

**Addendum to Branding the Broads**  
Report by Chief Executive

<b>Summary:</b>	This addendum report provides details of additional responses to the Broads Authority's consultation entitled "The Broads National Park – making the most of a brand which is internationally recognised".
<b>Recommendation:</b>	That the Authority take the responses into consideration when considering the recommendations within the main report for Agenda Item No 9.

**1 Background**

- 1.1 This report provides details of additional responses received to the Broads Authority's consultation entitled "The Broads National Park – making the most of a brand which is internationally recognised". These include:
- a. The minute from the Broads Forum on 6 November 2014. This also includes a précis from the Chairman of the Broads Forum on this matter;
  - b. The minute from the Navigation Committee on 11 December 2014; and
  - c. A response from BRASCA which was received before the end of the consultation period. This also appends the proposed BA response.
- 1.2 The minutes and consultation response form BRASCA are detailed in Appendix 1. Members are requested to take these responses into consideration when considering the recommendation within the main report for Agenda Item No 9.

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Broads Plan Objectives: None

Appendices: APPENDIX 1 – Additional Responses to Consultation

## **APPENDIX 1**

### **Additional Consultation Responses**

#### **Minute from the Broads Forum Meeting on 6 November 2014**

##### **2/6 National Park Branding of the Broads**

Members received a report which provided details of the Broads Authority's consultation on the proposal to use the term Broads National Park for marketing related purposes when referring to the Broads.

Members were informed that The Broads missed out on becoming a national park in the initial phase in the 1950s because of the sheer complexity and a concern about cost. The 1988 Act established an organisation which looks after The Broads and gave The Broads the same status as a National Park.

The Chief Executive emphasised that the proposal only related to the branding of The Broads and did not involve any changes to the formal name or legal status of the executive area or the functions, name and responsibilities of the Broads Authority. The Broads Authority's three purposes of conservation, recreation and navigation would therefore remain of equal priority. The Chief Executive further stressed the point that the name change would purely be for promotional reasons without any hidden agenda.

Tony Gibbons mentioned that The Broads was different to one big park accessible everywhere and open to everyone like they have in the USA and therefore might not be perceived as a national park. The Chief Executive responded that National Parks in the UK, including the Lake District and Pembrokeshire Coast were not widely accessible because they were primarily privately owned and not owned by the state as in the USA.

While the Chief Executive pointed out that tourism was very important to the local economy with the term National Park potentially helping retain existing and attracting new visitors, several members believed that too much emphasis was put on tourism. Richard Starling (RS) in particular believed the impact of tourism on the economy is not that substantial as tourism primarily creates low paid, seasonal and part-time jobs. He also believed that as UK taxes were higher than abroad becoming a National Park would not attract extra visitors.

Brian Barker added that as tourism was only accountable for 14% of income coming to Norfolk it would be more important for the Authority to concentrate on other types of industry which would bring in more income.

The Chief Executive responded that using the term National Park could have financial benefits to the Broads and that the impact of tourism spends would be much wider than just the tourist economy.

Peter Horsfield mentioned that he did not believe the Broads Authority should decide for areas which were outside The Broads executive area to which the Chief Executive responded that the success/benefits of using the term National Park would not be delivered mainly by the Broads Authority but by businesses such as

Hoseasons and Richardsons and could be beneficial for the wider catchment rather than just the Executive Area.

While some members did not see any issue with the name change as the Authority had set out the legal advice in the consultation document others said they would feel more comfortable if Defra could put this in writing.

John Lurkins (JL) mentioned that attracting visitors to waterways should not just be to benefit the hire boat companies, but should also advantage the boat building industry and did not believe a name change to National Park would do that. Andrew Alston (AA) commented that the Authority should consider all three of its purposes as a National Park equally and remain central to all discussions. He also considered that, for this concept to be successful, the Authority would need support from local residents.

Philip Pearson said that changing to a National Park would be beneficial for moving forward with joined partnerships and projects and therefore it would be important not just to look locally but to keep the bigger picture in mind, despite some of the conflicts involved.

An informal show of hands for the Chairman to help him gauge how to report back to the Broads Authority indicated that the majority of members (13 v 5) supported the proposed use of the term Broads National Park for branding purposes. The Chairman agreed to circulate the views of the Forum to its members for comment, prior to these being forwarded to the Broads Authority as the Forum's response to the consultation.

### **Response from Chairman of the Broads Forum in Accordance with the Minutes of the Broads Forum Meeting on 6 November 2014**

"The Broads Forum debated the proposed branding of the Broads as the "Broads National Park".

Several concerns were expressed but in the end by an informal show of hands members indicated by 13 to 5 that the majority supported the proposal whilst a minority were opposed to it.

Those opposed raised the following issues:

- a) That too much emphasis was being placed on Tourism which was criticised for creating low-paid, seasonal, part-time jobs. The BA should encourage diversification through other industries which gave better-paid, full-time employment.
- b) That the legal advice the BA had received was questioned and that Defra's formal opinion was not known.
- c) That the use of the name should not alter the equality of status of the purposes of the BA.

A fuller account of the discussion can be found in the Forum's minutes."

## **Minute from the Navigation Committee Meeting on 11 December 2015**

### **3/7 National Park Branding of the Broads**

Members received a report which provided details of the Broads Authority's consultation on the proposal to use the term Broads National Park for marketing related purposes when referring to the Broads. It was made clear that the proposal related only to the branding of the Broads and would not involve any changes to the formal name or legal status of the executive area or the functions, name and responsibilities of the Broads Authority. The Broads Authority's three purposes of conservation, recreation and navigation would remain of equal priority.

The Chief Executive highlighted some issues where there were different views for example the Sandford Principle and the long term ambition for the area to become a National Park by 2030 in the current Broads Plan.

The Broads Plan review was programmed to start in 2015 and it was suggested that would provide the opportunity to review the long-term aim.

In response to a question as to what has changed since the last time the Broads Authority looked to change the name of the area, the Chief Executive advised that the Authority had previously investigated changing the legal name of the area. No legal change was being proposed in the present consultation. The Authority's recent legal advice was that as the Broads had a status essentially the same as a National Park and given the great similarities with the UK's national parks, it was legally possible to refer to the area as the Broads National Park for marketing purposes.

Several members expressed their disappointment in having to find out about the consultation through the media. Making greater use of the National Park brand was one of the Authority's strategic priorities for this year.

Members discussed whether additional tourism would harm the delicate habitat of the Broads.

There were some reservations in regards to the legality and reputational risks of the proposal and members requested sight of Defra's advice on this matter.

The Chief Executive responded that in line with the Authority's strategic priorities bilateral discussions had been held with all key stakeholders which had prompted had been consulted a great deal of positive feedback to the proposal.

It was explained that in the view of Visit England's Chief Executive the tourism industry in the Broads was fragile and that many people did not recognise how important the Broads were and that the branding sought to help address this.

The Chairman of the Authority had written to the Minister asking for his views on the proposal to adopt the national parks brand on the authority's promotional material. The Minister had responded that the consultation on

branding was a matter for the authority and its stakeholders. In terms of government policy, the Minister indicated that Broads is treated as a member of the national park family although its statutory basis is quite separate and it is not legally a national park. There was no proposal to change this position and it was Defra's intention that the three purposes of the Broads would remain of equal standing.

The committee considered various forms of wording to reflect their views for feeding back into the current consultation and continued to have reservations about the legality and reputational impact of adopting the National Park brand.

After some discussion, the Chairman proposed the following consultation response which was based upon the submission of the BHBF and incorporated concerns raised by members of the Committee:

“The Navigation Committee continues to have reservations about the legality and reputational implications of adopting the Broads National Park name and style and the following support is conditional upon the further reassurance from DEFRA and other statutory bodies being received should the Broads Authority approve this process. On this basis the Committee:

1. Supports the use of the term “The Broads National Park’ for the reasons and benefits described in detail in the Consultation Document October 2014.
2. Supports the term “The Broads National Park” but not to the exclusion of the branding “Britain’s Magical Waterland” it being of more direct relevance to the Broads and its leisure boating and tourism activities.
3. Urges the Authority members in their forthcoming review of the Broads Plan to recognise the legitimate concerns of the boating community and remove the ‘long term ambition of achieving full National Park status’ from its policy documents.
4. Asks them to confirm whilst doing so that there is no intention now or in the future to introduce legislation invoking the Sandford principle in its management of the Broads otherwise than in a manner that is acceptable and supported by this Committee and its constituent boating interests.”

Committee members supported the proposed consultation response by 8 votes to 1 with 4 abstentions.

## Broads Reed & Sedge Cutters Association Consultation Response and Broads Authority Response

### Broads Reed and Sedge Cutters Association

The Broads Reed & Sedge Cutters Association (Brasca) wishes to make the following responses to the 3 key questions listed on the back page of the consultation document.

1. How do you feel about a more consistent use of the term the Broads National Park as a brand?

Response: The legal situation should first be clarified by Defra as to whether there are any changes to that stated in Defra's letter to Keith Simpson MP dated 31st March 2008. Defra state in this letter "We do not think the area can lawfully take the title of a National Park". Brasca interprets this as branding the area as a National park may be illegal or misleading.

2. In what ways would you envisage your organisation using the term the Broads National Park?

We may well harvest reed in the Broads but it has been marketed as 'Norfolk Reed' for many years. Brasca shares a website and marketing with the North Norfolk Coast reed cutters who also use the term 'Norfolk Reed'. We therefore see no benefit what so ever to use the term Broads National Park in marketing or branding commercial reed or sedge.

3. Are there any specific actions the Broads Authority could take to support and help your organisation in using the Broads National Park brand.

Despite our previous comments, Brasca would be happy to support National Park status for The Broads and changing the name from Broads Authority to Broads National Park if the following conditions were met;

A). That Defra provides full assurances in writing to satisfy the worries of those parties concerned with historical rights of navigation.

B). To agree local representation such as exists in UK National Parks.

C). To safeguard against any negative environmental impacts from increased tourism

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D). To clearly demonstrate benefits to the wider local community e.g. Broads tourism interests adopt the Living Wage Initiative.

You may be interested to look at the TUC website ([www.tuc.org.uk](http://www.tuc.org.uk)) and their references to local wages.

32.8% of men & women in North Norfolk are paid less than the living wage. 32.3% in Mid Norfolk.

In North Norfolk the figures for women only are worse with 42% paid less than the living wage and in Mid Norfolk 40.6%.

The National Minimum Wage from 1st October 2014 is £6:50p per hour (adult rate) with 18 - 20 year olds £5:13p/hour.

The U.K. Living Wage Rate is £7:65p per hour. (London rate is £8:80p per hour).

Once again, Brasca thanks you for consulting with us on this matter.

**BA response:**

Defra's response is provided in paragraph 5.5 of the main report.

The latest figures for tourism in the Broads are:

- Visitor numbers: 8 Million
- Direct expenditure: £568 Million
- Economic impact: £768 Million
- Dependent employment: 9,452 jobs

Tourism is therefore hugely important in the Broads, more so than in Norfolk as a whole. Some of the jobs are low paid and seasonal, but not all, and the industry provides valuable second incomes as well as useful openings into employment for young people and career progression.

The dramatic reduction in unemployment in recent months, much of which can be attributed to the sector, is to be welcomed.

The tourism economy does not exist in a silo but is a key contributor to the regional economy as a whole.

The Government has announced its intention to consult on a draft bill in regard to direct elections to national park authorities and the Broads Authority. The nine County and District Councillors who sit on the Broads Authority are directly elected and try to reflect local views and concerns.