

# Hoveton Great Broad 'restoration' – At What Cost to our Fisheries?



## Natural England accused of putting fish at risk with barriers

By Helena Horton

NATURAL England is under investigation for putting up "environmentally disastrous" fish barriers in an effort to encourage weeds.

The Environment Agency is looking into its sister organisation after it erected fish barriers at Gravel Dyke and Hudson's Marsh on the Norfolk Broads.

The barriers stop fish from travelling down the river, and the Angling Trust has argued they are likely to impede the spawning of bream and pike.

The structures are at the entrances to the broads and aimed at reducing fish numbers in order to encourage water fleas to thrive, which eat built-up algae, encouraging the growth of plants and clearer water.

However, they also reduce fish populations and can cause flooding.

Martyn Page, of Angling Direct, said: "The Broads have been famous for their bream since the 1800s but evidence shows that these are now threatened by

the plans to close off their main spawning grounds on Hoveton Great Broad and as such potentially seriously endanger not only the Northern Broads bream stock, but also pike as well as other fish-eating birds and animals."

A spokesman for Fish Legal, acting for the Angling Trust, called the barriers "environmentally disastrous, add-

*"These plans threaten not only the bream stocks, but also pike and other fish-eating birds and animals"*

ing: "In November, the High Court quashed Natural England's permit to erect two fish barriers at Hoveton Broad after Fish Legal (acting for the Angling Trust and the Broads Angling Services Group) launched judicial review proceedings. Meanwhile, Natural England erected two separate fish barriers at Gravel Dyke and Hudson's Marsh

without a permit from the Environment Agency – and with no evidence of an assessment of their impact on the fish community of Hoveton Broad.

"The Environment Agency has now confirmed to Fish Legal that the matter has been passed to its enforcement team to investigate further."

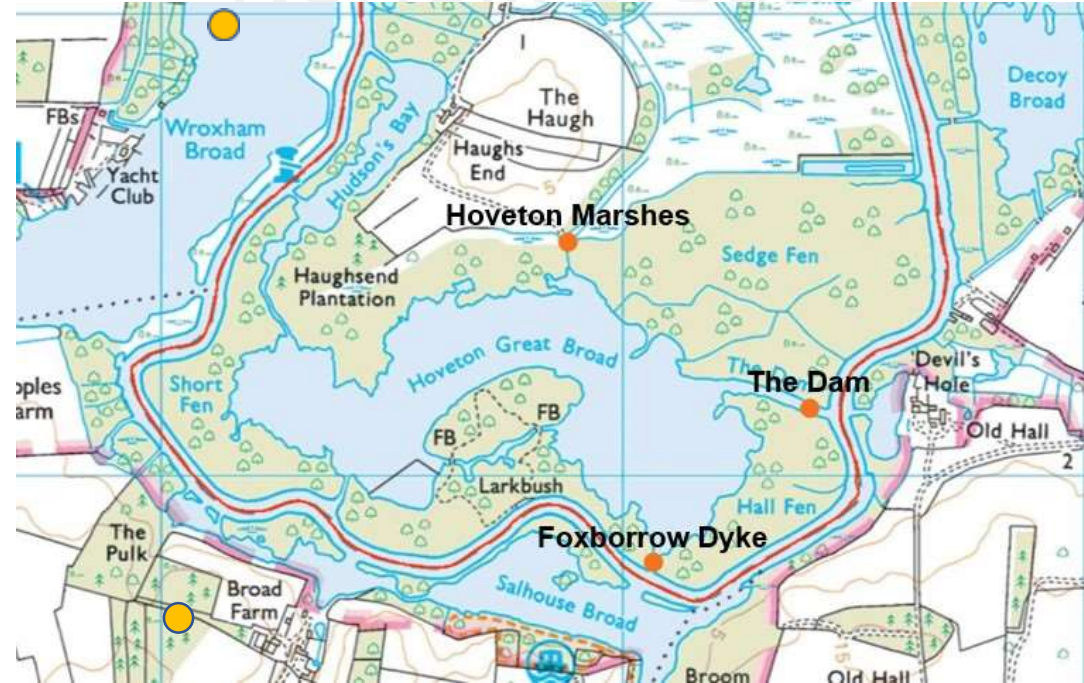
The Environment Agency had previously granted Natural England a permit to install fish barriers at Hoveton Broad in July 2020 in order to "combat turbidity and promote better weed growth". Fish Legal took them to court and forced a U-turn.

Hannah Thacker, Natural England Suffolk area manager said: "Natural England and the EA have a statutory duty to conserve and enhance protected sites and have been working in partnership to restore Hoveton Great Broad."

The Environment Agency said: "The installation of barriers at Gravel Dyke and Hudson's Marsh are subject to further investigation."



# Norfolk Broads



## Ruth Knight, Chair of Visit The Broads;

"Angling plays a crucial role in the Broads visitor economy, from young families casting a line for the first time, to professional anglers returning year after year. The Broads attracts over 7 million visitors annually, supporting 7,000 local jobs and generating £600m for the local economy, with anglers making up almost 20 per cent of the visitor numbers. They are particularly critical in the off-peak and shoulder months, and a significant fall in fish stocks would severely damage the reputation of one of Britain's best known angling locations, taking millions of pounds out of the local visitor economy and placing hundreds of jobs at risk."



**The story of a 7 year battle royal over Broads Bream**

# Key Milestones in 'Battle of the Broads'

- **2014** - Natural England falsely describes Hoveton Great Broad as a 'barren aquatic desert' to gain £4.5 million of Lottery and EU funding. Planning permission granted.
- **2015 onwards** - EA spends four years on fish surveys, studies and tagging at a cost of more than £250,000 of rod licence and taxpayers' money to establish spawning patterns of bream in the North Norfolk Broads.
- **2019** - East Anglia FGB fisheries survey report concluded along with Emily Winter PhD
- **July 2020** - HGB FRAP permit granted by EA
- **August 2020** - Condemnation from AT, IFM & BASG - Campaign launched
- **September 2020** - FOI request reveals East Anglia FBG Team evidence showing that the proposed barriers would be harmful to the recruitment of bream stocks in the Northern Broads.
- **November 2020** - JR successful for "unfair and unlawful public consultation as evidenced by the failure to place relevant information, including the objections from Environment Agency fishery staff, in the public domain."
- **January 2021** - Natural England threatened with enforcement action after erecting two additional fish barriers without flood risk permits at Hudson's Marsh and Gravel Dyke.
- **April 2021** - Second 'minded to' EA consultation
- **October 2021** - Permission finally granted on revised terms

# Planning – Design – 2013 - 2014



Generously supported by the European Union LIFE+ Nature and Biodiversity Programme.  
Bringing the Broads back to LIFE: LIFE14NAT/UK/000054



Natura 2000 - Europe's nature for you. The sites benefitting from this project are part of the European Natura 2000 Network.



The National Lottery Heritage Fund is the largest dedicated funder of heritage in the UK.

£4m

## Project Objectives

*Using state of the art technology and ground-breaking techniques, this project will transform Hoveton Great Broad from its current brown, cloudy state to a clear, pristine, species-rich wildlife haven.*



Environment Assessments  
WFD Assessments  
etc , etc

# Fisheries Survey & Assessments 2015 - 2017

So what's the impact on fish?

Surveys Methods Undertaking

PASE Point Abundance Sampling by Electrofishing

FSSA Fixed Station Sonar Assessment

MHRSA Mobile High Resolutions Sonar Assessment

PhD Scope Agreed

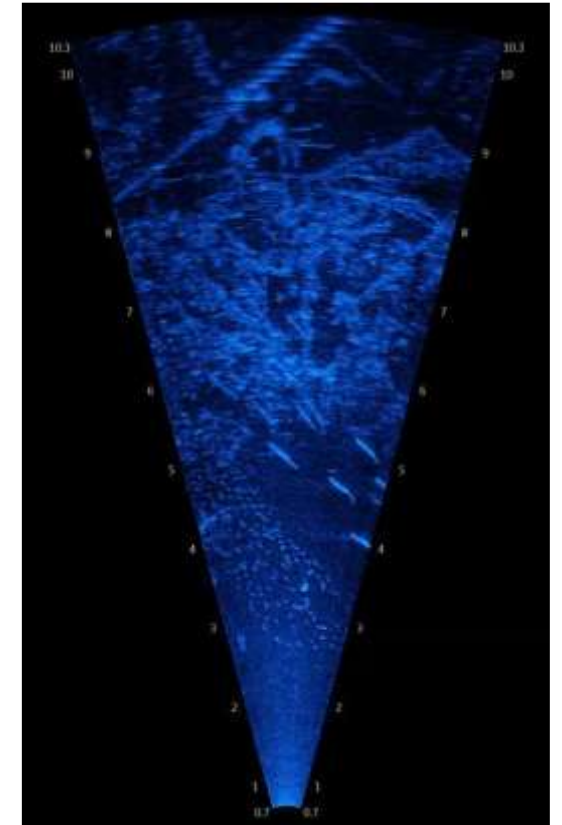
PASE



FSSA



MHRSA



# Northern Broads Fish Tracking



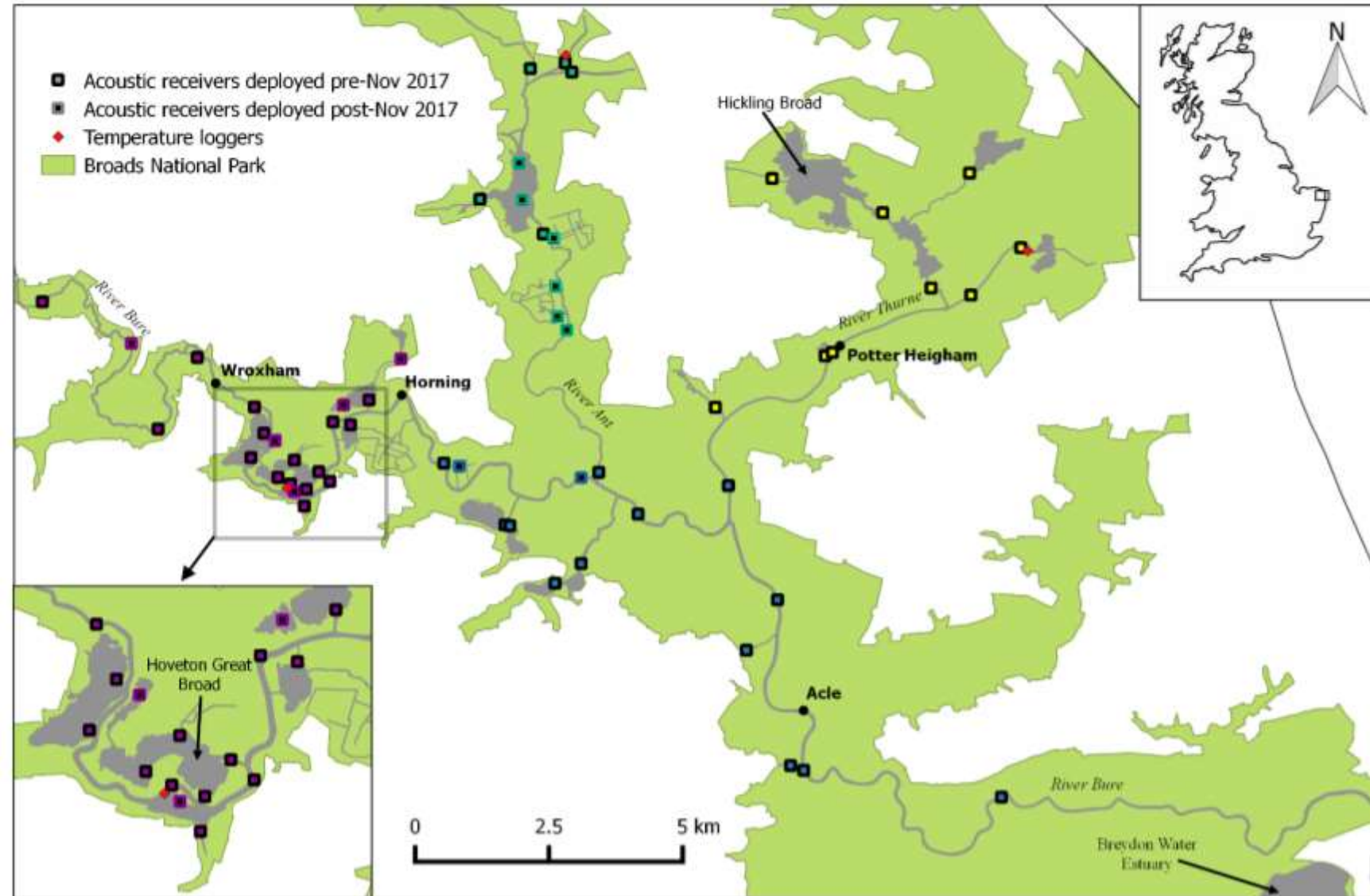
Emily Winter  
(Bournemouth  
University  
PhD)



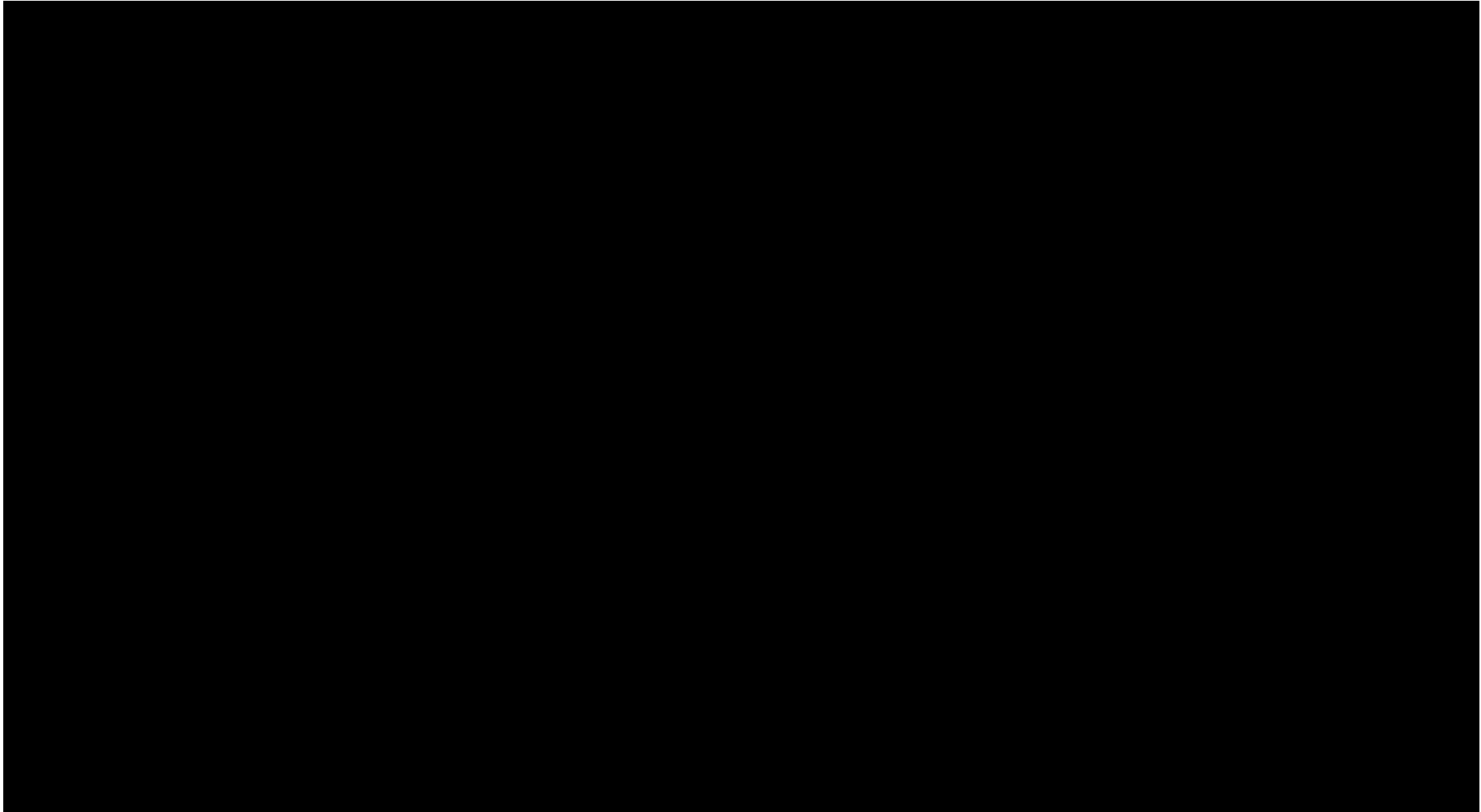
45 Receivers  
installed  
in the  
catchment



250 Internal  
acoustic  
transmitters  
emit coded  
'ping'



**The things we do for love – ‘Randy’ the bream**



# Fisheries Survey Findings – 2015 – 2019

## Fixed Point Sonar at Hoveton – Bure Confluence Sep 2014

Found dawn bream movement of 1138 or average 12.6 fish per minute into Hoveton

(NE Presentation Jan 20019)

It was assumed HGB largely similar to other Broads

## Baseline Survey Found.

## Lots of Fish

## Spawning Bream

Comparative Surveys showed significantly more in HGB

Spawning habitat showed significantly better in HGB

## Tagging data proved catchment wide influence of HGB

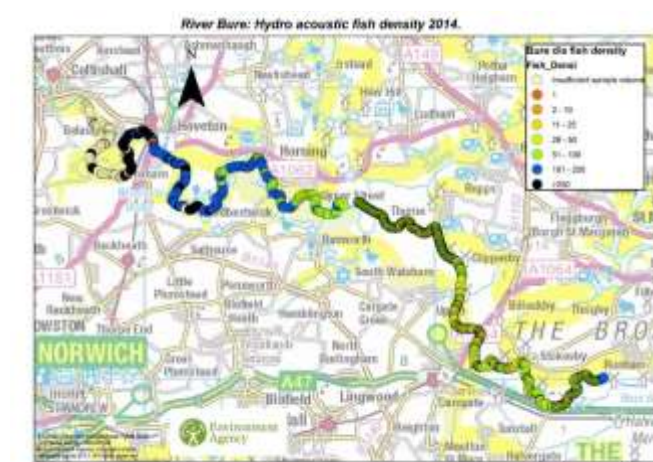
## Concerted move to HGB area

## Significant numbers of spawning bream

HGB far more important and at greater scale than expected Particularly cyprinids

***“The HGBHB complex dominates all other comparative broads for whole broad density estimates over all four seasons Indicating its importance for broads fish populations. ”***

**47<sup>th</sup> IFM Conference** visited the site and survey work in 2016

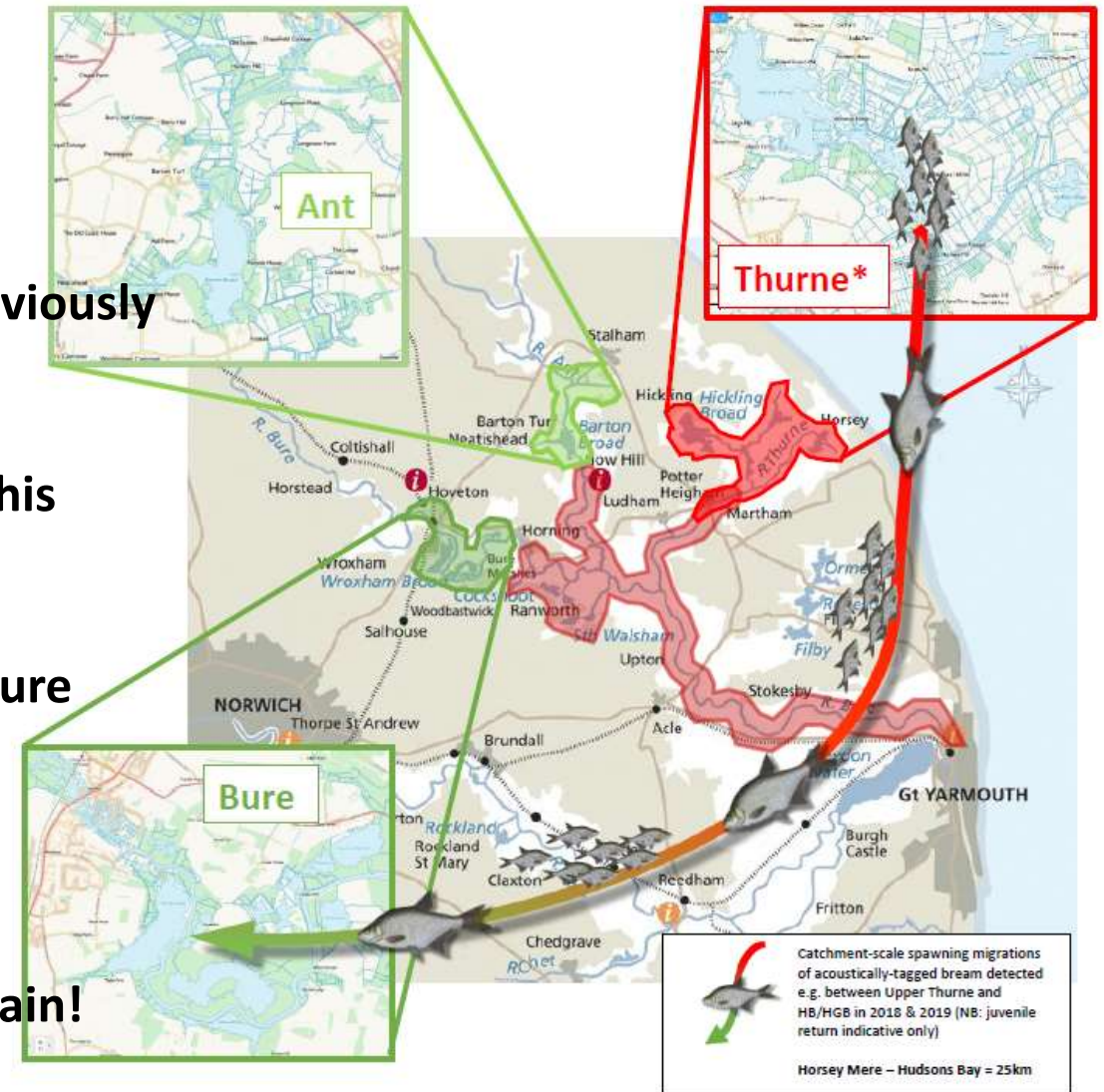


FSSA Fixed point error – The Gate @ dawn

[illegible]

# Fisheries Survey Publications - 2019

- The Agency shared its summary findings with BASG as previously Agreed. Exposing the significance of HGB.
- Formal objection raised by Natural England to release of this information
- Led to Area Fisheries staff subjected to complaints procedure Forcing staff to resign
- BASG engage with the IFM to review the science.
- No fisheries evidence further allowed into the public domain!  
Only the applicant views and opinions
- Meetings held between BASG - EA – NE – AT to explore options
- EA Decision to run an FRAP consultation



Broads/river covered daily during spawning assessment:

- | BURE ZONE:                          | ANT ZONE:      | THURNE ZONE:     |
|-------------------------------------|----------------|------------------|
| - Wroxham Broad                     | - Barton Broad | - Hickling Broad |
| - Bridge Broad                      | - Turkey Broad | - Horsey Mere    |
| - Salhouse Broad                    | - Sutton Broad | - Duck Broad     |
| - Decoy Broad                       |                | - Martham North  |
| - Pound End                         |                | - Heigham Sound  |
| - Hoveton Little Broad              |                |                  |
| - Hoveton Great Broad & Hudsons Bay |                |                  |

# 2020 Environment Permit Applications and subsequent Judicial Review

**EPRNB3494JP Consultation Papers Jan-2020**  
**No papers showing the impact assessment of the barriers as defined by EA Fisheries**  
**Permit Granted to Natural England July-2020**

**FOI reveals:** “It follows that the proposed bio-manipulation methodology, involving the installation of fish proof barriers to prevent fish accessing the habitats currently found within HGB [Hoveton Great Broad] carries a high risk of detrimental impacts to the fish populations of both HGB and the Northern Broads system.”

BASG- AT – Fish Legal initiate JR

Permit Quashed Nov-2020

But what did Natural England then do next?



# Project 2020 – Natural England Press on Regardless

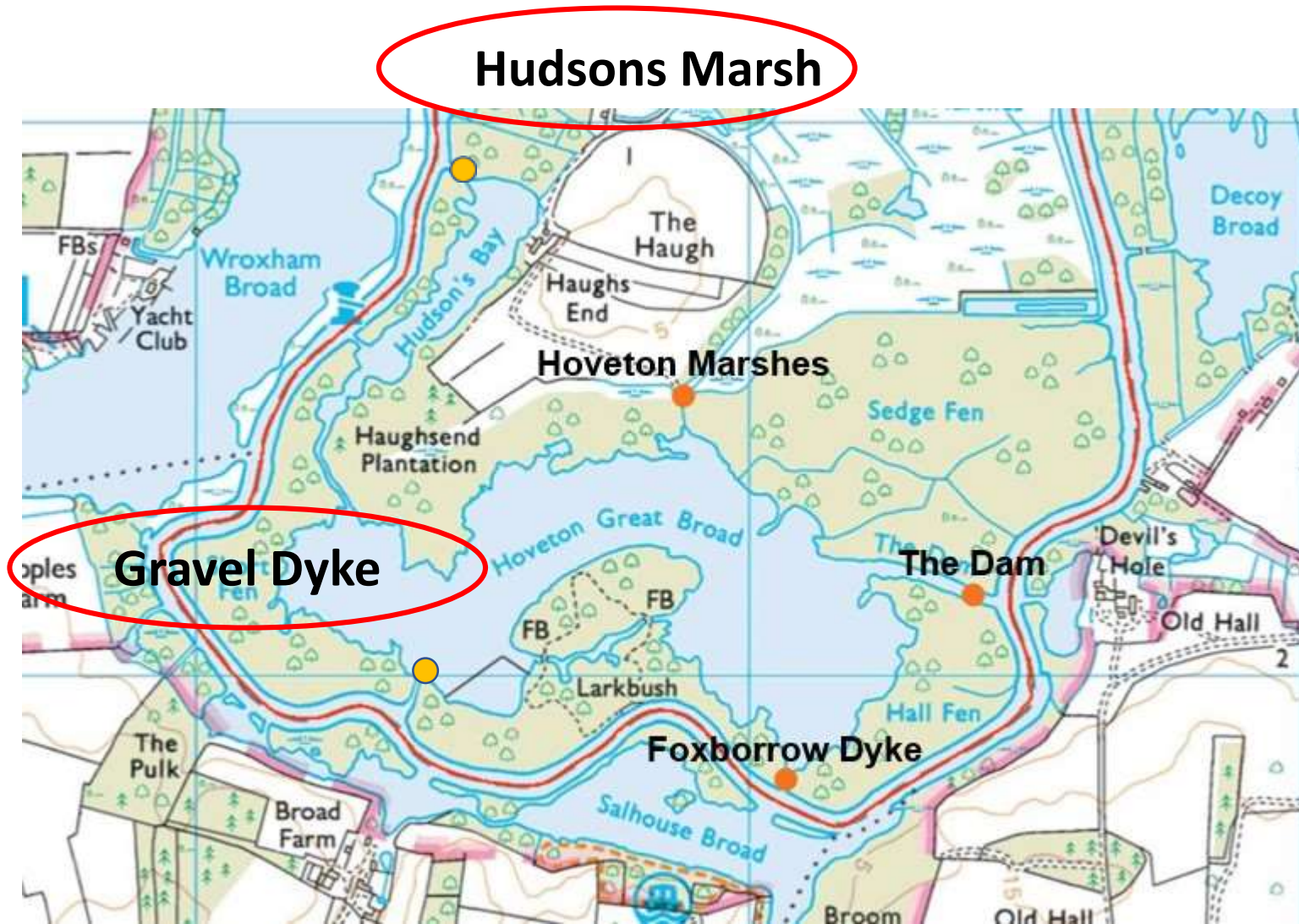
In Autumn 2020 whilst the permit was Being challenged, Natural England installed Two Piled barriers without either permit or planning approval.

This is currently subject to ongoing enforcement activity by both EA and LPA.

Extraordinary Behaviour by a national regulator



Gravel Dyke Nov-2020



# Project 2021 - 2<sup>nd</sup> Environment Permit

**Natural England new submission received Jan-2021**

**Hoveton Great Broad – 3 Temporary Fish Barriers, EPR/RB3557SW:  
Flood risk activity permit consultation March-2021**

No new evidence provided within the application

But EA own fisheries expert objection papers included

Confirmed by independent specialists at the IFM

**Finally after almost 6 months**

**Hoveton Great Broad – “Minded Too” consultation Aug-2021**

Again No new evidence provided by the applicant

Some changes to the biomanipulation objective to 75% of something to be determined

The EA management brings in external academic to “review the evidence”

EA placed conditions on the permit, yet to be agreed

Overruling all it’s own Fisheries expert advice and that of the independent specialists at the IFM

**Hoveton Great Broad – “Minded Too” consultation Oct -2021**

**Permit Granted**

No new evidence provided within the application

All Fisheries Officer Evidence demised in favour of the applicants views



# What Next for Hoveton?

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- Other grounds still subject to challenge include:
- Failure to follow obligations under the Water Framework Directive. (The WFD requires getting waterbodies and linked waters to “Good Ecological Status” but failed to take into account the fact that Hoveton Great Broad would go from being a prolific spawning area to having no fish).
- The breach of the written assurances from Natural England that it would not go ahead if the Environment Agency’s fisheries specialists considered that there would be a “significant impact on fish”.



# David Bunt - Chairman of the IFM

- *In 2019 the Institute of Fisheries Management highlighted the deleterious impacts that any fish exclusion from this area could have on fish stocks. Regrettably, none of the recommendations made in our report have been adopted. Continuing research has further highlighted the importance of Hudsons Bay and Hoveton Great Broad as a spawning habitat, not only for the local bream and fish populations, but to all fish populations throughout the Northern Broads Ecosystem*
- *This evidence reveals the vital importance of this area not only to the fish populations, but to the supporting fishery and wildlife that rely on these fish. The IFM consequently strongly recommends that this project should not proceed with the existing plans for fish removal and exclusion which could have irreversible and damaging impacts on the fish populations and ecosystem as a whole.*



Institute of Fisheries Management

- \* Anglers in Norfolk will never accept the closure of these spawning grounds and plan further challenges
- \* What does all this say about the statutory fisheries duties of the Environment Agency?
- \* What impact do these episodes have on rod licence compliance?
- \* Does Natural England really have an anti fishing agenda?
- \* With the new OEP do will NE and the EA survive in their present forms?
- \* Angling Trust, Fish Legal and BASG will be looking to the Agency to enforce all monitoring requirements





Thanks for listening

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Martin Salter - Angling Trust  
Kelvin Allen - BASG