

EA East Anglia East Fisheries Review

Introduction

There is much in the media about the performance and resources available to the Environment Agency to perform their regulatory role in protecting the environment. This dossier looks specifically at the Fisheries function of the Agency and their ability to deliver any tangible outcomes supporting the Norfolk and Suffolk Broads. The primary source of funding for resources come from Rod Licence income, which has shown some downward trend, but remains around £20m per annum.

There is significant variance in the delivery of a fisheries service across the East Anglian Area, with what can only be described as brilliant from the former Cambs and Beds area run out of Brampton, whilst the offering from the former Essex, Norfolk and Suffolk area has materially deteriorated.

Over the past decade on a number of occasions, the Angling Community has questioned and challenged the way fisheries are managed and supported within the Norfolk and Suffolk Broads. The low point was back in 2015, when things came to a head when the available fisheries budget was reduced by 47%, when resources vacated their positions and were not replaced. Now that the budget remains relatively stable, the issues seem to stem from the resources themselves and their management. Increasing people being seconded away without replacement, and a seemingly lack of understanding of what is a definable fisheries service.

The EA made clear in last year's FRAP permit conditions that a monitoring plan supporting and evidencing the impact of the Hoveton Great Broad isolation would be robust in nature. However, the plans seen to date, do not reflect this and only build on the EA failings in recent years on Broads Hydroacoustic Surveys and complete lack of understanding on stock assessment.

The partnership agreed back in 2015 on Prymnesium Management, still hasn't delivered on any of its outcomes in terms of incident management, some 5 years after being agreed.

Indeed, the most recent Salinity event found the inability to deliver any form of incident management is very worrying and concerning, given the scale of the damage.

Whilst on the River Wensum, one of the UK's iconic chalk stream rivers, is left to its own devices and it seems the only output from the EA is say 'no' to almost everything.

Local angling communities, NGO's and third sector bodies confidence in the Agency is lower than we have ever seen, with almost zero engagement and activity reporting.

Whilst additional resources have been recruited, the net Fisheries FTE is still down overall and still not capable of resourcing the needs of the Broads Catchment. We must find a way of working together on this, learn from it or find new ways to allow the third party sector to drive things forward.

Kelvin Allen
Chairman BASG
October 2022



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What is the Fishery Service

The Salmon and Fisheries Act was reviewed in 2020 by the Fisheries Act.

<https://www.legislation.gov.uk/ukpga/2020/22/section/1/enacted>

This provided 4 core freshwater objectives that the Fisheries Agency needed to pursue.

The sustainability objective

- Are environmentally sustainable in the long term

- Are managed so as to achieve economic, social and employment benefits and contribute to the availability of food supplies

The precautionary objective

- The precautionary approach to fisheries management is applied

The scientific evidence objective

- Scientific data relevant to the management of fish and aquaculture activities is collected

- Where appropriate, the fisheries policy authorities work together on the collection of, and share, such scientific data

- The management of fish and aquaculture activities is based on the best available scientific advice.

The climate change objective

- The adverse effect of fish and aquaculture activities on climate change is minimised

- Fish and aquaculture activities adapt to climate change.

However, the actual definition of the Fisheries Duty was seen as work in progress by the Joint Fisheries Policy and Legislation Working Group (The Moran Committee) 24 years ago.

<https://publications.parliament.uk/pa/cm199899/cmselect/cmenvtra/829/829m11.htm>

Section 7.3 States:

Some progress has been made under the stimulus of the Salmon and Freshwater Fisheries Review, but a great deal still remains to be done. The Moran Committee believes that as a matter of priority the Environment Agency should:



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- Reaffirm its responsibility towards fisheries and make it a key element in all its activities
- Reaffirm that fisheries quality is one of the principal measures of its success in managing the water environment
- Develop a consistent approach to the discharge of the fisheries duty both nationally and throughout all its Regions
- Publish a regular account of what it has done to carry out this duty.

Is it lack of clarity on these issues why the management team in East Anglia East struggle with Fisheries?

Why do we have such a variance between the East Anglian West and East area's on fisheries?

General Budgetary Management

Over the past decade, transparency in the way Rod Licence income has been distributed has become almost invisible at area level. We used to have a National annual report, supported by a report produced by each specific area. This is now not the case and as such area's seem able to spend the fisheries money as they like, without any recourse on service levels. This was stated by Thomas Enright the AEM from L&N at a recent meeting and formed part of the ethos set by Sir James Beavon in the way area directors prioritised their activities, across a wide challenging budgetary environment. The last annual fisheries report for 2020-21 was dire reading by any means, a document now only some 20 pages with more budget and less outcome delivery direct by the Agency and what are still statutory outcomes. See below.

Activity	2016	2020	Change
Income	£20,700,000.00	£25,000,000	20.77%
Coarse Fish Stocked	393884	489156	24.19%
Project Partners	185	1200	548.65%
Stock Surveys	1935	119	-93.85%
Prosecutions	2300	340	-85.22%
Attended Incidents	590	391	-33.73%
River Habitat Improvement	1218	575	-52.79%
Licence Checks	63039	17106	-72.86%
Tried Fishing for First Time	35000	4696	-86.58%
Fish Passes	87	45	-48.28%
Fisheries Improvement Projects	107	172	60.75%
Volunteer Patrols	2149	11604	439.97%

Although this is a national picture, it shows how the Agencies own performance is dire. How can it be right that with a 439% increase in intelligence through VBS patrols, overall fishery prosecutions are down by 85%. Maybe not seen in the wider delivery across the Agency as significant, but to the 500 or so volunteers undertaking many thousands of patrols, reduced enforcement outcome by the Agency is demoralising to say the least.

In 2015 This transparency enabled Kelvin in his role as both AT regional chair and member of the Broads Authority, to take up with the EA the dramatic decline on area fishery budgets to what was then the Essex, Norfolk & Suffolk area of the Environment Agency. The annual budget was allowed to drop to a level of £212k.



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After a series of meetings lobbying the National Fisheries team for an approved allocation in the 2015/16 round, the budget was increased to £383k. Nobody ever acknowledged how this came about however, apart from the fishery officers on the ground.

For the period of 2016-2018, things stabilised and some additional posts were recruited within Essex to provide both a fishery specialist officer and enforcement provision.

However, since then we have seen a continuing decline in fisheries resources, despite confirmation in July 2021 of a confirmed fisheries budget of £754k across the now combined East Anglian Area.

Looking in from the outside, East Anglian East still basically operates as a standalone entity with very different working practices to that seen in the West in the previous Cambs and Beds area. Following the principle of previous apportionment, this accounts to an equivalent of £400k to the previous Essex Norfolk and Suffolk area for the period 2021/22.

Giving this history of poor managerial control of fisheries budgets, it's very apparent that there is little or zero focus on Fisheries in the East. Despite this confirmed fisheries budget of circa £400k, experienced resources have been allowed to leave on long periods of secondment without any replacement, leaving the Broads and Wensum exposed without any fishery experts for long periods.

To make matter worse it remains the case that these technically skilled officers are allowed to be seconded away outside the area, with additional budget and the area left without any resources or skills to deliver any outcomes or even advice. It's compounded as the budget remains within the area and seemingly spent on other non-fisheries related outcomes. This cannot continue and it's no wonder the angling community feel so disconnected and let down by the Agency. The Angling community is more connected than ever through modern communications and this decline in resource is clearly noticed.

Below is some evidence of this and what actions we have initiated.

- On the 26th July 2021 a focussed budget meeting and review with the EA area team and AT was undertaken. This clarified the position in terms of available budget, but not people and skills. It's not our job to manage their teams, only point out the deficiencies.
- East Anglia total budget 2021/22 was £754k (*Roger Handford July 2021*)
- East Anglia A&R budget represents £38k within this. (*Alison Parnell July 2021*)
- From 2022, there has been zero FBG fisheries staff based in Norwich.
- Two key technical staff members have been allowed to move on secondment out of area with no replacement.
- The only Norwich based FBG Fishery officer is on long term sick.
- Resourcing regional forums, the area couldn't resource the planned regional forum this June. One can only but wonder what reception they receive once they do.
- But there are many other issues that previously have been agreed to bring the East up to a standard we see in the West, in communications and briefings. [See News Briefing](#)
- All these agreed initiatives have now lapsed into nothing and no communications or action, since the likes of Jez Wood moved on without replacement and now Julia Stansfield. When their salaries and expenses remain in area.
- BASG formally a respected stakeholder is seemingly dumped from all EA communications and Broads strategic fisheries development.

Hoveton Great Broad

The Hoveton project led by Natural England with the EA as a key strategic partner seems unable to move forward for lack of EA resources. Much the same applies to the River Wensum.

But in 2021 set against clear overwhelming evidence, the management team decided to ignore their own fisheries experts (and yes they are experts) and place the fishery at risk, ignoring both the precautionary principle as laid out in the assessment regulations and its objectives as a Fisheries Service. One can only but wonder if the same logic will apply in future years with new evidence and the precautionary approach. Clearly this has soured relations despite BASG remaining professional at all times.

In April this year the EA gave a short verbal presentation on their proposed stock monitoring plan as required under the FRAP conditions they set for the deployment of the fish barriers on Hoveton Great Broad. The delivery of this presentation was shoehorned into a meeting, given less than 20 minutes and no time for comment or discussion. These proposals only matched the level of capability currently provided and was well below meeting any form of robust monitoring plan. We formally disputed this proposal, but to date neither BASG or Natural England have had any firmer proposals from the EA. So alarmed and dismayed by this we taken the unprecedented step to offer a solution to Natural England to undertake this ourselves for a fixed price. We have had no feedback on these proposals.

[BASG Fishery Monitoring Plan Proposals.](#)

The ability to undertake surveys to assess stock density so critical and aligned with the Hoveton Great Broad Isolation shows skills are lacking, this is clearly seen with the poor standard of surveys, both in its field operation and postproduction. Indeed, more importantly, we don't see any concerns that the management team nether understand or feel the pain from this. But despite our protestations the previous Broads Technical Specialist post, made vacant by the resignation of Steve Lane was filled by a person based in Essex. This in no way reflects on the individual's skills, but in no way could deliver the required local service to Norfolk. We do understand that under guidance from the National Fishery team, a further band 5 technical specialist has been recruited to support the Broads fishery locally based in Norwich. However, we have still yet to meet Arnie Warsop, now in post.

Broads Hydro Acoustic Surveys

This expands and looks at the ability to provide any form of fisheries monitoring within the Broads as an example of this state of affairs. This cannot continue and somebody needs to be held to account for this action.

More recently it can't be called a delivery of any form of service. Whilst surveys in the West of the area are professionally undertaken and processed within a matter of weeks. Why is this?

This mantra in the East can only be down to either incompetence or management not accepting the technical knowledge of staff wanting to do the right thing. It is certainly indicative of a lack of general fishery management in the Broads, any effective fisheries management team would understand the importance of good baseline data from which to manage.

[Summary of the Bure surveys](#)

Since 2015 none of this specific species and year class data has been published or even undertaken. So no baseline of stock and year assembles is known.

What have we done to improve this.



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This situation has been discussed at length at various area fisheries management forums held every 6 months, on the 15th Oct 2020 Area Fisheries Management Forum, extract from the minutes are below.

- *KA described the use of the technology in the West to understand the Cambridgeshire Fens and reflected on a disconnect of the use of technology across the region. IH outlined the specific skills required to use the technology and interpret the data.*
- *KA highlighted that no survey or reports had been issued from the East since 2016, DH advised that BASGs view is that the non-delivery of surveys and reports is unacceptable. This is an issue KA escalated to Simon Hawkins, Area Director in July this year. **Action:** MS to follow-up on status of hydroacoustic surveys.*

[Escalation to Simon Hawkins Jul 2020](#)

[Reply from Simon Hawkins Jul 2020](#)

- *Update from MS towards end of meeting – MS advised Broads hydroacoustic survey report is in progress and will be shared when complete. 2020 hydro acoustic survey has not been carried out as size of boat meant social distancing could not be complied with. See Survey & reporting section below.*

An additional A&R post at band 4 was deemed appropriate, but this only led to a shift around of staff from band 3 to 4 and no overall increase in FTE. Actually after 18 months in post despite recruiting into this band 4 post, no successful processing of hydro acoustic data has been achieved out of the Norwich and Ipswich based resources. All the recent 2021 reports have been produced by Brampton based resource. So what did this appointment achieve and who should be accountable?

Some factual evidence building from table 1 in appendix 1.

- The 2014,15 & 16 Broads hydro acoustic surveys were produced and seemingly gave the impression that the River Bure had some of the UK highest fish densities. But subsequently this has been questioned as whether the post processing algorithm filter was set too high and created a higher density than that of previous years when the data was processed by and configured by expert staff, who subsequently left the Agency in 2011 and weren't replaced.
- The 2017 & 2018 surveys were undertaken at night as per previous years. However, the use of two sonars and having the transducers to close without validating the results, not only produced corrupted results for one year, but due to lack of resources and skills this was then duplicated the next year. A complete lack of competence to undertake the job by any standards.
- 19th Nov 2020 the 2019 hydro acoustic report was finally published, after 14 months. Only to discover it was undertaken 2 days after a saline incursion. So completely useless and so demonstrates the level of incompetence we are faced with.
- The 2021 survey was again found lacking, as it was undertaken during heavy rain which made the results unusable, for the area around Hoveton. So critical for the survey to be meaningful. Undertaking these surveys is complex and requires technical knowledge and skills, that seems lacking or is it the management ethos is carry out a survey regardless of the results.



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- BASG has therefore been asked to provide proposal to take on the fisheries monitoring on the Broads, so at least some form of baseline stock assessment can be made. We have looked at the available hardware and post processing software available today. But comes at a price. [BASG Fishery Monitoring Plan Proposals.](#)
- More recently some mentoring of the A&R East staff has taken place in undertaking these surveys in early October with staff from Brampton, which must be welcomed

Prymnesium Management

As far back as 2012 John Currie started to look into Prymnesium and lobbied various academics for some theories on it's causes and its management in the Broads.

In the spring of 2015 one of the worst outbreaks of a Prymnesium Algal bloom, led the EA to rescue some 500,000 fish across the Northern Broads. This led to a working group chaired by the then FBG Team Leader in the Environment Agency to look at what measures could be taking to avoid such rescues in the future. This resulted in a significant piece of scientific study by the John Innes Institute and the UEA, followed by a PhD on how to manage such events going forward.

[Published PhD](#)

In August 2017 after some lengthy lab and field testing, some recommendations were made and agreed that management of such algal blooms could be maintained by dosing with hydrogen peroxide. At the time Jamie Fairfull, Senior Environmental Officer for the Environment Agency said: "*Prymnesium* is one of the biggest risks to the fish population in the Broads. Being able to use hydrogen peroxide is a major breakthrough because for us the current options are so labour intensive. The Environment Agency usually recharges polluters for the cost of dealing with pollution incidents -- but with *Prymnesium* of course there is no-one to invoice."

We are now 5 years on and to date, no formal undertaken is available that any incident involving a Broads Prymnesium Algal bloom would be managed using these agreed techniques and processes. We are told that an internal trial has taken place, in recent months. But with the lack of fishery expertise who and when this is to be undertaking is unknown. So we have proving confidence in the procedures and staffing to deliver them.

Again, we refer to the Brampton team, who operate incident management processes using hydrogen peroxide on the Ouse Washes annually, without any issues and publicly announce they are ready with resource rosters etc for such events. Why is this so challenging in the Broads and taken 5 years and still not delivered?

Warm Water Piking

The Broads Angling community have always known that its bad to fish for pike in the summer, generations of knowledge and understanding of how the shallow water environment works means local anglers don't fish for them in summer. Unfortunately, many of the visiting anglers that make up around 90% of angling days on the Broads don't understand this. Fishing deep glacial lakes, or strong tidal rivers, the issues around water temp don't normally figure in their angling thoughts. This is why the Broads Angling community has pushed so hard for the reinstatement of the old extended closed season for pike that was abolished in the 1970's. This byelaw was removed as part of a simplification of bylaws and not based on fishery science, and since its abolition the pike fishing on the Broads has deteriorated.

There are likely to be many factors in the deterioration of the Broads Pike fishing, but the regular occurrence of dead pike in the weeks after June 16th (long after spawning casualties) certainly doesn't help mitigate other factors. On our last survey this year, over 80% of local anglers support restriction on pike fishing in warm water, these include many long served and nationally well respected anglers, who love nothing better than catching pike, but realise how counterproductive this is to pike.

Whilst understanding the resistance of bylaw change, the community embarked on a path of education to the visiting angler with support from the Pike Anglers Club, Angling Direct and Environment Agency. One of the measures trialled was using the 21°C upper limit for angling (as determined by Prof Cowx, Hull University) being an advisory cut off for pike angling. Live water temperatures were displayed in Angling Direct Wroxham and became a real discussion point among visiting anglers, many accepting that they shouldn't fish for pike. The live, dynamic data gave real power to the advice and was really well received as a positive move by the local angler community. Without question this reduced the amount of pike fishing that was taking place at critical times, best of all it was achieved through education and cooperation and increased the EA respect within the local community.

Equipment had been purchased by the EA and trialled successfully, the local community engaged, the largest angling retailer in the UK were providing in full support, and the trial resulted in reduction in angling at its most harmful time. The scheme was gaining significant traction.

Then without explanation or consultation the scheme was dropped in 2021. This has had the effect of discrediting the entire conversation about warm water and turned a positive EA action in to a negative one within the local community. This leads us to the conclusion that the fisheries management team are so disconnected from the Broads environment and its stakeholders that, even a low cost and staff impact of a project is viewed with little value. That said in 2022 the EA provided FIP funding for education leaflets targeting this visiting angler market.

Broads Salinity Ingression

Whilst the Broads has long suffered from tidal surges and salinity ingression, the regularity of such events is becoming a major concern for the whole angling and tourist community. This September we have seen record levels of salinity move right through the whole Northern Broads, people are reporting dead and dying fish everywhere.

In The Eastern Daily Press, Dec. 29, 2016 article Louise Taylor is quoted as saying,

“We are so lucky to have a passionate community of anglers that also want to get involved. As a result, we have a network of volunteers that collect additional salt level data across other rivers. This increases our coverage during an incident and helps identify other areas that could be protected in the future. This really helps our understanding of these surge events and their impacts.”

During the recent saline incursion in Sept 2022, that network of volunteers, monitored, recorded and reported saline levels, fish in distress, aggregations of fish that could have been relocated. These reports spanned the entire Northern Broads as high as the North End of Barton Broad but the response from EA fisheries was minimal.

[Bookmark to spreadsheet of recorded events and monitoring](#)



A single crew was sent to rescue fish from a road side dyke at Womack Staithe, while a report from South Walsham Broads 20th September (02100765) of 100'000s of fish aggregating in distress was ignored. Fairhaven Trust then reported dead fish at South Walsham Broad on the 25th Sept.

Between the 16th and 26th of September the local community had volunteers all over the Broads Network, resulting in 100's of hours of on the ground time, yet apart from the John Clark rescue at Womack and the raising of the Barrier on the 27th September, none of our volunteers witnessed any EA staff on the Broads. We don't consider this to be providing any form of fisheries service, especially when intelligence was provided directing where resource could have been deployed.

The local community is alarmed by the EA statement Eastern Daily Press Sept 22, 2022 "We manage the saltwater barrier at Herbert Woods marina. On September 16, after careful consideration, we decided not to operate the barrier and concentrated our response in other areas."

Where was this response concentrated?

Since 2009, the Local Angling Community have run a saline monitoring program, headed by John Currie, that has been recording and supplying data to the Environment Agency on saline incursion. Within a few years this program had given new understanding to how the saline incursion affects the Broads ecosystem, in particular the fish populations.

Between 2016 and now this important community resource has been eroded to the point where it is no longer used and is in fact largely ignored. A request to provide additional salinity meters was acknowledged back in 2021, but no funding was available.

[Email from Kevin Grout](#)

Proactive engagement and management of Salinity

In 2015 the Environment Agency contacted Deltares in Holland to look at the feasibility of air curtains to reduce salt intrusion and increase the size and extend the duration of the fresh water layers that act as a refuge for fish. Deltares were then contracted (order number 1070008623) to conduct a feasibility study.

In February 2016, Deltares met with Stephen Lane, Clarie Humphries, Tom Howard, Adam Clarke and John Currie at various Broads locations, after which a report was issued that recommended further works to be completed around use of slipper dams and air curtains.

We have a copy of the initial report, but we are told the entire computer folder with all the follow up work as being lost. We understand that the location of this file was within the DVH server @ G://broadsanglingstrategygroup/

<https://basg.online/document/feasibility-paper-for-air-curtains-in-the-broads-to-reduce-salt-intrusion/>

We understand that this further work concentrated on slipper dams, and the use of air curtains in dykes and dead ends.

Given that saline intrusion prevention systems are used across the globe and the importance of protecting fish in a piscine based ecosystem, we are concerned that no progress has been made on any of this in the past 6 years, despite these papers being passed to the Broads Futures Initiative.

We have now had two significant salinity events, where the EA failed to implement any form of incident management which enables formal process and communications let alone deploy the



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barrier at Potter Heigham, for whatever reason. It's very evident that this should have been the case as is well defined by national policy.

[Incidents and their classification: the Common Incident Classification Scheme \(CICS\)](#)

We are not saying that a solution isn't needed and that some form of adaption is needed to mitigate these events, but the fact is the Agency has a duty to respond and manage the consequences from the events remains. We have 100's of thousands of dead fish and the Agency doesn't declare an environment incident, why is this?

Broads Fishery Assets

Potter Heigham Barrier

"100,000 fish killed by Seawater Surge", The Times, Mar. 3, 1988. National Outrage that huge numbers of fish were killed in the "Jewel of the Crown of UK Fisheries", yet 24 years later the EA Fisheries Team looking after the Broads fail to declare an incident despite being faced with locally estimated fatalities being some 10 x that figure.

After this incident the overseeing Fisheries Team at that time identified a safe haven for some of the Broads fish stocks at Herbert Woods Boat yard in Potter Heigham and with the support of the company effected a successful temporary barrier system which could be deployed to prevent salt water entering the yard and provide refuge for up to 500,000 fish. The Herbert Woods company has been part of the Broads community for nearly 100 years and understands the importance that fish have to the success of the Broads, not only for anglers but supporting the iconic species of birds and otters that many come to see. They are so convinced of the importance of looking after these fish that in the mid 1990's they allowed a permanent barrier to be installed across their boatyard. It shouldn't be underestimated the disruption and cost to the Herbert Business each time the barrier needs to be raised, but for over 20 years they have provided full support and saved millions of fish from untimely death.

The scheme has been universally accepted as a major success, indeed the EA have taken much positive press mileage from this over the years, including in The Eastern Daily Press, Dec. 29, 2016. In this article Louise Taylor of the EA's Fisheries and Biodiversity team is quoted as saying

"knowing when to raise the barrier was a 'big team effort', which began with flood forecasting experts assessing when a surge tide was on its way. However, this does not tell us how quickly the surge tide moves up the river,' the post says. 'This is where my team comes in. To find this out, we use some water quality monitors called sondes that record the level of salt in the river. The sondes enable the team to track the salt as it moves up the river - giving them enough time to raise the barrier."

In the last 2 years, this team effort has broken down on at least 2 occasions, April 2021 and September 2022, which has resulted in the deaths of 100'000s of fish. If a private company had system failures that lead to the death of 100's let alone 100'000s of fish they would be fined and made to restock. (i.e. Anglian Water pollution of the River Cam in 2013).

We strongly believe that the condition of the Barrier, is at least in part, responsible for the "team breakdown" BASG officers witnessed the barrier being raised in September 2022 which required 3 staff and took 42 minutes to complete. We know that when the barrier was in good working order it

took 1 person just a few minutes. We believe that the additional staff resources and time to raise and lower the barrier are affecting the decisions made.

We have been making our feelings very clear on this for the past year, Duncan Holmes has discussed this with Jez Wood (Potter 24/01/22), The Broads Society 11/02/22 and 02/03/22, Kirk Markham and Rebecca Mason (Potter 21/04/22) and we know that further meetings were held on 21/01/22 and 13/04/22 with MP's CEO's and Regional representatives.

Despite the press statements, it is clear that both the Barrier and the Systems used to determine deployment are failing after 20+ years of successful use and immediate action needs to be taken to avoid repeated fish deaths.

The same applies to the EA expressing a desire to dispose of its Broads Fisheries Assets. Jez Wood approached BASG back in September 2021 about depositing these assets to BASG. On 30th March 2022 Duncan met with Rebecca Mason and Kirk Markham for a day visiting these assets including on the river Yare at Postwick. But again, nothing has transpired from this and who is leading on this matter.

Wensum Engagement

Looking back to 2018, when we reviewed the status and overall governance of the Wensum, we found many promises and much money was spent pushing the Wensum Restoration Strategy forward. However, once this money was exhausted, the whole strategy became left stranded and nobody with the resources to continue any further work, let alone communicate anything positive.

The Wensum Past Present and Future review, proposed a new alignment to the nationally supported CaBA approach, which was launched and agreed by all stakeholders including the Environment Agency in October 2019. However, despite all of this, again the Agency has been absent until the Spring of 2022 in any meaningful partnership meetings of the formalised group. Indeed, there still hasn't been a presence at any of the Ecology working group, who have met both virtually and face to face on many occasions. Just what is the Agency's role now in 2022, one has to ask and what is the fisheries budget actually delivering.

When chasing the status of potential Fish Surveys on the Wensum for 2022, initially there was none planned confirmed in March and May 2022. Now we find some attempt is being made to undertake these electro fishing surveys without any form of resource plan, but left to staff on the ground to gather resources from across matrix teams to try and work together to deliver an outcome on what is a statutory required survey. Where is the management taking ownership of such resource planning, as we see in Brampton. Where the annual survey program is published for all to see.

There has been attempts in the past to introduce Calverton reared fish into the Wensum, but in the past decade it seems the policy of introducing reared native fish into Norfolk Rivers is fronted upon.

Many of the Wensum angling clubs have lakes within the Wensum flood plain which flood from the river on regular occasions in Winter. Not surprising is that Wensum fish find themselves trapped in these lakes when the water resides. All attempts to transfer these native Wensum fish back into the river is rejected without good cause, even when the EA's own surveys show the Wensum Roach levels low. Why is the Agency in Norwich, so against what is a nationally recognised policy of restocking and moving trapped fish from impounded flood plains?

[Norfolk Flyfishers Lake Evidence of Wensum flooding and history.](#)

More recently in Sept 2021 the Wensum main river bank breached above Bintree Mill, the EA wouldn't instigate a repair and actually stopped the local community attempts to affect a temporary repair with sand bags. As we write this, seemingly contracts are now signed for the IDB to implement a repair, some 12 months after the original offer was rejected. This breach meant that several kilometres of the main river a designated SSSI was affectively dry during the summer of 2022 and made the BBC news at Bintree Mill this summer.

Potential Ways Forward - Solutions

Could the existing East Anglian East create a framework to build on that delivered by their colleagues in the West. If giving the additional resources just secured and the people on secondment finally return to area. This should have a defined recovery plan created and agreed with stakeholders.

If it looks unlikely that the EA will be able to provide the necessary resources to meet the needs of not only today's demands, but of the future climatic changes. There are already many activities involving citizen science surrounding invertebrate and water quality monitoring. These could be defined as both reactive and proactive tasks.

One way forward would be to extend this to proactive salinity monitoring in the Broads. BASG is already developing a low cost salinity monitoring solution with full automation, with a proof of concept funding secured from Water For Tomorrow. Its aim is to deploy a low cost monitoring solution right across the Broads connected by it's own low band radio mesh with cloud storage and graphical user interface.

We want to work together with the EA on making greater use of technology on items such as acoustic surveys, where there is a whole evolving industry in the 3rd party sector driving this forward. So we don't have wide gaps in our joint understanding of fish stocks in the environment.

Another component could be to create a 3rd party sector reactive volunteer and professional environmental task force, who could be equipped and trained to deploy on environmental incidents and surveying. We have opened initial discussion with Broads Watch on this activity. This approach is something the Dutch already undertake across in the Netherlands on fish rescues and surveys.

Reference <https://www.sportvisserij nederland.nl/vis-water/vbc/>

Whilst the items above are more reactive to events and proactive evidence gathering, we also need to look at potential defensive measures to limit the impact of such events and as such we have reviewed the previous work back in 2016 by Dutch consultants on salinity management techniques.

This opens up options on some relatively low-cost defensive defence devices like bubble curtains and the modelling on flood relief using marshes at Halvergate, which to date have focussed on agriculture benefit rather than a wider catchment approach. This potentially is one way in which the Broads Adapts to rising sea levels, without the need for costly barriers and more concrete defence systems.

BASG is now actively engaged with both the Broads Bio-Diversity Partnership and BFI on these mitigation options.

Conclusion

This really is a sad indictment of what is left of any form of Fisheries Services supporting the Norfolk and Suffolk Broads including the River Wensum.

All of these issues are factual and well evidenced. But the middle and senior management seem oblivious to this, what's clear the same management remain in post, despite the creation and merger of the two Areas to form East Anglia under a single Area Director Simon Hawkins.

All attempts through calibration to squeeze a best practice ethos, which worked initially have since gone back to the old ways and as such outcomes and now even communications have been lacking.

We are left with staff so pressured that their standard response is send a FOI or call the help desk.

After 12 years of working as a volunteer in collaboration with the Agency, I've never seen such a state of affairs and when viewed against the Fisheries team in Brampton. Words fail me.

We want to sustain the Broads we love so dearly and offer a number of potential solutions to both provide the reactive and proactive resources and skills to actively manage such events to the best of our combined abilities, but also explore some possible options in both mitigating and adapting the impact of such events as we battle against the grip of climate change.

To do nothing just leads to more frustration right across the Angling community and now even the wider public who see the Broads being destroyed.

Appendix 1 – Reference and Evidence Material

Escalation to Simon Hawkins Jul 2020

From: Kelvin Allen <kelvinallen@btinternet.com>

Sent: 10 July 2020 11:49

To: 'Hawkins, Simon' <Simon.Hawkins@environment-agency.gov.uk>

Cc: 'Stansfield, Julia' <julia.stansfield@environment-agency.gov.uk>; marcus.sibley@environment-agency.gov.uk; Andy Hinds <fishtrackltd@gmail.com>; Duncan Holmes <duncan.holmes@basgonline.org>; Kelvin Allen BASG <kelvin.allen@basgonline.org>; Martyn Page (martynpage1@gmail.com) <martynpage1@gmail.com>; Tim Colman <tim@posterity-it.co.uk>

Subject: FW: Wensum report

Hi Simon

Since we met in late January to discuss Hoveton Great Broad and its planned bio-manipulation program, the world has changed somewhat with covid-19. However the environment permit consultation closed in early February and has clearly being impacted by covid-19 working restrictions. But we are now in July and I would like some idea on the direction of travel the Agency wishes to take with this matter.

As we have made clear we want to find a workable solution to this and are ready to work this through with all parties.

However throughout this matter we have relied on the science to lead us and even though the fish tracking data is still coming through, via the PhD team. It doesn't provide the base density figures we have used in the past, which come from EA fishery surveys. The last hydro acoustic survey reports we have comes from 2016.

I'm not sure what has happened within the team, but back in 2014 the Broads team were leading the way in this technology with other areas learning from the ground breaking

results that this technology can produce. I now learn that both 2017 and 2018 results are not usable and the 2019 data still remains unprocessed and assessed. Set this against the need for base data whatever the outcome with HGB to assess any impact annually this is extremely concerning.

I have with my meetings between Helen and Marcus attempted to bring best practices to the forefront as clearly some underlying structural issues exist between the two respective areas now merged under your leadership.

I have been working with Julia Stansfield the A&R team led attempting to resolve this for the last 2 years. It was highlighted particularly on the river Wensum last year in that we are unable to assess trends in species and life cycles without the science, as reported in other fishery reports delivered outside ENS area. I had hoped that a regrading of the role would resolve this, but it seems not the case.

The grading of such work activity seems to be the core issue and it's not for me to manage such matters, but only challenge the resultant outcomes.

Giving the significance of this with the challenges facing the Broads fish populations from not only climate change, but projects like HGB all potentially impacting on the social economics of the Broads fishery we need this structure foundation to baseline anything.

I ask that you seek to resolve this position urgently.

Regards

Kelvin

Kelvin Allen
Chairman

Angling Trust Eastern Region Freshwater Forum.

Home 01366 384458

Mob 07850 709769

Email kelvinallen@btinternet.com

Kelvin Allen is inviting you to a scheduled Zoom meeting.

Topic: Kelvin Allen's Personal Meeting Room

[Reply from Simon Hawkins](#)



10742 2020 07 21
reply.pdf

East Anglia (East) Area Fisheries Newsletter



EA-ENS-April-Newsle
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Broads Hydro Acoustics Survey History

Year	Bure Density	Table 1



Broads Angling Services Group

2004	41	
2005	37	
2006	39	
2007		No Survey
2008	60	
2009	30	
2010		No Survey
2011	40	
2012		No Survey
2013		No Survey
2014	106	
2015	102	Including PASE Surveys
2016	84	
2017		No Survey
2018		No Survey
2019	20	Undertaking after a saline incursion
2020		No Survey due to COVID
2021	27	Loss of GPS signal in vital aggregation points and heavy rain impacting the results.
2022		

The 2015 survey also included results a PASE survey undertaking in some boat years to provide a sample of species and year class.

Age / Species	0	1	2	3	4	5	6	7	8	9	10	11	12
Roach	0	39	24	14	25	8	9	9	1	1	1	1	1
Bream	0	70	10	8	5	2	12	7	1	1	1	1	1

Broads Fishery Monitoring Plan Proposals.



Broads Monitoring
Plan Proposals BASG \

Incidents and their classification: the Common Incident Classification Scheme (CICS)

<https://www.ofwat.gov.uk/wp-content/uploads/2017/12/20171129-Incidents-and-their-classification-the-Common-Incident-Classification-Scheme-CICS-23.09.16.pdf>

Daily Timeline of Salinity Event Sep-22

[Saline incursion Sep-22 BASG Timeline of events and measures.](#)



Salinity Monitors Response

----- Forwarded message -----

From: "Grout, Kevin" <Kevin.Grout@environment-agency.gov.uk>

To: "rbjc1959@yahoo.co.uk" <rbjc1959@yahoo.co.uk>

Cc: "Wood, Jez" <jez.wood@environment-agency.gov.uk>, "Mason, Rebecca" <rebecca.mason@environment-agency.gov.uk>

Sent: Thu, 5 Aug 2021 at 11:48

Subject: RE: Monitors

Hi John,

Hope your well?

Regrettably I have slightly disappointing news regarding the supply of salinity meters for use on the broads.

To cut a (very) long story short, we are currently in the process of getting the barrier at PH replaced as it is no longer fit for purpose. Although I cannot state the exact amount this will cost, I can tell you that it is exponential especially for our teams budget. This unfortunately has left a state of uncertainty around available funding for the forthcoming months. Therefore we are going to have to put the supply of meters on hold for the time being until further funding is available.

However, the good news is that I now have Jez Wood assisting me with this. We have agreed that the project can go into the pot for FIP funding, and if approved we will then have the required funding to purchase the meters. We feel it is a worthwhile project which warrants our support, but I am sure you will agree that our priority must be to get the barrier fully operational again prior to the saline season, so we have a mechanism to save fish.

As for the meter that Steve left at DFH for you (in the cage), we have searched high and low for it and cannot find it anywhere. We have even looked at the financial costs over the last year or two and cannot find any evidence to suggest a salinity meter was purchased. So I am not sure what has happened here?

I still have the nets for you at CFF which we need to arrange collection / delivery for at your convenience.

Final thing; Wwill be going to HB this afternoon to install the solar panel onto the Sonde. I guess the live feed is working as it should?

Thanks

Kev

Appendix 2

Wider Norfolk Anglers Views

Tim Ellis WACA

My personal angle is that as Chair of a leading Wensum Valley angling club, (WACA) one of the few undertaking restorative work on the river, with a record going back 30 years and more (we were once known as NACA), in recent years I have received virtually zero communications from EA on a



Broads Angling Services Group

daily basis. This in itself is extremely odd. Given that the EA are surveying fish stocks etc for their records (monitoring a declining river!) and other actions ongoing I would expect regular updates and notices of intent etc. I do not even have a named point of contact - I have people I can get in touch with like Rob Dryden in Ipswich, or Jon Clarke purely because I have their contact details from past operations etc, but only official line of contact is via the EA national phone number.

(I should just add here that having personally contacted Jon Clarke recently about this he is now informing me of fish surveys in advance.)

In days past we had reasonable levels of co-operation and even physical help from the Fisheries guys and their successors, with such diverse projects as gravel jetting, gravel augmentation and even barbel and roach stocking and tracking. Much of it after pressure from ourselves admittedly but there were times when the likes of Steve Lane and Graham Gamble actually came to us with unsolicited offers of help. That never happens now, other than the Lyng Sluice project (more of which shortly) I have heard absolutely nothing from the local guys since 2019, it's as though they have just disappeared!

One thing I do have direct experience and ongoing comms with EA about is of course the proposed new bypass in whatever form at Lyng Mill Top Sluice. This was originally mooted and meetings held in 2018, target date for a spade in the ground at least by 2019. Today in August 2022, we are being told, after many meetings, much shuffling of papers and personnel that the original plan had been found to be unworkable due to excessive length of new channel, and that alternative ideas were being explored. God knows how much money and time has been spent getting to this point, we are talking consultants the likes of APEM, I reckon their fees make solicitors look cheap! There is supposed to be a fishery habitat improvement program piggybacked onto this, which is of course also being held up. If fisheries had some sort of self-standing status maybe this could be pushed along independently, however it seems everything hinges around flood defence (EA) and the goal of a "more typical chalk stream form and function" (NE).

Norfolk Flyfishers Lake Dennis Willis & Roger Gibbons Concerns

Norfolk Flyfishers Lake sits beside the Wensum at Swanton Moreley, they also own a stretch of the Wensum which sits besides the Lake. In previous years they were allowed to move roach and dace that had become trapped in their lake during periods of flood. More recently in the past decade the Agency has enforced a policy of labelling these fish as non native to the Wensum and as such cannot be stocked back into their former home. The images and tables below demonstrates a clear and equivocal link exists between the river and the lake (a former gravel quarry) which sits in the flood plain.

Floodwater coming down river Wensum and IDB drain can and does accumulate in the land above the Haul Road section of the West bank of Norfolk Flyfishers Club lake. When level gets high enough floodwater tends to flow down the road from south to north usually. In 3) and 4) below this resulted in sections of the road and bank being washed away, mostly into lake. Both locations have been repaired by the club, one being an overspill sill into the lake and other (under gate) being a concrete turning area. Last major incident was in December 2020. Roger Gibbons may confirm which day the breach actually occurred. There has been at least one other occasion during period below when part of road was washed away by flood water but at present I have not identified the date of the event. On ALL events there is usually overtopping of the IDB drain.



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- 1) Overtopping of IDB drain into lake 08/01/2016
- 2) Overtopping of IDB drain into lake 10/03/2016
- 3) Breach of Haul Road at West end of lake washes away road base to 1m. Sand/cement bags installed and concreted over. Concrete turning area installed in front so gravel/sand hopefully does not get washed into lake.
- 4) Breach of Haul Road at West end of lake end of 2020 or beginning of 2021. Repaired with concrete posts with gravel boards along roadside. Gabions of about 1 m put in lake and from boards to these a concrete overspill has now been fitted. Still possible for road gravel surface to be washed into lake here in high flood.

All of above allow fish transfer into/out of lake from river and drain.

Swanton Morley 2 Arch peak river flows in cu.m/sec. daily mean.

Date	DEFRA/EA	No. days high flow	NFC	NFC
08/01/2016	12.4	+7.9 for 5 days	1) Have video	Overtopping IDB
10/03/2016	13.4	+8.07 for 3 days	2) Have video	Overtopping IDB
28/12/2017	16.9	+ 8.02 for 8 days		
31/12/2017	16.1			
03/04/2018	13.7	+7.9 for 5 days	3) Have photos	Road breach **
16/01/2020	12.6	+8.1 for 4 days		
24/12/2020	21.6	+8.14 for 7 days	4) Have photos	Road Breach
20/01/2021	17.1	+8.35 for 10 days		*
29/01/2021	14.2	+7.87 for 15 days		
03/02/2021	12.7	8.3 for 3 days		
16/02/2021	12.6	+10 for 7 days		

* From 15/01/2021 to 21/02/2021 only four days below 6cu.m/sec

**believe this was when breach damaged/removed road under lower Haul Road gate near IDB culvert.

Swanton Morley 3 Arch peak river flows in cu.m/sec. daily mean

Date	DEFRA/EA	No. days high flow		NFC
08/01/2016	11.4	+6.8 for 2 days		Overtopping IDB
10/03/2016	12.8	+6.3 for 3 days		Overtopping IDB
28/12/2017	16.0	+ 7.9 for 6 days		
31/12/2017	14.8			
03/04/2018	12.7	+ 5 for 5 days		Road breach
16/01/2020	8.53			
24/12/2020	19.3	10.5+ for 5 days		Some Road Breach
20/01/2021	14.7	9.67+ for 3 days		
29/01/2021	10.9	9.31+ for 2 days		
03/02/2021	6.78			
16/02/2021	8.88	+ for 7 days		

Swanton Morley combined flow daily qualified in cu.m/sec.

Date	DEFRA/EA	No. days high flow		NFC
08/01/2016	12.9	+6.8 for 2 days	Have video	Overtopping IDB
10/03/2016	21.4	+6.3 for 3 days	Have video	Overtopping IDB
28/12/2017	19.3	+ 7.13 for 11 days		
31/12/2017	18.3			
03/04/2018	13.7	+ 7.6 for 7 days		Road breach
16/01/2020	15.2	+6.03 for 7 days		
24/12/2020	15.8	+6.93 for 9 days		Some Road Breach
20/01/2021	13.2	+6.2 for 43 days		
29/01/2021	12.7			
03/02/2021	12.7			
16/02/2021	16.5			

* From 14/01/2021 to 21/02/2021 43 days above 6.2 cu.m/sec – long time high

8th January 2016 IDB drain overtopping
West bank NFF



24th December 2020 Haul Road was washed
away – now in lake



Andy Beckett Concerned Angler.

I regularly fish both the Broads and Fens and make the use of my boat on both venues.

Why is it that the Agency Brampton team provide guidance to anglers with regular and timely reports of fish aggregations using their sonar surveys, even providing analysis on competition venues in a matter of days. When in the Broads we are lucky to even get anything meaningful within 12 months after the survey. What is missing in the Norwich team?

Management of the Broads, Duncan Holmes

In such a widespread and diverse environment of the Broads local knowledge is so important, and BASG have provided the Agency with access to this for 20 years. Graham Gamble, Andy Hinds and Steve Lane, all recognised the importance of local angler knowledge, and spoke with the local community almost everyday. As a result, the intelligence flow into the management team was far beyond what even the most generous of budget would allow to happen.

Fish aggregations and locations, early sign of fish in distress, illegal activity, AIF and FIP projects and assistance with scans and surveys, were all readily available to the agency via a single phone call. This is would still be available but the agency, despite numerous offers are not engaging. the Broads Angling community has arguably the largest daily deployment of Side Scan Sonar anywhere in the UK, has volunteers taking saline, and invertebrate samples most weeks and can mobilise a volunteer effort in the dozens at very short notice. Most authorities or agencies would be delighted to have this resource available to them, but in the Broads, this appears to no longer have value.

Against a backdrop austerity and budget or resource barriers, it seems incredulous that this Free resource is not used, especially considering that the Broads Authority have over 150 volunteers at any one time.