



Broads Angling Services Group

Hoveton Great Broad Restoration

Version Final

Marcus Sibley EA Area Environment Manager Norfolk

15th Nov 2019

Chris Terry NE Hoveton Project Manager

Dear Marcus and Chris

Further to your email on the 18th Oct, we have heard nothing further from Natural England on this matter, despite we understand tenders being sought on the implementation of the fish barriers and bio-manipulation.

It was made clear at our meeting in January that EA Fisheries have significant reservations about bio-manipulation, whilst both IFM, AT and ourselves have highlighted concerns, with clear reference to a legal judgement on WFD from the ECJ in the Weser ruling (2016). We have been stalled by Natural England for long enough, with them referring to additional available data back in a meeting in June and consultation on this with the IFM. The only available update that we are aware of is the 2019 bream spawning assessment report, released by the EA in July. This only strengthens the evidence on the critical role Hoveton has across the whole northern Broads catchment. The IFM have also confirmed to us that they have not received any approaches from Natural England in respect of any new evidence.

Accordingly, we ask the following please:

- Has the 2019 Spawning assessment paper been shared with Natural England?
- Has Natural England completed a WFD assessment for the project and this final phase of isolating the Broad and impact on fish? If not, when is this available for us to view and assess?
- Why has dredging operations recommenced within the Broad? We were told that this was completed and the associated budgets were used. If the project has found additional funds, from whom, when Natural England stated it cannot support any further assessment work due to budget limitations?
- Why, as the competent authority, would the EA authorise the installation of barriers that have a sole purpose of blocking fish migration when:
 - Millions are being spent by the EA to remove barriers and open up fish passage to spawning grounds in rivers across England
 - The EA has recently taken a decision to retain the close season in England to protect spawning fish in rivers and the Broads
- Have NE carried out EIA assessment of this activity and consulted EA fisheries relating to this?
- Has the underlying RBMP strategic environment assessment being taking into consideration with this activity?
- Have NE put the necessary precautions in place to remove or rescue fish as per all other areas of the country when dealing with fisheries issues and civil engineering projects?

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- Have the associated land owners surrounding Hoveton Great Broad been made aware of the impact this activity on their land, undertaken by statutory authorities?

Next steps

We have discussed how to proceed with this, if as the competent authority you approve this against all the fishery science, evidence and expert advice.

If this was an attempt to block other species like the seals at Horsey Beach from reaching their favoured birthing beach by fencing it off, or like earlier this year Sand Martins at Bacton cliffs that had nets installed to stop them nesting. There would be a public outcry for the former and indeed there has been a public outcry and it was stopped in its tracks.

We believe just because this is fish that can't be seen, there is a hope that nobody will notice. Well it's these fish that generate the angling pound that fuels >£100m/yr⁻¹ EA, 2016 of tourism activity every year in the Broads. Let alone the wider ecology with significant numbers of notable birds and mammals that need these fish to sustain their numbers within the Broads area. Break this cycle through impacting the ability of fish to spawn and recruit, or to feed and migrate within the system and the whole of the Broads ecosystem will suffer, in addition to the businesses and livelihoods that rely on good fishing to survive and prosper.

We plan to initiate a major communications plan, with the aims at raising both the public awareness and the Broads Tourism Industry to the damage this will have across the entire Northern Broads, famous for its bream, roach and pike fishing. We have partnered with Angling Direct Limited to start the delivery of this.

We also plan to notify the senior executives in your respective organisations, as clearly dealing with Area management has just resulted in us dealing with the same people that are running the project. Somebody needs to take ownership this this, once and for all.

We hope that in light of the evidence and our concerns that you will seek alternative ways to restore Hoveton. If we have to challenge your approach in supporting Natural England to undertake bio-manipulation, then we will. Using a crowd funded legal challenge based on WFD deterioration as tested and demonstrated in the Weser ruling 2016.

Regards

Broads Angling Services Group Broad

cc	Rory Sanderson	Environment Agency
	Simon Hawkins	Environment Agency
	Hannah Thacker	Natural England
	Stuart Singleton-White	Angling Trust
	Mark Owen	Angling Trust