

THE BROADS SOCIETY RESPONSE TO THE SARAH WOOLLER REPORT ON THE LEGISLATIVE AND FINANCIAL STRUCTURE OF THE BROADS AUTHORITY

Thank you for the opportunity for the Broads Society to respond to the Defra (Sarah Wooller) Report. Our members share a common purpose to help secure a sustainable future for the Broads as a unique and protected landscape in which leisure, tourism, and the local economy can thrive in harmony with the natural environment. The Society is a member of the Council for National Parks. We have an expanding membership of some 2000, coming from all over the country and abroad.

We support the need to review legislative and financial structure of the Broads Authority. There is much to be welcomed in the report, such as reducing the size of the Authority. However, the Society is extremely disappointed that there is no recommendation for increased funding which is so crucial for the future of the Broads. Some of the conclusions in the report seem to be based on a considerable misunderstanding of the area and the problems it faces, written by someone largely unacquainted with the managerial and ecological complexities of The Broads.

To give just four examples:

1. The report states: "by the 50's an area famed for its flora and fauna was reduced to mediocrity". On the contrary, the Broads is still widely regarded as the best example of a lowland wetland system left in Britain.
2. The report states: "the primary reason (for dredging) is to enable navigation". This is simply not true: the Barton Broad 'Clear Water' project was carried out to restore the site to good ecological condition, which was also to the benefit of navigation.
3. The report states: "The Broads Authority believes that an appropriate response (to the threat of climate change and rising sea levels) is managed retreat". No is doesn't, not according to their own Draft Broads Plan 2004. Such a response would be totally at odds with the extensive and costly Flood Alleviation Scheme, currently being carried out in the region.
4. The report states "The heart of the Broads Authority is almost completely inaccessible by land" (sic) and "Access to Broadland is very poor unless you are on board a boat". This is undoubtedly correct (you might also state that access to the Peak District is very poor unless you are on foot), but to imply that this is a problem shows a misunderstanding of the very nature of the Broads.

To deal with specific points:

Finance Issues

Para 22 and 23

The proposals for capital need to be clarified. The reference to a new Broad may refer to the Bure loop which we understand has been taken out of the programme.

Para 26

We support the concept of working within any agri-environment scheme.

Navigation

Para 32

Any support from local authorities would be welcomed. It does not seem to us that Norfolk as a whole gets much help from EEDA let alone the Broads. This is an area

where the Broads Society can help to give any application for funding more strength. We support the point made about tolls being outpaced by the increasing cost of dredging, and question the practicality of increasing them while the hire boat industry (in its current form) is declining.

Para 33

There is a misconception in the report about the locality of boat users. The owners of boats are not necessarily the users, and the report appears to ignore the domicile of thousands of holidaymakers.

Para 37 and conclusion

We consider that the most disappointing and concerning aspect of the report is the proposal not to subsidise waterway maintenance.

The report fundamentally misunderstands the dual role of dredging. It claims on the one hand that the primary reason for dredging is to enable navigation, and yet admits that the increase in boat tolls has been "outpaced by the increasing cost of dredging as a result of tighter environmental standards, and heavy metal contaminants found." (para 32). The £1½3m or so spent on the magnificent restoration of Barton Broad was not just for navigation purposes (although most boat owners are delighted by the results) but primarily to restore the environmental health of a broad once dubbed 'the most polluted lake in Europe'.

Some of the bank clearance and dredging is for environment and conservation reasons and would still be carried out if there were no boats. Without some of this work, many of the waterways would ultimately become overgrown and cease to be able to fulfil their crucial drainage function. Additional maintenance is essential for safety reasons, such as clearing dangerous obstructions, fallen trees, underwater stumps etc.

The Broads Society believes that a great deal more money is urgently required for environmentally advantageous dredging and waterway maintenance than that currently provided by boat tolls.

Access and the Promotion of Enjoyment

Para 38

The report does not recognise that one of the reasons for the designation of the Broads as a national park was its remoteness and that much of the area can only be appreciated from the water. The Broads Authority must have the necessary resources to ensure that facilities are available for the public to see the area from the water.

An implication in the report is that there should be an increased drive to improve land access opportunities. We would like to add a note of caution over the threat of damaging wildlife habitat by excessive land access. A limited number of walkways such as the one to Barton Broad should be built for disabled access (although it's worth noting that there is also disabled access via boat), but to a very great extent the seclusion, remoteness and wildness of the Broads should not be compromised.

Para 40

We support the concept that any changes to the navigation area should be by

management agreements with landowners. This has worked well over the years and has generally avoided conflict.

Legislative structure

Para 44 to 47

The Society has no objections to reducing the number of members on the Authority, provided the Authority's planning function is not compromised, particularly if full planning control (as planned in the Broads Draft Plan 2004) is brought in house, a concept we support. We note and welcome that this also has some support from the Districts.

We note the point about the Forum but are concerned that it does not become just a talking shop. There is a risk that it can become a vehicle for individuals to ride their particular hobby horses.

Para 64

We believe the separation of the navigation account is no longer necessary so long as there is accountability and transparency.

Para 68

We do not think the Authority should be given powers to issue spot fines, believing them to be difficult to administer fairly and could damage the image of the Broads and the Authority itself. Nor do we feel the Authority requires a right to enter land. This would be a further source of criticism and conflict.

We support the suggestion that the Secretary of State should no longer need to approve the Norwich Navigation Officer as there is sadly no longer commercial coaster traffic using the river to Norwich.

Para 69

We support the importance of safety under a BBSS but it should be recognised that there is a very large number of traditional sailing and heritage craft on the Broads and the rules need to be flexible enough for them to comply.

Para 76

We support the suggestion that the Authority should be able to give general directions to non-seagoing vessels.

Overview of boundary issues

Para 82 to 88

The Society welcomes a review of Broads Authority boundaries particularly if such a move would bring the area's most dangerous stretch of water (Breydon Water and the lower Bure) under BA control. Some of Broadland's most exciting restoration possibilities are in the upper reaches currently out of the boundary (the Walsham and Dilham canal, the Waveney from Geldeston to Bungay, and the Bure from Coltishall to Aylsham). We would support their inclusion but not for their use by motor craft.

We welcome the suggestion in para 89 that the Authority itself can initiate boundary changes, and we would like to be consulted at an early stage about any proposals.

Further comments:

An inference throughout the report is that navigational interests are irreconcilably at odds with environmental interests (despite acknowledging that "it is pointless to make a distinction between conservationists and navigators"- para 17). The significant occasion where real differences occurred between conservationists and navigators was when a rare aquatic plant grew suddenly in unmanaged profusion in Hickling Broad, which seriously restricted sailing. All parties have learnt from that unfortunate experience and are confident that dialogue and mutual understanding will prevent it happening again. We believe the report is reopening old wounds.

Finally, the Authority needs a very substantial increase in its grant-in-aid if it is to manage the Broads on a sustainable basis. We are very disappointed that the report has completely ignored this fact.

Gerard Stamp
Chairman
The Broads Society
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