

**National Parks Review**  
Report by Chief Executive

<b>Purpose:</b>	This report updates Members on the work of the Chairs' Group in compiling a response to the National Park Review.
<b>Recommendation:</b>	The Chief Executive, in consultation with the Chairs' Group, further refines the draft response to the National Park Review contained in Appendix 1 taking into account comments from all Members and submits it to Defra as the Authority's response.

- 1.1 At the last meeting of the Authority Members unanimously resolved:
  - (i) That the Chairs' Group together with the Chief Executive consider and provide a robust response for submission to the Review Team based on the eight areas required of the team and guidance from Members as indicated.
  - (ii) That a report be brought back to the Authority for consideration in November.
- 1.2 Two meetings of the Chairs' Group have been held to discuss the response the National Park Review and Appendix 1 contains the current version of a draft response.
- 1.3 Members are invited to discuss the draft response and identify any additional points for inclusion in the Authority's response. A further meeting of the Chairs' Group has been arranged for further discussion and refining the document.

Background papers: None  
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Date of report: 12 November 2018

Broads Plan Objectives: Multiple  
Appendices: Draft response to the National Parks Review

## **The Future of England's National Parks: Questions from a Broads National Park perspective**

The Broads National Park, located in one of England's fastest growing regions, is an internationally important wetland which contains 25% of Britain's rarest species as well as being a major tourist destination for more than 7 million visitors a year. The catastrophic decline of the Broads ecosystem during the 1960s and 1970s was halted and reversed following establishment of the Broads Authority in 1979 with its commitment to sustainable, integrated management for both people and wildlife. The Broads, of all the UK National Parks, is arguably the most vulnerable to impacts of climate change and sea level rise, given it is an easterly, low-lying freshwater wetland predominantly within a floodplain. Other key threats to the integrity of the Park include changes to agri-environment schemes following Brexit, food and energy policy, and growing demands for housing and infrastructure in the East of England.

The Broads National Park is not well known locally or nationally despite its very special qualities and international significance. Progress is being made by the National Park Authorities on branding and communications, but it is clear that the majority of people living in the UK's towns and cities use the Parks infrequently. At the same time, membership of NPA Boards, including the Broads Authority, does not reflect the wider society in terms of gender, age or ethnic background.

Following discussion by the Authority's Chairs' Group, the Board, subject to confirmation in November, considers three of the Review Team's agenda questions to be of fundamental importance for the future of the Broads:

1. Are the purposes/functions and powers of the National Parks Authorities fit for the future?
2. Are the boundaries of the National Parks fit for the future?
3. Is the governance structure of the National Parks fit for the future?

### **1. Are the purposes/functions and powers of the National Parks Authorities fit for the future?**

(a) Comment: National Parks are living landscapes that include towns, villages and hamlets and sizeable populations, yet the social and economic welfare of the local population within the Parks is excluded in the English National Park purposes and considered only as a 'duty to have regard'. The branding project for the UK's National Parks is suggesting that "UK's National Parks are the most extraordinary landscapes, among the best in the world and that we should inspire everyone to care for them and then the Parks will be in the best shape to inspire more care ... a virtuous circle."

For consideration: Whether the English NPs should have an overriding principle of sustainable development (as for the Welsh National Parks), and a fourth duty regarding the social and economic well-being of those who live or work in the Park (as for the Scottish National Parks). Equally fundamentally, following the UK branding ideas, whether the first two purposes should be recast to create a clear synergy in the public consciousness between conserving and enhancing on the one hand, and promoting understanding and enjoyment on the other.

(b) Comment: The Broads Authority is a navigation and harbour authority with responsibility for maintaining and improving the waterways under Section 10 of the Broads Act. Its third purpose is to manage the Broads for the purpose of 'protecting the interests of navigation'. This purpose was considered essential and appropriate in an era now long gone when coasters brought their commercial cargoes up into Norwich, but the city is no longer a port and now the primary use of the waterways is recreational boating. This could be seen as falling primarily under the second purpose and it may be appropriate to review the wording of the purposes and consider whether the duty to maintain the navigation area should be given greater prominence.

For consideration: Whether to review the Authority's responsibilities in relation to the recreational use of the waterways, protecting the interests of navigation and maintaining the navigation area in a way so the wording of the purposes better serves the modern use of the waterways and interests of all those with a stake in the Broads.

(c) Comment: The Broads Authority would like to see some practical bureaucratic obstacles to its maintenance of the waterways addressed. A major example is that silt dredged from the rivers and broads is treated as a waste product and is, therefore, subject to Waste Regulations. This means many consents are required for the Authority to fulfil its statutory duties.

*For consideration: Whether the regulations governing the Authority's statutory duty to maintain the navigation area can be simplified to reduce cost and bureaucracy, for example removing the requirement that silt excavated from the Broads waterways should be treated as a waste product and be subject to the Waste Regulations.*

(d) Comment: In the NP National Awareness Survey (August 2018), members of the public ranked protection of nature, habitats and species as the most important responsibility of the NPs. However, the Parks were designated for their natural beauty, not their abundance of wildlife. Treated separately in the 1949 Act, the Review presents an opportunity to join up landscape and wildlife protection. In the Broads, wildlife and the natural environment face severe threats. One of the greatest concerns is the uncertainty surrounding the future of agri-environment payments to farmers. Agriculture and land management are critical to the health of ecosystems, not least through application of nutrients, management of run-off or the availability and use of water. These issues need to be dealt with more holistically than they have been, and more integrated management of land and water within each National Park is essential.

*For consideration: Whether the role of National Park Authorities could be strengthened with regard to the protection and enhancement of wildlife. This could be done through transferring to NPAs the responsibility and the necessary resources for overseeing the condition of National Nature Reserves and Sites of Special Scientific Interest within the Park boundaries, together with giving the NPAs a more defined role in supporting environmentally friendly agricultural practices. This would need a national approach to avoid fragmentation.*

## **2. Are the boundaries of the National Parks fit for the future?**

(a) Comment: Each National Park Authority will have detailed knowledge to be able to respond to this question. In our case, the boundary of the Broads Executive Area is drawn tightly around the floodplains and lower reaches of its 7 rivers. Having a boundary which follows a hydrological rather than a geo-political rationale causes difficulties for us. Our boundary is not coterminous with any other administrative entity or jurisdiction. **Parts** of 93 parishes fall within the Broads Executive Area and no parish is fully within the Park. The boundary divides settlements such as Horning, where only one side of the village's main street is in the Broads. This creates significant problems in terms of Broads Authority/district council planning boundaries and responsibilities. The small settlement of Wroxham/Hoveton, straddling the River Bure and regarded as a centre of the Broads tourism industry, is served by *three* local planning authorities. The difficulties of engaging with local communities and applying planning policies effectively are obvious. Similarly, individual farm holdings are frequently bisected, creating a situation where the prime agricultural land on the valley sides, which has a hydrological relationship with the adjacent grazing marshes, is outside the National Park.

*For consideration: That to improve engagement with the farming/landowning community and wider population, the boundaries of the Broads National Park should be reviewed to include whole parishes and where possible complete landholdings.*

## **3. Is the governance structure of the National Parks fit for the future?**

(a) Comment: NPAs have evolved from local authorities and their composition and operation have inherited many local authority characteristics, including disproportionately large boards, an appointment process that does not deliver diverse Boards with the range of skills required, and excessively onerous, complex budgetary and auditing requirements. Local authorities used to make direct contributions to the Broads Authority budget but these contributions were replaced by direct grant aid from Defra. The relationship with local authorities and the local authority mode of operation may no longer be appropriate.

*For consideration: Whether there should be a fundamental review of the governance structure and financial and audit requirements of the National Park Authorities. This could refer to the experience in Scotland regarding direct elections, different governance models such as that of Scottish Canals, and the duty to cooperate.*

(b) Comment: The English National Park Authorities appear to have a less effective relationship with central Government than do the National Park Authorities in Wales and Scotland which may largely be a matter of scale. However, this could be seen as a missed opportunity for the English National Park Authorities to help Government formulate and deliver appropriate policies for the management of the Parks.

*For consideration: Whether there should be a closer relationship between English National Parks and central Government, to enable the National Park Authorities to play a bigger part in delivering the Government's agenda.*