



NORFOLK & SUFFOLK BOATING ASSOCIATION

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

30 December 2016

Ms M Conti
Yare House
62-64 Thorpe Road
NORWICH
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Dear Ms Conti

NSBA Response to Second Draft Broads Plan 2017

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

We are grateful to the Authority for taking account of some of the comments we made in response to the first draft Broads Plan 2017.

We welcome the inclusion of clearer and better defined Indicators against the Strategic Actions. However, in many places these are cross references to other documents. To be useful and accessible to all, the Broads Plan should, as far as possible, be a complete document in itself and the measures to be used to judge outcomes should be clear to the reader, not dependent on a search through a large number of related documents. Similarly, Indicators expressed in terms of "agreed criteria" or "agreed targets" are imprecise and liable to redefinition.

Our further comments are listed below:

Page	Para	Comment
8	5	In the interest of accuracy, we feel that "The Broads has equivalent status to a National Park under the National Parks and Access to the Countryside Act 1949." should read "The Broads has similar status to that enjoyed by a National Park designated under the National Parks and Access to the Countryside Act 1949."
12	4	We welcome the vision "Local communities are taking an active part in decisions about their future...". In order for this to happen we believe that changes will be required in the composition and constitution of the Authority. We note and regret that no actions to give effect to this are listed in the Plan.
13	3)	Similarly, we welcome the stated intention to "Involve people from an early stage, and throughout, in making decisions that affect them."

25	3.1	We recommend that the Indicator used to measure progress against the annual dredging programme should be the proportion of the waterway that meets the defined waterways specification, not the volume of sediment removed. It is important that the right sediment is removed and that is not assessed purely by the volume extracted.
26	3.2 second para	We would hope that the Key Project on the Chet would have had some concrete achievement by the end of the plan period – not just have a feasibility study / work plan in place.
26	3.2 third para	We recommend that the indicator for identification of dredging disposal sites should be the total available capacity in m ³ together with the number of available disposal sites.
26	4.1 first para	We suggest that “opportunities taken to negotiate” would be better phrased as “opportunities created to negotiate”.
28	bullet 2	Reference is made to the need for ongoing support to preserve, restore and use historic Broads craft but we can see no specific actions identified within the detail of the Plan. Indeed, the recently announced swingeing tolls increases for certain historic craft runs counter to this objective.
37	bullet 4	We commented on this section in the previous draft but our comment was misreported. We believe that, in the interests of accuracy, this bullet should read “The Broads has similar status to a National Park designated under the National Parks and Access to the Countryside Act 1949 but, in addition to the 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 was established under a different Act of Parliament to the 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 purposes.”
38	8.2	We note with some concern that the “Result” listed under 9.1.2 in the first draft of the Plan (viz: “Yacht Stations maintained at Great Yarmouth and Norwich.”) does not appear in the revised draft. We believe that the Plan should state a clear intention of maintaining the Yacht Stations and their associated facilities at Great Yarmouth, Norwich, Beccles and Oulton Broad. Similarly the Ranger presence at Reedham Quay should be maintained.

We hope this is useful and, as always, we are happy to assist the Authority deliver its objectives for the benefit of our members.

Yours sincerely

Brian Wilkins

Brian Wilkins
Chairman