

Since the Hobhouse Report in 1949 it has always been accepted that the Broads need a bespoke solution for the protection of the unique landscape. We believe this should continue. To adopt exactly the same statutory framework as other protected landscapes would inevitably cause problems.

The Broads Society – Friends of the Broads, was instrumental in the creation of the Broads Authority. We always participate in its public consultations and we see ourselves as a “critical friend.” We do not represent a particular group of users. We are a charity.

We have seen the draft of the Broads Authority’s response. Their concrete proposals are:

- A greater role in the local economy.
- Enlarging its area.
- Abolishing the “local” Membership of the Authority.
- Replacing all the Members with a structure similar to Scottish Canals, i.e. a Board of five, including Chair and CEO, all appointed by the Minister
- Absorbing the statutory purpose of protecting the navigation into recreation.
- Reducing budgetary and auditing restraints.
- Reducing restraints on operations eg. regarding waste disposal.

The management of the Broads is different from the English National Parks because:

- Over half its income comes from navigation tolls, which are supposed to be ring-fenced for navigation expenditure.
- There is an extra statutory purpose of “protecting the navigation”.
- Instead of a duty to “foster” the local economy, balanced by the Sandford Principle. the Broads Authority should merely, “have regard” to it, without the balance of S 62(2) Environment Act 1995. We do not have the Sandford Principle.
- Local Members are not appointed from Parish Councils, because none are enclosed by the Executive Area, but instead all are appointed from higher tier local authorities by the political parties in power. Knowledge of the Broads is far from automatic.
- There is a separate Navigation Committee whose role is only advisory.

We believe the primary aim of a Broads Authority must be toward conservation, rather than development. Waterfront property is in very short supply and highly sought after. An ambition to encourage “sustainable development”, as in the Scottish Parks, does not sit well in the small landscape of the Broads, most of which is water. The other substantive proposals of the Broads Authority, outlined above, all have the same tendency to weaken governance.

Whilst enlarging the Executive Area would provide a larger potential electorate,

that still would not get around the problem of a lack of representation for those who actually pay tolls for the upkeep of the Broads, many of whom live elsewhere. Also, elections are expensive. We agree the management structure needs modernising to provide Members having the right skill sets, but not with making it even more undemocratic and unaccountable than it already is.

A robust means of holding the Authority to account is required. The present position of having no one with the *Locus Standi* to do this is a very serious handicap. The recommendation of the Campaign for National Parks, in their reply to question 16 for, "a body with a clear remit", is strongly supported by us.