

The *Draft* Broads Plan 2011 –
2016:
**“A Strategic Plan to manage
the Broads”**

Public Consultation

Response from:-

The Broads Society

August 2010

About This Response

The Broads Society is pleased to have been asked to comment on the draft Broads Plan for 2011-2016 and presents its response in this document.

Our Society has been in existence for over 50 years, is a charity dedicated to improving understanding of the Broads as a whole and is a member of the Campaign for National Parks. It is the only society dedicated to the Broads area as a whole, with no prioritised interest in a particular activity, district or subject matter. Many of our members are also members of such societies but we regard it as our particular role to stand above narrow interests and consider those of the Broads as a whole.

We strive therefore for balance between all of the competing interests over this wonderful area.

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1. General comments

As the draft Broads Plan notes, once agreed, it is the "overarching document that coordinates and integrates other strategies, plans and policies relevant to the Broads with the Authority's statutory duties." As such, its role is ambiguous: it will guide the Authority's work for the next five years but it apparently has not been prepared as a prioritized framework for Authority management on what needs to be done.

The Society is concerned by the document as a strategic plan

This brings us to a serious concern: the fundamental flaw of this document is that it is not a Plan, still less a Strategic Plan. It is a wish list. Laudable as these wishes may be, that is all they are as presently stated.

A realistic business strategic plan should include:-

- terms of reference,
- list of responsible participants,
- clearly defined objectives
- timescales
- outline critical paths and cost benefit analyses
- budgets

- and other metrics including the sequential steps necessary to attain the desired outcome(s), the required time and resources needed and the cost thereof to ensure that progress against each target is measurable so that the responsible parties can be held to account.

Such a plan must also define clearly how it will be recognised that the objectives have been achieved, i.e. – what will things look like when the planned work is complete?

The plan is unclear on demarcation and allocation of responsibilities: areas of Authority involvement are discussed where other parts of the government machine are also involved. Many objectives in the various tables show multiple 'lead' organisations: in these cases it needs to be clear which one really does take the lead, or the resulting uncertainty will mean that accountability is once again compromised. Whose staff are utilised? What is the cost and who bears it? Who manages it? We are not alone in struggling to find clarity and coherence here.

In rationalising this Plan, potentially with fewer targets, the Authority may achieve more of what it is tasked to do.

No indication of progress since last plan

This Plan is very similar to the 2004 Plan: it differs mainly by the inclusion of the obligatory emphasis on climate change and the inclusion of the Whole Valley Project. Apart from that, the Plans are much the same.

A rolling plan must include the salient points from the previous version (in this case the Broads Plan 2004) including the strategies, tactical projects and goals therein and full information on progress against each with financial budgets and time factors clearly identified. This Plan does not do this.

Fundamental governance issues

The Broads Authority has three fundamental purposes: simply, conservation, encouragement of visitors and maintenance of the navigation area. However, it has multiple additional purposes thrust upon it by the conflation of national goals for the area and those of the Authority. The 122-page Environmental Assessment accompanying the Broads Plan contains a 17-page list of items of legislation which affect the Authority and impose additional requirements upon it that are ultra vires to the original 1988 Act (as amended).

Upon reading this list the Society found it much easier to understand why the Authority seems to be frequently criticised by many for not setting clear priorities. We are driven to the conclusion that some fundamental rethinking of governance arrangements is called for. “What should the Authority do?”, and “how should it best do them?” are key questions that need to be faced.

Financial and political climate now changed

The draft plan was probably conceived during the final months of the last government. The result of the general election has brought a fresh government with radically new ideas on governance and financial management. The new government has said that it:

- plans to return more power to local communities
- wants to reduce the "self perpetuating stream of bureaucracy where plans required strategies that require boards and bodies."
- will very likely cut expenditure by at least 25% and possibly more.

So the context for the operation of this plan will be very different from the time of its drafting. This is another flaw in the process of creating plans without the ideal characteristics we have outlined above: without some idea of priorities it is difficult to decide what the consequences should be when funding is restricted.

Fundamental difference between the Broads and other Park areas

All our National Parks have distinctive landscapes heavily influenced by local farming practices, themselves influenced by national and European legislation as well as the tastes of consumers. Many upland areas have been intensively grazed by sheep which have controlled the development of scrub and preserved what is recognisably open grass and heathland, often divided by walls built with distinctive local stone.

With recent economic changes, there has been a decline in the economics of hill farming, a decrease in grazing and an increase in scrub. The government has

recently recognised this by granting extra assistance to hill farmers. This assistance toward the preservation of our distinctive national hillsides and National Park landscapes is provided outside of funding for the Parks themselves.

The Broads are, in contrast, lowland areas renowned for their open skies. Landscape management needs to consider three different types of land and the vegetation on them:

- low-lying and flat farmland: often below sea level and needing to be drained. Originally often grazing meadow, a considerable amount has in the last 50 years been put to the plough. While some green-ness has thereby been lost, land under active cultivation remains open. However, poor economics for farming generally is leading to more fallow fields and more development of scrub.
- river banks: often poorly maintained but many recently rejuvenated by flood prevention works. Those rejuvenated areas are the responsibility of BESL while their contract is in force, but a plan needs to be made now for their maintenance in the years after the contract expires. Equally the upper reaches of rivers such as the Bure, Ant and Yare are now lined with substantial trees which ruin the banks and shade out other plants. In order to provide a continuous and manageable maintenance workload, work needs to begin before too much general deterioration everywhere makes it an absolute necessity, at which point the situation is almost beyond economic or practical resources to tackle, so that we have an intolerable but intractable situation. It is important that following the breakthrough work by BESL there is a Plan that takes bank repairs and tree growth into account and that we do not make the same mistake as was unwittingly made in the past by allowing the dredging programme to fall so far behind.
- marsh and carr landscapes: often formerly cultivated reedbed, now frequently neglected and gradually being grown over by larger and larger trees. In some respects the landscape so produced is environmentally very valuable as a rich source of biodiversity. Close to the rivers, however, they spoil the open skies.

Our point is twofold: that (a) hidden money is being made available to National Parks to control vegetation and preserve distinctive landscapes but not to the Broads where it is arguably more important and (b) the Broads have a bigger vegetation problem because of less land being under cultivation and the ground being more fertile. In theory, as long as landscape is actually controlled, the Society argues that the Broads should get a higher level of National Park funding. If not, they will lose their essential character.

A similar argument could be made regarding funding for dredging to maintain the navigation which also has a positive ecosystems impact, although this is currently mostly funded by tolls levied on boats.

2. Responses to Specific Questions posed

Question 1: Long-term Vision

Overall response: broadly, no. We do not agree with the vision.

Comment: The Broads Authority executive area is smaller than all of the National Parks and yet, because the Broads are lowland areas with many easy access points, they are intensively used by people with a wide variety of interests: ramblers, canoeists, sailors, holidaymakers on boats, private boat owners, dayboat hirers, waterskiers, wakeboarders, millwrights, anglers, naturalists of all hues, marshmen, to name but a few. This is more intensive use than almost anywhere else in any of the National Parks.

The Broads Society profoundly believes that *only* by maintaining that proper balance of interests can the unique qualities of the Broads be preserved. The maintenance of that balance requires that the different user groups have a good understanding of each other's needs. This requires that they talk with each other.

Action point 1: The Authority is uniquely placed to maintain the balance of interests, take awkward decisions when necessary and ameliorate tensions between disparate groups. For example, at Broads Forum meetings the Authority could act more as a low key facilitator to encourage different user groups to learn from each other and arrive at their own balance.

Comment: Item 1 in Table 2 assumes an intervening change to primary legislation to alter the name of the area: to change the 1949 National Parks Act, the 1988/2009 Broads Act(s) or any permutation thereof. It breaks the balance of interests and also provides a method for the introduction of the Sandford Principle which would completely destroy that balance. On several occasions the Authority has been told by DEFRA that the Broads cannot become a National Park. By continuing to push for change, the Authority persists in divisive behaviour and demonstrates how out of touch with public opinion it is.

Action point 2: We suggest the Authority publicly accepts the need for balance between users of the area and desists from further calls for a National Park.

Action point 3: The Society prefers the term "*protect* the navigation" as it currently stands in the Broads Act 1988 (as amended) and requests that this definition be restored in the Vision, Item 1, Table 2.

Comment: Most of the other items in Table 2 are ill defined thus we are unable to comment, laudable though some of these wishes at first seem. More importantly, table 2 does not show how the local population will be "engaged in the key debates and decisions about its future". The Society completely agrees with the concept and has long argued for more local democratic representation on the Authority itself, not just the moribund Broads Forum. Our vision for National Parks, expressed in our submission to DEFRA earlier this year, is of "National Treasures, Local Stewardship" and we believe this is a good model for all engaged with the Broads to consider.

Action point 4: We suggest the Authority be more specific on how the public will be "engaged".

See also our response to question 6 regarding maintaining the navigation.

Question 2: Responding to Climate Change in the Broads

Overall response: Not in agreement.

The wish is laudable so far as it relates to isostatic sea level rise however the Society finds it difficult to see how communities at risk from sea and river flooding can be said to be “involved in making the decisions” for the same reasons mentioned in our response to Question 1. The Society continues to believe that, as sea-level rises, the only solution for maintaining a freshwater environment is a barrage across the mouth of the river system. The budget for a barrage cannot be met by Authority funding but with a projected sea level rise of 37cm in 70 years, nothing less will provide protection for the entire area.

A much more significant immediate concern is that we do not believe (see previous responses to DEFRA consultations) that the Authority should duplicate the responsibilities of other government bodies particularly in view of current financial restraints. Research and evidence on climate change, sea level rise, flood risk management, carbon reduction and promotions seeking to ‘minimise consumption’ should not be the remit of the Authority (beyond reducing its own consumption): there are already other state bodies responsible. This is especially so where there is democratic control over the state bodies but not over the Authority.

Action point 5: The Authority to suggest to central government that climate change adaptation would be better organized and funded as a national initiative.

Action Point 6: The Society recommends that the need for and potential of a Yare Barrier be included at Policy CC3 (p11).

Question 3: Landscape and Cultural Heritage

Overall response: Broadly in favour of the wish but with strong reservations about past performance.

The Society notes the wish to “put people at the democratic heart of landscape protection, management and planning”.

Comment: We cannot find any mechanisms to achieve this defined in the draft Plan

Action point 7: We suggest that the Authority addresses this failing in the published version.

Comment: The local populace is concerned that planning decisions are often delegated to officers who (along with many Members) have little or no local knowledge. There are well known examples of unfortunate decisions.

Action point 8: The Society is heartened to learn that “on the spot” viewing of some of the places concerned has been valuable to the Authority’s officers; this needs to be continued.

Comment: The Society is strongly opposed on cost grounds to the proposed project for inclusion on the World Heritage List.

Action point 9: The Society is concerned that the potentially high cost of this project will outweigh the benefits that might be achieved. We suggest that the Authority

publishes detailed costings at an early date and that it puts the matter out to public consultation.

Comment: The Society notes the plans to develop the 'Whole Valley Approach'. We believe that the aims remain unclear and unknown to most people within the pilot area: the Ant Valley. There are few observable differences in building style or construction from one valley to another, and while it may make some sense to have a whole valley approach to sediment control, the Authority's executive area does not extend far enough upstream to have any effect.

Action point 10: We are unable easily to determine the aims or the achievements of the Whole Valley Approach as piloted in the Ant Valley. We suggest that unless something tangible and of positive value to the residents of the Ant Valley becomes available soon this initiative must be reconsidered and possibly abandoned.

Within living memory, it used to be possible to see from Sutton Broad, past Hunsett Mill to Wayford Bridge, a distance of only 1.5 miles, this is now impossible due to tree growth along the rivers and surrounding carr. The section on landscape makes no mention of the need to control tree growth. Indeed, we even observe the opposite in Tree Protection Orders.

Comment: Where maintenance of strong banks and reducing leaf deposits in river beds are concerned, most Broadland trees are giant weeds and should be treated as such. A paragraph on tree and scrub management under Navigation says nothing about the need for proper and extensive scrub management for landscape, river bank protection, bio-diversity and reduction of sedimentation reasons. Management needs will increase as a result of BESL's efforts once their contract expires.

Action point 11: The Society recommends that the Authority urgently needs to restrict the growth of tree and scrub close to river and broad fringes to maintain the essential character of the rivers and the open sky landscape which made the Broads what it is.

Action point 12: We also recommend that, where new tree plantation is allowed near a river or broad, planning approval is subject to maximum height and density specifications in order to protect the views, enable navigation and reduce sediment load. These provisions should therefore include measures for mandatory ongoing maintenance and cutting when trees exceed the height specifications.

Action point 13: We suggest the Authority begins monitoring riverbank scrub growth and the cost of management with a view to anticipating the management needs "post BESL" in order to put a strategy in place in good time before the contract expires.

Action point 14: We suggest the Authority urgently considers how much of the open sky landscape it intends to maintain and that it calculates the annual cost of controlling scrub and carr, before it becomes plain woodland. A possible option would be to encourage more thatched roofs through the planning function because cultivated reedbeds contain few trees.

Staithe

Comment: An important part of the cultural, commercial and recreational heritage of the Broads is the staithe yet these are totally ignored in the draft Plan. Staithees are the access points to land from the navigation system and vice-versa. Hardly used for transportation these days, many staithees still have a valuable access function and even just as a place to sit and enjoy the scenery. First utilised for basic needs of sustenance and later commercially and recreationally, staithees were both publicly and parish owned. Some appear to have been taken into private ownership. Nowhere in the Plan are staithees addressed yet the Authority has duties under the 1988 Act (Schedule 3, Part 2, Section 37).

Action point 15: The Society suggests the Authority builds on prior work by both organisations and maintains a full list of staithees, their current status and usage *and* that it also takes steps to bring any such wrongfully in private hands back into public or parish use. Having already done some work in this area, the Society would be glad to help.

Action Point 16: The Society recommends that the Plan should refer to staithees at AR2 (p39) and at all other places where access is discussed.

Question 4: Biodiversity

Response: Partly in favour of the wish but this section appears unfocussed and repetitive, with few hard goals or measurement metrics. One of the few measurable goals has no associated initiative.

Comment: The statement about increased recreational pressure illustrates the difficulty of intensive use of a small area. We understand the Authority's concerns about such pressure but it also proceeds to expand access rights, new footpaths etc that allow public incursion into hitherto remote and tranquil areas. The Society notes that water borne pressure has decreased in line with hire boat numbers whereas other pressures (from hikers to cyclists) have increased.

Action point 17: We suggest the Authority keeps some areas totally free from land-based access.

Comment: One of the Society's concerns is illustrated by The Biodiversity Action Plan for the Broads (2009). We understand that there was no consultation with the local reed and sedge cutters; they were not "engaged in this particular key debate and decisions about the future" nor at the "democratic heart of landscape protection, management and planning". This is not evidence of good, democratic, involvement.

Action point 18: We propose that the long term biodiversity aim should include a positive commitment to biodiversity and that this statement should be the watchword: "Biodiversity is maintained and enhanced by adopting appropriate and agreed management techniques, including newly created wetland habitats designed for the improvement of important ecosystems and clearance of overgrown scrub."

Action point 19: The Society suggests the Authority puts more emphasis on the elimination of alien species, whether plant or animal. The rapid growth and spread of zebra mussels and Asian crayfish desperately needs research into the impact on

local species as well as eradication methods, just as much as floating pennywort or Himalayan balsam.

Action point 20: Define the initiative that will lead to the creation of 400ha of grazing marsh and 200ha of fen, or abandon the measure.

Question 5: Agriculture and Land Management

Response: This section addresses certain matters outside of the Authority's remit e.g. local food production: this is the responsibility of other central government bodies and decisions of consumers in the market economy.

Action point 21: The Society recommends that this reference be removed from the plan.

Comment: We welcome the reference on page 22 that "Reed and sedge cutting remains a traditional, local and sustainable industry that maintains the valued open landscapes and helps wetland biodiversity". We also welcome the prioritised protection of peat areas but remain sceptical as to the global impact of trying to preserve carbon storage and seeking to include such protection within agri-environment criteria.

Action point 22: Remove the reference to carbon storage from this section.

Question 6: Management of the Navigation Area

Response: Supportive in general of these aims but mindful of the enormous backlog of dredging to be done to maintain what we have. ***We strongly oppose the opening statement of the vision for 2030.***

The Society is dismayed by the 2030 vision statement in Table 2 that the area will be "A national park where the traditional rights of navigation are maintained and enhanced". The Society prefers the term "*protect* the navigation" as it currently stands in the Broads Act. The recent experience of the passage of the Broads Authority Act 2009 (that, in its first version, had as its primary purpose the change of name and status to "The Broads National Park") should be sufficient evidence that any attempt to revisit this subject will be lengthy and very costly. This change will require primary legislation not only of the Broads Acts but probably also to the National Park Act 1949 – the Broads cannot be a National Park without these changes.

Action point 23: Restore the phrase "protect the navigation" to the Vision.

Action point 24: Remove the reference to a national park from the Vision.

The Society does not support a change to apply the Sandford Principle to the Broads. As noted above, this is a unique area with unique pressures from multiple simultaneous users. It cannot be managed by the Sandford Principle or any similar mechanistic approach and it would be a bad outcome for everyone for a single purpose to have primacy.

Comment: The Society questions the suggestion that historic spoil sites are protected from use by EU law, not least because in other EU countries such sites continue to be used (there are exemptions and derogations in place to allow

traditional methods to continue). On the contrary, the Society believes that the evidence for such restrictions lies elsewhere.

Action point 25: Remove the reference to EU Directives as the cause of spoil disposal problems and make reference to where the problem really lies.

Much more emphasis should be given to the removal of trees and scrub along river banks in order to promote the regrowth of reed and vegetation which in turn gives greater protection to the banks and reduces erosion and subsequent sediment loads whilst improving biodiversity and restoring more of the historically open skies for which the Broads were at one time renowned. The Authority has conducted *some* overgrown tree and scrub clearance, though we do not agree it is “significant”. Our impression without measurement is that there are more and taller waterside trees today than ten years ago, except in areas cleared by BESL. As noted in our General Comments, we do not believe that this is solely a navigation issue but is of interest to most Broads users and is a potential source of additional revenue for the Authority.

Action point 26: We suggest the Authority gives this item more prominence in the sector on landscape.

The Society is concerned by the loss of informal moorings caused by the BFAP project which is already leading to overcrowding in “honeypot” areas such as pubs etc. where double or stern-on mooring is now more common. For many, neither double nor stern-on mooring equates to a peaceful environment.

Action point 27: We suggest the Authority looks at this difficult problem more closely before further substantial informal moorings are lost.

Question 7: Promoting Understanding, Enjoyment and Wellbeing

Response: laudable in parts but the Authority’s track record is not promising.

Comment: The statement that “Local people feel actively involved in making decisions about the future of the Broads” is a myth currently and will remain so without fundamental changes to bring more local representation and a more local democratic voice inside the Authority. There are indeed local councillors on the Authority but those people are not accountable in respect of their work for the Authority.

The draft outcomes by 2016 fail to state just how local people will have clear opportunities to influence decisions about the Broads any more than they do now. Influencing decisions is completely different from ‘making decisions concerning the future of their local area’ which should be a draft objective.

Action point 28: the Authority to state in the Plan the detailed means to accomplish this “involvement” and “influence”.

Comment: The Society’s members cannot help but notice the increase in signage about the system. Often, these are large signs placed high on the skyline thus damaging that “open skies” air of the place.

Action point 29: We implore the Authority not to erect any more signs, interpretation boards and other unsightly notices high up on the river banks. Most add no value and all detract from the natural landscape. It makes little sense to argue with the power companies to put more cables underground and then to erect more and more signs atop the riverbank. If signs there must be, let us have lower, less visually intrusive, signs. This would definitely improve the environment.

Comment: The Mosaic Project work with its emphasis on ethnic minorities is misplaced here: it is not the job of the Authority under its statutory duties. However, we fully support efforts to be more inclusive of all disadvantaged groups, particularly children from low-income communities in Great Yarmouth and Lowestoft many of whom have little or no knowledge of their local area.

Action point 30: The Society suggests that this be removed from the Plan along with much of the other research discussed here.

The Society is concerned by paragraph 5.1.7. We applaud the expressed desire to listen to the communities involved, but that cannot be done effectively if outcomes are already settled and unless there is a genuine desire to listen. We say elsewhere that:

- bodies such as the Broads Forum have become moribund after being dominated by presentations from the Authority i.e. talking not listening
- the Society has concerns about the Whole Valley Approach; these are reported at Action point 10.
- climate change adaptation needs in our view to be much more concentrated at least at county level, if not national. There is no point in having a climate change adaptation plan for the Broads separate from those of the many overlapping local authorities.

Action point 31: We suggest the final sentence in this section be dropped.

Question 8: Sustainable Tourism

Response: Broad agreement with the aims.

Comment: The Society is concerned that the Authority is spending money on branding when the money is so badly needed elsewhere.

We note that previous projects with a Mr. Anholt and Lady Knollys produced no discernible outcome.

Society committee members are already receiving unsolicited adverse comments from the public about the “magical waterland” banner which many find unnecessary and not a little patronising. These schemes are of dubious benefit, especially when done in competition with other overlapping local authorities each of which is attempting to brand its own area. The result is consumer confusion.

Action point 32: The Society sees no need to tamper with one of the best known brands the UK has to offer; we request the abandonment of the current branding project.

Comment: It is laudable for retail establishments to offer a quality experience but we do not believe this is the Authority's job. There are already many guides and awards from established experts. A considerable sum is now charged to Charter Mark recipients, thus debasing the award whilst not guaranteeing quality.

Action point 33: Cease the BA Charter Mark operation, save the money and reduce consumer confusion, or combine the efforts of all local authorities into the same direction.

Comment: With regard to the statement at p35 of “a sense of remoteness” we refer the Authority to our other comments on that vital remoteness being removed by ever increasing “access”.

Comment: The statement at ST4 appears to be asking for donations: even if channelled directly to other vehicles, this would appear to reduce the need for Authority expenditure.

Action point 34: We suggest the Broads Society or the Norfolk and Suffolk Broads Charitable Trust as suitable vehicles for such donations. Whatever the vehicle, local people should be making the allocation decisions.

The Society would prefer to see less Authority involvement in awards etc. and more focus upon creating the framework that will enable tourism to prosper.

Question 9: Access and Recreation

Response: Some agreement but there is a lack of focus, some ambiguity and an assumption that the Authority should deal with matters outside its remit.

Comment: For example, p36, 5.3.1, paragraph 1 suggests that “Emphasis needs to be put on access that minimises greenhouse gas emissions and is sustainable.”

The Authority cannot control the output of greenhouse gases emitted by any mode of transport to & from an access point be it diesel coach, car or a flatulent horse.

Action point 35: It is not possible to impose policy on methods of transport to and from the BA executive area. We suggest the point be deleted with all references to p36, 5.3.1, paragraph 1.

Comment: The Society is concerned by the ambiguity and conflict within the Plan regarding access. It cannot be sufficiently emphasised that the very tranquillity so often referred to in this Plan will be lost if ever greater access is given to more and more sites. For example, one of the quietest moorings on the entire system used to be on the Coltishall side of the River Bure at the lock (head of navigation). Since access has been granted to the Horstead bank it is now, effectively, park land: it is used heavily including by groups bringing “boom boxes” thus totally destroying the previously tranquil spot. Needless to say, the bird life has disappeared, too, with

this human intrusion. There comes a point when sufficient “access” has been achieved: surely, it cannot be right to go on for ever?

Action point 36: We support the reopening and maintenance of derelict footpaths (and staithe). Where new access is concerned, the Society suggests that the Authority should focus upon requests from the public and relevant organisations thus it should also determine and publish the criteria for assessing such requests. One criterion should be to determine if sufficient access already exists and to consider whether further change might adversely affect the character and tranquillity of an area.

Action point 37: The Society is not aware of any readily available list or register of access points in the Broads. We suggest that the Authority creates and maintains a comprehensive list that is easily accessible by the public (via websites, publications etc.) and will also form a basis for Authority decision making e.g. to assess whether insufficient or excess access exists in any specific case. Its publication alone should improve the public’s knowledge of accessibility and may mitigate some of the need for further interventions. This list may already exist internally, if so it should be made public.

Comment: At 5.3.2, the Plan mentions boating and tranquillity. Certain forms of boating are intrinsically tranquil – sailing, rowing and even well designed internal combustion engine installations. However, the Society is concerned that far too many motor boats, both hire and private, are extremely noisy.

Action point 38: We recommend that the Authority makes an immediate start on ridding the Broads of excessively noisy engine installations.

The Society is, of course, aware of the electric boating scene and accepts that such vessels are very quiet but we remain unconvinced that this is “green” (we prefer “non-locally-polluting” or “low noise pollution”).

We also believe that some compromise needs to be reached with the owners of party boats operating in the evening from Wroxham and Horning. Such boats are very enjoyable experiences to people on them, but the noise they create travels for miles over wet marshland and is frequently objectionable.

Comment: The Society is also concerned that this much valued tranquillity is usually lost at night (and for many periods in the day) when hire boat engines are run continually at moorings, often for several hours. This not only destroys any peace for other river users but in certain places (e.g. Irstead Shoals) can be extremely annoying to adjacent property owners. The Society understands that most boatyards now tell hirers to run their engines for several hours per day to keep the batteries charged, whether moored or underway.

Action point 39: We recommend the Authority insists that yards stop telling hirers to run engines when moored and, indeed, tells them not to do so. If yard owners retort that this is problematical because of the plethora of electrically hungry devices on board, they must be told that either these devices must go (who really needs 240v cooking & dish washing on a boat?!) or larger battery banks be installed. There is scope here for changes to construction and use standards for hire boats.

Comment: This brings us to a point not covered in the Plan but which the Authority should, we think, address – hybrid drive. Boats currently are either petrol/diesel or electric (mainly dayboats). The latter are not really safe to negotiate Yarmouth due to lack of power and range. If adopted in the hire cruiser fleet, a hybrid installation would address this problem by retaining internal combustion power to safely negotiate Great Yarmouth and traverse Breydon Water whilst allowing silent propulsion on the less tidal stretches.

Action point 40: We suggest the Authority contacts companies competent in installing hybrid drive systems with a view to promoting their use in hire craft (with the co-operation of British Marine Federation, Broads Hire Boat Federation etc.).

Comment: Wakeboarding is mentioned at 5.3.3 but the Society cannot reconcile this activity as being “in keeping with the national park philosophy of quiet recreation.” To which we would add *safe* recreation. It is unacceptable to pass off this incongruity by citing “managed through negotiated agreements”, a statement that fudges the issues of acceptability and suitability, safety and bank erosion.

Policy point: The Society remains opposed to wakeboarding anywhere on the system.

Action point 41: The Authority should address the possibility of curtailing or banning wakeboarding.

Comment: 5.3.5 – The Society urges caution in the expansion of greater access to traditional tranquil and/or remote sites lest their *raison d’être* is abolished forever.

Action point 42: The Society recommends that in future greater emphasis should be placed on timely consultation with local residents and their elected representatives in order to maintain balance and minimise any impact upon residents and villages, river users and those unique qualities of the Broads described by Ted Ellis as a breathing space for the cure of the soul.

Comment: The rivers are tidal from which ancient rights derive: the Society does not accept the need for restrictions on the angling community, other than what can be obtained by discussion. It is unacceptable to use phrases such as “EA angling targets” for tidal waters.

Action point 43: The Authority should provide some explanation of what this means.

Question 10: Development, Economy and Sustainable Communities

Response: Partial agreement with the wishes.

The general public has no idea what “sustainable communities” means.

Action point 44: We suggest the Authority defines the term and seeks people's reaction to it and its implications.

Comment: Paragraph 5.4.1 – many of these matters are outside of the Authority's statutory duties.

Action point 45: This reference should be removed with the exception that planning (and other) regulations should, where possible, be designed to aid business not hinder it.

The long term aim may sound well but many locals remain ill served by the Authority's planning process which seems to favour large new builds whereas affordable housing needs to be encouraged. Existing residential planning policies and design preferences do not address the needs of many low income earners since they are unable to afford existing properties traditionally available. The Authority should look favourably upon shared ownership and other schemes to help the younger and less wealthy members of the local population, while minimising development within the executive area. Given the tight drawing of the Executive Area boundary and the inevitable premium to be paid for waterside properties, it is unlikely that the Authority can satisfy the demand for low-income housing within its own area, and it is possibly unwise for it to try.

Comment: In the table on p43, item DE3, point 1, states that the Plan should "Ensure that new development does not adversely affect the special qualities of the Broads." The Society agrees wholeheartedly. One of the measures of the special quality is how dark are the skies. The Society is concerned at all potential development North-East and East of Norwich given that from much of the Broads, the Southern and Western skies are already dominated at night by a glow toward Norwich.

Action point 46: We would welcome a clear statement from the Authority of its opinion on such developments and in particular how much development is tolerable on the doorstep of an already intensively used area.

The Broads area is small with relatively few planning applications, and sometimes gives rise to questions as to the viability of the Authority's planning department. The Society is pleased to note the formal visits of officers to sites where Authority approval has been given in the past to the subsequent concern of the local population and that some lessons have already been learned. This is valuable and should be maintained including site visits at application consideration stage.

Comment: We are concerned that, at the end of the section, there is mention of a "Greater Norwich Design Quality Panel" with no justification at all. From DE3 it appears that some kind of mini-regional approach is to be taken to planning.

Action point 47: Given the new government's recent abandonment of regional planning policies and the desire for greater local public accountability in the planning process, we suggest such an approach will need to be extensively justified in the Plan before this goes ahead.

Action point 48: The Society suggests that the Authority engages with local people and their elected representatives to establish criteria for an area's long term future and that the means to achieve this are clearly set out in the Plan.

Question 11: Priority Outcomes for English National Parks and the Broads

Response: Do not agree.

Section 70 of the Vision and Circular for English National Parks and the Broads states: “The Parks socio-economic duty has been given added weight and momentum by the Taylor Report and the Rural Advocate’s Report on the economic potential of rural England.”

Both reports point to the need to accommodate growth, development and investment in all rural areas at an appropriate scale and form. This should not be interpreted as meaning that development cannot be accommodated. On the contrary, it means that additional and concerted efforts are required to ensure communities, planners and businesses have clear, consistent advice regarding the acceptable forms development might take, so that Park communities are places “where people can live and work by maintaining sustainable livelihoods”.

The objectives set out in this Plan do not appear to satisfy section 70 as regards some planning issues for local residents.

Comment: The management structure, regimes, conservation policies and bureaucracy surrounding the proposals included in the Biodiversity section, in their present form, will probably result in the Broads being a place where people will *not* be able to live and work. This is especially true, for example, where reed and sedge cutting are concerned. The Biodiversity plans require considerable state funding to support a completely different management regime which is currently undertaken by RSPB as regards to reed beds. Instead of cutting some areas as is done now every year or every two years to produce commercial reed for thatching, some conservationists say a longer cutting rotation is better and water levels on reed beds should be deeper. This results in the reed beds becoming useless for commercial reed production. The Reed Cutters’ Association has suggested a 50-50 solution with 50% commercial management and 50% 'other regimes'.

Action point 49: The Society recommends a rethink of this section with a better explanation of how livelihoods will be maintained and improved.

Question 12: Priority objectives – Five most important priorities?

The Society recommends that the Authority, in discharging its statutory duties, sticks rigidly to its core functions and:

1. (With other agencies) maintains the Broads as a predominantly fresh water system for as long as possible by protecting it from the devastating consequences of North Sea salt water tidal surges by promoting protection by means of, inter alia, a Yare Barrier.

2. (With other agencies) maintains effective long term sea defences between Happisburgh and Winterton to prevent sea water entering the Upper Thurne Broads and beyond into other parts of the Broads, not just from breaches in the dunes but also through groundwater seepage and transmission from drainage systems such as those around Brograve. This remains an Environment Agency responsibility which the Society believes the Authority should support.
3. Introduces appropriate democratic representation to accommodate local residents' interests and aspirations.
4. Continues to give equal priority to navigation, conservation & recreation, to *protect* navigation and abandons all question of a National Park.
5. Abandons all programmes that are not wholly essential (or outside of the Authority's executive area) to carrying out the Authority's core statutory duties, in order to reduce workloads, eliminate waste, minimise costs and increase focus on those statutory duties.

Question 13: General Comments:

The Society notes with concern that the "State of the Park report" has not been updated since April 2007 when it was originally promised that it would be regularly updated. To some large degree, this has now been replaced by the Environmental Assessment. We hope that the measures in the latter document will be published in shortened form and updated online so that progress can be seen over time.

In the Upper Thurne Working Group, Hickling Broad has been noted to be practically devoid of life, although some fishermen dispute this. We would like the Authority to make a clear public statement about the health of specific large water bodies so that the public can assess priorities for action. Is Hickling dead and if so, what is being done to fix it?

Possibly related, Heigham Sound has continued to silt up despite protests from navigators for some years. What is the Authority's current thinking on the general situation and on Heigham Sound in particular?

Many parties feel they are not listened to: the Broads Forum, fishermen, reed cutters, and many local residents, despite four parish drop-in sessions in the past year. We hear rumours that one parish even desires to secede from the Executive Area.

Action point 50: The Authority needs to provide regular up to date information not only to address the above points but also so that outsiders can assess performance and priorities.

Action point 51: The Society believes that communication is key and that the Authority should do much more to engage with its constituents and interested

parties. The Authority should meet interested parties to forge a better way of working.

The Society notes with some sadness that, whilst at the level of the fundamental purposes (conservation, navigation and tourism) almost all Broads users want the same thing: balance, the Authority struggles to gain acceptance let alone enthusiasm. We cannot go on as we are. Something must change.