



# NORFOLK & SUFFOLK BOATING ASSOCIATION

President: R I Card      Chairman: B E Wilkins  
www.thegreenbook.org.uk

7 April 2016

Ms M Conti  
Yare House  
62-64 Thorpe Road  
NORWICH  
NR1 1RY

Dear Ms Conti

## **Consultation First Draft of the Broads Plan 2017**

The NSBA is grateful for an opportunity to comment on the Consultation First Draft of the Broads Plan 2017.

The NSBA regrets that, yet again, the Broads Authority appears to be producing a 'Plan' that is no such thing. The document presented for consultation is really a list of aspirations. A Plan would identify activities to be undertaken, the timescales for completion, metrics to allow progress to be measured and completions to be identified, clear indications of responsibilities between partners for management and resource contributions and budgets.

NSBA is particularly disappointed that the document as presented deals with the Broads Navigation in such a limited fashion. The Navigation gets scant attention. Certainly not enough attention to reflect the facts that 'protecting the interests of Navigation represents one third of the Authority's statutory purpose and that 49% of the Authority's 2016/17 income is provided by toll payers using the Navigation.

NSBA would have preferred to see clear measurable targets for a year on year improvement in:

- The proportion of the Navigation meeting the waterway specification in terms of depth and width;
- The length of riverbank and broad edge which is protected by piling/quay heading or has sustainable reeded margins which are not being shaded out by tree and shrub growth;
- The number and condition of mooring places (by whatever means of provision);
- Visitor numbers and income/expenditure at Yacht Stations.

Looking in detail at the document we have the following comments:

## **Long Term Vision**

Ms Julia Bower, 43 Pembroke Road NORWICH NR2 3HD  
Tel: 01603 623372 e-mail: julia.bower1@btinternet.com

Page 13: We welcome the inclusion in the Vision for the Broads of an aspiration to enhance the waterways.

### **Long Term Aims to 2030**

Page 14: We welcome the abandonment of the long term aim to promote primary legislation to make the Broads a National Park

Page 15: Under Management of the Navigation Area we would have liked to see recognition of the importance of maintaining and improving navigation infrastructure in the form of moorings, signage, supplies of fuel and water, pump out facilities, etc. We would also like to see recognition of the fact that there are existing water spaces which are not currently available for recreation purposes or for full navigation and a consequent aspiration to provide access to these spaces.

### **Conserving priority habitats and species**

Page 23: We note that 2.1 refers to the enhancement of water bodies and suggest that the corresponding entry under 'Uses' should equally refer to the enhancement of navigation channels and not just to 'maintaining' them.

### **Maintaining the navigation**

We believe that it would be more appropriate to extend this title so that it reads 'Maintaining, enhancing and extending the navigation'.

Page 25: We note that 2.4.1 refers to the identification of potential/opportunistic areas for habitat improvement and we contrast this with the failure to display any equivalent aspirations for seizing opportunities to improve and enhance the navigation and its accompanying infrastructure. We suspect that this lack of emphasis lies behind the Authority's recent failures to exploit planning applications in respect of Hoveton Great Broad and Upton Dyke for the benefit of the navigation. Aspiration 4 is far too narrow in its vision: we would add other aspects (see below).

Page 26: We believe that the statistics quoted in the first bullet point paragraph should also analyse the extent to which the rivers and water bodies referred to are open to navigation or closed off. The plan should clearly identify an ambition to increase the extent of public navigation on the Broads together with indication of how this is to be achieved. We suggest that an additional guidance point 4.3 is included: that there should be more opening up of water spaces currently non-navigable from the existing waterways.

The second bullet point paragraph should identify the need to restore reed fringed edges to the rivers and broads in order to absorb wave energy and reduce bank erosion. This will only be done by clearing encroaching tree and shrub growth which shades out the reeds. It will also have a landscape benefit – giving more opportunity to enjoy open vistas and broad skies. We suggest that an additional guidance point 4.4 is added to reflect the fact that useful water space depends on appropriate management of bankside vegetation.

Page 26/27: Guidance 4.2 should include reference to the agreed waterways specification and demonstrate a clear commitment to increasing the extent to which the navigation meets that specification. We also consider the volume of 50,000 m<sup>3</sup> to be below the amount achievable with the Authority's current resource and would welcome an aspiration to improve productivity and effectiveness.

### **Conserving local landscape character**

Page 28: We would like to see a reference to the heritage embodied in the local boating scene and suggest an additional bullet point along the following lines:

'The boating heritage of the Broads is not just about the numbers of boats, it is far more than that – the variety of boat designs, ages, construction, not to mention skill level, is rich and diverse. Visitors to the Broads will encounter up close Yare and Bure One Designs ('White Boats'), Broads One Designs ('Brown Boats'), period launches and day boats some propelled by steam, the Broads River cruisers, (a type of yacht complying with local rules making them unique to the Broads), 'Norfolks' (varnished wooden dinghies), the racing derivatives of the traditional Norfolk punt, dozens of types of nationally and internationally recognised racing/sailing dinghy, and last but not least albeit in much smaller numbers, the restored and maintained traditional trading wherries and leisure wherries. Many of the craft in this list are of wooden construction, a proportion are pre-war or even over 100 years old, and all require significant investment of skilled maintenance and periodic restoration by their owners and local specialist boatyards. This rich variety of boating heritage is probably unrivalled anywhere in the world. An indication of the commitment of local people to heritage boats and boating on the Broads is that there are over 50 voluntarily run clubs and classes affiliated to the Norfolk and Suffolk Boating Association. Additionally, local clubs produce national and international champions from time to time, whose fame and notoriety filters back to the 'grass roots' to enthuse and encourage younger members.'

Page 28/29: If section 5.1 is aiming at 'Enhanced distinctive landscape character and historic environment, valued and maintained for future generations', then it, too, needs to contain a reference to the need to combat invasive tree and shrub growth on the margins of the waterbodies.

### **Providing distinctive recreational experience**

Page 35: We note the comment that angling is a major contributor to the local economy but we are also aware that, despite the Authority's strategy of provision of facilities for anglers, they make no direct contribution to the Authority's budget. We can't help feeling that the Authority should be seeking to address this and find ways to enable the anglers to contribute to the cost of maintaining and enhancing the Broads.

Individual boat owners appreciate the ability to cruise throughout the different stretches of the navigation. The opportunity to do so brings a substantial number of boat owners from around the country. Some 66% of the NSBA individual membership is drawn from outside the Norfolk and Suffolk postcodes contributing to the local economy but requiring local infrastructure along the navigation.

There should continue to be an aspiration to provide locations at bridges where motor boats can lower their windscreens and yachts lower their masts. This is a vital part of the infrastructure needed for safe passage on the navigation.

Page 36: We welcome the intentions to 'Review water space access, including broads, and identify and develop potential to extend access for various types of craft' and to 'Create a range of new moorings/stopping places (including wild/quiet moorings) in priority locations and maintain the existing network' but feel that these aspirations should receive greater prominence and should certainly be referred to under 'Maintaining the Navigation'.

### **Promoting understanding**

Page 38: We believe the third bullet point paragraph needs rewording in the interests of accuracy and should read as follows (changes in italics):

While the Broads may mean different things to different people, a unifying brand and key messages can help create an overall feeling about the area that captures its essence, places the area in peoples' minds and makes them want to be part of it and care for it. Information and interpretation needs to provide consistent and coordinated messages that help to strengthen visitor understanding, awareness and enjoyment of the area, both before and during their visit. The Broads has equivalent status to ~~a~~ *the National Parks under which were designated under* the National Parks and Access to the Countryside Act 1949 but, in addition to the ~~other~~ English and Welsh National Parks' two purposes of conservation and promoting enjoyment, the Broads Authority has a third purpose of protecting the interests of navigation. As such it is defined under a different Act of Parliament to the ~~other~~ *National Parks* and has been known as a 'member of the National Park family'. In 2015, the Broads Authority voted to brand the area as the 'Broads National Park' for marketing related purposes to promote more clearly its National Park credentials and special qualities. That decision is currently under legal challenge. For the purposes of the Broads Plan review process, we are using the branding pending the outcome of the judicial review.

Yours sincerely

*Brian Wilkins*

B E Wilkins  
Chairman