

DEFRA CONSULTATION 2010. WATERWAYS FOR EVERYONE. BROADS SOCIETY RESPONSE

INTRODUCTION

The Broads Society is the only voluntary organisation representing all users of the Broads.

The Society, a registered charity, was founded in 1956 to promote the future wellbeing of the Broads area and provide a focus for all who are interested in the region, navigators, naturalists, farmers, residents and visitors alike.

The Society's mission statement sums up our purpose:

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.

Our response falls into two parts:

A An overview of the document, its style and content.

B Responses to the questions with reference to the text.

Note that this response is mainly restricted to the Society's area of responsibility – The Broads.

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Part A OVERVIEW

The Society is concerned that DEFRA has, again, chosen not to include the Society in the list of consultees nevertheless it is pleased to submit its response.

The Society asks DEFRA to include the Broads Society in all future consultations having any impact upon the Broads, their conservation, tourism and navigation.

At 71 pages, the consultation paper is too long. It is also repetitive, ill thought out and poorly constructed. There is no summary. The entire style makes it difficult easily to discern the important message(s).

The paper is heavily biased towards the canals. This is understandable but unfortunate. The Society, being a Broads based organisation, specifically looked for appropriate statements but finds the consultation too canal based to be of much relevance to the Broads.

The Society believes that these specific points deserve overview comment:-

The Broads are different from the canals

The Broads navigation is isolated from the rest of the UK inland system(s) and has very few of the structures (locks, houses, distributed offices) of the canal system; the Broads have large, often internationally important, conservation designations at all levels.

The Broads may appear to be natural but have largely been created from a rich local heritage and now require more maintenance than many canals.

Sediment management is a central issue for the Broads as it impacts upon all three statutory purposes of the Broads Authority yet funding for dredging is insufficient to meet identified needs and grant funding is restricted to conservation based work.

Governing legislation has been in place since 1988.

Public right of navigation

The three statutory purposes of the Broads Authority are defined in the Norfolk and Suffolk Broads Act 1988 (and amended in 2009) which holds navigation equal to but not subsumed by conservation (the Sandford Principle does not apply). This status was arrived at after much deliberation and remains an important, local, concept today. Indeed, the Broads Authority is legally charged "to protect the interests of navigation". This means that the integrated management of the Broads is, in many respects, already ahead of that of the canals.

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Waterways Management

The Society believes that the other waterways organisations have much to learn from the way the Broads are managed. The Broads Authority's purposes are defined in Statute and whilst there is always room for improvement, in areas of access, partnership involvement, conservation and safety, the Authority already appears to be ahead of BWB and EA in its active policies.

Membership of Waterways Authority Boards

The Society believes that members should be chosen solely upon the basis of their relevant expertise and local knowledge. For example, if one considers the parallel of Network Rail, no-one asks that Network Rail place higher emphasis on diversity, merely that the railway networks work and are safe.

Inter-departmental group on Inland Waterways

The Society is disappointed that this group omits Broads conservation and navigation related organisations and asks for voluntary groups, charities etc. to be treated as partners (not just as stakeholders).

Funding - additional DEFRA burdens

This paper includes new responsibilities for waterways authorities.

It appears from several parts of the consultation that DEFRA wishes to impose many new responsibilities on the navigation authorities but does not wish to pay for implementing and maintaining them.

There are many additional funding burdens proposed for navigation authorities that are not relevant to their remit e.g. in addition to climate change there is social cohesion and diversity, ethnicity and disadvantage etc. The Society believes that these are the responsibility of central government not a waterways/navigation authority.

The Society acknowledges that we live in straitened times but we think that the Consultation attempts to place an unreasonable additional burden on already hard up organisations constrained by many years of inadequate maintenance budgets.

Funding these additional responsibilities without additional grant aid will dilute the ability of the waterways/navigation authorities to carry out their prime function – maintaining the waterways.

Funding - Europe

The Society believes that insufficient attention has been given to drawing upon EU funding mechanisms and calls for DEFRA to implement a central service to waterways/navigation authorities. This will develop and maintain: a high level of expertise, contacts with EU decision makers and restrain costs by removing duplication across authorities (indeed, some overlap with the National Park Authorities is evident and should bring further administrative savings).

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Climate change

In the light of recent revelations concerning certain research establishments and the IPCC, the Society finds it disquieting that so much emphasis is placed on climate change, mitigation and carbon reduction. These are not scientifically proven needs and are not short term targets. The cost of some suggestions itself rules out the activity.

The consultation paper's recommendations cannot be implemented solely by the waterways/navigation authorities when they are neither legally responsible nor suitably funded so to do.

The Society questions the emphasis still placed on climate change, mitigation and carbon reduction and suggests that this requirement should, logically, be deferred.

Ethnicity

We remind DEFRA of the old adage "Management is colour blind" to which also add race, creed and religion. Again, the Network Rail analogy applies.

The way forward?

The Society is disappointed that the Consultation document does not include any plans, strategies, tactics or actions for addressing the questions posed. It appears not to seek a way forward let alone determine how projected performance might be measured.

The Society wishes to be consulted in any future consolidation of this consultation stage into an implementation plan.

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Part B – RESPONSES TO QUESTIONS

Chapter 1 The Introduction

“... the success of *Waterways for Tomorrow...*” – the paper does not state what this success was, how it was measured and against which criteria, nor is the Society aware of what the success was.

Q1

The Society’s view is that most of these points are relevant but we would omit climate change and social cohesion as these are not (and cannot be) within the remit of a waterways/navigation authority.

Q2

Specifically, in the Broads, the picture is mixed.

Water quality (the responsibility of the Environment Agency and Anglian Water) has continued to improve with joint projects such as Barton Broad Clear Water 2000, mainly funded by the private sector, being particularly impressive thus far.

On the other hand, dredging has been an intractable problem. Having neglected the necessity to dredge for many years, the Broads Authority, to its credit, is now setting about the task in earnest and has even worked hard on a particularly difficult part of the navigation (Heigham Sound in the Upper Thurne area) with a pilot project starting this year.

Nevertheless, in another part of the Broads system (Oulton Broad) dredging is urgently needed: where vessels drawing nearly 10ft could traverse the Broad 100 years ago today most traditional Broads cabin yachts leave a brown wake of churned mud behind them and even dinghies sometimes go aground.

In certain other respects, little, or no, action has been taken by the Authority. For example, in many upstream areas, scrub has encroached upon the river banks resulting in reduced biodiversity, erosion of the bank by reed margin die-back, narrowing of the river and poor sailing conditions (overhanging trees, lack of wind etc.).

The big problem remains. The Authority’s navigation responsibility is huge whilst central funding (toll payers **only** pay for navigation maintenance) is **zero**. The Society urges DEFRA to find substantial additional grant funding to assist the Broads Authority in meeting its dredging and scrub clearance duties.

It cannot be emphasised too highly: without a **properly funded** dredging program the Broads will eventually silt up with detrimental impact upon all three of the statutory purposes of the Broads Authority.

2.13

“...the productivity...has increased...”. This is a bald statement which the Society believes should have been backed up by evidence. In the absence of such evidence the point is meaningless.

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Q3

In the Broads this is hardly relevant. Places already have their own distinct identities and do not need outside interference (from a national body)? to shape them – this is the job of locally elected representatives of the citizenry.

The Broads Authority is already the relevant planning authority within its executive area and whilst anomalies arise (opposite sides of a road in separate planning authorities) the situation is different from EA/BWB.

The EU Water Framework Directive suggests that the best model for a single system of water management is by river basin, the natural geographical and hydrological unit instead of according to administrative or political boundaries. The Broads Authority is piloting a “Whole Valley” approach to management but the Society remains unconvinced that this additional layer of bureaucracy at such a low level has had or will have any measurable, beneficial, impact upon the lives of local citizens, the environment or navigation. ***The entire Broads river system is the logical river basin in this context.***

It is for the Broads Authority to discuss this with DEFRA but it seems to the Society that RDAs (EEDA) do not value the contribution of the Broads to the local economy therefore we suggest that closer ties be developed not only with the Authority but also relevant organisations such as this Society.

3.1

“Most people like...”. This is, palpably, untrue: the paper itself asks many questions about how to achieve greater local involvement and locally, in the Broads, most residents do not go anywhere near the system, some are not even aware of its existence. That is their choice.

3.4

The Society does not believe that it is the job of the Broads Authority to create “community cohesion” whatever that is. It has difficulty enough managing its prime goals within its limited budget.

3.7

This appears to be DEFRA saying it wants to see restoration but will not pay for it.

3.14

The Society observes that this is a recipe for complicated communications; if there must be so many organisations, just one should take the lead on waterways matters. The additional workload envisaged has to be paid for – by whom?

3.15

It is not clear how greater bureaucracy will help waterways authorities; the Society suggests caution against the creation of more quangos.

3.17

The Society is concerned that HCA should not be involved with projects in the Broads which impinge upon the unique character of the area.

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3.21

“Developers and the occupants of waterside schemes benefit from enhanced amenity and high property values.”

The Society is deeply concerned by this statement. It is wholly unsuited to the Broads and could set a dangerous precedent. The Society calls upon DEFRA to consider the Broads as having distinctly separate spatial planning requirements from the canal system. The Society remains implacably opposed to any, further, urbanisation of the Broads.

Q4

The Broads Authority already runs a number of initiatives (some with nearby local authorities) and a number of other organisations do likewise e.g this Society, the Museum of the Broads etc. Publicity is the only answer.

Q5

Money!

“Place making” is a meaningless phrase no doubt drummed up by a civil servant. The citizens of a “place” will make what they will of amenities - some may use them, others may not: provided they know about them it is their choice.

A substantial development is proposed for an Eco-Town at Rackheath which may impinge upon a variety of resources, not least water: the Society urges caution lest the Broads (River Bure) are adversely affected.

Q6

NO! & NO!

The Broadland river system is partly an industrial landscape that has been adapted by man over hundreds of years to meet changing situations not least raising river banks to mitigate flooding.

Bearing the above statement in mind, the Society reminds DEFRA that the climate of this planet has changed for about 4.5bn years. Nothing is going to stop it. It is man’s interpretation of the ongoing change that is important: remember that, in the 1970s, the science was also “settled” – catastrophic global **cooling** was heading our way. Happily, wise counsel prevailed and no huge financial commitment was made.

We urge caution in all respects rather than urgent (headlong?) action.

The Society does not believe that any waterways/navigation authority, on its own, should be targeted (how?) or be asked to fund, climate change goals within a short term strategy. This is the job (if it is necessary at all) of central government. If there appear to be changes, of any kind, affecting a navigation, the relevant authority has a duty to adapt, probably with the aid of central funding if necessary, but burdening such authorities with a target to, somehow, change the climate or even reduce any anthropogenic impact is as inappropriate as it is absurd.

That said, the Broads are in an area of isostatic depression (*the land is falling relative to the sea – i.e. this is **not** sea level rise*) so we can expect, over the long term, greater influence of surge tides and salt water incursion. The Society urges DEFRA urgently to consider inclusion of a Yare Barrier in current discussions for a third river crossing in Great Yarmouth as a mitigating force against potential flooding and salt water incursion.

(By the way, there is no evidence whatsoever of greater or increasing storm impact due to climate change; we are talking here of a gradual increase in the impact of existing, expected, surges as the land mass slowly sinks.)

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4.1

“...carbon emissions...will cause further change in the future.” The Society respectfully points out that there is no proof that CO₂ has caused any change to date or that it will do so in future. The science is not settled. In any event, in global terms, the Broads carbon foot print is miniscule and irrelevant as proven by the Broads Authority’s own research. This does not mean that the climate is not changing: it is.

4.2

The potential for commuter cycle routes alongside the Broads river system is, for practical purposes, nil.

Whilst the history of motive power on the canals dictated towpaths and the canals passed through many villages, towns and cities, the Broads developed quite differently: because of soft banks and strong tides in the rivers, cargo was transported under sail and there was (and still is) little canal-like infrastructure. Indeed, the Society believes that, even if river bank commuting was feasible (and it isn’t) great caution should be exerted before any plan is put in place that will damage the unique character of the Broads. The fact that parts of the Broads system are not accessible to walkers, joggers, cyclists etc. is a large part of their attraction for both people and wild life.

Commercial traffic in the Broads has, apart from passenger vessels, all but disappeared since oil cargoes to the Cantley sugar refinery ceased to be carried by ship. Ongoing discussions to carry sugar cane to the factory by river are crucial – the Society has been closely involved in these talks, its position being that, in this instance and for many reasons, river transport is preferable to road transport.

Waterway/navigation authorities are not able to force people to holiday in the UK: only the market (or draconian legislation) can do so.

The Society agrees with investigation of certain renewable energy sources (and finds the hydropower idea interesting but would like to see results published with a full cost/benefit analysis) and reminds DEFRA that the Society’s policy for the Broads is to object to planning applications for wind turbines that are within the Broads Authority’s executive area or are visible from it (turbines 400ft high are visible for miles in our “flat” landscape).

4.8

The Society has been involved with the promotion of electric boating. Quietness is a virtue but problems remain: the lack of a full charging point infrastructure, low power (for negotiating our “inland sea”, Breydon Water) the efficiency of electricity generation/transfer/storage and battery waste disposal.

The Society urges DEFRA and the Broads Authority to look hard at the idea of electric/diesel installations: these will meet the need for higher power outputs (Breydon Water) and provide silent power whilst cruising less tidal waters and when moored (too many loud diesel engines are run at night).

The recent change to the pricing structure of marine diesel has removed the price advantage of such engines. Modern petrol units are nearly as economical as diesel ones. The Society suggests that DEFRA might research the beneficial use of petrol engines in inland boats: they should (now) be similarly economical, much quieter and far less polluting than diesel engines (petrol, when spilled on water, evaporates, whereas diesel does not).

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4.9

The Society calculates that the impact of a waterway/navigation authority's carbon footprint is so small relative to other carbon uses, as to be negligible thus any additional cost burden is intolerable.

4.10

The Society reminds DEFRA that CO₂ makes up c.0.038% of the atmosphere and man's contribution is a tiny fraction of that and that by far the biggest greenhouse gas is water vapour whilst the most potent is methane. Should Broadland grazing marshes become devoid of methane producing cattle? We think not!

4.11

Point one – this is already being done.

Point two – this statement is hopelessly inaccurate. Worse still, it shows the gross lack of understanding of climate science in government circles. The “urban heat island effect” is **caused** by man's living in large conglomerations where his use of all types of fuel creates a local warming. It is **not caused** by climate change (although poor use of temperature data by some “scientists” has given rise to the, misinformed, corollary – that global warming is caused solely by man).

4.12

Again, none of this is proven, is not relevant to waterways/navigation authorities and is an unwarranted additional financial burden. What is described may be attributable to weather not climate.

4.13

It is not clear how authorities can mitigate the effects (at 4.12) or what individual boaters can do. The paper is valueless for not giving suggestions.

4.14

Again, cost implications are devolved (abrogated?) to authorities from central government thus diluting their ability to fulfil their primary duties. The results will be immeasurable and have no discernible global impact.

Section 5 – The Natural Environment

Oddly, there appear to be no questions at the end of this section.

The Society's observations on the text are as follows:-

The Broads Authority is already charged with the statutory purpose of conserving the Broads, a task that, on the whole, it has carried out well. The Broads is a relatively compact area in which a variety of intensive and often competing usages occur sometimes resulting in conflict and the need for difficult decisions and processes. To help mitigate such conflicts (5.4) the Broads Authority has set up groups to help manage conflict – e.g. the Upper Thurne Working Group, where all parties try to co-operate, usually successfully.

5.13

Dredging is **always** an essential activity especially in slow running rivers and lakes (broads). The Society wholeheartedly agrees that dredging also has a beneficial effect upon ecosystems. In fact, without dredging some believe that the Broads would already have quickly become a stinking swamp.

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5.15

The Society does not agree that “waterway corridors” will in any way better assist migration of species however it wholeheartedly agrees that the introduction of non native species is damaging to the ecosystems in which they exist and that some species may even damage river banks.

The Society welcomes all attempts to deal with the invasive species problem (including shellfish and flora) and believes that central government funding should be made available to the relevant authorities.

The Society believes that migration of species is not dependent on climate change alone.\

5.22

There is no proof that climate change will put pressure on water supplies, in fact, some believe the opposite will be true: the science is not settled and the outcome of continued warming is not clear.

The paper does not address a significant problem: population explosion. In some rural areas, e.g. Norfolk, government policy is to massively increase the population by creation of whole new communities. These communities (some ironically labelled “Eco-Towns”) will cause an additional burden on already scarce resources including water supplies. The Society is concerned that aquifers will be insufficient to provide the new demands thus river water abstraction will be requested: ***the Society will oppose all such applications.***

The Society can find no published evidence (apart from ***building*** cooling by heat exchangers, which is different) to support the notion of “city cooling” by inland river/canal systems, indeed, simple calculations show that far greater expanses of water are required to absorb excess heat. If such claims are made, the Society suggests greater clarity and that references are given.

Q7

Yes.

However, the Society believes that it may not always be wise to open up every inch of a navigation to all conceivable users lest the special qualities that exist be lost. Particular examples occur on the Broads system where rural informal moorings are favoured by many for their remoteness, quietness and closeness to nature and wildlife: hordes of ramblers and mountain (sic) bikers will destroy the value of these places in an instant.

The Society is concerned that the historic value of vessels is not mentioned in this section. There are many Broadland craft that are unique to the area from “One Design” racing dinghies (and other sailing vessels) to the familiar cruising cabin yachts of the River Cruiser Class and the vintage wooden motor boats that were specifically built for the Broadland river system. Perhaps most iconic are the unique wherries some of the last few of which are desperately in need of maintenance bordering on restoration. **See Q9**

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Q8

So far as the Broads are concerned, the Society does not see this as a primary goal of the Authority (those are stated in legislation) but due care should be taken where the Authority is the relevant planning authority that the necessary local knowledge of place & heritage is available when considering planning applications. There are examples where this appears not to have been the case in the Broads.

See Q7.

Q9

In the Broads, the Society believes that these are the three most important areas of concern:-

The traditional Broadland scene is conjured by images of windpumps (often wrongly described as windmills) and wherries (a traditional Broads sailing vessel) under Broadland's vast skies.

Over the years the windpumps have fallen first into disuse and then disrepair. The Broads Authority has been working to good effect in creating training schemes for millwrights and overseeing restorations, most of which are in private hands. It would be good to see greater grant funding for such schemes so that the traditional Broadland vistas remain in place for generations.

The traditional Broads sailing cargo vessel is the wherry, itself derived from the (often, larger) keel boat. Once, goods of all kinds were moved to and from Broads villages by wherry but the trade has disappeared so that today few such vessels remain, the majority having been burned or sunk. Those that remain ply the holiday passenger market to maintain their existence but revenues hardly match maintenance costs. One businessman currently has all of his craft laid up. The Society believes that DEFRA should consider substantial grant funding from central government to keep these precious, unique and iconic vessels sailing as they are every bit as important to our national heritage as canal-side architecture. Examples: Norfolk Wherry Trust and Wherry Yacht Charter Trust.

A distinct feature of Broadland is the "big sky" depicted by so many artists – the wide open vistas are famous – and enjoyed by all who live in, or visit, the Broads. That these vistas can also be appreciated from the river system is partly the creation of the wherry men of old who cleared scrub from the riverbanks to aid wind and therefore the passage of their boats - Broadland is as much an industrial landscape as the canals. Since the demise of the wherry trade, the scrub has hardly been touched and is heavily encroaching into navigable channels. In places river width is severely constricted and banks have eroded as tree cover causes reed margin dieback. The Society has launched a project to address some of these issues. We are supported by the Broads Authority, Natural England, the Environment Agency, wildlife groups and riparian owners: *we invite support and funding from DEFRA for this Habitat Restoration initiative.*

Of course, the wider implications of "heritage" might include the ability to navigate and if so, dredging must rank as the most important of all.

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Q10

Yes.

These facilities are available to all who wish to use them. The Society suggests that restoration of defunct navigations (there are three in the Broads: the North Walsham and Dilham Canal, the upper Bure from Coltishall to Aylsham and the Bungay navigation on the Waveney) should be a high priority for waterways/navigation authorities.

One facility in danger of further loss to the navigation in Broadland is the historic "staithe", a mooring quay usually located in a village and created at the time of the Enclosure Acts for the common good. Many have been lost or sequestered, illegally, by private persons.

The Society believes that all public staithe should be restored for enjoyment by the public.

The Broads are host to many water borne activities from wild life organisations to yacht clubs, private boating and boat hire businesses. Sport is catered for in many ways including sailing, wind surfing, rowing and angling. There are, at least, two organisations meeting the needs of the disadvantaged. Both the Society and the Broads Authority support these facilities and other waterways may be able to learn from the Broads experience.

Support for most of these sporting organisations is mainly voluntary; the Society suggests that financial support could be addressed by grant funding and concessions on e.g. business rates.

7.10

The Society's opinion is that provision of services should be colour blind thus it questions their provision on the basis of ethnicity which some would consider patronising. If female, ethnic, folk do not wish to go fishing, surely that is their choice?

Q11

Without introducing a plethora of signposts (the Broads already have too many) the Society suggests better information on location and availability of services. The Internet should be better utilised.

The Broads have many footpaths and there are plans to open up more with Society members being involved in at least one of these. The Society welcomes the opening up of such footpaths provided "quiet places" do not become overrun and we emphasise that our support is for walking not cycling (the proposed Three Rivers Way excepted) on riverside footpaths.

Q12

Whilst this seems not only feasible but desirable in many canal navigations, the Broads do not lend themselves to this approach with one or two exceptions. The Broads is not a large commuter area – it is largely rural. Many jobs are local and walkable already. The big business centre, Norwich, is not easily accessible by riverbank pathways due to a variety of obstacles.

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Q13

Nothing easy can be done.

Market forces (or, possibly, government legislation – the worst of all options) will dictate the most efficient business outcomes. Commercial traffic in the Broads ceased some time ago with the withdrawal of the regular bunkering (oil) service to the Cantley sugar refinery. Both the Society and the Broads Authority have been at pains to point out to British Sugar that their plans for importation of raw sugar cane to Cantley via Great Yarmouth should include transportation by river rather than road. This solution eliminates heavy truck traffic through rural areas and a congested town (Gt. Yarmouth), stops greater road wear, removes blight on local residents and is likely to be a more economical answer.

8.3

In view of recent events the source (ref. 41) is questionable.

8.11

In the case of Cantley (above) the Society has urged just that so we are in strong agreement.

Q14

Whilst not perfect, significant progress can be made by setting up joint panels. The Broads Authority has lead the way by introducing:-

- * the Broads Forum
- * the Broads Tourism Forum
- * the Upper Thurne Working Group

the last, especially, is comprised of many disparate interests working together in common purpose – the good of this most precious part of the Broads.

Some question the efficacy of such panels but that is a function of how they are managed and their ability to determine Authority policy rather than their existence. Ultimately, decisions have to be made and it is important that the Authority clearly demonstrates that due process has been followed and with what outcomes.

Churchill said “jaw, jaw is better than war, war” and we agree.

Q15

Nothing (we assume that properly maintaining the navigation, including dredging and ensuring that moorings are not lost to flood or other works is a given).

The market will decide which services the citizenry chooses to use: make the services or goods too expensive (or shoddy) and people won't buy, reduce costs (and improve them) and they might. The Society does not believe that it is a purpose of a waterway/ navigation authority to attempt to manipulate the market (once services have been made available, at reasonable cost and well publicised).

In fact, there is a downside to growth: at some point, the raison d'être of a location is lost because of crowding. The Broads in the 70s is a good example.

Higher boat numbers may not be a worthwhile target, especially in the Broads. In fact, the increase in fuel, toll, berthing, insurance and other costs may drive boat numbers down (Broadland yacht registrations are already falling alarmingly) and within limits the Society would not be averse to this on conservation and “quality of (visitor) experience” grounds.

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Q16

Marketing publicity and focussed advertising.

In addition, the Society has been concerned for some time about poor services: recently a local district council tried to close all Broads public lavatories within its area, of which there are several – one can imagine the outcry.

The Society is also concerned about parts of the local commercial infrastructure, especially pubs. The closure of Broads pubs affects the infrastructure in many ways – any assistance from a waterways/navigation authority short of buying them (for example, pressing licensing authorities for lower business rates and pub companies for reasonable rents) is welcomed.

The Society would discourage attempts to brand the area the “Broads National Park” however enticing the label, at first, appears. There are distinct problems with this name as DEFRA is only too well aware.

9.10

The Society deprecates use of the word “excluded” as it is needless, meaningless, politically correct and unhelpful jargon. *Nobody* is excluded from any part of waterways/navigation authority services by default. Everyone can participate. If some choose not to, are ignorant of the existence of a service or insufficiently wealthy to avail themselves of it (buying & maintaining a boat, for example) that is a different matter – they are NOT excluded.

Q17

Yes. In the Broads, the Society has, for many years, run winter working parties helping to clear scrub encroachment on the river bank (see above). This is done in conjunction with the Broads Authority (whose facilities are necessary and welcome) and works extremely well. The Society suggests that this venture, “Broadsword”, might usefully be taken up by other waterways and we would be happy to discuss our experience with DEFRA and all other interested parties. The Society welcomes all ideas for increasing public participation.

Q18

Local schools should be encouraged by waterways/navigation authorities to be more closely engaged with their nearby resources. Authorities should help set up projects relevant to their navigation (possibly with suitable prizes) and assist with publicity for special events and funding thereof.

The Broads Authority already organises a number of such events but will need funding to achieve more.

Q19 & 20

The Society does not believe that social inclusion and diversity amongst boaters and anglers are the prime tasks of a waterways/navigation authority.

However, the Society wishes to help those disadvantaged in any way and less able than some to enjoy the Broads. To this end it has just started to look at a project to bring a number of disparate organisations together to see if more can be achieved. We shall consult the National Community Boating Association via Waveney Stardust.

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10.1

The Society disagrees: inland waterways exist for enjoyment, possibly freight, certainly wildlife but are not a mechanism for “social cohesion”, whatever that means. Similarly, we are not certain about “community self esteem” although we agree that civic pride may be a welcome result of a well run waterway.

We, again, refer to the phrase “social exclusion” as inappropriate, politically correct, jargon.

10.14

Whilst the Society believes that it is the choice of the citizen to use, or ignore, his/her local waterway(s) we are continually amazed by the number of people, many “born and bred”, who know nothing about the Broads and, frankly, could not care less. We agree with DEFRA's research findings and welcome any attempt to find ways in which to turn this situation around although, in the end, involvement is a personal choice.

Insert after 10.17

Point 4 – The Society points out that any change in (the ill defined concept of) carbon footprint will be infinitesimal in the global scheme of things thus should be ignored on these grounds. However, the Society supports the efficient use of resources.

10.18

The Society finds the following statement of great concern:-

“...IWAC recommends that evidence is gathered to demonstrate that this form of intervention is effective and that, if the evidence is positive, the initiatives should be promoted...”

This is unacceptable in “terms of reference” because the desired outcome is predetermined.

The Society believes that the terms of reference should read:-

“...IWAC recommends that data is gathered. If analysis of this data determines that this form of intervention is effective, the initiatives may be promoted...” etc.

10.21

Has DEFRA considered that these “black and ethnic communities” may not use waterways services as a matter of choice because the services do not fit their own lifestyles and ethnic preferences? Again, the Society believes this is a patronising and invalid position.

The Society does not understand the jargon phrase “diversity agenda”.

Q21

The Society's response is strictly related to the Broads, so long as there is no question of a takeover of navigation responsibility by British Waterways or any other organisation.

Whilst welcoming the Broads Authority's greater remit over its predecessor, the Great Yarmouth Port and Haven Commissioners, the Society is concerned by the seemingly inexorable growth in staff levels at the Authority. The current economic climate is already having an impact on this growth and the Society contends that a leaner Authority, better focussed upon real outcomes and discernible actions (rather than desk based “research”, consultant “studies” etc.) than hitherto, will be of benefit to all.

The Society believes that the Broads need to be managed in such a way as to meet fundamental statutory requirements and no more.

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Central government can help by not burdening the Authority with targets outside of its remit, scope and ability to deliver.

The Society has no political view on mutual or third sector status, it merely requires the most efficient means of management possible.

Q22

The Society believes that there is considerable scope for the Broads Authority to work in partnership with conservation organisations and recreational organisations (such as yacht and rowing clubs, training establishments etc.) and in many respects it is already doing so.

The Society believes that better use could be made of the Sustainable Development Fund.

Q23

The Society recommends that, where specific projects are initiated and measurable targets can be usefully employed (e.g. numbers of participants on training courses) then these metrics might be used, in part, to ascertain performance levels. Apart from that, it seems to us that many aspects of “performance” will remain intangible and not, necessarily, lending themselves to measurement.

The Society believes that monitoring and measurement of waterway/navigation authority performance must be wholly independent of all involved organisations and certainly not by peer review. The RYA could be the relevant provider of this service.

11.15

The Society does not believe that waterways/navigation authorities in themselves, can help economies move out of recession.

It is the job of central government to manage the economy by, for instance, easing the burden of taxation on business and providing the freedom from hindering legislation and bureaucracy that will enable businesses to flourish.

Point 1: The Society believes that this is a totally fallacious theory. No economic policy should be founded upon the assumption of the ever increasing value of residential property. This is a not only fiscally inept thinking it is also unlikely to be achievable for some considerable time.

Point 2: The Society agrees.

Point 3: The Society believes that the notion of green jobs is illusory. The U.S. is already finding that green jobs either do not exist or are extremely hard to set up (one of the Society’s Committee members is an international business consultant with first hand experience of the U.S. economy). This is dangerous territory with which the Society believes waterways authorities should not become involved.

That said, the Broads Authority and Broads boat businesses already have the perfect means of addressing low energy use recreation – sailing. From racing yachts to just “messaging about in boats”, the Broads area is, happily, well placed to benefit from “staycationing” in this respect. The Broads Authority is aware of the benefits of yachting and recognises this by reduced tolls.

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Point 4: The Society does not comprehend this point but observes that it does not believe that it is the job of the waterways/navigation authorities, or central funding, to compete with e.g. gymnasias etc.

The Society is disappointed by the muddled thinking in this section:

11.20

The Society is concerned by this section.

“Eco systems services” – what does this mean in practice? More desk based studies with absolutely no impact upon the waterways, their environment, navigability or the experience of the user?

The Society notes that DEFRA cites the ‘apparent’ lack of usable data and points out that with respect to the Broads that this is simply untrue. The Broads have been researched and documented for many years and in many ways:-

- a) The Broads Authority (and before it, “the Commissioners”) holds data on boat registrations by year and type of vessel.
- b) Many books have been written about the Broads; for example, the history and environmental knowledge of the Broads is unsurpassed amongst UK waterways.
- c) *The Society recommends for further reading “The Land Use, Ecology and Conservation of Broadland” by Dr. Martin George OBE (a past Society Chairman, widely acknowledged as an international authority on wetland environmental issues).*