

The Broads Society response to the DEFRA Consultation on Governance of National Parks

February 1st 2011

Dear Protected Landscape Team,

The Broads Society is a Registered Charity concerned with the well-being, protection and enhancement of all aspects of the Broads. The Society has been in existence for over fifty years and has a proud record including a key role in the original establishment of the Broads Authority.

Although the Broads is a member of the National Park Family it is not a National Park for very good reasons which were recognised by the different legislation on which it stands. It follows that the governance of the Broads does not always fit easily within a policy regime in which sometimes it seems that the consideration of the optimising of governance is dominated by the much larger National Parks and the Broads seems to be tagged on as an afterthought. It is to this aspect of the consultation that the Society principally responds.

The principal difference of course is that uniquely the Broads Authority has the additional purpose of protection of the interests of navigation. These are (or should be) financed by the entirety of Tolls paid to the Authority by boat owners of all kinds. This provides almost half the income of the Authority. The perceived clash between navigation and conservation is a constant problem and is a source of local and wider conflicts and suspicion. In this respect the governance of the Broads is quite distinct from that of the National Parks proper.

A second major difference lies in the relatively tiny envelope defining the Broads Authority Executive Area, which makes the Planning function a very different proposition from the other Authorities.

For these reasons the Society believes that the governance of the Broads calls for special consideration.

The Broads does share the problem facing all the National Parks, which is the tension between the governance of a national treasure with the need to respect the needs and aspirations of local people.

In addition to the common mix of Local Authority; National and Parish membership the Broads Authority also has to take account of the need for representation of the interests of the people who provide a substantial portion of the Authority income as well as an appreciable input into the economy of Broadland – the several navigation interests.

The Society does not advocate any change in the number of Authority members.

However, on the principle of "No taxation without representation" it can surely be argued that the interests of the navigability of Broads waters (which include many businesses as well as boat users) are not adequately covered in the present breakdown of representation. The health of the Navigation aspect of the Broads goes far beyond boaters. There are many and diverse businesses whose income depends on it and indeed the rivers are the essential drainage system of a large part of North Norfolk. The efficacy of this drainage system depends on the dredging of the rivers. The Society advocates that at least three of the non-Navigation Committee appointed members should have some direct interest in these vital concerns. This should be a criterion for the Secretary of State in the selection of Members.

It could equally well be argued that the appointments of the Secretary of State should be made from those many people, local and otherwise, who have an interest in and knowledge of the Broads as well as any other special interests for which they stand. Presently there are some who do not seem to have either and some who reportedly attend meetings of the Authority only spasmodically. This is not an argument for changing the number; it is an argument for being more selective in making appointments and for replacing those who have poor attendance records. The presence of members with poor basic knowledge (and who indeed might not be present at meetings) leads to the unsatisfactory situation in which the Executive is encouraged actually to drive the policies and is able to do so. Conversations with the other Park support bodies confirm that this is not unusual.

Because of the sinuous nature of the Broads Executive Area (which is determined by the course of the rivers) and the fact that the rivers are more often than not de facto Parish boundaries the question of Parish representation is not the same as those Parks whose size and topography can contain whole Parishes. There is a large number of Parishes contiguous with the Area. The understandable wish to have Parish representation is unworkable in practice.

It has been suggested by one member of the Society that there would be considerable merit in making the post of an Authority member to be that of a Trustee, whose responsibilities and behaviour would be constrained by this fact. These Trustees would be democratically elected. This notion is being discussed and refined at present and might well be advocated in Parliament.

The governance process of the Broads Authority is itself lop-sided in that there is a Sub-Committee which deals with the single aspect of Navigation, but no balancing body for conservation interests. This inevitably leads to the perception that the Authority itself is a conservation body which is saddled with a rather troublesome minority interest. The Society is of the opinion that there should also be a Conservation Committee, with a neutrally balanced Authority sitting above both.

The Society is grateful for the opportunity of making our comments known and we hope our views will be of interest.

Yours sincerely

Peter Horsefield,
Chairman.