

Response ID ANON-MW92-FHTF-Q

Submitted to **Landscapes Review: Call for Evidence**

Submitted on **2018-12-18 08:20:52**

About you

1 Are you replying as a member of the public or on behalf of an organisation?

Organisation

2 If you are replying as a member of the public

What is your name?:

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.:

3 If you are replying on behalf of an organisation or organisations

Which organisation(s)?:

I am replying on behalf of the Norfolk and Suffolk Boating Association. The Norfolk & Suffolk Boating Association has around 1000 individual members and over 50 affiliated organizations, themselves representing many thousands of boat owners in the area. There are about 11,000 privately owned boats on the Broads, based on numbers tolled annually. The NSBA has been representing the interests of private boat owners since its foundation in 1894.

What is your name and position?:

Brian Wilkins. I am chairman of the Norfolk and Suffolk Boating Association.

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.:

wilkins@paston.co.uk

4 We would like to be able to use extracts from submissions in our final report. If you would not like them, potentially, to be made public, please tell us here.

Yes, I am content for you to use extracts of my response in the final report

5 We have obligations under freedom of information laws and there is more information below. For the purposes of these laws, would you like your response to be confidential?

No

If you have answered yes, please give your reason:

Before anything else

6 We would love to know what makes National Parks and AONBs special to you

Upload :

NSBA, Thurne Mouth Open Regatta.JPG was uploaded

Yes, you can use my photo online or in the report

Part 1 - Opening thoughts

7 What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs

Please write your answer here:

The Norfolk and Suffolk Boating Association considers that the present system has successfully designated the most special landscapes, provides stewardship and generally protects them from inappropriate development, albeit not without controversy from time to time.

8 What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs

Please write your answer here:

The Norfolk and Suffolk Boating Association considers that whilst the Broads Authority receives adequate funding to carry out the scope of maintenance work that it presently commits to, there is a considerable amount of degraded infrastructure within the administrative area which projects a poor image to visitors and can present hazards. Unfortunately no organisation takes responsibility for the eye-sores on the Broads. Additionally, the present system fails to ensure that all the

governmental agencies with overlapping responsibilities have adequate regards for the purposes of the NP and AONB authorities. For instance, the Government cost cutting fiasco over redefining boat waste has placed a large and totally avoidable burden on both the Broads Authority and the Broads community.

Part 2 - Views

9 What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?

Please write your answer here:

The Norfolk and Suffolk Boating Association considers that the National Parks and AONBs have a very important role in nature conservation and biodiversity. The NSBA appreciates conservation because biodiversity and boating are not mutually exclusive.

Could they do more to enhance our wildlife and support the recovery of our natural habitats?:

More could be done to enhance wildlife, although considerable skill is needed to balance the needs of biodiversity and wildlife with living landscapes in areas also having socio-economic drivers.

In the Broads, nature conservation should not pre-empt the use of waterways for navigation and recreational purposes.

Most of the bank side trees and scrub on the main rivers of the Broads are non-indigenous because of historic land and waterway uses.

10 What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?

Please write your answer here:

The Norfolk and Suffolk Boating Association points out that the Broads are unique because they are man-made and have a unique geomorphology that requires more active maintenance than typical upland and coastal protected areas. Without the thousands of boats and the navigation, the Broads would silt up.

Further to the response to Q9 above, the challenges of shaping landscape and beauty, and protecting cultural heritage, is a considerable challenge where, for instance, it must be decided which year in the past is the target for restoration of degraded water space, or wooded areas or of traditional working practices.

11 What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?

Please write your answer here:

The Norfolk and Suffolk Boating Association does not have any strong views on land stewardship as such, as this is not one of our purposes. However it is aware that land ownership rights do prevent the Broads Authority from providing facilities for recreational boating on the Broads.

12 What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

Please write your answer here:

The Norfolk and Suffolk Boating Association has strong views in regards to the role of the Broads Authority in relation to managing access and recreation, especially in relation to the navigation of the Norfolk and Suffolk Broads - 120km of safe waterways ideally suited to recreational boating.

Additionally, the navigation has commercial uses, with a thriving hire boat industry, small boat building businesses, boat storage and maintenance. Wooden boat building and maintenance continues to thrive. Access, recreation and these socio-economic uses rely on the navigable rivers Yare, Chet, Bure, Thurne, Ant, Waveney and Wensum.

50% of the open water beside the River Bure, within the protected wetland, is closed to the public. This has been allowed to happen over a period of over 100 years by ownership and land management practices that are no longer permitted, and the challenge of reinstating these areas for public use is presently not being taken up by the Authorities.

Whilst the Broads Authority has comprehensive policies in place on managing access and recreation, the Authority's income is insufficient (other waterways receive funding from the Environment Agency) and the applicable legislation is inadequate to do the whole job of managing access and recreation thoroughly. If there is insufficient funding, the amount of dredging may be so reduced as to fail to maintain the water depth which is essential as a means of flood prevention.

13 What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?

Please write your answer here:

The Norfolk and Suffolk Boating Association's views on the Broads Authority (BA) in relation to how it affects people who live and work in the Broads area include:

- a) The BA supports and encourages the Broads multi-million £ tourism industry which includes the successful hire boat industry. Tourism and Broads boating are major sources of employment in the area.
- b) The application of the BA's policies prevents inappropriate development in the Broads area, and permits appropriate development for housing and commercial / industrial purposes, albeit for the most part there is little development in the Broads Authority's administrative area because nearly all of it is in functional flood plain.

Are they properly supporting them and what could be done differently?:

There is much to be said for giving the BA a fourth duty about the social and economic well-being of those who trade, live or work in its area.

14 What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

Please write your answer here:

The Norfolk and Suffolk Boating Association does not have any strong views on housing and road transport in the Broads, as neither is one of our purposes.

However we would point out that The Broads, along with the National Parks, do have an unfortunate, if understandable, over reliance on private cars for access, with detrimental environmental effects in various ways. Transport by river, however, has been and can continue to be facilitated by the Broads infrastructure. Consideration should be given to reverting to the 17th and 18th century use of river freight, if environmental considerations might preclude road freight transport in the future. This involves provision of bridges which are either fixed bridges with adequate air draft or are of the lifting/swing type (which work) so as to allow

passage by craft.

Part 3 - Current ways of working

15 What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) feels strongly that there should be some seats on the Broads Authority reserved for representatives of toll-payers. At present there is no guarantee that a single toll-payer is a member of the Broads Authority. This seems indefensible when toll-payers contribute approximately 50% of the Authority's budget. Toll-payers should elect 50% of members in line with their contribution.

The Norfolk and Suffolk Boating Association (NSBA) feels strongly that the existing Navigation Committee is of fundamental importance to the competent management of the Norfolk and Suffolk Broads and must not be diluted in any way.

The Norfolk and Suffolk Boating Association (NSBA) is aware that governance arrangements for Broads Authority and the National Parks are challenged from time to time for being non-elected quangos, in the absence of direct elections by residents in the relevant area. However the NSBA does not believe that direct elections by local residents are the solution for the Broads because of land and population distributions. Only 6,000 people reside in the Authority's area (made up of parts of 93 villages), a small fraction of those who regularly enjoy the Broads, and an electoral system would be expensive, not least because an electoral roll would have to be established. Present arrangements, using the Local Authority pattern of members and committees, are effective provided that there is adequate calibre, commitment and objectivity of the board members..

Ten of the twenty one members of the Broads Authority are appointed by the Secretary of State. It seems to us of great importance that the Secretary of State is reminded of the need for adequate representation of toll-payers when making those appointments and of the fact that the Broads Authority has another statutory function besides those shared with the National Parks, namely the management of the navigation. In the past the NSBA has urged the Government to introduce direct elections by toll-payers to a number of seats on the BA which reflects the proportionate contribution to BA income from tolls. Establishing an electoral list would be easy: it would be the existing register of toll-payers.

16 What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) does not feel qualified to speak about the National Parks, but does in relation to the Broads Authority, which recently underwent a thorough Peer Review which made many recommendations for improvements in governance arrangements, many of which have been implemented within the past 12 months. Preliminary indications are that member – officer relations are improving, however it is too soon to draw firm conclusions.

17 What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) does not feel qualified to speak about the National Parks, but does in relation to the Broads Authority. It believes that the Authority has competent programmes for volunteering, however it does not appear to engage the most disadvantaged members of society, especially children and young people of the adjacent towns and city who remain almost completely oblivious to Britain's largest wetland "on their doorstep".

18 What views do you have on the way they are funded and how this might change?

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) does not feel qualified to speak about the National Parks, but does so in relation to the Broads Authority. Approximately 50% of the Authority's income comes from tolls paid by boat owners and hire boat companies. The NSBA feels very strongly that the existing arrangement for ring-fencing tolls income for navigation related expenditure must be safeguarded.

19 What views do you have on the process of designation - which means the way boundaries are defined and changed?

Please write your answer here:

In relation to the Norfolk and Suffolk Broads, the NSBA considers that the Authority boundary, tied tightly around the extent of functional floodplain, is about right in relation to the protection of the wetland and the navigation. However, because the Authority's boundary is not coterminous with any other administrative jurisdiction, in relation to the Authority's town planning function, there are a number of anomalies by which some settlements, typically small villages, are cut in half with a different planning authority across each side of the road, resulting in occasional anomalous decisions. The same can apply in respect of agricultural holdings.

If the protected area was enlarged to the degree suggested by the Broads Authority there is a risk that party politics would affect the management board, which would be inappropriate and would not be productive.

20 What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas.

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) does not have any views on new designations.

21 Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) remains open to suggestions for the working of designated landscapes based on experience elsewhere. However the unique pattern of wetland, landscape, boating heritage and existing settlements within the Broads area requires bespoke arrangements, not least

because the BA has a third statutory purpose: protecting the interests of navigation. Highly relevant to the delivery of this purpose, the BA is a navigation and harbour authority. The NSBA would resist any attempt to dilute this purpose or to amalgamate it with the BA's second purpose of promoting the enjoyment of the Broads. There is a public legal right to navigate the Broads, but no such right to enjoy them.

Part 4 - Closing thoughts

22 Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?

Please write your answer here:

The NSBA has no strong views on the use of current terms National Park and AONB. However the Norfolk and Suffolk Broads are not a National Park within the terms of the National Parks and Access to the Countryside Act 1949, and are not described as a National Park in the legislation (Norfolk and Suffolk Broads Act 1988) designating the Broads Authority, its functions and powers. The NSBA urges DEFRA to refer to the Norfolk and Suffolk Broads (as they are known nationally and have been for over a century) as such and not as "Broads National Park".

23 The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

Please write your answer here:

The Norfolk and Suffolk Boating Association (NSBA) considers the raft of designations to be quite confusing to most members of the public. Whilst the designations are for the most part based on sound technical or environmental assessments, making them more "stakeholder friendly" would be a worthy aspiration.

24 Do you have any other points you would like to make that are not covered above?

Please write your answer here:

Further to Question 23, the Norfolk and Suffolk Boating Association (NSBA) considers that management decisions are hampered by environmental requirements, e.g. that sediment dredged from the Broads waterways should be treated as a waste product.