and is seeking exemptions from statutory environmental obligations. We are concerned that both could adversely affect BAWAG members who may be subject to licence revocations and non-renewals as a consequence of the Broads Plan and other initiatives.

The draft 2024 WRMP is currently with the new Defra Secretary of State, who will determine if it is in the public interest to call a public inquiry or hearing. If there is a public hearing or inquiry, BAWAG will make a submission to the Planning Inspector to make clear our concerns and to propose measures to mitigate any related risks.

### **BAWAG transition to Norfolk Environment, Food & Farming**

We've finished drafting the Articles of Association for the new company and have started work on a Membership Agreement. This will set out what the new company will do for members and what, in return, members obligations will be. We'll make sure that the Agreement dovetails with the EA MOU, so that on matters related to licences and permits, we have absolute clarity about "who does what".

We are also in the process of selecting Directors for the new company. We have had a couple of expressions of interest but are still open to suggestions. If you are interested in becoming a Director, please let us know and we will (a) talk you through what will be involved, and (b) if you're still interested, progress your application. Our aim is to get the new company up and running in the New Year and we will use the AGM in March 2024 to do this.

### **Water for Food Group**

Over the last few months, we've realised that to secure access to water in Norfolk, we have to be effective in discussions at national level with Defra & the Environmental Agency. This involves working with the regional planning process (WRE) and with the support of other abstractor groups, such as the East Suffolk Water Abstractor Group (ESWAG), the NFU, CLA and organisations such as GB Potatoes and the UK Irrigation Association.

The vehicle we've decided to back for this effort is the "Water for Food Group" (WfFG). The WfFG has been around since the 2012 drought and has served as a

general discussion forum for abstractors and the EA. Over the past few months, we have been engaged in an effort to re-purpose WfFG, making it much more about water abstractor groups (WAGs) and representing WAG interests in the National Framework for Water Resources. This change has coincided with the end of the current round of regional planning and work to set-up the next round. In this, referred to as National Framework II, there will be a greater emphasis on meeting the needs of agricultural abstractors and funding is being made available by the EA to support WAG work on:

- Agri-food Water Resource Management Plans, and
- Local Resource Options (LROs). These are the agri-food equivalent of the new public water supply reservoirs that are being proposed by Anglian Water and others.

BAWAG is represented in all of the key discussions and, on behalf of the WfFG, will participate in meetings of the National Framework Senior Steering Group (SSG), Regional Coordination Group (RCG) and the Regional Chairs Group. The latter is being viewed as the key forum for engaging Defra on strategic issues linked to farming and water. In all of these meetings, we will be working closely with the NFU and the other WAGs.

### **Norfolk Water Strategy Programme**

The Norfolk Water Strategy Programme (NWSP) is a partnership between Norfolk County Council, Anglian Water, WRE & The Nature Conservancy which aims to coordinate private investment in water-related infrastructure in Norfolk. To date, most of their work has been focussed on “nature-based solutions” for dealing with flooding and drought related issues in the County.

A key NWSP development is the “Norfolk Water Fund”, through which the private funding will be channelled. While BAWAG has had little involvement in the activities & discussions of the NWSP core group, this is changing and there is now a suggestion that we will be engaged to represent the economic aspects of any projects which are delivered using the Fund including, specifically, those that relate to abstraction for irrigation & food processing. We’ll be able to give more details in the next Newsletter and at the AGM.

**December 2023 Committee meeting & 2024 AGM:** the next Committee Meeting will be held at the AF Group Offices at Honingham Thorpe on Thursday

14 December starting at 2pm. We're working on the agenda at the moment and are expecting papers on the following:

- Norfolk Environment Food & Farming
- NSA programme work packages & budget for 2024/25
- EA Broads Plan
- Water for Food Group, and
- Norfolk instrumentation & monitoring project

We're also planning an Annual General Meeting (AGM) for early March 2024. This will confirm arrangements for transitioning from BAWAG to Norfolk Environment Food & Farming and details of the NSA programme for 2024/25, including the budget which is required. Linked to this, details of the 2024/25 subscription will be shared. For next year, this will revert to the much lower annual rate, which is currently £3.30/1,000m<sup>3</sup> licenced volume of abstraction.

### **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.