

# Shaping the future of boat licensing

INDEPENDENT ANALYSIS OF RESPONSES TO THE CANAL &  
RIVER TRUST CONSULTATION ON BOAT LICENSING 2017

TONIC

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## EXECUTIVE SUMMARY

### Introduction

The Canal & River Trust is responsible for 2,000 miles of canals and rivers in England and Wales, home to over 32,000 licenced boats, whose licence fees contribute to the Trust's income used to maintain these waterways. The Trust held a three-part consultation process during 2017, with the third part being a consultation open to all licence holders and key stakeholders through a confidential and anonymous online and paper survey asking for views on a number of options and proposals to ensure the fairest and simplest way to share the important financial contribution made by different types of boats and boaters to ensure the long-term sustainability of the waterways.

### Preparing this Report

Responses to the consultation were collected, analysed and findings are reported here on behalf of the Canal & River Trust by TONIC Consultants Ltd (TONIC), an independent organisation specialising in public consultations and social research.

### Participation in the Consultation

11,085 responses were made to the consultation, from across England and Wales, and from a range of different boat and licence holder types. Typically, the quantitative (or "closed") questions received between 6,217 and 7,465 responses, with the qualitative (or "open") questions receiving between 687 and 1,815 responses. All responses were included in this analysis, with every answer to the open questions read in full, coded and added to our thematic analysis, alongside all results from the closed questions. Our analysis is summarised in this report.

### Consultation Findings

#### Options for calculating the price of a licence

The most favoured option was for licence fees to be calculated by actual area (Length x Beam), with 58% stating this was fair and 25% unfair. ( $n=7,437$ )

The second most favoured option was for fees to remain length-based using the existing bands, with all wider boats (i.e. those wider than a standard narrowboat width) charged an uplift on their respective length-based fee, with 52% stating this was fair and 33% unfair. ( $n=7,450$ )

The least preferred option was for licence fees to be calculated based on length only (i.e. no change) with the existing bands that increase every additional 1m, with 31%

stating this was fair and 52% unfair ( $n=7,331$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about calculating the price of a licence ( $n=1,731$ )	Number raising theme
<b>Support for increased charges for wider boats</b>	<b>518</b>
General support for charging by area and thereby increasing the licence fee for widebeam boats	413
This approach works for the Environment Agency and Port of London Authority	87
Issues around lock usage by widebeams	86
<b>Opposition to increased charges for wider boats</b>	<b>633</b>
Seen as an unfair tax on widebeams	465
Wider boats have fewer accessible waterways	331
Arguments that widebeams restrict double mooring and around simultaneous lock use are erroneous	84
Length is as much of a factor in mooring issues as width	59
Certain canals are designed for widebeams, as well as rivers, therefore the perceived problems are not ubiquitously relevant	44
<b>Other views</b>	
Concerns about administration, potential complications and cost	121
Concerns around accurately measuring boats	90
Banding proposals are unfair and potentially problematic	67
Charging by area for a River-only licence is unfair	27
Concerns about enforcement and the possibilities for abuse	24
If not being done to increase revenue, will increases in widebeam fees be reflected in reductions for other craft?	18

### Suggested alternatives to the proposals for calculating the price of a licence

The following table sets out the main themes raised by respondents.

Themes raised by respondents about suggested alternatives to the proposals for calculating the price of a licence ( $n=881$ )	Number raising theme
Licence should be based on an individual boat's usage of the waterways and its facilities, calculated by the number of miles travelled and locks traversed	226
Emphasising their view that the current length-based system works well and should be retained	172
There should be a single licence fee for all boats	80
Licence should be based on total water displacement	56
Licence fees to remain length-based, but with a widebeam uplift of up to 100%	54
Charge a liveaboard fee or supplement	43
The reintroduction of a system of tolls for locks and tunnels	34
Licence fee based on the value of the boat and/or engine size	30

Introduction of a surcharge for boats in congested areas	28
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### Licence considerations in respect of mooring status

61% felt it was fair to take mooring status into consideration as part of the licensing process, while 30% felt it was unfair ( $n=6,608$ ).

Views on proposals for how to take mooring status into consideration with regard to licensing were mixed, although all three options had slightly larger numbers considering that they were fair than those who felt they were unfair. The most favoured option was to introduce over time a higher fee for boats without a home mooring, with 53% stating this was fair, however 40% felt it was unfair ( $n=6,482$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about licence considerations in respect of mooring status ( $n=1,815$ )	Number raising theme
<b>Views on licensing considerations in respect of mooring status</b>	<b>707</b>
More enforcement required	350
The distinction between "continuous moorers" and continuous cruisers	226
Not enough mooring spaces for either cruisers or visitors	138
London was seen as a focal point for fee avoidance, illegality, and congestion	128
<b>Support for continuous cruisers</b>	<b>612</b>
Regulations and fee structure for licences should be independent and unrelated to mooring fees and status	147
Continuous cruisers bring benefits to the waterways	88
Mooring permanently and/or in a marina is a choice and one which comes with its own benefits	82
Proposed change to the licence unfair to winter moorers	82
The proposed change to the licence is illegal	46
Continuous cruisers may actually travel less	34
<b>Opposition to continuous cruisers</b>	<b>494</b>
Continuous cruising licence fee should be increased	168
Continuous cruisers use more of the waterways and facilities while paying less, while those with "home moorings" use less and pay more	170
Unfairly occupying visitor mooring spaces	103
Creating "unsightly" areas	37
Continuous cruiser licence fee should be abolished, or limited in number, with no new licences issued	36
Continuous cruisers more likely to cause damage and litter	37
<b>Other views</b>	
Home mooring licence fee should be reduced	163
Opposition for the proposal to introduce a licence which would limit boats to a specific area	147
Support for the proposal to introduce a licence which would limit boats to a specific area	57

## Prompt Payment discount

The most favoured option was to reduce the Prompt Payment discount and change it so that part of the discount is applied for prompt payments and part of the discount is applied to encourage automatic methods that reduce administration costs to the Trust (e.g. online payments, direct debits), with 50% stating this option was fair and 26% unfair. (*n*=6,748)

The least favoured option was to remove the discount entirely, with 9% stating this was fair and 84% unfair. 73% also felt it unfair to remove the prompt payment discount in a phased way over a period of time. (*n*=6,808)

However, 62% felt the proposal to change the current Prompt Payment discount to one that recognises both Prompt Payment and self-service / direct debit payments was fair. (*n*=6,849)

The following table sets out the main themes raised by respondents.

Themes raised by respondents about the Prompt Payment discount ( <i>n</i> =1,662)	Number raising theme
<b>Prompt Payment Discount</b>	<b>746</b>
There should have been an option to select 'no change to the current system' – i.e., keep Prompt Payment Discount at 10%	214
Without a prompt payment discount, what incentive is there to pay on or ahead of time?	211
The discount appears to have been effective in reducing late payments	160
No real distinction between Prompt Payment Discount and late fee penalty	110
The Prompt Payment Discount ensures the Trust's cash flow	83
Those most able to pay in full ahead of time are the least likely to require a discount	77
Questions about how a revised Prompt Payment Discount would be administered in cases where fees are paid by agents or through clubs	49
<b>Direct Debit and Self-Service</b>	<b>851</b>
The Prompt Payment Discount should be applied no matter what the payment method	431
Encouragement for the use of direct debit	266
Increased benefits of streamlining and reduction in administration and staff requirements ought to be passed on to the licensee	157
Online procedures need improving	65
<b>Other views</b>	
Concern that non-fee payers were not being dealt with	109
Why do payments by credit card receive the full discount?	28
Could there be an increased discount for those who wished to pay 2-3 years upfront?	26

Given a streamlining of the admin process, this would imply that the Trust would be reducing staff numbers	19
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### Historic Boat discount

The consultation put forward a proposal to retain the Historic Boat discount on the proviso that eligibility for the discount aligns with the National Historic Ship Regulations (with the criteria being reviewed outside of the consultation).

79% felt this proposal was fair, with 9% stating it was unfair ( $n=7,352$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about Historic Boat discount ( $n=1,288$ )	Number raising theme
<b>Support for maintaining the historic boat discount</b>	<b>593</b>
Ownership and preservation of historic boats should be incentivised	362
Discount should be raised to 20-50%	291
Licence should be free, as with classic car tax	53
Generous historic discount will not have any significant impact on the Trust's income	19
Discount should increase with age of boat	12
<b>Qualified support for a historic boat discount</b>	<b>194</b>
Boats must be ensured to be "genuinely historic"	88
Discount should only be applied to unconverted, non-liveaboard vessels	58
Discount should only be for those whose boats take part in festivals, or are open to the public in other ways	44
Discount should only apply to charities	23
<b>Opposition to the historic boat discount</b>	<b>227</b>
Owning a historic boat is a choice, using as much of the waterways and facilities as others	227
<b>Other views</b>	
Questions about how boats would qualify for the discount, and concerns that certain historic boats were not being included	107
Difficult to offer an opinion without making clear how "historic" was to be defined, and with the potential for changes to be made to this definition post-consultation	53

### Disconnected Waterway discount

The most favoured option was to retain the disconnected waterways discount at its current level, with 59% stating this option was fair and 26% unfair ( $n=6,867$ ). The least favoured option was to withdraw the discount entirely, with 29% stating this was fair and 57% unfair ( $n=6,549$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about Disconnected Waterway discount (n=1,116)	Number raising theme
<b>Support for maintaining the disconnected waterway discount</b>	<b>433</b>
The discount is fair and reasonable	433
Without discounts, waterways may fall out of favour and suffer from lack of use	178
Discount reflects restricted access to the network as a whole	136
Owners may not have a choice in the location of their boat	32
<b>Opposition to the disconnected waterway discount</b>	<b>430</b>
Placing a boat on a disconnected waterway is the owner's choice	184
Maintenance and facilities costs the same	126
Actual usage in terms of distance and hours travelled is unaffected	79
Many boats are restricted by their size but receive no discount	48
Experience of boating is the same, or possibly better	23
There may be advantages to being on a disconnected waterway, such as lack of congestion and passing traffic	23
<b>Other views</b>	
The licence fee should be set according to each particular waterway	51
The Trust should work to connect disconnected waterways	49
Concerns that craft may be trailered to the main system	18
Not enough information provided to make an informed decision	17
Liveaboards on disconnected waterways should not receive a discount, as this was the owner's choice, and beneficial	15
A number of specific waterways were mentioned as being cases worthy of specific consideration in relation to disconnected discounts	



## Unpowered Butty's discount

68% favoured the option to leave the unpowered butty's discount unaltered, with 32% preferring the discount to be removed ( $n=6,931$ ), with 63% rating the retention of the discount as fair and 27% unfair ( $n=7,054$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about Unpowered Butty's discount ( $n=1,208$ )	Number raising theme
<b>Support for the discount for unpowered butty's</b>	<b>611</b>
Agree that a discount for butty's is appropriate – though often dependent on certain criteria:	
• Only if shown to be of historic or cultural value	122
• When associated with a powered boat as part of a pair	99
• Not if used as a liveaboard	92
• Only if being used as a "working boat"	45
• Only if not being used for business purposes	25
Butty's tend to be historic and rare, and preservation should be encouraged	132
Current level of discount should be maintained	71
Discount should be in place, but limited to 25-30%	67
Because butty's are rare, giving discounts will make little difference to the Trust's overall funds	25
<b>Opposition to the discount for unpowered butty's</b>	<b>453</b>
Unpowered butty's should be considered as any other vessel	386
There is no justification for the discount	41
The use of butty's causes hazards and delays	38
<b>Other views</b>	
Concerns that the administration of discounts is not abused	91
This discount is not aligned with widebeam charge	35
Discounts for butty's are already covered by the historic boat discount	32
Horse-drawn boats should also qualify for an unpowered discount	21

## Electric Boat discount

All three options put forward for consideration received mixed support:

- Retain the current 25% discount – 40% fair and 43% unfair ( $n=6,699$ )
- Reduce the discount to 10% - 33% fair and 42% unfair ( $n=6,517$ )
- Remove the discount – 45% fair and 42% unfair ( $n=6,632$ )

40% felt it was fair in principle for the Trust to introduce a new higher discount that recognises more environmentally friendly boating, with 36% feeling this would be unfair ( $n=6,877$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about Electric Boat discount ( $n=1,719$ )	Number raising theme
<b>Support for the electric boat discount</b>	<b>589</b>
It rewards and encourages the extra expenditure owners have outlaid in order to make less of an impact on the environment	118
Support for an electric boat discount, but they should be "genuinely ecological"	119
Electric boats reduce air and noise pollution	49
Electric boat discount demonstrates leadership and innovation in green technology	22
Electric boat discount is in alignment with steps being taken in motoring and other areas of energy production	18
<b>Opposition to the electric boat discount</b>	<b>594</b>
All boats use the waterways and facilities equally	361
Electric boats are not actually environmentally friendly	363
The existing and proposed electric boat discount does not take into account the many other ways environmentally friendly behaviour may be occurring	116
It is not within the Trust's remit to use licence fees to promote changes to the way boats are powered	62
An electric boat discount only helps the wealthy	64
The projected number of vessels moving from fuel to electricity is not viewed as making any significant impact on lowering pollution levels	41
An electric boat discount is a penalty on traditional diesel engines	39
An electric boat discount is inconsistent with the historic boat discount	35
Pollution from diesel engines is minimal, therefore it is unnecessary to take steps to address it	34
The move towards electric-powered vehicles is happening anyway	26
Questions whether the electric boat discount has been shown to be effective	15
<b>Other views</b>	
Solar and wind power should be especially rewarded	187
Difficulties in measuring "environmental friendliness"	125
Increase the number of electrical charge points	77
Discounts should be adjusted as the introduction of environmentally friendly technologies increases	46

Raising questions as to how this will be enforced	36
Other means of powering vessels should also qualify for a discount	36
Emissions should be measured	28

### Charity Boat discount

79% felt the proposal to retain the charity boat discount and review the conditions for eligibility was fair, with 8% stating they felt this was unfair ( $n=6,762$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about Charity Boat discount ( $n=788$ )	Numbers raising theme
<b>Support for the retention of the charity boat discount</b>	<b>261</b>
Charities do good work, especially for the disadvantaged	96
Discount should be increased to 100% – i.e., no fee	69
Charities bring new people to the waterways	34
Discount should be based on the amount the boat is being used for charitable purposes	16
<b>Opposition to the retention of the charity boat discount at 60%</b>	<b>259</b>
Charity boat discount should be reduced to:	
• 40-50%	20
• 25%	54
• 0%	87
Charities which profit from their boats should not receive a discount	33
Charities ought to be seen in the same light as businesses	20
<b>Other views</b>	
There needs to be an adequate measure as to whether boats truly merit charitable status	184
Not enough information was provided to make an informed decision	53
Deciding whether a charity was worthwhile or not was outside the Trust's remit	32

### Multiple discounts

55% preferred the proposed option for customers to receive multiple discounts as per the current arrangements, with 45% preferring instead the proposed option for customers to only receive a maximum of one discount per licence in addition to the River Only Licence discount and the revised prompt payment and/or direct debit discount ( $n=6,471$ ).

50% felt it was fair for the Trust to allow multiple discounts, with 30% stating it was unfair ( $n=6,714$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about the application of and eligibility for multiple discounts (n=687)	Number raising theme
<b>Support for the retention of multiple discounts</b>	<b>291</b>
If boats qualify for multiple discounts there is no reason why these discounts should not be applied	140
Multiple discounts encourage and incentivise boaters to operate, licence, and pay in ways that benefit the waterways and the Trust	88
Support for multiple discounts, but with a cap of between 25 and 50%	35
System currently used works fine	26
<b>Opposition to multiple discounts</b>	<b>160</b>
Concerns about unnecessary administration costs and complexity	42
Should be one licence fee for all	36
Could be open to abuse	12
<b>Other views</b>	
Would need to know more about the scale and application of multiple discounts to offer an informed opinion	65
How would the discounts be applied in practice?	12

## Short Term licences

78% felt the proposal for three short term licence options (of one week, one month and 30-day explorer) was fair, while 10% felt this was unfair (n=6,718). The following table sets out the main themes raised by respondents.

Themes raised by respondents about Short Term licences (n=912)	Number raising theme
<b>Views on the different licence options</b>	
The one-day licence should be kept	166
There should be more flexibility, such as a 2-week licence and weekend licences	81
There should be a 3-month licence	42
The one-day licence should be abolished	22
The explorer licence should be removed	24
There should also be 6 or 9-month licenses	24
There should be no short-term licences	17
A one-week licence is unnecessary	16
There should only be a 30-day licence	16
<b>Other views</b>	
The system of short-term licences is open to abuse - especially with regard to portable craft	177 - 34
How can the administration costs be so much higher if licences are processed automatically online?	98
The purchasing process should be modernised, including utilising smart phones	67
The proportionately higher price for short-term licences is acceptable, providing this can be proven to accurately reflect administrative cost	55

More information would be necessary in order to give an informed opinion	36
Short-term licences should not be disproportionately higher, or not significantly so	35

### Implementation of any changes

Four options were put forward for views on the fairest way to implement any proposed changes. The most favoured option was to phase the introduction of changes over a 3-5 year transition period, with 55% stating this was fair and 20% unfair ( $n=6,257$ ). The following table sets out the main themes raised by respondents.

Themes raised by respondents about the impact of any changes following the consultation ( $n=1,041$ )	Number raising theme
<b>Support for phased changes/notice period</b>	<b>506</b>
Support for the implementation of a transitional period:	371
• 1-2 years	49
• 2-3 years	71
• 3-5 years	51
• 5-10 years	22
• Not stated	176
Concern that an increase in fees may require some to make significant changes to their way of life	134
There should be an adequate notice period, as well as a thorough explanation of what the changes are	106
<b>Opposition to phased changes/notice period</b>	<b>145</b>
Changes should be implemented immediately	104
Concern that a prolonged transitional period may be detrimental to both boat owner and the Trust	44
<b>How changes may affect new boaters</b>	
Changes should apply only to new boats and owners	157
Changes should apply to both new and current boats and owners	75
<b>Other views</b>	
The current system works well enough	129
Insufficient information to fully answer the question	99

## INTRODUCTION

### Purpose of this document

This report provides a summary of part 3 of the Canal & River Trust consultation on boat licensing held in 2017. In this report, we explain why and how the consultation was run, and explain key themes from the responses received.

### Context

The Canal & River Trust (referred to in this report as “the Trust”) cares for 2,000 miles of canals and rivers in England and Wales, which are home to over 32,000 licenced boats. Boat licence fees have contributed 10-15% of the Trust’s income over recent years, which is used to maintain these waterways.

### About the consultation

Throughout 2017, the Trust held a consultation about how boats are licensed on waterways in their jurisdiction, made up of 3 parts:

**PART 1:** In February 2017, Involve, an independent charity specialising in public engagement, interviewed representatives from the main boating organisations to find out their views on how the consultation should work and what it should cover. Read the stage one report here:

<https://canalrivertrust.org.uk/refresh/media/thumbnail/32167-licensing-consultation-phase-1-report-2017.pdf>

**PART 2:** During May and June 2017, Involve hosted a series of in-depth workshops with boaters across the country, with participants reflecting the diversity of the boating community. Read the stage two report here:

<https://canalrivertrust.org.uk/refresh/media/thumbnail/33550-licensing-futures-stage-2.pdf>

**PART 3:** Between 12<sup>th</sup> October and 18<sup>th</sup> December 2017, TONIC ran an online and paper survey on behalf of the Trust, open to all boat licence holders and key stakeholders to respond to.

## Part 3 in detail

The proposals, options and questions at Part 3 of the consultation were informed by Part 1 and 2 of the process.

This stage welcomed new ideas, as well as seeking feedback on a series of proposals and options presented in the consultation document. Boaters were asked for their views on the fairest and simplest way to split the important financial contribution made by the different types of boats and boaters to ensure the long-term sustainability of the waterways.

The consultation was focussed at individual boaters, with Business and Trade licence customers also being able to express views, with the caveat that the Trust did not intend to make any business licence changes over and above any they make to private licenses as a result of this consultation.

The consultation aimed to help the Trust identify an approach to future licensing that is:

- Simpler and administratively less burdensome than the current system;
- Robust and workable; and
- Balances pricing and affordability.

The Trust were clear that the intention of the licence review was not to increase the proportion of revenue from boat licences, but to make sure the contribution from boat licences is distributed more fairly.

The next steps are for the Trust to consider the findings of the consultation process and identify a future approach to its licensing framework that is fair, straightforward and sustainable.

The questions used in this consultation can be found in Appendix A of this report, and the full consultation document can be found here:

<https://canalrivertrust.org.uk/refresh/media/thumbnail/34242-licence-review-stage-3-summary.pdf>

## HOW THIS REPORT WAS PRODUCED

### TONIC

Responses to the consultation were collected, analysed and are reported here on behalf of the Canal & River Trust by TONIC Consultants Ltd (TONIC), an independent organisation specialising in public consultation analysis and social research. You can read more about them here: [www.tonic.org.uk](http://www.tonic.org.uk).

### Confidentiality

All responses to this consultation were made anonymously and confidentially, with no personal details being requested that could identify the respondent. All data were stored securely within the UK in accordance with all Data Protection Act requirements by TONIC, who are registered with the Information Controller's Office (Reference ZA273132). The Canal & River Trust do not have access to individual responses and have only been supplied with anonymised data that cannot be linked back to individual licence holders or boats.

A unique hyperlink was sent out by email to all licence holders and stakeholders with an email address registered with the Trust inviting them to take part in the consultation. This link could be used only once by each respondent. Those without an email address with the Trust were sent a paper version of the survey by post, with a Freepost address to return it to.

### Response channels

People could respond to the consultation in several ways:

- Using the dedicated online portal
- On paper, by being sent or requesting a paper response form from the Trust or printing out the online form and returning it using the Freepost address directly to TONIC
- Completing an electronic version of the paper survey, which was then sent by email sent to a dedicated email account at TONIC

Some respondents did not use the formal response channels, but emailed or wrote to the Trust directly, who forwarded these responses to TONIC.

The survey was a mixture of qualitative and quantitative questions. For qualitative questions requesting people's comments to explain their views and suggestions, there was no character limit to the free text box in the online survey and electronic version of the form. Those completing paper versions were informed that they could



add additional pieces of paper to their responses if they wanted to write more text than the spaces provided allowed for.

## Analysis of Consultation Responses

### Quantitative Analysis

We performed analysis of the quantitative questions and have set out the response rates for each question as not all respondents answered all questions. Percentage figures have been rounded to the nearest whole number for the majority of questions, therefore as a result not all numbers may add up to 100%.

Response numbers to each of the quantitative (or “closed”) questions varied, ranging from 6,217 to 7,465. Response numbers for the qualitative (or “open”) questions ranging from 687 and 1,815.

Although the total number of respondent who took part in the consultation constitutes around a third of all boat licence holders, the sample of respondents were self-selecting and therefore appropriate caution should be applied when interpreting and using the response numbers in this report.

### Qualitative Analysis

Each of the 14,523 qualitative question responses was analysed, coded, and assigned to a theme or themes relevant to the question asked.

We conducted a thematic analysis of the qualitative questions. Thematic Analysis is a simple and flexible form of qualitative analysis that is commonly used in social research. We have chosen this approach as it provides a way of summarising patterns in a large body of data, highlights similarities and differences across the data set, and can generate unanticipated insights<sup>1</sup>.

Our use of Thematic Analysis is driven by the consultation questions; all data relevant to the consultation questions is read and coded. Our analysis process is data driven, providing an overall analysis of themes relevant to the consultation, and comprises six steps:

- **Step 1:** A detailed reading of the data to become familiar with the text
- **Step 2:** Initial codes are then manually ascribed to the data, organising the data into meaningful groups relevant to the consultation questions
- **Step 3:** Codes that are conceptually related to one another are grouped together, and identified as themes. A theme is defined as capturing

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<sup>1</sup> Braun and Clarke (2006)

something important about the data in relation to the research question, and represents some level of patterned response or meaning within the data set

- **Step 4:** The themes are reviewed to determine whether they are internally coherent (i.e., all data within them are conceptually linked) and distinct from each other
- **Step 5:** We then define and name the themes with the aim of capturing the essence of the data they comprise. This stage also involves the identification of subthemes, which help to provide structure to the analysis. The relationship between the codes, subthemes and themes is then captured in a thematic map and coding workbook
- **Step 6:** Finally, we write up the results, providing a narrative summary of the relationship between codes, subthemes and themes, often including examples from the data to illustrate the essence of each theme

While the numbers of respondents mentioning particular themes and issues have been recorded and noted, caution should be applied in viewing and using the figures alone to support a particular conclusion. A large proportion of respondents chose not to provide answers to all the qualitative questions in the consultation; therefore, it is difficult to view these numbers as indicative of the views of the entire set of respondents or all boat licence holders. However, they do provide valuable insight into key drivers for the views expressed in the quantitative questions. However, we have set a minimum number of 10 responses mentioning a theme for them to be included in the analysis tables in this report.

While the number of respondents raising a particular issue in their comments has been recorded, it is important that views and suggestions are taken on their individual merits and qualities, rather than their apparent popularity.

We have attempted to faithfully capture and summarise comments received and are not fact checking nor censoring the contributions made by respondents.

## Structure of the Report

This report provides an overview of the responses received to Stage 3 of this consultation, setting out the main themes that emerged. The ordering of arguments does not denote the level of importance for a particular theme.

Given the number and variety of consultation responses received, in order to present our analysis in a way that reduces duplication and makes sense to the reader, we have grouped themes together in the most relevant locations within this report.

## WHO TOOK PART IN THE CONSULTATION?

11,085 responses were made to the consultation. This represents around a third of the approximately 32,000 Canal & River Trust licence holding customers.

However, as not all participants answered all questions, total response numbers for each question are shown in this report as (*n = the number of responses*).

### **Gender** (*n = 6,559*)

- 78% of respondents were male
- 19% were female
- 3% stated their gender as "other" – this included a number of responses that identified that they had responded as a couple using a single response

### **Age** (*n = 6,492*)

- 70% of respondents were aged 55 or over
- 21% were aged 35-54
- 4% aged 16-34
- 4% preferred not to say

### **Ethnicity** (*n = 6,268*)

- 90% of respondents described themselves as White British
- 4.6% were from other ethnic backgrounds
- 5.4% preferred not to say

### **Disability** (*n = 6,586*)

- 76% stated that they did not have a disability
- 6% stated their disability involved mobility
- 4% had difficulties with hearing
- 4% had a progressive condition
- 5% preferred not to say

### **Work Status** (*n=6,447*)

- 50% of respondents were retired
- 30% work full-time
- 11% work part-time
- 4% preferred not to say

### **Relationship with Trust** (*n=6,848*)

- 91% of respondents were leisure licence holders
- 4% described themselves as other stakeholders
- 3% had a business licence
- 1% stated that they did not have a licence with the Trust

### **Licence Type** (*n=6,663*)

- 62% of respondents were leisure boaters with a home mooring
- 12% liveaboard boaters with a home mooring
- 10% liveaboard boaters without a home mooring (continuous cruiser)
- 6% leisure boaters without a home mooring (continuous cruiser)

### **Licence Payment Method** (*n=6,513*)

- 55% paid for their licence by credit or debit card online
- 19% paid by direct debit
- 14% paid by credit or debit card by telephone
- 9% paid by cheque

### **Main Boat Type** (*n=6,508*)

- 79% of respondents had a narrow boat
- 11% had a cruiser
- 6% had a widebeam boat

### Main Region for Boating (*n*=6,443)

- 22% of respondents did the majority of their boating in the West Midlands
- 19% in the East Midlands
- 13% in the North West
- 12% in the South East
- 8% in the Kennet & Avon area
- 7% in London
- 5% in the North East and Wales & Borders
- 4% in Manchester, Pennine & Potteries
- 3% in South Wales & Severn
- 2% in waters under other Navigation Authority

We compared demographics from these consultation responses with data held by the Trust on its licence holders and found the following:

Demographic	Responses to this consultation	Trust Data on Licence Holders	Responses to the most recent annual Trust Boaters' Survey
Leisure Boat licence holders	68%	93%	-
Home Mooring	84%	81%	-
Continuous Cruisers	16%	21%	-
Business licence holders	3%	7%	-
Liveaboard	-	-	22%

## FINDINGS FROM ANALYSIS OF THE CONSULTATION RESPONSES

This section sets out a summary of the responses to the qualitative and quantitative questions asked in the consultation in the order in which they appeared in the survey.

### 1. LICENCE CONSIDERATIONS FOR THE INCREASING NUMBER OF WIDER BEAM VESSELS ON THE WATERWAYS

#### Question: Options for calculating the price of a licence

This was a closed question. The Trust proposed five options for different approaches to calculating the price of a licence. Respondents were asked to rate how fair or unfair they felt each option was, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>2</sup> The five options and respondents' rating of these are shown below:

- Licence fees to remain length-based using the existing bands, with all wider boats (i.e. those wider than a standard narrowboat width) charged an uplift of 25% on their respective length-based fee
  - 52% felt this option was fair
  - 33% felt this was unfair
  - (n=7,465)
- Licence fees to remain length-based using the existing bands, with all boats wider than a standard narrowboat width (i.e. in excess of 2.3m beam) charged an uplift of 50% on their respective length-based fee
  - 48% felt this option was fair
  - 38% felt this was unfair
  - (n=7,450)
- Licence fees to be calculated by actual area (Length x Beam)
  - 58% felt this option was fair
  - 25% felt this was unfair
  - (n=7,437)

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<sup>2</sup> Throughout this report, we have presented results on five-point scale questions (Likert scale) as follows: we combine "very fair" and "fair" responses to show the level of overall support for a particular option or proposal, and; we combine "very unfair" and "unfair" responses to show the level of overall objection to a particular option or proposal.

- Licence fees to be calculated based on length only (i.e. no change) with the existing bands that increase every additional 1m
  - 31% felt this option was fair
  - 52% felt this was unfair(n=7,437)
- Licences fees to be calculated on length only using exact length with no bands
  - 32% felt this option was fair
  - 47% felt this was unfair(n=7,331)

**Question: Please provide other views or suggestions on charging based on the area of a boat**

This was an open question. A free text box was provided for respondents to make any comments on licence charges based on the area of a boat. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

*Note: While this question asked specifically for views or suggestions on charging based on area, the majority of respondents used the question to express support for or opposition to increasing charges for widebeams, and why. The views below, therefore, tend to reflect both the question above, and a different question: "Please tell us any views or suggestions you have on increasing charges for widebeam boats".*

## Summary of Themes Raised

Themes raised by respondents about calculating the price of a licence (n=1,731)	Number raising theme
<b>Support for increased charges for wider boats</b>	<b>518</b>
General support for charging by area and thereby increasing the licence fee for widebeam boats	413
This approach works for the Environment Agency and Port of London Authority	87
Issues around lock usage by widebeams	86
<b>Opposition to increased charges for wider boats</b>	<b>633</b>
Seen as an unfair tax on widebeams	465
Wider boats have fewer accessible waterways	331
Arguments that widebeams restrict double mooring and around simultaneous lock use are erroneous	84
Length is as much of a factor in mooring issues as width	59
Certain canals are designed for widebeams, as well as rivers, therefore the perceived problems are not ubiquitously relevant	44
<b>Other views</b>	
Concerns about administration, potential complications and cost	121
Concerns around accurately measuring boats	90
Banding proposals are unfair and potentially problematic	67
Charging by area for a River-only licence is unfair	27
Concerns about enforcement and the possibilities for abuse	24
If not being done to increase revenue, will increases in widebeam fees be reflected in reductions for other craft?	18

### Question: In terms of calculating the price of a licence, please suggest alternatives to the proposals in the consultation document

This was an open question. A free text box was provided for respondents to suggest other approaches to calculating the price of a licence. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

### Summary of Alternative Approaches Suggested

Themes raised by respondents about suggested alternatives to the proposals for calculating the price of a licence (n=881)	Number raising theme
Licence should be based on an individual boat's usage of the waterways and its facilities, calculated by the number of miles travelled and locks traversed	226
The current length-based system works well and should be retained	172
There should be a single licence fee for all boats	80
Licence should be based on total water displacement	56
Licence fees to remain length-based, but with a widebeam uplift of up to 100%	54
Charge a liveaboard fee or supplement	43
The reintroduction of a system of tolls for locks and tunnels	34
Licence fee based on the value of the boat and/or engine size	30
Introduction of a surcharge for boats in congested areas	28

### Detailed Analysis

#### Support for charging by area and increasing the fee for wide boats

Of the 1,691 respondents who provided qualitative feedback on this question, 581 supported increased charges for wider boats.

413 saw charging by area as a logical step which would more accurately reflect a boat's true footprint on the water – particularly with regard to boats wider than a standard narrowboat. For many of these respondents, charging by area was seen as a long overdue and welcome 'tax' on widebeam boats, which were unpopular with certain respondents for a number of reasons, as stated above in responses to Question 1. Primarily, respondents said that widebeams: make navigation difficult for others; are used as cheap and sometimes unsightly housing; delay others at locks and tunnels; use more water and facilities; and restrict double mooring of boats.

It was pointed out that widebeam boats are becoming increasingly popular, in large part due to the increased amount of liveable space they provide, with no increase in



the licence fee. They felt that addressing this through either a charge by area or a widebeam uplift would help discourage both their production and purchase. Some felt that widebeam boats should be “priced off” the canals.

Respondents familiar with the licensing system of the Environment Agency and the Port of London Authority were amongst those supporting charging by area. These respondents felt those systems worked well and had done for a number of years.

Some also mentioned that it would simplify the transition were the administration of Environment Agency waters to come under the jurisdiction of the Canal & River Trust in the future.

Significantly, of those who indicated an awareness of other authorities who charged by area, there were no respondents who felt such a system did not work.

### *Issues around lock usage by widebeams*

86 respondents commented on issues relating to lock use by widebeam boats. This was the single most common reason cited for why respondents felt widebeams should be charged more than narrowboats.

Many respondents argued that, compared to a narrow boat, they use double the amount of water while traversing locks, given that they are unable to share a lock with another boat. Also, it was felt by some that this causes delays on the canals.

A similar number countered this argument, stating that while most narrowboats *could* double up in locks, they rarely do, with some users – including narrowboat owners – estimating that locks were shared around 5-15% of the time.

Respondents also felt that larger boats would use significantly less water than a single smaller boat in a lock, and that much of the wear and tear – as well as damage – that was caused to locks may come about as a result of narrowboats entering locks by opening only one gate.

Some respondents questioned whether actual lock usage had been sufficiently monitored, and whether there was good evidence to support an increase in widebeam fees based on this.

### ***Opposition to an increase in fees on wide boats***

633 respondents made comments expressing opposition to an increase in fees for wide boats. For many, there was insufficient justification to increase fees on

widebeam boats, with increases being seen as an “unfair tax”. Reasons cited by respondents in support of this view included:

- More limited access to the network
- Lack of actual evidence for the perceived impact of widebeams
- Fewer miles cruised and much more likely to be permanently/almost permanently moored
- A lack of double mooring by narrowboats, as well as a lack of simultaneous lock use (as above)
- Length being more of a factor in mooring issues than width
- The fact that certain canals were designed for widebeam boats, therefore perceived problems were not relevant to the system as a whole

The most common reason given for why it would be unfair to charge by area or introducing a widebeam uplift charge was that widebeam boats have much less access to the waterways system than narrowboats do, and that there is no way for wider boats to move between the northern and southern parts of the network, other than by road or sea.

Many of the respondents opposing the introduction of additional charges for widebeam boats, including some narrowboat owners, felt that limited access to the navigation was balanced by the additional space used by and available to widebeam owners and that the two “cancelled out” each other.

This argument was countered by some who said that the longest narrowboats are also unable to navigate the full system, and that widebeam owners were aware of these limitations when they purchased their vessel. It was also questioned as to whether they *would* want to navigate widely or cross between the north and south, given the perceived prevalence for widebeam owners to liveaboard and stay local to one area.

Some respondents thought that the argument for charging widebeams more due to mooring issues was erroneous, for several reasons, including:

- Length being the primary factor when mooring on the towpath
- Though it is suggested that narrowboats can double moor, this does not necessarily happen, with some canal users putting up signs forbidding it
- Boat area already being accounted for in mooring fees when moored in a marina
- Mooring issues where width may play a factor are mostly focused in congested areas such as on the Grand Union

### *Canal design and River-only licences*

44 respondents commented on canal design and river-only licences, raising the broader point that issues perceived to be caused by the width of a boat are not system-wide and hence do not require a system-wide solution. Though many of respondents' arguments against widebeam boats focused on the difficulties they are perceived to cause for others' navigation, some felt that these are entirely dependent on both the level of congestion on a particular waterway, as well as the width of the waterway itself. Some navigations, like the Aire & Calder, were mentioned as having been designed for wide boats, therefore issues caused by width, such as congestion, passing, and mooring do not apply there.

Similarly, some respondents commenting on this issue felt that an increase in fees for wider boats would be particularly unfair on those boats with River-only licences, where the potential for issues to result from the width of a boat is felt to be limited.

For those bringing up this issue, the Trust was urged to consider each waterway on its own merits, and not to levy charges on boats navigating waterways on which the problems the charges are intended to solve do not exist.

### **Other views**

#### *Accurate Measurement of Boats*

90 respondents made comments on how boats would be measured. Some of these respondents expressed concerns that changes to the current licence system would be administratively burdensome and difficult to implement, with a heavy financial investment necessary to ensure the measurement information for all boats was accurately updated and calculated. Concerns were also raised about the potential for abuse – for example, owners reporting their boats as being narrower or shorter than they actually are – and how this would be effectively checked and enforced, given the perceived low level of enforcement currently in operation.

Many of these respondents pinpointed the accurate measuring of boats as an issue of concern, and questioned whether "length x beam" is the best way to measure a boat, given that many boats are far from rectangular in shape. Owners of GRP cruisers, for example, felt that a "length x beam" measurement may be unfair to them, while others wondered where boats would be measured – i.e., whether at the waterline or elsewhere – and whether fenders and rudders would or should be included.

### *Banding Proposals*

67 respondents commented on the banding options in the consultation. Some felt these were unfair and potentially problematic, in that they might 'penalise' those whose boats fell into the lower portion of the band, with a measurement of a few inches potentially amounting to a significant increase in licence fee. Many of those highlighting accurate banding as an issue felt that there should be a greater number of increments, enabling a more gradual and fairer increase, while others noted that, were fees to be decided by area, exact calculations based on precise square meterage should be possible, and banding therefore unnecessary.

### *Overall revenue*

18 respondents commented on the overall revenue from licensing. These respondents felt that a move to either an area-based licence fee or the implementation of a widebeam uplift would result in a large increase in revenue from boats wider than a standard narrowboat. This led them to question whether licence fees for narrowboats would fall correspondingly, given the Trust's declaration that changes to the licensing system were intended to be "revenue neutral".

### **Detailed analysis of proposals for alternative ways to fund the licence**

#### ***Licence should be based on an individual boat's usage of the waterways***

869 respondents provided responses to this question.

223 respondents felt that the licence fee should reflect the amount the waterways are actually used, given that the licence fee contributes directly to their maintenance and the provision of facilities. Particularly highlighted were continuous cruisers, who, it was felt, travelled the most miles, therefore causing the most "wear and tear" to banks, locks, moorings, and utilising more of the facilities such as bathrooms and garbage disposal. This was directly contrasted with boats which travelled rarely, or which were permanently moored in a marina, and may cause little or no damage to the waterways. This groups, therefore, felt it unfair that they should be required to contribute as much to their upkeep, and that a licence fee based on use would more accurately represent the relationship between boater and system.

There were those, however, who questioned this argument, pointing out that wide use of the network is available to all, and that not doing so is a personal choice. They also suggested that there may not be any actual evidence that continuous cruisers travelled significantly more than those with home moorings, and that they may actually travel less.

Likewise, measuring an individual boat's use of the Trust's facilities would be difficult and widely varied. Implementing such a fee, therefore, was seen as potentially unfair and possibly based on perceptions and impressions rather than fact.

The solution to the problem was seen by some to be found in technology, with boats being outfitted with small GPS trackers which could calculate the actual mileage covered, as well as the specific location. Therefore, any locks passed through and areas of congestion entered into and/or moored in, which may attract additional charges. This use of such technology, however, was seen as an ideal for the future rather than a current possibility.

### ***Retention of the current length-based system***

170 respondents re-stated their position that they felt that the current length-based system should be retained, believing that there were no significant problems in the calculation of the licence fee which needed addressing, and that the current system had worked well for a number of years, with a widebeam boat's inability to access the same percentage of the network as narrowboats seen as balancing out against their increased space requirements.

Length was seen as the primary factor in issues such as mooring, while arguments against widebeams based on their lessened ability to double moor or to allow more than one boat to use a lock were viewed as 'red herrings' or false arguments (see responses to Question 2).

Some objected to the proposed changes being put to boaters through the consultation on the basis that widebeam owners were greatly outnumbered by narrowboat owners, therefore it was likely that the survey results would show in favour of an increase in widebeam fees.

### ***A single licence fee for all boats***

80 respondents suggested a single licence fee for all boats. For some of these, the inherent difficulties in calculating a licence fee that represented a fair spread across all different types of boats makes sharing the cost equally more straightforward. As explored above, and in Question 2, respondents felt that increases in widebeam fees may not necessarily be justified, while the perceived extra usage of continuous cruisers over those with home moorings was felt to lack strong evidence.

Similarly, variations in a boat's length were deemed to not necessarily play a part in the wear and tear that is caused to the system, nor to directly correspond with the amount of facilities used, which may be more dependent on the number of people using a boat, and the number of days it is used. Other factors that were felt to be

difficult to measure included speed of travel and level of boatmanship which would both play a role in cost to the system, as well as the specific canal or a river a boat travelled on.

Respondents therefore felt that, as there could be no fair system that could currently be implemented, without devising one which would be extremely complex to introduce and administer, that a single fee may be the best way to calculate the licence fee.

### ***A licence fee based on displacement***

56 respondents suggested a licence fee based on total displacement. Some of these respondents felt that, rather than area or length, the amount of water a boat displaces would be the best way to calculate its licence fee. Charging on displacement, it was stated, would take into account the actual draught, and therefore the potential wash damage that could be caused to the banks of the canal. This would also be a factor for narrowboats with deep draughts, as well as widebeam boats with shallow draughts.

### ***Licence fees remaining length-based, but with a widebeam uplift - up to 100%***

53 respondents suggested length-based licences, but with a higher uplift for widebeam boats than suggested in the option presented. They felt that the extra charges were justified by the problems that widebeam boats are perceived to cause on the waterways, including when passing or being passed, not being able to share locks, and restricting double mooring.

Other issues associated with widebeam boats included the belief that the majority of canals were built for narrowboats, and that widebeam boats are therefore unsuitable for these navigations, and that a favourable licensing structure which has allowed for increased space at no extra cost has resulted in large growth in the number of widebeams, and in particular those being used as liveaboards.

There was a strong sentiment among some of these respondents that both widebeams and liveaboards should be discouraged through financially punitive measures, and that doing so would help ease congestion and overcrowding.

### ***Charge an additional liveboard fee***

42 respondents suggested charging an additional fee for liveboard boats. Some stated that liveboard boats should be made to pay a supplemental fee. These respondents argued that liveaboards use extra facilities and increase congestion on the waterways. Some felt that the prime purpose of the waterways is navigation, and

that boats being used as “cheap housing” and “avoiding council tax” are contrary and detrimental to this purpose, making navigation less pleasant and more hazardous, and that this should be discouraged.

Some also suggested that this type of fee could be calculated by charging by the number of berths a boat has, therefore reflecting the potential number of people that may use the waterways’ facilities.

### ***The reintroduction of a system of tolls for locks and tunnels***

34 respondents made comments on reintroducing tolls for locks and tunnels. Some felt that tolls could be charged at locks and tunnels, either collected by staff or by an automated electronic system. This was seen as a way to more accurately increase a charge on widebeams and continuous cruisers.

It was also suggested that toll points could be introduced at regular intervals along the waterways, and, in particular, at popular places and areas of congestion.

### ***Licence fee to be based on the value of the boat and/or engine size***

29 respondents suggested a licence fee based on the value of the boat and/or the engine size. They argued that this would be fair and would avoid many of the issues raised in other questions, including: changes to the licensing system aiding those most able to afford them and while being detrimental to those who may already struggle to pay their licence fee, and perhaps face being “priced off the water” by any increases.

Related to this, some of these respondents felt that charging by a boat’s engine size may more fairly reflect the wear and tear a particular boat may cause to the waterways, suggesting that boats with larger engines may be more likely to travel over the speed limit, create greater wash, and therefore cause more damage resulting in increased costs in maintenance and repair.

### ***Introduction of a surcharge for boats in congested areas***

27 respondents suggested a surcharge for boats in congested areas. Of these, some felt that many of the problems on the waterways – including many of those the proposed changes to the way the licence fee is calculated is looking to address – were localised to specific areas, and that implementing nationwide change was an unnecessary way to tackle the problems of popular and highly-congested areas such as London and Bath.

Responses to later questions address this issue more fully – in particular, Question 26 – though some used their answers to Question 1 to suggest that focusing on these areas and attempting to solve their problems through a specific surcharge would be fairer than introducing blanket changes to the basic licence which also covered lower frequently used and wider canals and rivers elsewhere.



## 2. LICENCE CONSIDERATIONS IN RESPECT OF MOORING STATUS

**Question: The statements below suggest different options for how licensing might take mooring status into account. How fair you think each proposal is?**

This was a closed question. The Trust proposed three options for different approaches to taking mooring status into account in licensing. Respondents were asked to rate how fair or unfair they felt each option was, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>3</sup> The three options and the respondents' rating of these results are shown below:

- Retain the current arrangement with a single licence fee whether with or without a home mooring
  - 50% felt this option was fair
  - 36% felt this was unfair
 (n=6,443)
- Introduce over time a higher fee for boats without a home mooring
  - 53% felt this option was fair
  - 40% felt this was unfair
 (n=6,482)
- Introduce – at a higher fee – a new licence that would permits boats without a home mooring to remain within a limited area (provided they satisfy the Trust concerning their bona fide navigation)
  - 45% felt this option was fair
  - 38% felt this was unfair
 (n=6,403)

**Question: How fair do you think it would be to take mooring status into consideration as part of the licensing process? (n=6,608)**

This was a closed question. Respondents were asked to indicate how fair or unfair they felt a proposal was to take mooring status into consideration as part of the licensing process, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>4</sup> Respondents' rating of this proposal is shown below:

- 61% felt the proposal was fair (28%) or very fair (34%)
- 30% felt the proposal was unfair (12%) or very unfair (19%)

**Question: Tell us any other views or suggestions you have on licensing considerations in respect of mooring status**

<sup>3</sup> See footnote 2.

<sup>4</sup> See footnote 2.

This was an open question. A free text box was provided for respondents to make comments on licensing considerations in respect of mooring status. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

*Note: In general, This question was answered with support for or opposition to continuous cruisers, as revealed in the responses below.*

### Summary of Themes Raised

Themes raised by respondents about licence considerations in respect of mooring status (n=1,815)	Number raising theme
<b>Views on licensing considerations in respect of mooring status</b>	<b>707</b>
More enforcement required	350
The distinction between "continuous moorers" and continuous cruisers	226
Not enough mooring spaces for either cruisers or visitors	138
London was seen as a focal point for fee avoidance, illegality, and congestion	128
<b>Support for continuous cruisers</b>	<b>612</b>
Regulations and fee structure for licences should be independent and unrelated to mooring fees and status	147
Continuous cruisers bring benefits to the waterways	88
Mooring permanently and/or in a marina is a choice and one which comes with its own benefits	82
Proposed change to the licence unfair to winter moorers	82
The proposed change to the licence is illegal	46
Continuous cruisers may actually travel less	34
<b>Opposition to continuous cruisers</b>	<b>494</b>
Continuous cruising licence fee should be increased	168
Continuous cruisers use more of the waterways and facilities while paying less, while those with "home moorings" use less and pay more	170
Unfairly occupying visitor mooring spaces	103
Creating "unsightly" areas	37
Continuous cruiser licence fee should be abolished, or limited in number, with no new licences issued	36
Continuous cruisers more likely to cause damage and litter	37

Other views	
Home mooring licence fee should be reduced	163
Opposition for the proposal to introduce a licence which would limit boats to a specific area	147
Support for the proposal to introduce a licence which would limit boats to a specific area	57

## Detailed Analysis

707 respondents commented on licensing considerations in respect of mooring status. Many respondents felt there are several steps and courses of action necessary before any decision to change the licence fee with respect to mooring status could be considered. A number felt that the proposed changes were motivated by perceived “problems” caused by those commonly referred to in responses as “continuous moorers” or “bridge hoppers”. 350 felt more enforcement was required, including other methods which are available to tackle these issues, which ought to be implemented first.

Primarily, respondents commenting on “continuous moorers” saw this as a problem of enforcement. Some said they had seen boats breaking waterway rules and regulations relating to movement and mooring, whilst some reported seeing boats in 14-day moorings for many months at a time, year on year, and many desired for action to be taken against these so-called “bridge hoppers”. These respondents felt that the rules and regulations regarding cruising and mooring are clearly laid out, but not policed or enforced with sufficient rigour. Some respondents commented that this included many boats, with no valid licence at all. Some questioned how changing the licence fee would solve problems that are perceived to result from boats with no licence at all.

A large number of respondents (226) highlighted the significant difference between “continuous moorers” and genuine continuous cruisers, arguing that a large group of boaters conflate the two. Tackling the problem of “continuous moorers” through the boating licence was therefore seen to be unfairly punishing genuine continuous cruisers who abide by the rules and neither desire nor need a home mooring due to their preferred lifestyle and their widespread and legislation-compliant navigation of the waterways.

Likewise, many respondents (128) felt that the problems this proposed change sought to solve (which were presumed to be primarily issues of congestion and lack of mooring spaces) were neither nation- or system-wide, but concentrated on certain waterways in certain parts of the country. Respondents named London and the Kennet & Avon in particular. They encouraged measures to tackle issues in these specific areas before implementing universal changes.

Some respondents stated that the waterways they use are not congested; nor did they suffer from issues caused by wider boats; nor was there a lack of mooring spaces. However, 138 did think that the number of available mooring spaces needed to be increased to be sufficient to meet the demand for cruisers and visitors, before considering any changes to the licence fee.

Some believed that a number of continuous cruisers may desire a home mooring, but that they are in very short supply and prohibitively expensive, favouring the better-off by being auctioned to the highest bidder, and that the system was therefore in urgent need of expansion.

In short, many respondents felt there are several significant and critical steps that the Trust needs to take before a change to the licence fee with regard to mooring status could be considered. The principal one was seen as ensuring full and proper enforcement of existing rules, which these respondents felt are being flouted by a large number of boats, and that it was these boats which were causing the problems which this change sought to address.

### ***Support for continuous cruisers***

612 respondents expressed their support for continuous cruisers, with some feeling they are being unfairly treated and oppressed, and that this has been going on for many years and throughout previous license reviews. Many who expressed support pointed out that they are not continuous cruisers themselves, while some of those who identified as continuous cruisers stressed some of the reasons for choosing this type of licence. These included widespread navigation of the network, in accordance with the rules, and a preference for a freer, less-bound lifestyle. They emphasised that they had neither the need nor the desire for a home mooring, nor would they be able to use one if it were forced upon them.

82 respondents noted that it is a personal choice to have a home mooring – and in particular a marina mooring – which comes with its own benefits. These included security, stability, greater comfort and privacy, and facilities such as restaurants, showers, laundry, parking spaces, and access to public transport. In addition, whether to cruise or to not cruise the waterways was also considered a personal choice.

88 respondents commented that continuous cruisers are viewed as providing many benefits to the waterways, often described as “the lifeblood of the canals” and the Trust’s “eyes and ears”, in that they help clear debris, kept channels clear, and report problems such as low water levels, lock damage, and fallen trees. The value of these benefits in winter time was particularly emphasised, as far fewer boats use the waterways, and storm damage is more likely to occur. Many who identified as

continuous cruisers spoke passionately of their love for the canals, and of how they view it as their “home”, and take care of it as such, clearing rubbish and providing maintenance on a voluntary and spontaneous basis. Some who spoke of travelling many hundreds of miles, across almost the entirety of the network, raised fears that they may not be able to afford to continue to do so were their licence fee increased.

82 respondents questioned how the proposal would affect the licence fee of boaters who cruise during warmer months and moor during the winter, perhaps for a period of three to six months. These boaters are not, respondents noted, strictly speaking either with or without a home mooring for the full 12-month period.

### *Legality*

46 respondents raised their view that making changes to the licence fee in respect of mooring status may be illegal, and in contravention of Section 17 (3) (c) of the British Waterways Act 1995, which states there should be “two equal choices of licensing a boat with or without a home mooring.”

Some likened the proposal to the Trust’s previous proposal to create a Roving Mooring Permit, which they felt had been dropped due to its being seen as unlawful.

Likewise, the proposal to create a “new licence that would permit boats without a home mooring to remain within a limited area” was also seen to be in contravention of the British Waterways Act.

These respondents felt as well that the proposal is discriminatory, that it endorses “segregation”, and that it is being used against some of the most disadvantaged and vulnerable people on the waterways, as well as the least represented. They said that boaters without a home mooring comprise around only 15% of survey respondents. Many of these respondents felt that licensing and mooring fees were two separate issues, and that they should remain so.

Some respondents did question this widespread assumption that all continuous cruisers place a greater strain on the network. They suggested that even genuine continuous cruisers who move every week or two may still travel less and use fewer facilities than heavy-use weekend and holiday boats, or those who take long trips in the summer. They thought too that continuous cruisers are also potentially less likely to travel in the most popular and congested areas, or to occupy prime visitor moorings. They questioned, therefore, whether the proposal was genuinely evidence-based, with enough research having been done to sufficiently substantiate the claims made against continuous cruisers.

## **Opposition to continuous cruisers**

494 respondents expressed opposition to continuous cruisers in their comments. This was based primarily on the perception that they travel more, use more of the waterways' facilities, such as sanitation and waste disposal, and cause more wear and tear and damage to the network. 168 respondents felt that this should be reflected in either a greater financial contribution, or in the abolishment of the non-home mooring licence altogether.

Several suggestions were put forward as to how a proposed increased fee might be managed, including:

- Adding on the cheapest home mooring fee;
- Adding on an average home mooring fee; and
- Adding on a figure equivalent to the percentage of the marina mooring fee which goes to the Trust, believed to be around 9%.

Other reasons for opposition to continuous cruisers included the belief that they make it difficult to find visitor mooring spaces, especially in the most popular areas, and that they stay in such spaces long beyond the allowed time (as discussed above, in enforcement).

37 respondents stated that they saw that increased levels of continuous cruisers without a licence requirement for a home mooring had led to the creation of unsightly canal side areas, alongside which the towpath may have been expanded onto and littered. Some of these respondents said that the boats are often in poor shape, and that these areas make mooring and passing through, an "unpleasant experience". Some felt these boats should be moved on, that boats in a state of disrepair should be removed, and that more enforcement was required, given the number of boats perceived to be on the water without a licence. As mentioned above, this is seen as an issue that cannot be solved with increases in licence fees. Indeed, some respondents felt that any increase in licence fees may exacerbate the problem of non-payment.

The Trust was urged by some to recognise that it was not its job to manage issues of social housing – though others felt that, given the situation in places like London, where many boats were used as "floating apartments", this may now represent the '*de facto*' situation in popular urban areas, and that the Trust needed to recognise the "landlord role" that it now had.

## **Other views**

### *Discounts for home moorings*

163 respondents commented on discounts for home moorings. Some of these proposed reducing the licence fee for those with home moorings instead of - or as well as - increasing the licence fee for those without a home mooring. The more frequently made suggestion was to reduce the fee by the same amount as that part of the mooring fee paid to the Trust. Some felt this is a particularly unfair arrangement, meaning that boats are paying to the Trust twice.

### *Limited area licence*

147 respondents made comments on a limited area licence, for boaters who wish to remain in a particular area. They expressed strong opposition to this idea, arguing that it could exacerbate problems of congestion and mooring in the most popular areas, and even increase a sense of entitlement for those holding such a licence. They felt it would increase the difficulty of finding visitor mooring spots and lead to gentrification, forcing the poorest boaters away from their long-term "homes".

Some of these respondents felt that allowing boats to remain within a limited area was inconsistent with the current requirements for minimum navigation, and with the idea that those who use more of the network should pay more. How "bona fide navigation" and "remaining within a limited area" would work together was not seen as being clearly explained in the consultation.

Some also questioned the legality of such a licence, with reference to the British Waterways Act 1995, believing that the introduction of such a licence would require an Act of Parliament.

57 respondents were in favour of the proposed licence to limit boats to a specific area. They felt it could offer a solution to the problem of "continuous moorers" who wish to remain close to a particular locale for work and/or school, for example, without really wishing to move. Others suggested that it may make managing the number of boaters in congested areas easier.

Supported the introduction of this licence, but felt that it should only be made available to those who wish to remain in less congested areas, and that other means should be employed to solve the problems of the more populated cities and canals.

### *Enforcement*

As above, the issue of enforcement was a common theme raised with regard to this licence, with some respondents stressing the need for proper policing of the system to ensure boaters comply with any new regulations, if these are introduced.





### 3. DISCOUNTS

#### 3A. PROMPT PAYMENT DISCOUNT

**Question: In terms of Prompt Payment discounts, how fair you think each proposal is?**

This was a closed question. The Trust proposed three options for different approaches to prompt payment discounts. Respondents were asked to rate how fair or unfair they felt each option was, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>5</sup> The three options and the respondents' rating of these results are shown below:

- Removing the Prompt Payment discount entirely
  - 9% felt this option was fair
  - 84% felt this was unfair
  - (n=6,808)
- Reduce Prompt Payment discount (potentially phased over a period of time)
  - 13% felt this option was fair
  - 73% felt this was unfair
  - (n=6,651)
- Reduce the Prompt Payment discount and change it so that part of the discount is applied for prompt payments and part of the discount is applied to encourage automatic methods that reduce administration costs to the Trust (e.g. online payments, direct debits)
  - 50% felt this option was fair
  - 33% felt this was unfair
  - (n=6,748)

**Question: How fair do you think the idea to change the current Prompt Payment discount to one that recognises both Prompt Payment and self-service / direct debit payments?**

This was a closed question. Respondents were asked to indicate how fair or unfair they felt a proposal was using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>6</sup> Respondents' rating of this proposal is shown below:

- 62% felt the proposal was fair (37%) or very fair (25%)
- 23% felt the proposal was unfair (11%) or very unfair (13%)
- (n=6,849)

<sup>5</sup> See footnote 2.

<sup>6</sup> See footnote 2.

**Question: Tell us any other views or suggestions you have on the proposal for Prompt Payment and direct debit/self-service discounts, particularly on whether you think this change is fair given the benefit derived by the Trust**

This was an open question. A free text box was provided for respondents to make comments on prompt payment and/or direct self-service discounts. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

*Note: while the question asks respondents for views or suggestions on the removal or reduction of the Prompt Payment Discount, almost all those who addressed this issue appeared to address only the idea that it was being removed.*

### Summary of Themes Raised

Themes raised by respondents about the Prompt Payment discount (n= 1,662)	Number raising theme
<b>Prompt Payment Discount</b>	<b>746</b>
There should have been an option to select 'no change to the current system' – i.e., keep Prompt Payment Discount at 10%	214
Without a prompt payment discount, what incentive is there to pay on or ahead of time?	211
The discount appears to have been effective in reducing late payments	160
No real distinction between Prompt Payment Discount and late fee penalty	110
The Prompt Payment Discount ensures the Trust's cash flow	83
Those most able to pay in full ahead of time are the least likely to require a discount	77
Questions about how a revised Prompt Payment Discount would be administered in cases where fees are paid by agents or through clubs	49
<b>Direct Debit and Self-Service</b>	<b>851</b>
The Prompt Payment Discount should be applied no matter what the payment method	431
Encouragement for the use of direct debit	266
Increased benefits of streamlining and reduction in administration and staff requirements ought to be passed on to the licensee	157
Online procedures need improving	65

Other views	
Concern that non-fee payers were not being dealt with	109
Why do payments by credit card receive the full discount?	28
Could there be an increased discount for those who wished to pay 2-3 years upfront?	26
Given a streamlining of the admin process, this would imply that the Trust would be reducing staff numbers	19

## Detailed Analysis

### Prompt Payment Discount

746 respondents commented on their support for retaining the current Prompt Payment discount, addressing the question as if the proposal was to remove it completely. Many of these respondents felt that this discount is wanted and that it works. Some (204) noted that absence of an option in question 14 to “keep it as it is”, saying that this should have been included and would have been their preferred choice.

Many of these respondents (160) felt that the Prompt Payment Discount is doing the job it had been introduced to do – i.e., to reduce the number of late payers. They felt that the Trust was being short-sighted and lacking in critical thinking and seemed unable to follow the likely logic of removing the discount, which was that the number of late payers would begin to increase again. Some asked what the incentive would be for boaters to pay on or ahead of time, if the discount were removed. Without it, they felt the Trust would have to “chase” boaters for their licence fee, necessitating increased costs of administration and enforcement, as well as wasting time.

Encouraging prompt payment through the discount was seen as crucial in securing the Trust’s cash flow, providing benefits in terms of interest earned and having funds in place many months before they would be in its absence. Many type of businesses and utilities, it was noted, offer early payment discounts precisely because of the benefits they bring, and the Trust was encouraged to continue to do the same.

Some respondents argued that it was fair for that any savings made by the Trust to be shared with licensees making an effort to pay in ways that made these savings possible, though not necessarily in full.

211 respondents stated that, though they had always paid promptly in the past, were the discount removed they would endeavour to withhold their payment for as long as possible, seeing no possible benefit to themselves to do otherwise.

## Application and Administration

Respondents commented on the application and administration of the prompt payment discount.

110 felt there is little distinction between the idea of a discount for early payment and a penalty fee for payments made later, with each perspective amounting, in effect, to the same thing. These respondents said - as noted by the Trust as well - that for many boaters – and perhaps for the Trust itself – the discounted fee had become the '*de facto*' fee. They felt that this meant any reduction or removal of the Prompt Payment Discount could be seen as equating to an increase in the licence fee, which would be contradictory to the stated aims of the proposal.

For some of these respondents, the solution is to recalculate the licence fee to the level of the '*de facto*' fee, and calculate any discounts or penalties from there.

Other respondents felt that, for the Trust's income to remain "revenue neutral", a simple removal of the Prompt Payment Discount would be flawed, explaining this in the following way:

- 72% of boaters currently utilise the Prompt Payment Discount
- If we assume an average licence fee of £600 – purely as an example – these boaters are paying £540 each (excluding any other discounts)
- For each 100 boaters, then, the total fees paid, and therefore revenue received by the Trust, amounts to £55,680 ( $72 \times £540 + 28 \times £600$ )
- To remain revenue neutral the undiscounted fee paid by each boater would actually be £556.80 – approximately a 3% increase on the "*de facto* fee", and something quite different to a complete removal of the 10% discount
- Likewise, were the Prompt Payment Discount reduced to 5%, to remain "revenue neutral" – i.e., to generate the same amount of income as is currently received – the undiscounted licence fee would be approximately £584.64, rather than £600

49 respondents raised concerns about how a revised Prompt Payment Discount would be administered by those who were required to pay their fees to agents and clubs, and how it would be possible for them to benefit from paying promptly, particularly where clubs require payment by cash or cheque. Some also noted that agents and clubs benefit greatly from the commission they receive on these fees, and that any changes to this would presumably impact them negatively.

## Objections

77 respondents felt that the Prompt Payment Discount may be unfair in that it is perceived to be available to the wealthiest of boaters only, who need it least, while being out of reach of those who would most appreciate the savings. Others, however, though including themselves among the less well-off, said they are able to budget and save throughout the year in order to pay their full fee ahead of time, and that the current level of discount and savings offered were important to them, and perhaps even crucial.

### ***Direct debit and self-service***

There was strong support for the introduction of discounts for direct debit payments and other modern methods of payment which encouraged a streamlining of administration and the resulting reduction in staff requirements. However, a great many respondents who commented on this issue (431) felt that any revised Prompt Payment discount must be available for all methods of payment, including cash, cheque, bank transfer (BACS and EFT), and for payments made over the phone. The removal of this latter option was seen as extremely unfair to a large number of boaters. Many of these respondents noted that they themselves, or others they knew, do not own computers, have no internet access, and are often in areas with no phone signal. Furthermore, they have no interest in being connected to and involved in this world, feeling it was not conducive to their lives on the waterways. Others stated that they do not have or want bank accounts, while some expressed that they felt much more secure making payments using traditional methods, and do not trust online payments or direct debit. Some said that the Trust's own systems had been guilty of errors in the past which had resulted in overcharging or funds being mistakenly withdrawn from licensees' accounts.

Some respondents felt it would be discriminatory and unfair to use method of payment to limit access to the prompt payment discount. They felt it was potentially punitive to elderly people or those who are less advantaged and may benefit most from licence fee discounts, as well as those who may have been long-term waterways users who had always paid licence fees in advance. These respondents felt that administration costs were likely to be minimal and easily swallowed. Some respondents proposed a slightly reduced discount for Prompt Payment that could be offered for boaters wishing to pay in more traditional ways which required extra administration time or costs.

### ***Online procedures***

65 respondents made comments about online licensing. There was support for modernising and streamlining online licensing but concerns that the Trust's website was not truly capable of supporting automatic payments and self-service. These respondents felt that many changes and improvements would be required to justify

changes to discounts which would otherwise become unavailable to a number of users, in effect penalising them through no fault of their own. In particular, business licence holders, hire companies, and those who only licence their boats for part of the year mentioned being unable to renew their licence online. Others said that they had met numerous problems attempting to renew online and that they had given up.

### **Other views**

Respondents raised other points in their comments, which included the need for improved enforcement overall, and in particular for the Trust to ensure that all boats are licensed. 109 respondents disputed the claim that licence evasion had been largely eradicated, pointing out that they saw many unlicensed boats on the water. Others felt that changes to the Prompt Payment discount and a modernisation of the licensing system may lead to increases in licence evasion, as was believed to have occurred with cars following the abolition of paper tax discs. Some said that printed licences could be easily manufactured and manipulated. In general, enforcement was seen as severely lacking, with a shortage of inspectors, inspectors not doing their jobs effectively, nothing being done with the information being reported, and a lack of prosecution and punishment for those found guilty of breaching waterways rules and regulations.

### **Questions**

28 respondents raised questions in their comments, wondering why payments by credit cards were being proposed to qualify for a full discount when the Trust was presumably being charged a percentage fee on these, with this fee presumed to be in excess of any administration fees applicable to other payment methods which had been proposed as inadmissible for a discount.

26 people said they would be willing to pay their licence fees 2-3 years in advance, were an additional discount offered, and wondered if this might be made available.

As had been mentioned in the responses to other questions, 19 pointed out here that any streamlining of the administration process would necessarily result in decreased staff requirements and were curious as to what changes this might lead to – for example, whether the Trusts' staff numbers would be reduced, as seemed the logical outcome, and what would be done with the money that the financial savings from lower administration and staff costs provided.

## 3B. HISTORIC BOAT DISCOUNTS

**Question: Retain the historic boat discount at 10% on the proviso that eligibility for the discount aligns with the National Historic Ship Regulations. The criteria will be reviewed outside of the consultation. How fair do you think this proposal is?**

This was a closed question. Respondents were asked to indicate how fair or unfair they felt the Trust's proposal was for a discount on historic boats. The results are shown below.

- 79% felt the proposal was fair (40%) or very fair (39%)
  - 9% felt the proposal was unfair (5%) or very fair (4%)
- (n=7,352)

**Question: Please explain any other views or suggestions you have on proposals for a Historic Boat discount**

This was an open question. A free text box was provided for respondents to make comments on a historic boat discount. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

### Summary of Themes Raised

Themes raised by respondents about Historic Boat discount (n=1,288)	Number raising theme
<b>Support for maintaining the historic boat discount</b>	<b>593</b>
Ownership and preservation of historic boats should be incentivised	362
Discount should be raised to 20-50%	291
Licence should be free, as with classic car tax	53
Generous historic discount will not have any significant impact on the Trust's income	19
Discount should increase with age of boat	12
<b>Qualified support for a historic boat discount</b>	<b>194</b>
Boats must be ensured to be "genuinely historic"	88
Discount should only be applied to unconverted, non-liveaboard vessels	58
Discount should only be for those whose boats take part in festivals, or are open to the public in other ways	44
Discount should only apply to charities	23

<b>Opposition to the historic boat discount</b>	<b>227</b>
Owning a historic boat is a choice, using as much of the waterways and facilities as others	227
<b>Other views</b>	
Questions about how boats would qualify for the discount, and concerns that certain historic boats were not being included	107
Difficult to offer an opinion without making clear how "historic" was to be defined, and with the potential for changes to be made to this definition post-consultation	53

## Detailed Analysis

### *Support for maintaining the historic boat discount*

593 respondents felt that the historic boat discount is vital. 362 stated that they saw it as encouraging boat owners to restore and preserve an important part of the nation's heritage, and maintaining the presence of historic boats on the waterway. Such boats were seen as picturesque and of interest, and as important to attracting new users to the canal, including those who may also decide to restore a historic canal boat.

Many respondents mentioned the increased cost of restoring and maintaining a historic canal boat. These respondents felt that the discount is not only useful to owners of historic boats, but that it plays a pivotal role in encouraging preservation projects and preventing boats from being scrapped. 291 felt, therefore, that it would be fair to increase the discount for historic boats, with figures of between 20% and 50% mentioned most frequently, possibly according to a 'sliding scale' to reflect the degree of historicity, originality, and age.

53 felt that genuinely historic boats should receive a 100% discount on their licence fee, in line with road tax for classic cars.

19 respondents felt that a 10% (or higher) discount for historic boats would have little impact on the Trust's income, while providing great benefit for both owners of historic boats, other boaters, and the general public.

### *Qualified support for a historic boat discount*

194 respondents expressed qualified support for a historic boat discount. Many of these did encourage a discount for historic boats, but with certain caveats. Some were concerned that boats which were merely 'old' but of little historic value may qualify, while others expressed concern that some historic boats were in states of



disrepair, with little prospect of restoration, and were becoming eyesores on the waterways. Some also questioned whether historic 'replicas' would qualify for a discount, as well as questioning how original a boat had to be (i.e., how much of it had been replaced with newer parts). These respondents encouraged the Trust to ensure that each boat which applied for a historic discount was deemed to be "genuinely historic". Some also felt that boats which had been converted to liveaboard status should not qualify for a historic discount.

To some, the historic discount should be linked to its direct connection to the public, with certain minimum requirements for attending festivals or otherwise allowing public access to the boat, in order to "promote, educate, and exhibit canal history".

Others felt that historic boat discounts should only apply to those vessels owned by charities.

### ***Opposition to the historic boat discount***

227 respondents opposed the historic boat discount. In line with opposition to many other discounts, some respondents expressed the opinion that "a boat is boat", taking up the same space on the water, using potentially the same facilities as any other boat, and that its owner should therefore pay the same, undiscounted licence fee. Some also felt that owning a historic boat was a personal choice incentivised not by a discount but by the pleasures of owning a historic craft, and that fears that historic boats would fall into disrepair without the discount were unwarranted.

### ***Other views***

In addition, respondents raised other points in relation to the historic boats discount. 53 expressed concerns that the qualification criteria had not been included in the consultation, concluding that it was therefore not possible to make an informed decision about the proposal. These respondents felt that they were being asked to agree to something without knowing the details, or what changes may take place after the consultation.

107 respondents questioned how the Trust would administer and define 'historic', and the proposed use of the National Historic Ships Register (NHSR) in deciding which boats would qualify. Many of these felt that the Register is inadequate for the purpose of deciding the status of canal boats, and that numbers of genuinely historic boats would then miss out. One respondent stated that their boat, built in 1895, was not eligible for the NHSR, while others felt that the use of the Register unfairly excluded non-British boats which were clearly of historic value. Some suggested the criteria used by the Historic Narrowboat Club would be more suitable. It was also

proposed that there should be a process for appeal for historic boats which did not qualify for the National Historic Ships Register.

### 3C. DISCONNECTED WATERWAY DISCOUNT

#### Question: In terms of the disconnected waterway discount, how fair do you think each proposal is?

This was a closed question. The Trust proposed three options for different approaches to the disconnected waterway discount. Respondents were asked to rate how fair or unfair they felt each option was, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>7</sup> . The three options and respondents' rating of these are shown below:

- Retain the disconnected waterways discount at its current level of 25%
  - 59% felt this option was fair
  - 26% felt this was unfair
  - (n=6,867)
- Reduce the disconnected waterways discount to 10% (e.g. over 2-3 years)
  - 33% felt this option was fair
  - 40% felt this was unfair
  - (n=6,464)
- Withdraw the disconnected waterways discount entirely (e.g. over 3-5 years)
  - 29% felt this option was fair
  - 57% felt this was unfair
  - (n=6,549)

#### Question: How fair do you think any proposal to withdraw the disconnected waterway discount is?

This was a closed question. Respondents were asked to indicate how fair or unfair they felt a proposal was to withdraw the disconnected waterway discount, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>8</sup> . Respondents' rating of this proposal is shown below:

- 31% felt the proposal was either fair (16%) or very fair (14%)
- 56% felt the proposal was unfair (30%) or very unfair (26%)
- (n=7,045)

<sup>7</sup> See footnote 2.

<sup>8</sup> See footnote 2.

## Question: Please explain any other views or suggestions you have on proposals for the disconnected waterway discount

This was an open question. A free text box was provided for respondents to make comments on proposals for a disconnected waterway discount. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

### Summary of Themes Raised

Themes raised by respondents about Disconnected Waterway discount ( <i>n</i> =1,116)	Number raising theme
<b>Support for maintaining the disconnected waterway discount</b>	<b>433</b>
The discount is fair and reasonable	433
Without discounts, waterways may fall out of favour and suffer from lack of use	178
Discount reflects restricted access to the network as a whole	136
Owners may not have a choice in the location of their boat	32
<b>Opposition to the disconnected waterway discount</b>	<b>430</b>
Placing a boat on a disconnected waterway is the owner's choice	184
Maintenance and facilities costs the same	126
Actual usage in terms of distance and hours travelled is unaffected	79
Many boats are restricted by their size but receive no discount	48
Experience of boating is the same, or possibly better	23
There may be advantages to being on a disconnected waterway, such as lack of congestion and passing traffic	23
<b>Other views</b>	
The licence fee should be set according to each particular waterway	51
The Trust should work to connect disconnected waterways	49
Concerns that craft may be trailered to the main system	18
Not enough information provided to make an informed decision	17
Liveaboards on disconnected waterways should not receive a discount, as this was the owner's choice, and beneficial	15
A number of specific waterways were mentioned as being cases worthy of specific consideration in relation to disconnected discounts	

### ***Support for maintaining the disconnected waterway discount***

433 respondents provided comments about their support for maintaining the disconnected waterway discount, which they felt is fair and reasonable. The primary reasons provided were:

- the lack of ability to navigate the network as a whole;
- being restricted to a small area; and
- the widespread sentiment that, without the incentive of a discount, boats may be moved away from disconnected waterways and that they may fall into disrepair.

These respondents felt that maintaining a presence of boats on disconnected waterways is imperative to keeping the waterways open and encouraging new boaters to begin to use them. They felt that this would ease on the main network and help to clear the waterways of silt and weeds, which in turn was seen as saving the Trust money.

Without the incentive of a discount, many feared these waterways would become derelict and lost forever. The discount was seen as providing encouragement for their use, maintenance and perhaps their preservation until they are reconnected to the network.

### ***Opposition to the disconnected waterway discount***

430 respondents opposed the disconnected waterway discounts. The primary reason cited for opposition was the view that maintaining a boat on a disconnected waterway is a free choice made by the owner and that they are free to move the boat to the main network if they want to navigate more widely. Some respondents felt that many boats on disconnected waterways are used as liveaboards, and therefore tied to a local area, with owners having commitments such as work and school, much in the same way many boats on the main network are.

This view was countered by others who felt that it might not be a free choice to be based on a particular waterway. Rather, they felt that boaters might be limited by the need to be close to home and a lack of connected waterways within reasonable travel distance.

Others felt that boats on disconnected waterways would be unlikely to navigate widely even if on a connected waterway, or if their waterway were reconnected, due to being used as liveaboards or through lifestyle choice. Many boats on the main network, it was pointed out, travel little, or perhaps never leave their home marinas,

while others are similarly restricted in their abilities to navigate by size, but receive no discount.

126 respondents proposed that maintenance and facilities costs on disconnected waterways are likely to be as high, if not higher, than those on the main network. They suggested that use of these waterways, in terms of hours travelled and wear and tear, as well the boater's actual experience of navigation, may be exactly the same as it is for all other boaters. Indeed, some felt there are advantages to being on disconnected waterways, in terms of less congestion, less passing traffic, more mooring spaces available, and a more pleasant and peaceful experience as a whole. It was, therefore, seen by some to be unfair that boats on disconnected waterways should be "subsidised by others".

### **Other views**

Other respondents raised a variety of points about the disconnected waterways discount.

51 felt that the level of discount should be set according to each individual waterway, based on length of navigable water, number of locks, popularity, available facilities, and how much need there is to encourage new boats on little used waterways. They felt that there is a great deal of variety across the different disconnected waterways, with many specific waterways mentioned in response to this question:

- The Gloucester and Sharpness Canal was viewed as being "partially disconnected" due to restricted access to the Severn during winter months, as well on certain days per week and because of bridge and Severn Lock opening times
- Boaters moored on short waterways such as the various sections of the Montgomery and the north section of the Ashby felt that a higher discount may more fairly reflect the percentage of the system they are able to navigate, encourage much needed new boaters, and that a removal of the discount would "kill the canal"
- Some users of the Lancaster Canal, which is not classified as a disconnected waterway, felt that it should be as many vessels are not able to navigate the Ribble Link
- The Basingstoke Canal was perceived as being "virtually disconnected", due to limitations in its use
- The River Whitham was seen as disconnected from November to March due to low water levels which leave boats unable to navigate and "sitting on mud"
- The Chesterfield Canal was felt to be "partially disconnected" due to safety issues in navigating the tidal Trent

- The Tees was viewed as being potentially disconnected due to the “magnitude of the voyage required to reach the Humber”
- Several respondents felt the Bridgewater and Taunton should be eligible for a higher discount, with one reporting that its managers had stated that they felt its waters would be easier to manage were more boaters encouraged to use it, and that this would result in less weed and silt needing to be removed by contractors
- The Monmouth and Brecon was also felt by some to be worthy of a higher discount, due to a lack of navigable waters
- The Lee and Stort, the Ancholme, and the Pocklington, however, were mentioned as receiving discounts for being disconnected, but were felt by some to actually be connected waterways
- Though the Pocklington was another which was felt to need encouragement to increase levels of use, as was the Cromford and the Grantham

### *Concerns over potential abuse of the discount*

18 respondents made comments about the potential abuse of the disconnected waterways discount. Some of these were worried that boats which had qualified for discounted licences may then transport their boats to the main network, navigating undetected on a reduced licence fee. Others felt that this is unlikely to happen, in large part due to the cost and difficulty in moving a boat between waterways, but thought that boats which were more easily transported by trailer may need to be considered more carefully when registering for a disconnected waterway discount.

### *Request for more information*

17 respondents expressed the view that they would need more information to provide an informed response to this question. They felt that they lacked knowledge about disconnected waterways, and would have welcomed details about which waterways were classed as disconnected and how many boats were currently claiming the discount.

### 3D. DISCOUNTS FOR UNPOWERED BUTTYS

#### **Question: In terms of the discounts for unpowered buttys, which you believe to be the fairest approach?**

This was a closed question. The Trust proposed two options for different approaches to the discount for unpowered Buttys. Respondents were asked to indicate which of the two options they felt was the fairest approach. The two options and respondents' rating of these are shown below:

- 68% favoured the option to leave the unpowered buttys discount unaltered
  - 32% preferred that the discount should be removed (potentially over a period of up to 5 years)
- (n=6,931)

#### **Question: How fair do you think the proposal to retain the unpowered buttty discount is?**

This was a closed question. Respondents were asked to indicate how fair or unfair they felt a proposal was to retain the unpowered buttty discount, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>9</sup>. Respondents' rating of this proposal is shown below:

- 63% felt that the proposal was fair (33%) or very fair (30%)
  - 27% felt the proposal was unfair (18%) or very unfair (8%)
- (n=7,054)

#### **Question: Please tell us any other views or suggestions you have on proposals for the Unpowered Butty discount**

This was an open question. A free text box was provided for respondents to make comments on proposals for an unpowered buttty discount. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

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<sup>9</sup> See footnote 2.



## Summary of Themes Raised

Themes raised by respondents about Unpowered Butty's discount (n=1,208)	Number raising theme
<b>Support for the discount for unpowered butty's</b>	<b>611</b>
Agree that a discount for butty's is appropriate – though often dependent on certain criteria:	
• Only if shown to be of historic or cultural value	122
• When associated with a powered boat as part of a pair	99
• Not if used as a liveaboard	92
• Only if being used as a "working boat"	45
• Only if not being used for business purposes	25
Butty's tend to be historic and rare, and preservation should be encouraged	132
Current level of discount should be maintained	71
Discount should be in place, but limited to 25-30%	67
Because butty's are rare, giving discounts will make little difference to the Trust's overall funds	25
<b>Opposition to the discount for unpowered butty's</b>	<b>453</b>
Unpowered butty's should be considered as any other vessel	386
There is no justification for the discount	41
The use of butty's causes hazards and delays	38
<b>Other views</b>	
Concerns that the administration of discounts is not abused	91
This discount is not aligned with widebeam charge	35
Discounts for butty's are already covered by the historic boat discount	32
Horse-drawn boats should also qualify for an unpowered discount	21

## Detailed Analysis

### Support for the discount for unpowered butty's

611 respondents expressed support for the discount for unpowered butty's, giving a range of different reasons for their support. They felt that unpowered butty's tend to be historic and rare, and an intrinsic and valuable part of the tradition of the canals – particularly when partnered with a matched powered boat and/or as part of a working pair.

Some feared that the removal of the discount would result in many more butty's being converted into powered boats, and saw the discount as important in encouraging as much preservation as possible. Others pointed out that, because

butty's are rare, the amount of discount would make little difference to the Trust's income as a whole.

A large number of respondents favoured the discount but felt it ought to be subject to certain criteria, and perhaps variable, depending on how well each individual butty fulfils the criteria and offers value to the canal, other boaters, and the public in general. The proposed criteria were:

- Discounts should only be given for butty's shown to be of historic or cultural value, with a strong emphasis on not providing discounts to boats which are simply unpowered. Some feared that butty discounts are administered to all unpowered boats, with many respondents pointing out that they had seen butty's which are highly unsightly, filled with 'rubbish', and being used as 'floating sheds' or 'skips'. Care was therefore encouraged to ensure that boats are deemed to be truly worthy of a discount.
- Discounts should only be given for butty's that are associated with a powered boat as part of a pair, encouraging the continuity of tradition and ensuring that larger butty's are not partnered with smaller, non-matched powered boats. This was seen as providing greatly added space and value to a boater while unfairly circumventing licensing considerations. Genuine matched narrowboat pairs, it was felt, are one of the most attractive sites on the waterways, and the removal of the unpowered butty discount may lead to these pairs being broken up and lost forever.
- No discount should be given for butty's that are being used as liveaboards, or have been converted. Respondents felt this would encourage the preservation of butty's in their original condition, and also avoid a loophole by which a vastly discounted licence fee and home could be had, when circumstances and conditions – i.e., not moving – would be much the same as a boat in a marina or home mooring which was not being used to navigate the system.
- Discounts should only be given for butty's being used as "working boats", therefore functioning in a way that is appropriate to their original intention, as well as providing service to the canal.
- No discount should be given for butty's that are being used for business purposes, such as those owned by hotels.

67 respondents expressed support for retaining a discount for unpowered butty's, but felt that 50% was too high, and that 25-30% would be more reasonable.

### ***Opposition to the discount for unpowered butty's***

453 respondents opposed the discount for unpowered butty's. As in comments made in response to other others, many of those who oppose the discount felt that butty's use the waterways in much the same way as any other vessel: occupying space on

the water and towpath, traversing locks, utilising facilities, and causing wear and tear to the system. They saw it as inconsistent with the proposed move to charging by area, and with the idea of increasing fees on widebeam boats, given this appeared to be motivated by the space they occupied on the waterways.

41 respondents could see no reason for the discount and wondered how it is justified. If it is to encourage preservation of historic vessels, they suggested it would fall under the historic boat discount? Some felt that if the discount is given because the boats lacked engines and power sources, they questioned what should be done about other boats that never moved, that had non-functioning engines or engines that had been removed, or dedicated houseboats.

38 people commented that they felt unpowered buttyts are responsible for hazards and delays – particularly at locks – due to the extra skill required and difficulty in navigating them proficiently.

## **Other views**

### *Concerns over potential abuse*

Respondents made a number of comments about the potential for abuse of the unpowered butty discount.

91 believed that powered boats would qualify unfairly for the discount, for example, by having their engines removed.

Others pointed to ex-oil rig lifeboats being used as liveaboards and qualifying for the discount, or those who attach fee-exempt 'powered tenders' to unpowered boats.

It was also suggested that many modern, plastic boats are being classed as buttyts and qualifying for the discount. Tighter regulations and classifications, and stricter enforcement, were therefore recommended.

### *Other non-powered vessels*

21 respondents felt that other non-powered vessels, such as horse-drawn boats, static houseboats, and human-powered vessels, should qualify for an unpowered boat discount.

### 3E. DISCOUNTS FOR ELECTRIC BOATS

#### Question: In terms of the discounts for electric boats, how fair do you think each proposal is?

This was a closed question. The Trust proposed three options for different approaches to discounts for electric boats. Respondents were asked to rate how fair or unfair they felt each option was, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>10</sup> The three options and the respondents' rating of these results are shown below:

- Retain the current 25% electric boat discount
  - 40% felt this option was fair
  - 43% felt this was unfair
 (n=6,699)
- Replace it with a 10% electric boat discount (a phased reduction of the discount over a potential 2-3 year period)
  - 33% felt this option was fair
  - 42% felt this was unfair
 (n=6,517)
- Remove the electric boat discount entirely (a phased reduction of the discount over a potential 3-5 year period)
  - 45% felt this option was fair
  - 42% felt this was unfair
 (n=6,632)

#### Question: How fair do you think any proposal for a new lower discount that recognises more environmentally friendly boating is?

This was a closed question. Respondents were asked to indicate how fair or unfair they felt any proposal would be for a new lower discount for environmentally friendly boating, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>11</sup> Respondents' rating of this proposal is shown below:

- 40% felt the proposal was fair (27%) or very fair (13%)
  - 36% felt the proposal was unfair (20%) or very unfair (16%)
- (n=6,877)

<sup>10</sup> See footnote 2.

<sup>11</sup> See footnote 2.

**Question: Tell us any other views or suggestions you have on replacing the electric boat discount with an alternative discount that supports more Environmentally Friendly Boating. We would also be interested in your views on what criteria the Trust might consider for any such discount.**

This was an open question. A free text box was provided for respondents to make comments on a discount to support more environmentally friendly boating. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

*Note: while the question asked is about the proposal to introduce an “environmentally friendly boating discount”, almost all replies were more directly related to how respondents felt about electric boats, in effect answering a different question, which is reflected below.*

### Summary of Themes Raised

Themes raised by respondents about Electric Boat discount (n=1,719)	Number raising theme
<b>Support for the electric boat discount</b>	<b>589</b>
It rewards and encourages the extra expenditure owners have outlaid in order to make less of an impact on the environment	118
Support for an electric boat discount, but they should be “genuinely ecological”	119
Electric boats reduce air and noise pollution	49
Electric boat discount demonstrates leadership and innovation in green technology	22
Electric boat discount is in alignment with steps being taken in motoring and other areas of energy production	18
<b>Opposition to the electric boat discount</b>	<b>594</b>
All boats use the waterways and facilities equally	361
Electric boats are not actually environmentally friendly	363
The existing and proposed electric boat discount does not take into account the many other ways environmentally friendly behaviour may be occurring	116
It is not within the Trust’s remit to use licence fees to promote changes to the way boats are powered	62
An electric boat discount only helps the wealthy	64
The projected number of vessels moving from fuel to electricity is not viewed as making any significant impact on lowering pollution levels	41
An electric boat discount is a penalty on traditional diesel engines	39
An electric boat discount is inconsistent with the historic boat discount	35

Pollution from diesel engines is minimal, therefore it is unnecessary to take steps to address it	34
The move towards electric-powered vehicles is happening anyway	26
Questions whether the electric boat discount has been shown to be effective	15

## Detailed Analysis

### ***Support for the electric boat discount***

589 respondents commented on their support for the electric boat discount. Of these, many said that anything that helps reduce pollution on the waterways and elsewhere is to be encouraged, particularly as there is growing awareness of climate change and movement in other industries to producing and providing more environmentally friendly products and services. 18 respondents drew attention to changes that have been made in the motor industry, and especially the government's plan to ban the sale of new diesel and petrol cars and vans from 2040. Encouraging propulsion systems which use non-fossil fuels on boats was therefore seen as the Trust demonstrating leadership and innovation in endorsing and supporting green technology.

118 respondents felt that it is right to support and encourage those who have made the investment to move to electric-powered boats, which is seen as considerable. They felt it would be correspondingly unfair to these boaters to remove the discount when purchases had perhaps been made with the idea of offsetting some of the cost against the discount to the licence fee. Purchasing an electric boat was seen as a long-term investment, and any change to the discount felt to be a retrospective and punitive change to the regulations.

Electric boats were also viewed as causing less damage to the banks of the waterways, due to their reduced speed, and therefore seen as costing the Trust less in terms of maintenance and repair, while the reduction in local noise and air pollution was also a key theme of support.

Some felt that a reduction in the electric boat discount would be a step backwards, out of sync with many other aspects of society. They suggested that, if anything, changes should be made to *increase* the discount, given the considerable cost of investing in cleaner methods of boating incurred by electric boat owners. Others felt that the discount could be reduced if changes in technology and consumer choice grew to the extent that their uptake no longer required the incentive of large discounts– e.g., more people moving to boats powered by renewable sources and

environmentally friendly engines becoming more affordable. This was argued to have been the case with domestic solar energy and hybrid cars.

119 respondents who supported the discount for electric boats, and for environmentally friendly boating in general, stressed that boats must be ensured to be “genuinely ecological”. This would mean taking into account the different uses of fuel by boaters. Primarily, these respondents said it would exclude the use of diesel and petrol generators to charge batteries, and they also highlighted how boats source power for heating, cooking, lighting, sanitation, and domestic appliances such as refrigerators and washing machines. These uses are seen as just as important as the use of power in propulsion of the boat.

This issue was also raised by respondents who mentioned the difficulty in arriving at a true measure of ‘environmental friendliness’ (see points raised later in response to this issue).

### ***Opposition to the electric boat discount***

594 respondents expressed opposition to the electric boat discount, citing a range of reasons for this opposition. The primary objection, cited by 361 respondents, was that these boats take up the same space on the water, have the potential for using the facilities in exactly the same way as any other boat, and cause as much wear and tear to the system, which is what the licence fee is designed to pay for, and therefore their contribution should be the same as non-electric boats.

A similar number (363) said that electric boats are not necessarily any more environmentally friendly than non-electric boats. Many of these felt that many electric boats use on-board diesel generators to charge their batteries, generating emissions and noise pollution, often at night, while a similarly large number stated that they felt electric boats are just as polluting as diesel-powered boats – or perhaps even more so – when taking into account how the electricity they use is generated and the environmental impact of manufacturing and disposing of their batteries (with different batteries causing different levels of environmental impact).

Others objected on the grounds that the licence fee is designed to contribute to the maintenance of the waterways and the manner in which a boat is powered is irrelevant to this, with incentives towards environmental awareness lying outside the Trust’s remit. These respondents felt that the government is best placed to handle environmental incentives, and that financial rewards are already provided by reduced fuel costs for those who have already installed more environmentally friendly means of power.

26 felt the change to electric-powered vessels was happening anyway. Some also questioned whether the application of an electric boat discount has been shown to work, pointing out that the number of electric boats on the network is small.

64 respondents felt that, given the increased costs in switching to or buying an electric boat, this was something that is only available to wealthier boaters, who are perceived as: a) being in less need of a discount to their licence fee; and b) more likely to be motivated to own and run an electric boat through personal choice rather than the enticement of a licence fee discount.

In common with other discounts – in particular the Prompt Payment discount – discounts which tend to be unavailable to less wealthy boaters generated some opposition about lack of equality of access to the discounts.

### *Diesel*

34 respondents commented on the pollution generated by diesel-powered canal boats, which they felt is minimal, and not comparable with its use in the motor industry, therefore similar incentives and levels of action were not required. Some respondents highlighted how few miles their diesel-powered boats journey in a year, pointing out that their environmental impact would be far less than an electric boat that travelled more. Others speculated that the lack of uptake for electric boats is at such a level that they make little or no difference to reducing pollution.

39 respondents felt that giving discount to electric boats could be viewed as punishment for those running diesel engines. They argued that it was, therefore, at odds with maintaining a traditional method of power on the canal, and with the historic boat discount, given that there are unlikely to be any historic electric boats, and that original historic diesel engines may be some of the worst polluters on the waterways. Some were puzzled about why the discount for electric boats was higher than that for historic boats, given the strong level of support for preserving the history and tradition of the waterways.



## Other views

125 respondents commented on difficulties in measuring “environmental friendliness” and on the many ways this could be calculated

For many, the introduction of a discount intended to reward environmentally friendly boating is seen as a logistical nightmare, and perhaps one impossible to implement and manage successfully. As mentioned above, many raised the issue of electric boats charging their batteries with fuel generators, which is seen as incompatible with an ecologically-motivated discount, while others questioned the scope of what environmentally friendly really meant.

Some raised a number of issues about different ways in which boating could be more environmentally friendly, including where:

- a boat with a low emissions diesel engine which travels little but uses solar panels to provide electricity
- boat owners who purchase phosphate-free dish soap and washing powder;
- boat owners who wash clothes by hand rather than powering a washing machine;
- boat owners who compost food and human waste;
- boat owners who abstain from buying plastic and recycle their garbage;
- boat owners who cycle instead of driving; who ensure nothing resembling a pollutant – e.g., chemicals used in household cleaning products – ends up in the waterways;
- boat owners who care for wildlife and the eco system;
- boat owners who generate their heat in the most environmentally friendly way possible – although there was some debate about what this would be
- boat owners who do not use their boat in winter; and
- boat owners who use clay pots instead of a refrigerator

These points were raised when asking whether in these scenarios this boat would receive the ‘environmentally friendly’ discount that its owner merited, based on a range of measures, in spite of the fact that it contained a diesel engine.

These respondents felt that an accurate measure of environmental friendliness would be a complex and highly nuanced task which, though laudable, may be beyond the scope of the current administration system, and incredibly difficult to enforce.

### *Solar panels and wind energy*

187 respondents commented on and strongly supported the use of renewable energy sources such as solar panels and wind energy: this includes those who supported and those who opposed the electric boat discount. They argued for the encouragement of solar panels and wind generators, with many feeling these represented the purest and perhaps even only pure form of green energy production, and that there could be few objections for discounts for these – though they questioned what amount of solar utilisation would result in what scale of discount.

These respondents argued that there is a large difference between a boat employing many hundreds of watts of solar panels to provide the majority of its required energy and one which uses a small solar system to charge a phone and iPad. They felt that such differences would necessitate either a minimum requirement, or a discount which could be adjusted on a sliding scale. Once again, questions of enforcement and ensuring compliance were asked – for example, in the event of solar panels being removed, sold, or stolen.

#### *Electrical charge points*

77 respondents commented on electrical charge points, noting that there are insufficient of these to fully support electric boats and a move away from fossil fuels. Installing charging points was therefore seen as an intrinsic element if the Trust were to encourage electric boating. Some wondered where the funding for such an operation would come from, and whether it could be justified given the current and projected levels of boats that would utilise them.

#### *Other means of powering a vessel*

36 respondents commented on other means of powering a vessel, noting that some are as environmentally friendly as electric boats, if not more so. These included boats pulled by horses, boats powered by steam, sailboats, and boats pedalled by humans.

### 3F. DISCOUNTS FOR CHARITY BOAT LICENCES

#### Question: How fair do you think the proposal to retain the charity boat discount and review the conditions for eligibility is? (n=6,762)

This was a closed question. The Trust proposed retaining the charity boat discount and reviewing the conditions for eligibility, so that the charitable objectives of the Trust and third-party charities are aligned. Respondents were asked to indicate whether they thought this proposal was fair or unfair. Respondents' rating of this proposal is shown below:

- 79% felt the proposal was fair (40%) or very fair (39%)
- 8% felt the proposal was unfair (5%) or very unfair (3%)

#### Question: Tell us any other views or suggestions you have on proposals for a charity boat discount

This was an open question. A free text box was provided for respondents to make comments on a charity boat discount. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

#### Summary of Themes Raised

Themes raised by respondents about Charity Boat discount (n=788)	Numbers raising theme
<b>Support for the retention of the charity boat discount</b>	<b>261</b>
Charities do good work, especially for the disadvantaged	96
Discount should be increased to 100% – i.e., no fee	69
Charities bring new people to the waterways	34
Discount should be based on the amount the boat is being used for charitable purposes	16
<b>Opposition to the retention of the charity boat discount at 60%</b>	<b>259</b>
Charity boat discount should be reduced to:	
• 40-50%	20
• 25%	54
• 0%	87
Charities which profit from their boats should not receive a discount	33
Charities ought to be seen in the same light as businesses	20

Other views	
There needs to be an adequate measure as to whether boats truly merit charitable status	184
Not enough information was provided to make an informed decision	53
Deciding whether a charity was worthwhile or not was outside the Trust's remit	32

## Detailed Analysis

### *Support for the charity boat discount*

261 respondents expressed support for the charity boat discount in their comments. 96 highlighted the good work that charities do, and the opportunities they afford to a wide variety of people, including the disabled and the disadvantaged, who may not otherwise have an opportunity to experience the waterways. 34 respondents felt that charities play an instrumental role in bringing new boaters to the waterways and offering them positive first experiences on the canals and rivers, perhaps helping "recruit" them to a boating lifestyle, and therefore increasing both the Trust's and tourism-related revenue.

69 of those who supported the charity boat discount encouraged an increase in the level of the discount, suggesting that licences could be free. They noted that the Trust is a charity itself, so therefore motivated to aid other charities as much as possible. 16 respondents felt that a discount for charity boats could be variable, depending on how much time the boat spends engaged in charitable activities.

### *Opposition to the charity boat discount*

259 respondents expressed opposition to the charity boat discount in their comments. Some stated that "a boat is a boat" and all boats should contribute equally to the maintenance of the waterways and the facilities provided. Some respondents felt charity boats are used more than many private and leisure boats. Others said they are a particular nuisance on the waterways, being poorly piloted and assuming privileges in mooring and navigation because of their charitable status.

Some respondents suggested that the charity boat discount could be retained but reduced, with 74 of these suggesting specific figures of discount (from 25-50% as in the table above). 87 stated explicitly that the discount should be abolished. It is not clear from comments how many of those opposed to the charity boat discount believed it should be removed entirely.

Some respondents opposed the charity boat discount according to how the boat is being used, with some stating that the discount should not be applied if passengers are being charged, while others believed that charities that pay staff to man the boats should not receive a discount.

Similarly, some respondents thought that charities that hire their boats to groups such as hen parties and corporations did not deserve a discount, whilst others felt charities should be viewed and treated in the same way as businesses.

Other respondents felt it would be unfair to exclude charities from discounts because they charge passengers, arguing that charities require funds to maintain their boats, or would put the money raised through charges towards good causes.

### **Other views**

184 respondents expressed support for the Trust's proposal to ensure that charities satisfy certain eligibility requirements, with some expressing concern that, in their view, some charities currently on the waterway appear to be doing very little charity work at all, while still qualifying for the discount.

A small number felt that some charity boats are used more by staff and their families and associates for their own personal leisure trips. The Trust's own boat, Beauchamp, was included in this category, and religious groups and private schools were also mentioned in this light. 32 respondents, however, felt that it is outside the remit of the Trust to pick and decide which charities deserve a discount, and that requiring charities' aims to be in alignment with those of the Trust – which were not made clear in the consultation – is flawed. Some respondents felt that registration with the Charity Commission should be enough to satisfy any criteria of eligibility.

53 respondents noted that, without knowing what the eligibility criteria was, it was impossible to offer an informed opinion, and that they were being "asked to vote for something without being told what it was." Some also felt that this question was actually two questions in one, asking at the same time how fair the retention of the discount was, and how fair it was to review the eligibility criteria – rendering it impossible to answer if it was felt that one of the proposals was fair and the other was not.

## **3G. APPLICATION OF AND ELIGIBILITY FOR MULTIPLE DISCOUNTS**

### **Question: In terms of multiple discounts, please indicate which option you think is fairest**

This was a closed question. The Trust proposed two options for different approaches to multiple discounts. Respondents were asked to indicate which of the two options

they felt was the fairest approach. The two options and respondents' rating of these are shown below:

- 55% preferred the option for customers to receive multiple discounts as per the current arrangements
  - 45% preferred the option for customers to only receive a maximum of one discount per licence in addition to the River Only Licence discount and the revised prompt payment and/or direct debit discount
- (n=6,471)

**Question: How fair do you think allowing multiple discounts is? (n=6,714)**

This was a closed question. Respondents were asked to indicate how fair or unfair they felt it is to allow multiple discounts, using a five point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>12</sup> Respondents' rating of this proposal is shown below:

- 50% felt it was fair (30%) or very fair (20%) to allow multiple discounts
- 30% felt it was unfair (22%) or very unfair (8%)

**Question: Tell us any other views or suggestions you have on multiple discounts**

This was an open question. A free text box was provided for respondents to make comments on multiple discounts. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

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<sup>12</sup> See footnote 2.

## Summary of Themes Raised

Themes raised by respondents about the application of and eligibility for multiple discounts (n=687)	Number raising theme
<b>Support for the retention of multiple discounts</b>	<b>291</b>
If boats qualify for multiple discounts there is no reason why these discounts should not be applied	140
Multiple discounts encourage and incentivise boaters to operate, licence, and pay in ways that benefit the waterways and the Trust	88
Support for multiple discounts, but with a cap of between 25 and 50%	35
System currently used works fine	26
<b>Opposition to multiple discounts</b>	<b>160</b>
Concerns about unnecessary administration costs and complexity	42
Should be one licence fee for all	36
Could be open to abuse	12
<b>Other views</b>	
Would need to know more about the scale and application of multiple discounts to offer an informed opinion	65
How would the discounts be applied in practice?	12

## Detailed Analysis

### Support for the retention of multiple discounts

291 respondents commented on their support for the retention of multiple discounts, arguing that there is no justification to remove this, given that each individual discount would have been deemed meritorious and worthy, and designed for a specific purpose. These respondents felt that discounts do not 'overlap' – i.e., boats cannot be rewarded twice for the same thing – and were seen as being given for things which benefit not only the owners themselves, but also the Trust and other people.

Discounts were also seen as a way for the Trust to control and encourage certain behaviours and beneficial practices – such as the restoration and preservation of old and rare boats – and the proposed removal of multiple discounts was felt to contract to this, reducing incentives for those who were currently claiming them.

In short, these respondents felt that the current system works well, and if individual discounts are deserved and earned, there appears to be no logical justification for them to be refused based on a particular boater being entitled to claim more than one.

35 respondents, however, who, though supporting the application of multiple discounts, felt that the amount discounted could be capped, with the most common figures suggested being between 25% and 50% of the total licence fee. These respondents gave no reasons for why a cap may be necessary.

### ***Opposition to multiple discounts***

160 respondents commented on their opposition to multiple discounts, though few explained why these might be unfair. The primary specific explanation (cited by 42 respondents) was a concern that the administration of multiple discounts may be complex and costly. Others (36) opposed discounts in general and supported a single licence fee for all boats. Some drew comparisons with supermarkets, where coupons "cannot be used in conjunction with any other offer."

Some respondents (12) who opposed multiple discounts feared the potential for abuse and for "playing the system", believing that some owners may be able to pay no licence fee at all – that is, that all their discounts would add up to a total of 100%. Whether this is in fact possible was not explored.

### ***Other views***

A number of respondents raised other issues in their comments. 65 respondents felt that they needed more information to offer an informed opinion about how multiple discounts currently work, and how they might be changed. This included information on:

- How many people claim multiple discounts?
- What is the financial scale and the impact on the Trust?
- How are they calculated and administered?
- What is the administration cost involved in:
  - a) applying multiple discounts?
  - b) applying only one discount where more than one is available?

12 respondents stated that their answers to the consultation questions may be very different depending on the answers to those questions – e.g., whether the application of multiple discounts is a large or small one, affecting and being claimed by very few boats.

Some respondents raised questions about the detail of the calculations involved, for example:



- Are all discounts applied to the full licence fee, as in three 10% discounts on a £1,000 licence each resulting in a £100 discount, and a final licence fee of £700?
- Or are they applied sequentially, so that the final licence fee arrived at is a little higher, at £729?

Some respondents said that this consultation was the first time they had heard of multiple discounts, with a few believing they applied to the owning of multiple boats, which was not supported.

## 4. CONSIDERATIONS FOR SHORT TERM LICENCES

The Trust explained that short term licenses take more time and resources to administer compared to a full licence that lasts for 12 months, and set out a proposal for how this could be simplified, through a proposal for three short term licence options consisting of:

- One week
- One month
- Thirty-day explorer

The cost of all the short-term licences would be priced proportionately higher than a full licence to reflect the greater administrative costs.

### **Question: How fair do you think the proposal around short-term licences is?**

This was a closed question. Respondents were asked to indicate how fair or unfair they felt a proposal was for short term licences, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>13</sup> Respondents' rating of this proposal is shown below:

- 78% felt the proposal was fair (45%) or very fair (33%)
  - 10% felt the proposal was unfair (5%) or very unfair (5%)
- (n=6,718)

### **Question: Tell us any other views or suggestions you have on short term licences**

This was an open question. A free text box was provided for respondents to make comments on short term licences. The main themes raised by respondents are summarised in the table below and analysed in detail in the subsequent sections.

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<sup>13</sup> See footnote 2.

## Summary of Themes Raised

Themes raised by respondents about Short Term licences (n=912)	Number raising theme
<b>Views on the different licence options</b>	
The one-day licence should be kept	166
There should be more flexibility, such as a 2-week licence and weekend licences	81
There should be a 3-month licence	42
The one-day licence should be abolished	22
The explorer licence should be removed	24
There should also be 6 or 9-month licences	24
There should be no short-term licences	17
A one-week licence is unnecessary	16
There should only be a 30-day licence	16
<b>Other views</b>	
The system of short-term licences is open to abuse - especially with regard to portable craft	177 - 34
How can the administration costs be so much higher if licences are processed automatically online?	98
The purchasing process should be modernised, including utilising smart phones	67
The proportionately higher price for short-term licences is acceptable, providing this can be proven to accurately reflect administrative cost	55
More information would be necessary in order to give an informed opinion	36
Short-term licences should not be disproportionately higher, or not significantly so	35

## Detailed Analysis

912 respondents commented on short-term licences, proposing a wide variety of suggestions. The majority proposed either to keep the 1-day licence, or to introduce new licences. The main suggestion was to introduce weekend and 2-week licences, to tie-in with the most common holiday periods, as well as 3, 6, and 9 month licences.

In general, respondents urged greater flexibility, with a number questioning why, in an age of advanced technology, short-term licences need to be so restrictive in terms of time, and based on ancient and arbitrary measures such as the week and the month – which varies from 28 to 31 days – and may have no real relevance to the requirements of boaters.

Some suggested, therefore, that licences should be made available for any particular length of time, with the boater themselves choosing the dates they require a licence to run, and a simple algorithm which factored in administrative and proportional costs used to output the price, whether it be for three, eight or twenty-six days.

166 respondents who opposed removal of the one-day licence gave a number of reasons for this, including:

- Making the minimum licence one-week seemed excessive if only one or two days were required
- A one-week minimum licence would vastly increase the cost of an 8-day trip, which would necessitate buying two one-week licences
- Concerns that the number of boats buying a short-term licence to cover a day's use would drastically reduce, either costing the Trust money through loss of earnings or through enforcement, and leading to issues of abuse
- Unfairly penalising those who buy one-day licences when journeying between two differently-managed waterways, such as from the Warwickshire Avon to the Severn, or for those making a day-trip to Oxford from the Thames
- The belief that many one-day licences are currently offered by agents, which therefore incurs little extra work for the Trust
- Boats passing through the Trust's waterways for a day and then returning the same way eight days later would be required to buy two one-week licences, which appeared exorbitantly expensive given the actual time spent on the water
- Fears that it would discourage boaters who wished to "test the waters" as it would make a day on the canal or river prohibitively expensive
- Worries that those using small day-boats such as kayaks would either no longer be able to justify the expense of buying a licence and cease to use the waterways, or that they would continue to use them but do so without a licence

### ***Support for the removal of one-day licences***

For the small number (22) who provided reasons of support for the proposal to abolish one-day, the most common was the belief that there should be no short-term licences at all.

### ***Other views***

#### ***Enforcement***

Some respondents commented on enforcement in relation to short-term licences. The most common response (raised by 177 respondents) was concern about

potential abuse and enforcement. Respondents felt that boaters may not buy licences for short journeys or day entries; or, in the case of the 30-day explorer, may misrepresent the actual time they have spent on the water, only specifying days when there was a possibility of enforcement.

Respondents' fears of abuse were directed more at their concerns about what may happen if short-term licences were removed, or made prohibitively and disproportionately expensive. They felt that many boaters would simply "take the chance" of not being caught without a licence – particularly given the view expressed by some that the Trust is ineffective at policing, enforcement, and punishment around licensing. Small craft such as kayaks, rowing boats, dinghies, and trailered power boats, who may be unlikely to require a licence for more than one day at a time, were mentioned in particular in relation to this concern.

### *Administration*

A number of respondents commented on administration in their responses to this question. 98 questioned how costly administration could be for issuing short-term licences, given modern technology, while some also wondered what would happen to administration staff were they to issue fewer short-term licences.

35 respondents supported the proportionately higher cost of a short-term licence, providing that figures could be shown to prove this was necessary to cover genuine administration costs, rather than to increase income or dissuade boaters from buying short-term licences. 55 pointed out that short-term licences already cost proportionately more. They felt that the wording of the question made it appear that this was not the case, that this would be a new introduction, and was therefore misleading. Without further information on the details of the changes being proposed, 36 pointed out that it was difficult to comment on this proposal.

Many respondents recommended that the Trust take steps in modernising the process of buying short-term licences, involving online purchasing, updating the website so that all licences can be found easily and are available to buy, and using smart phones and email so that licences do not need to be printed. These respondents said that taking these steps would also streamline the administration process, reduce long-term costs, and bring the Trust into line with other modern organisations. It would also, they felt, increase the likelihood that boaters would buy short-term licences, and therefore help tackle problems of policing and enforcement.

## 5. IMPLEMENTATION OF ANY CHANGES

### Question: How fair do you think each proposal regarding the introduction of changes is?

This was a closed question. The Trust proposed four options for introducing any changes following the consultation. Respondents were asked to rate how fair or unfair they felt each option was, using a five-point scale (very fair: fair: neither fair nor unfair: unfair: very unfair).<sup>14</sup> The four options and respondents' rating of these are shown below:

- Introduce changes over a potential 1-2 year period
  - 34% felt this option was fair
  - 43% felt this was unfair
  - (n=6,315)
- Introduce changes phased over a potential 2-3 year period
  - 50% felt this option was fair
  - 25% felt this was unfair
  - (n=6,266)
- Introduce changes phased over a potential 3-5 year transition period
  - 55% felt this option was fair
  - 20% felt this was unfair
  - (n=6,257)
- Introduce changes all together in one go, but giving a number of years' notice
  - 31% felt this option was fair
  - 47% felt this was unfair
  - (n=6,217)

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<sup>14</sup> See footnote 2.

## Question: Tell us your views on how we might manage the implementation of any changes (including suggestions about any transitional periods for existing and new customers)

This was an open question. A free text box was provided for respondents to make comments on managing the implementation of any changes. The main themes raised by respondents are summarised in the table below and analysed in detail in subsequent sections.

### Summary of Themes Raised

Themes raised by respondents about the impact of any changes following the consultation (n=1,041)	Number raising theme
<b>Support for phased changes/notice period</b>	<b>506</b>
Support for the implementation of a transitional period:	371
• 1-2 years	49
• 2-3 years	71
• 3-5 years	51
• 5-10 years	22
• Not stated	176
Concern that an increase in fees may require some to make significant changes to their way of life	134
There should be an adequate notice period, as well as a thorough explanation of what the changes are	106
<b>Opposition to phased changes/notice period</b>	<b>145</b>
Changes should be implemented immediately	104
Concern that a prolonged transitional period may be detrimental to both boat owner and the Trust	44
<b>How changes may affect new boaters</b>	
Changes should apply only to new boats and owners	157
Changes should apply to both new and current boats and owners	75
<b>Other views</b>	
The current system works well enough	129
Insufficient information to fully answer the question	99

## **Detailed analysis**

506 respondents commented on their support for a phased introduction and/or a significant notice period for any changes following the consultation. They wanted detailed explanations of how these changes would work so that boaters were as well informed as possible, and had sufficient time to prepare for how any changes to the licence fee may affect them.

134 respondents felt that a sufficiently lengthy notice period or phased introduction was particularly important for boaters who might not be able to afford any proposed increase in the licence fee, and therefore be required to make radical changes, such as selling their boats and leaving liveaboard situations to move into houses. Some feared this may cause considerable hardship to a large number of people, including:

- Families with children
- Boat prices may then be adversely affected due to an increased number being for sale – especially for wide boats
- Boat building businesses

As a result of these concerns, as gradual a change as possible was encouraged.

106 respondents said that changes to the way the licence fee is calculated should be thoroughly and completely explained, including the nature of the changes, how they will affect people - i.e., i.e., what their new licence fee will be – and why these changes are felt to be necessary.

Some of these respondents asked how and when changes would be introduced – e.g., whether they might be introduced in a particular order – and at what rate and frequency. Some proposed that a percentage cap per year be implemented, so that no particular group of boaters is faced with a large spike in their licence fee. They felt too that the length of any transitional and introductory period would be entirely dependent on the scale of the changes themselves, which was not yet clear.

Others questioned how changes for those whose licence fees would go down would be implemented. As noted earlier, this possibility was seen to follow logically, if some fees would increase, given the Trust's aim of revenue neutrality. In this case, respondents felt fee reductions should be introduced "the sooner the better".

## ***Opposition to phased changes/notice period***

145 respondents commented on their opposition to a phased introduction of changes and/or a notice period. 104 felt that changes should be implemented as soon as possible, and all at the same time, on the grounds that certain situations



which the proposed changes are designed to manage require immediate attention and correction. These respondents felt that delaying the introduction of changes would be unfair to those who feel they are being negatively impacted by the actions or behaviour of some other boaters. The proposed increase in fees for wide boats was singled out in particular: some respondents suggested that widebeam boat owners had benefited unfairly for a number of years. Others felt speedy implementation of increased fees for wide boats would help to tackle what they saw as the burgeoning problem of people using the canals for cheap housing.

44 respondents also felt that any transitional/phase-in period or prolongation of the time over which any changes are introduction would be administratively cumbersome, financially draining, and against the stated aim of simplification, as well as being potentially confusing for boat owners and the Trust itself.

### ***How changes affect new boaters***

A number of respondents commented on how they thought changes would affect new boaters. In general, those who favoured a phased and/or delayed introduction of licence fee changes felt that new boaters could and should be subjected to a new licensing fee system immediately, with 157 respondents making this point. Those who proposed the immediate and simultaneous introduction of changes believed both new and current users should be treated equally. In effect, then, both groups believed that new boaters should start paying the revised licence fee from the outset.

Some respondents noted that boaters in the process of purchasing a boat, or currently having one built, may be allowed some leeway, so a small period of allowance, a cut-off date, or an opportunity to make a case of appeal was suggested as a desirable option.

Some wondered whether it was fair to “discriminate” against new boaters in this way – or even whether it would be legal.

## ***Other views***

99 respondents felt that, in line with many of the other consultation questions, insufficient information had been provided, and without knowing the scale of the changes involved, or how they would affect people and how many people they would affect, it was not possible to offer an informed opinion.

129 respondents also took the opportunity to express again that they felt the current system worked well as it was, and that the proposed changes were neither required by the canals or by boaters themselves, nor were they fair.

Some felt that, as boats had been purchased with current fees and the way licences have long been calculated in mind, this equated to a long-term contract with the Trust, which could be breached by some of the proposed changes.

A number of respondents related that, if changes were introduced, they would either sell their boats or remove them from the Trust's waterways.

## 6. ADDITIONAL THEMES

In addition to comments relating directly to the consultation questions, several additional themes occurred repeatedly, and are therefore summarised in the following section.

### Enforcement

Across all of the questions, 549 different respondents highlighted the perceived need for improved enforcement of current legislation.

These respondents felt that corrections to the fairness of the licence fee may not be necessary if sufficient enforcement was carried out – or, at least, that enforcing the current rules ought to be a first step, rather than making changes to the licensing structure or legislation.

In general, respondents made the following points:

- Current levels of enforcement were insufficient
- Punitive measures lacked impact
- Too many boats used the waterways without a licence, or without the correct licence
- There were problems with speeding
- There were many abandoned and unsightly boats (presumed by respondents to be unlicensed)
- So-called “continuous moorers” flouted the system, to the extent that some boats were mentioned as being in the same mooring spot for many months beyond their permitted allowance time

### Maintenance of Waterways

Some respondents felt that the condition of the canals and rivers is not as it should be, and that the Trust is not fulfilling its remit in terms of dredging, clearing overhanging branches, maintaining locks, etc. Many felt that any proposed increases in licence fees would be unfair given this perceived lack of service on the part of the Trust.

This group expressed that they felt other users of the waterways should be asked to contribute to the maintenance of canals and rivers, particularly highlighting cyclists and walkers who used canal towpaths. Some expressed dismay that Trust funds are apparently being spent to provide facilities for those who may not contribute financially to the waterways.

## Consultation Process

A number of respondents commented on the consultation process. Of these, some commented on the aims of the consultation, expressing the following views:

- The proposed changes to licence fees would not achieve the stated goal of simplifying the way the licence fee is calculated
- The current system worked well and was simple to understand already
- The proposed changes would add unnecessary levels of complexity

Some of these respondents questioned the aim of asking boaters to help identify “the fairest way to split the licence fee”, as well as the wording of questions, given that the “fairest way” may not always be the most desirable in terms of administration, application, economy, or possibility – for example, many felt that the fairest way to charge boats would be based on actual use – miles travelled, locks traversed, staff utilised, etc. – but recognised that the implementation of such a system may not be possible due to complexity and the difficulty in installing and monitoring tracking technology in over 32,000 boats. Some, therefore, were conflicted in their answers, selecting not what they thought “most fair” but that which they thought most likely to be implemented at the current time.

## Consultation Questions

Some respondents commented on the consultation questions, or on the information provided in the consultation document. Of these, a number felt that there was insufficient information provided for them to give an informed response. Some suggested that this means the consultation failed to meet the standards set out in the Government Consultation Principles. This was particularly highlighted in the questions regarding discounts for historic boats and charities, which proposed revisions to the criteria for eligibility without stating what the revised criteria were.

Some felt that the phrasing of certain questions indicated that decisions on how the Trust was planning to proceed had already been taken. If this were the case, they felt this would also mean the consultation had failed to meet Government Consultation Principles. These respondents said that the consultation was therefore being done with the express purpose of either garnering statistical support for a decision already taken, or to enable the Trust to prepare arguments against views presented by respondents who opposed that which the Trust wished to do.

The question on the charity boat discount was seen by some as failing to meet the standards set out in the Government Consultation Principles, in that it did not give sufficient information to ensure that those consulted fully understood the issues, and that the criteria should have been decided and disclosed beforehand, with

information shared on which charities would be affected and potentially removed from the discount, as well as those which would retain it – a list of which, some felt, would have been helpful in deciding how they viewed the charity discount.

### **Views on the consultation**

Some respondents made comments on the Canal and River Trust in their responses to other questions. Views included the impression that the consultation seemed to indicate only increases in licence fees. Respondents noted that the stated aim of making changes “revenue neutral” would logically result in any increases in the licence fee for some being balanced out by reductions for others – for example, increases in fees for widebeam boats would naturally result in reductions for narrowboats.

Some respondents felt that a number of the consultation questions highlighted existing divisions among different groups of waterways users. For example, narrowboat owners vs widebeam owners; continuous cruisers vs those with home moorings; pleasure boaters vs liveaboards; and wealthy vs poor boat owners.

## APPENDICES

### APPENDIX A. CONSULTATION QUESTIONS

#### Licence considerations for the increasing number of wider beam vessels on the Waterways

1. In terms of calculating the price of a licence, please tell us on a scale of 1-5 how fair you think each proposal is

Please rate each proposal in the table below

Proposal	1 = Very fair	2 = Fair	3 = Neither fair nor unfair	4 = Unfair	5 = Very unfair
Licence fees remain length-based using the existing bands, with all wider boats (i.e. those wider than a standard narrowboat width) - charged an uplift of 25% on their respective length-based fee					
Licence fees remain length-based using the existing bands, with all boats wider than a standard narrowboat width (i.e. in excess of 2.3m beam) charged an uplift of 50% on their respective length-based fee					
Licence fees calculated by actual area (Length X Beam)					
Licence fees calculated based on length only (i.e. no change) with the existing bands that increase every additional 1m					

Proposal	1 = Very fair	2 = Fair	3 = Neither fair nor unfair	4 = Unfair	5 = Very unfair
Licences fees to be calculated on length only using exact length with no bands					

**None of the above – please suggest alternative**

**2. Please tell us any other views or suggestions you have on charging based on the area of a boat**

### Historic Boat Discounts

**3. Retain the historic boat discount at 10% on the proviso that eligibility for the discount aligns with the National Historic Ship Regulations. The criteria will be reviewed outside of the consultation. On a scale of 1-5 how fair do you think this proposal is?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**4. Please explain any other views or suggestions you have on proposals for a historic boat discount**

## Disconnected Waterway discount

5. In terms of the disconnected waterway discount, please tell us on a scale of 1-5 how fair you think each proposal is

Please rate each proposal in the table below

The disconnected waterway discount should be:

Proposal	1 = Very fair	2 = Fair	3 = Neither fair nor unfair	4 = Unfair	5 = Very unfair
Retained at its current level of 25%					
Reduced to 10% (potentially over 2-3 years)					
Withdrawn entirely (potentially over 3-5 years)					

6. On a scale of 1-5 how fair do you think any proposal to withdraw the disconnected waterway discount is?

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

7. Please explain any other views or suggestions you have on proposals for the disconnected waterway discount

## Discounts for unpowered Buttys



**8. In terms of the discounts for unpowered buttys, please indicate which you believe to be the fairest approach**

- ☐ The discount of 50% for unpowered buttys remain unaltered
- ☐ The discount would be removed (potentially over a period of up to 5 years)

**9. On a scale of 1-5 how fair do you think the proposal to retain the unpowered buttty discount is?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**10. Please tell us any other views or suggestions you have on proposals for the unpowered buttty discount**

## Discounts for Electric Boats

**11. In terms of the discounts for electric boats, please tell us on a scale of 1-5 how fair you think each proposal is**

**Please rate each proposal in the table below**

<b>Proposal</b>	<i>1 = Very fair</i>	<i>2 = Fair</i>	<i>3 = Neither fair nor unfair</i>	<i>4 = Unfair</i>	<i>5 = Very unfair</i>
Retain the current 25% electric boat discount					
Replace it with a 10% electric boat discount (a phased reduction of the discount over a potential 2-3 year period)					
Remove the electric boat discount entirely (a phased reduction of the discount over a potential 3-5 year period)					

**12. On a scale of 1-5 how fair do you think any proposal for a new lower discount that recognises more environmentally friendly boating is?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**13. Please tell us any other views or suggestions you have on replacing the electric boat discount with an alternative discount that supports more environmentally friendly boating.**

**We would also be interested in your views on what criteria the Trust might consider for any such discount**

### **Prompt Payment Discount**

#### **Prompt Payment Discount - Options**

**14. In terms of the Prompt Payment discounts, please tell us on a scale of 1-5 how fair you think each proposal is**

**Please rate each proposal in the table below**

<b>Proposal</b>	<i>1 = Very fair</i>	<i>2 = Fair</i>	<i>3 = Neither fair nor unfair</i>	<i>4 = Unfair</i>	<i>5 = Very unfair</i>
Removing the Prompt Payment discount entirely					
Reduce Prompt Payment discount (potentially phased over a period of time)					
Reduce the Prompt Payment discount and change it so that part of the discount is applied for prompt payments and part of the discount is applied to encourage automatic methods that reduce					

Proposal	1 = Very fair	2 = Fair	3 = Neither fair nor unfair	4 = Unfair	5 = Very unfair
administration costs to the Trust (e.g. online payments, direct debits)*					

**15. On a scale of 1-5 how fair do you think the idea to change the current Prompt Payment discount to one that recognises both Prompt Payment and self-service/ direct debit payments?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**16. Please tell us any other views or suggestions you have on the proposal for Prompt Payment and direct debit/self-service discounts, particularly on whether you think this change is fair given the benefit derived by the Trust**

### Application of and eligibility for multiple discounts

**17. In terms of the multiple discounts, please indicate which option you think is fairest**

- ☐ Customers can receive multiple discounts as now
- ☐ Customers should only receive a maximum of one discount per licence in addition to the River Only Licence discount (as this is a statutory requirement) and the revised prompt payment and/or direct debit discount

**18. On a scale of 1-5 how fair do you think allowing multiple discounts is?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**19. Please tell us any other views or suggestions you have on multiple discounts****Discounts for charity boat licences**

**Retain the charitable discount of 60%. Eligibility criteria will be reviewed in order to ensure that the charitable objectives of the Trust and third-party charities are aligned.**

**20. On a scale of 1-5 how fair do you think the proposal to retain the charity boat discount and review the conditions for eligibility is?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**21. Please tell us any other views or suggestions you have on proposals for a charity boat discount****Considerations for short term licences**

Short term licenses can take up more time and resources to administer, especially compared to a full licence that lasts for 12 months, and could be simplified.

Our proposal is for three short term licence options:

- One week;
- One month; or
- Thirty-day explorer.

The cost of all the short-term licences would be priced proportionately higher than a full licence to reflect the greater administrative costs.

**22. On a scale of 1-5 how fair do you think this proposal is?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**23. Please tell us any other views or suggestions you have on short term licences**

**Licence considerations in respect of mooring status**

**24. The statements below suggest different options for how licensing might take mooring status into account Please tell us on a scale of 1-5 how fair you think each proposal is**

**Please rate each proposal in the table below**

<b>Proposal</b>	<i>1 = Very fair</i>	<i>2 = Fair</i>	<i>3 = Neither fair nor unfair</i>	<i>4 = Unfair</i>	<i>5 = Very unfair</i>
Retain the current arrangement with a single licence fee whether with or without a home mooring					
Introduce over time a higher fee for boats without a home mooring					
Introduce – at a higher fee – a new licence that would permits boats without a home mooring to remain within a limited area (provided they satisfy the Trust concerning their bona fide navigation)					

**25. On a scale of 1-5 how fair do you think it would be to take mooring status into consideration as part of the licensing process?**

- ☐ 1 = Very fair
- ☐ 2 = Fair
- ☐ 3 = Neither fair nor unfair
- ☐ 4 = Unfair
- ☐ 5 = Very unfair

**26. Please tell us any other views or suggestions you have on licensing considerations in respect of mooring status**

## Impact of any changes following the consultation

### 27. Please tell us on a scale of 1-5 how fair you think each proposal is

Please rate each proposal in the table below

Proposal	1 = Very fair	2 = Fair	3 = Neither fair nor unfair	4 = Unfair	5 = Very unfair
Introduce changes over a potential 1-2 year period					
Introduce changes phased over a potential 2-3 year period					
Introduce changes phased over a potential 3-5 year transition period					
Introduce changes all together in one go, but giving a number of years' notice					

### 28. Please tell us your views on how we might manage the implementation of any changes (including suggestions about any transitional periods for existing and new customers)



## Tell us about yourself

### 29. What is your gender?

- ☐ Male
- ☐ Female
- ☐ Other (please specify):

### 30. What best describes your relationship with the Canal and River Trust?

- ☐ Leisure Licence Holder
- ☐ Business Licence
- ☐ I do not have a licence with the Canal and River Trust
- ☐ Other Stakeholder - please tell us which area or group you are representing:

### 31. What best describes the licence you hold with the Trust?

- ☐ Business Licence
- ☐ Leisure Boater with a Home Mooring
- ☐ Leisure Boater without a Home Mooring (a continuous cruiser)
- ☐ Liveaboard Boater with a Home Mooring
- ☐ Liveaboard Boater without a Home Mooring (a continuous cruiser)
- ☐ Prefer not to say
- ☐ Other (please specify):

**32. If you are a Business Licence holder, please let us know what business sector you are representing**

- ☐ Self-Drive Day Hire
- ☐ Self-Drive Holiday Hire
- ☐ Skippered Passenger
- ☐ Skippered Hotel
- ☐ Roving Trader
- ☐ Maintenance Workboat
- ☐ Trade Plate
- ☐ Sea Cadet
- ☐ Community Boat
- ☐ Static Letting
- ☐ Fixed Location Trading
- ☐ Club
- ☐ Exhibition
- ☐ Safety
- ☐ Other (please specify):

**33. It would be useful for us to know how you currently pay for your boat licence?**

- ☐ Credit/Debit Card Online
- ☐ Credit/Debit Card Postal
- ☐ Credit/Debit Card Telephone
- ☐ Direct Debit
- ☐ Cheque
- ☐ Cash

**34. Which waterway are you mostly based on?**

I am mainly based on:

- ☐ None – I cruise far and wide

**35. What was the region in which you did most of your boating in the past 12 months?**

- |  |  |
|--|--|
| <input type="checkbox"/> East Midlands | <input type="checkbox"/> Kennet & Avon                     |
| <input type="checkbox"/> West Midlands | <input type="checkbox"/> Wales & Borders                   |
| <input type="checkbox"/> North West    | <input type="checkbox"/> North East                        |
| <input type="checkbox"/> South East    | <input type="checkbox"/> South Wales & Severn              |
| <input type="checkbox"/> London        | <input type="checkbox"/> Manchester, Pennine and Potteries |
|  | <input type="checkbox"/> Other Navigation Authority        |

### 36. What is your age?

- ☐ 16-34
- ☐ 35-54
- ☐ 55+
- ☐ Prefer not to say

### 37. How would you describe your ethnicity?

#### White

- ☐ British
- ☐ Irish
- ☐ Other

#### Asian or Asian British

- ☐ Indian
- ☐ Pakistani
- ☐ Bangladeshi
- ☐ Any other Asian background

#### Mixed

- ☐ White and Black Caribbean
- ☐ White and black African
- ☐ White and Asian
- ☐ Any other mixed background

#### Black or Black British

- ☐ Caribbean
- ☐ African
- ☐ Any other black background

#### Other Ethnic Group

- ☐ Chinese
- ☐ Any other Ethnic Group

☐ I do not wish to disclose my ethnic origin

**38. Do you have a disability?**

- |   |  |
|---|--|
| <input type="checkbox"/> I do not have a disability | <input type="checkbox"/> Sight               |
| <input type="checkbox"/> Mobility                   | <input type="checkbox"/> Personal, self-care |
| <input type="checkbox"/> Manual dexterity           | <input type="checkbox"/> Other               |
| <input type="checkbox"/> Progressive condition      | <input type="checkbox"/> Prefer not to say   |
| <input type="checkbox"/> Hearing                    |  |

**39. Is your main boat...**

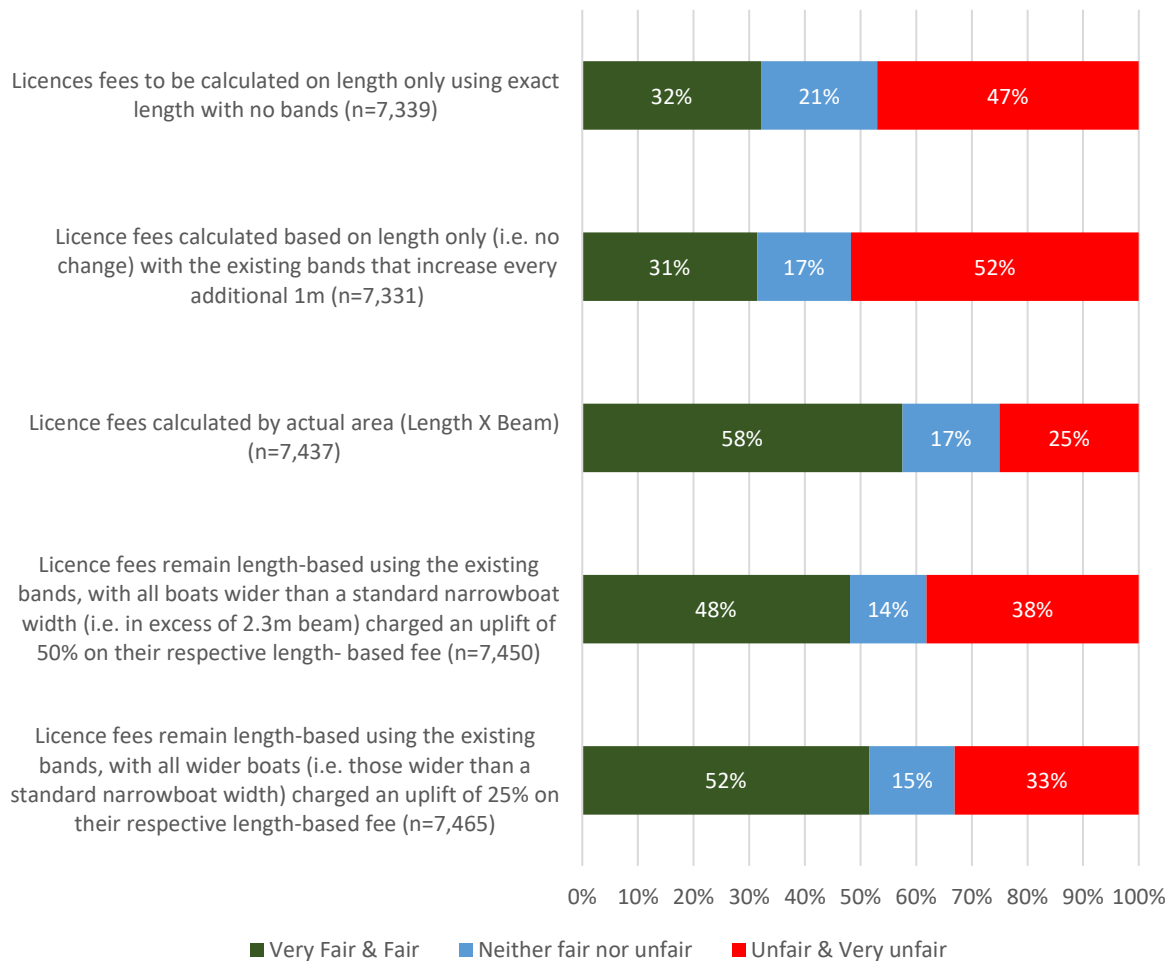
- ☐ A narrow boat
- ☐ A cruiser
- ☐ A widebeam
- ☐ Other (please specify):

**40. How would you describe your work status?**

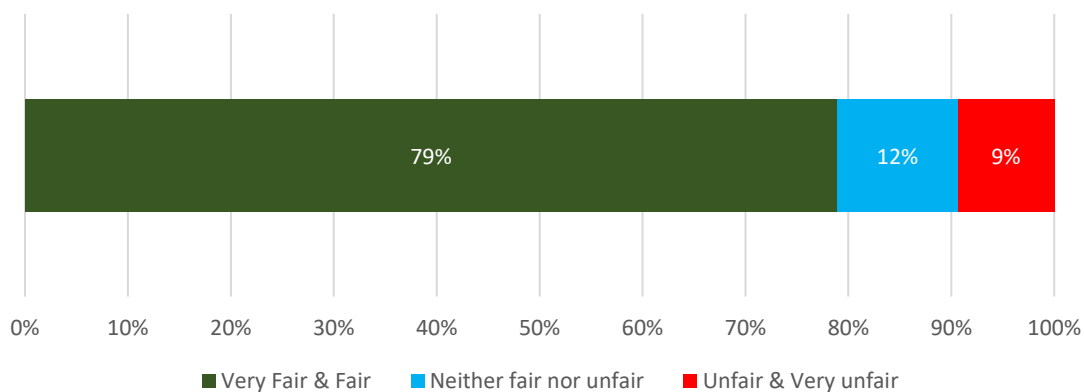
- ☐ Retired
- ☐ Full-time
- ☐ Part-time
- ☐ Not working
- ☐ Other
- ☐ Prefer not to say

## APPENDIX B. CHARTS FOR QUANTITATIVE QUESTION RESPONSES

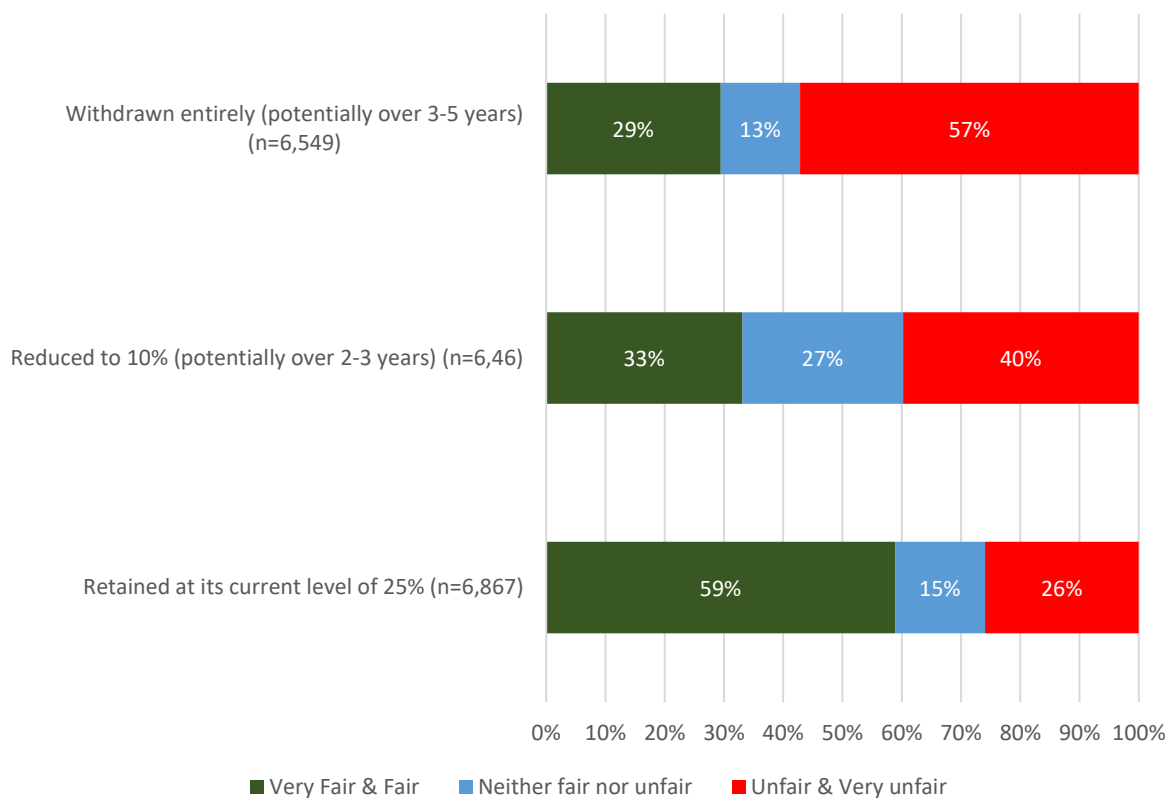
**Q1. In terms of calculating the price of a licence, please tell us how fair you think each proposal is**



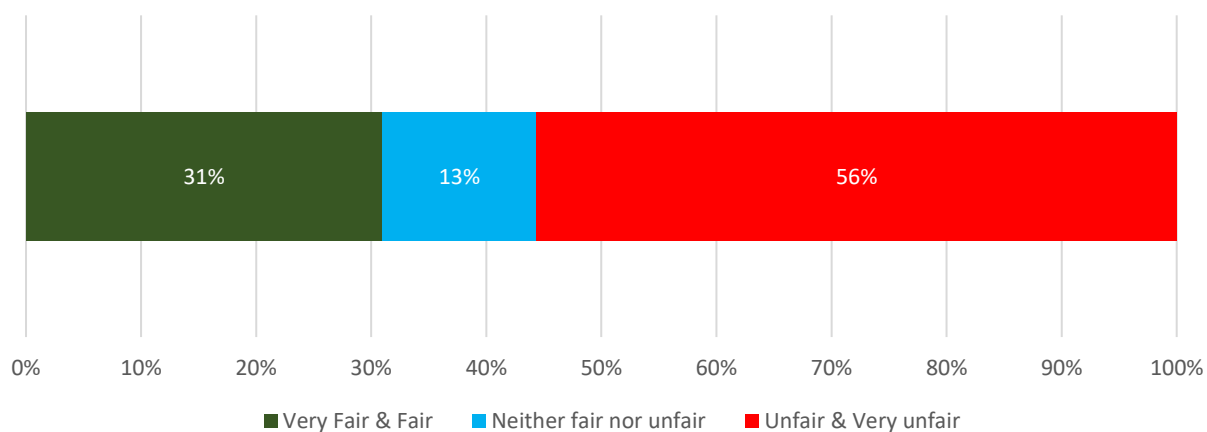
**Q3. Retain the historic boat discount at 10 % on the proviso that eligibility for the discount aligns with the National Historic Ship Regulations. How fair do you think this proposal is? (n=7,352)**



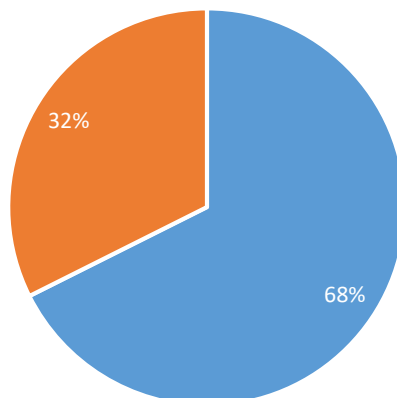
**Q5. In terms of the disconnected waterway discount, please tell us how fair you think each proposal is. The disconnected waterway discount should be:**



**Q6. How fair do you think any proposal to withdraw the disconnected waterway discount is? (n=7,045)**

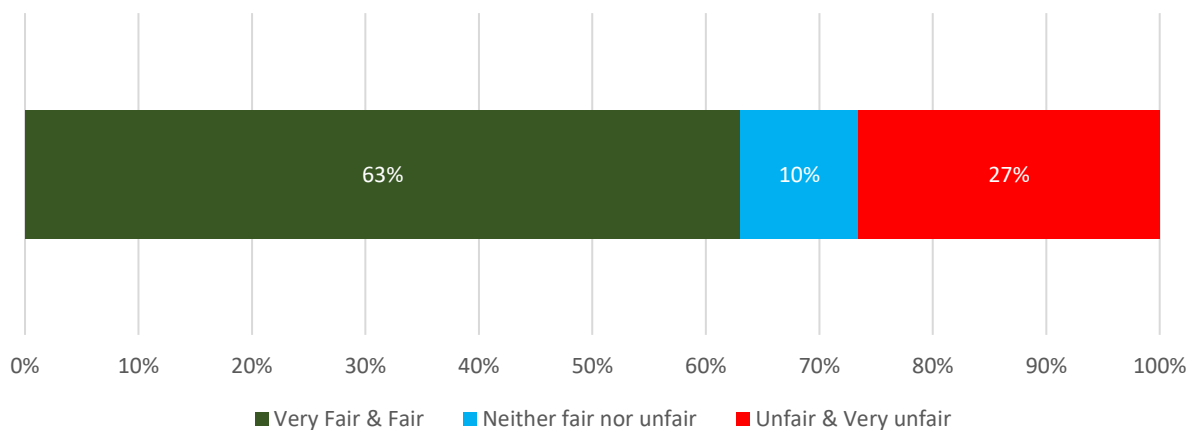


**Q8. In terms of the discounts for unpowered buttyys, please indicate which you believe to be the fairest approach (n=6,931)**



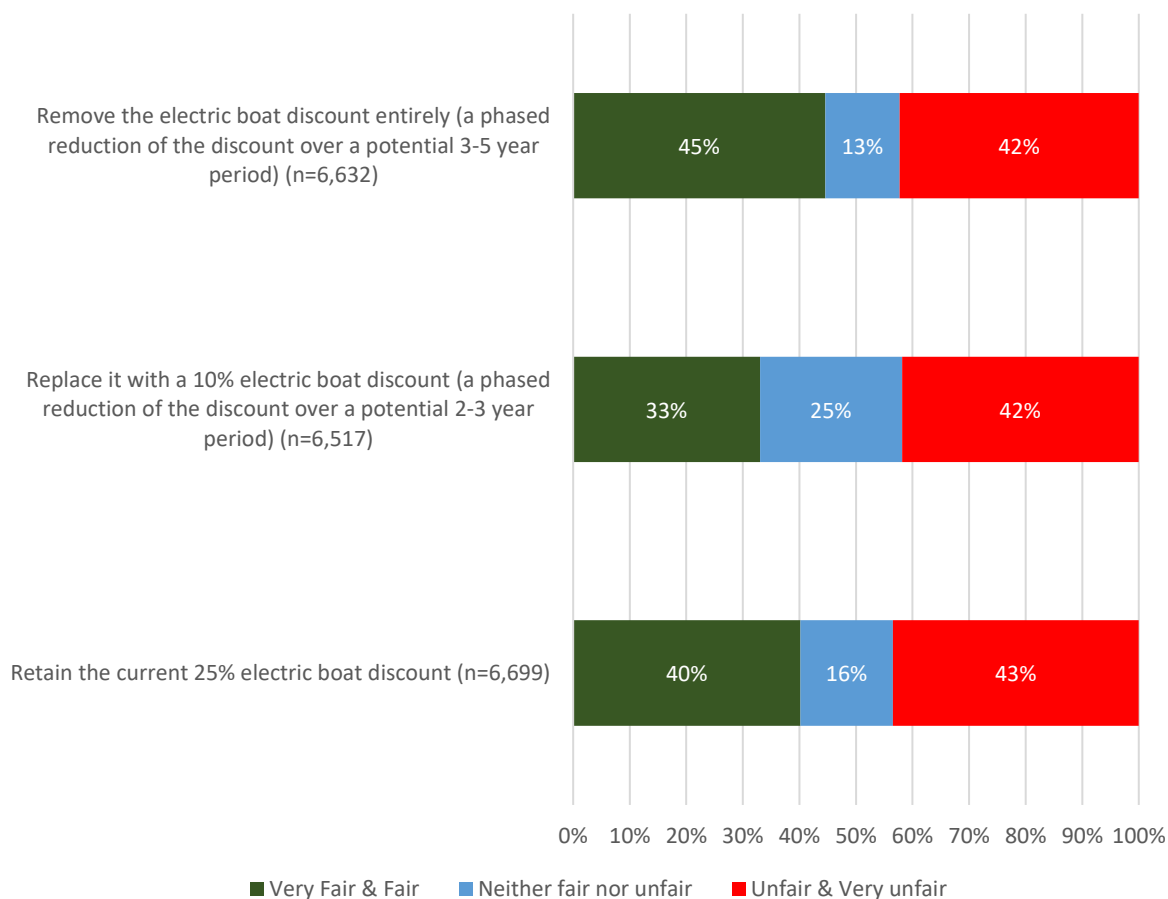
- The discount of 50% for unpowered buttyys remain unaltered
- The discount would be removed (potentially over a period of up to 5 years)

**Q9. On a scale of 1-5 how fair do you think the proposal to retain the unpowered butty discount is? (n=7,054)**

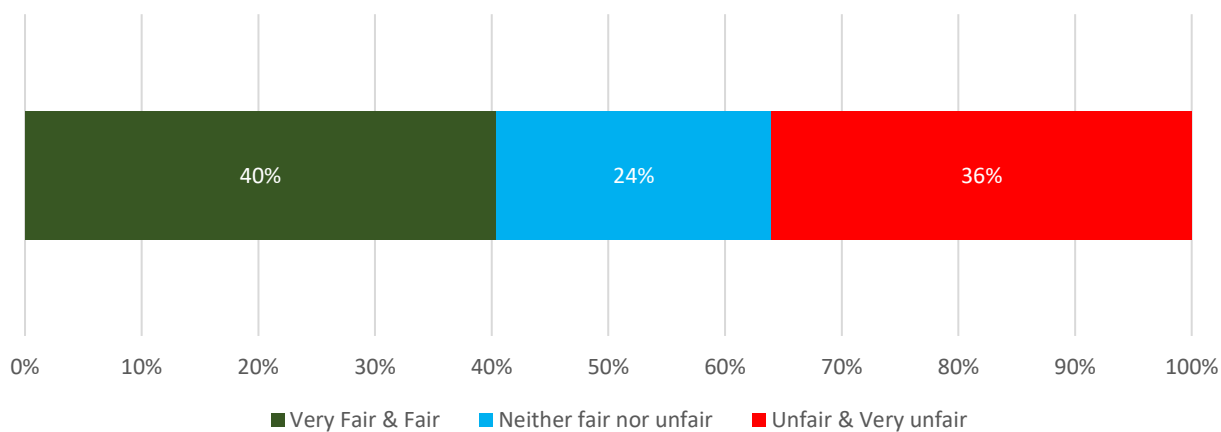




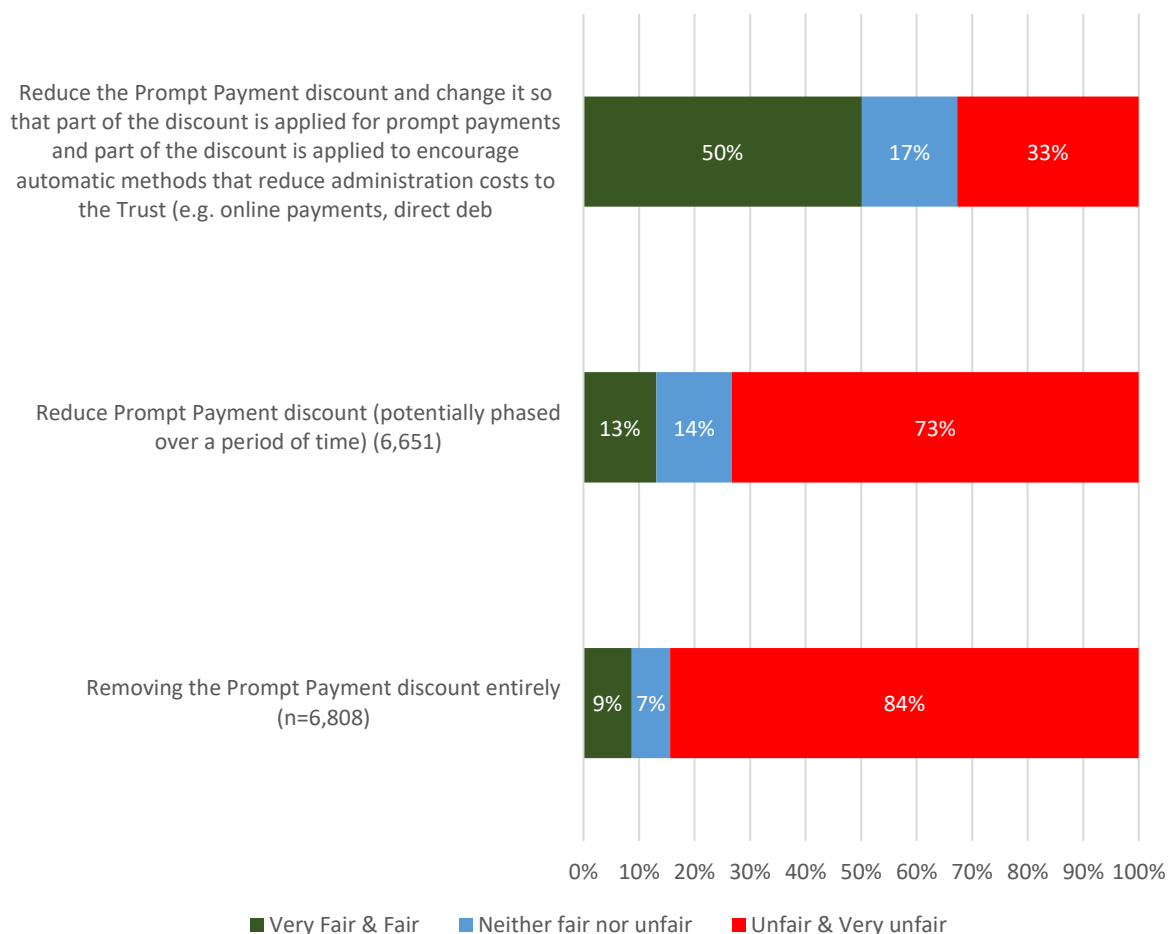
**Q11. In terms of the discounts for electric boats, please tell us how fair you think each proposal is**



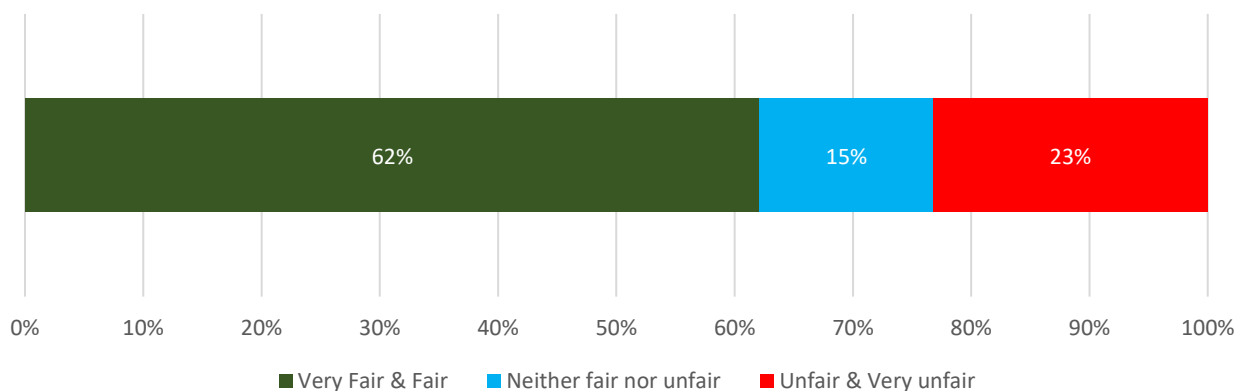
**Q12. How fair do you think any proposal for a new lower discount that recognises more environmentally friendly boating is? (n=6,877)**



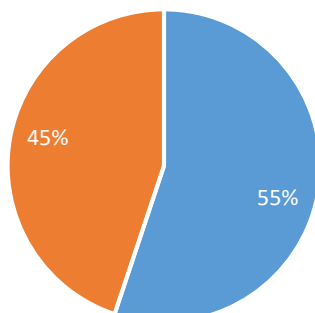
**Q14. In terms of the Prompt Payment discounts, please tell us how fair you think each proposal is**



**Q15. How fair do you think the idea to change the current Prompt Payment discount to one that recognises both Prompt Payment and self-service/ direct debit payments? (n=6,849)**

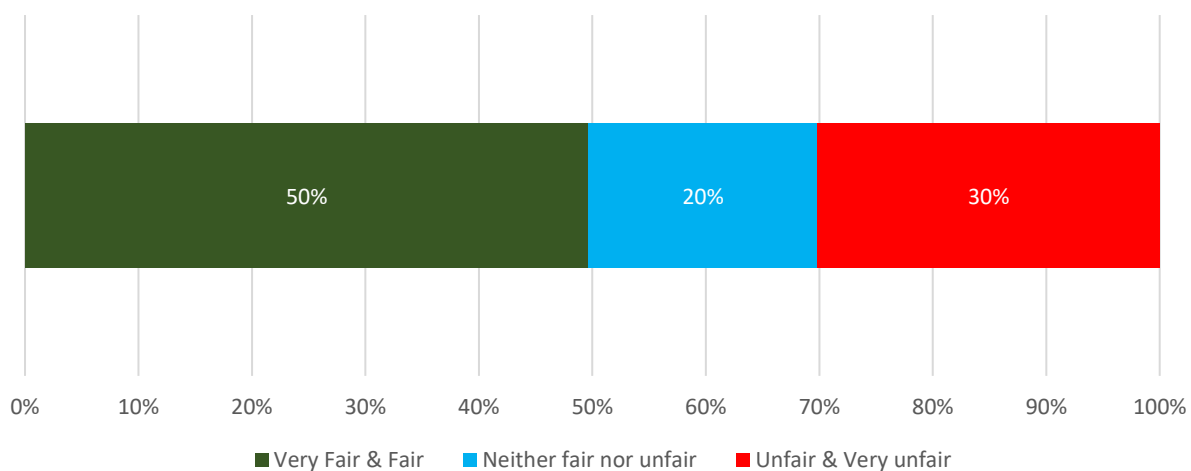


**Q17. In terms of the multiple discounts, please indicate which option you think is most fair (n=6,471)**

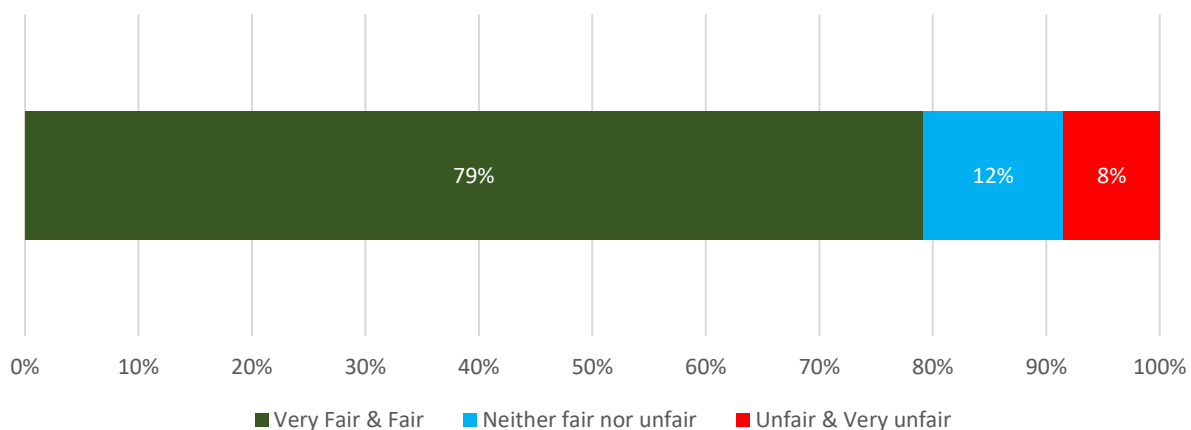


- Customers can receive multiple discounts as now
- Customers should only receive a maximum of one discount per licence in addition to the River Only Licence discount (as this is a statutory requirement) and the revised prompt payment and/or direct debit discount

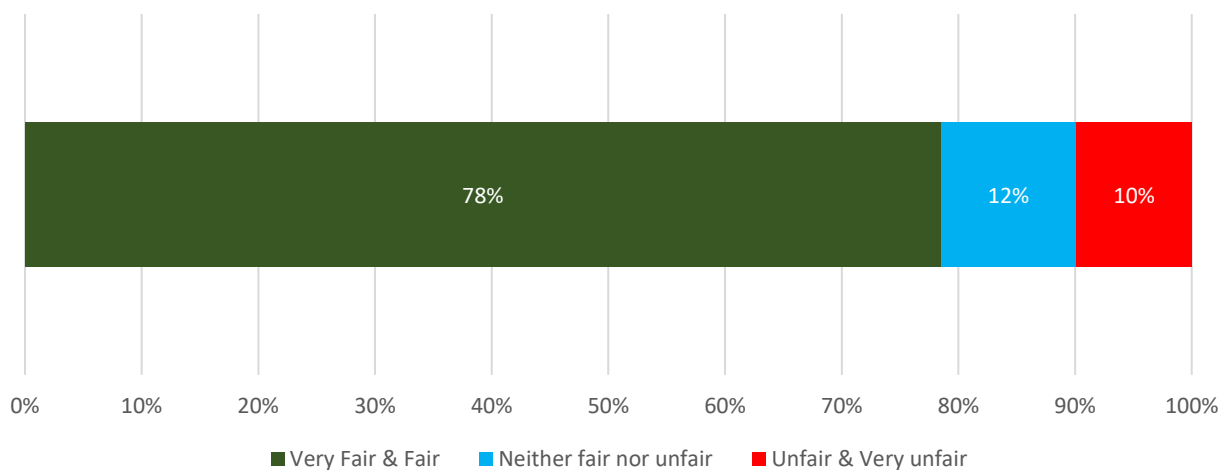
**Q18. How fair do you think allowing multiple discounts is? (n=6,714)**



**Q20. How fair do you think the proposal to retain the charity boat discount and review the conditions for eligibility is? (n=6,762)**



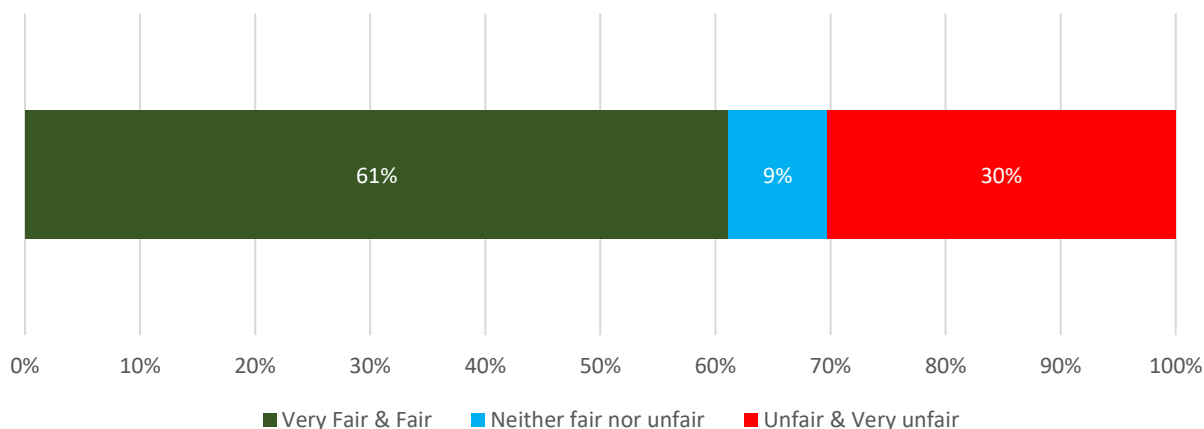
**Q22. Considerations for short term licences (n=6,718)**



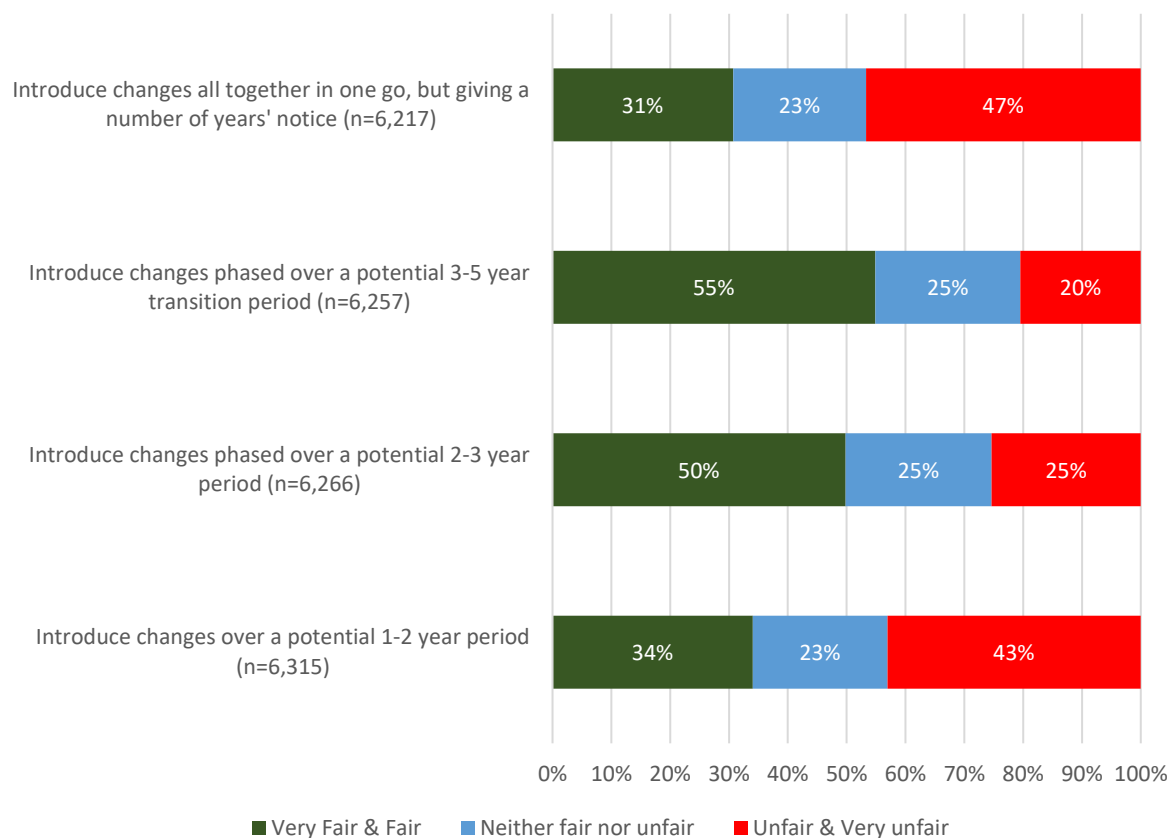
**Q24. The statements below suggest different options for how licensing might take mooring status into account. Please tell us how fair you think each proposal is**



**Q25. How fair do you think it would be to take mooring status into consideration as part of the licensing process? (n=6,608)**

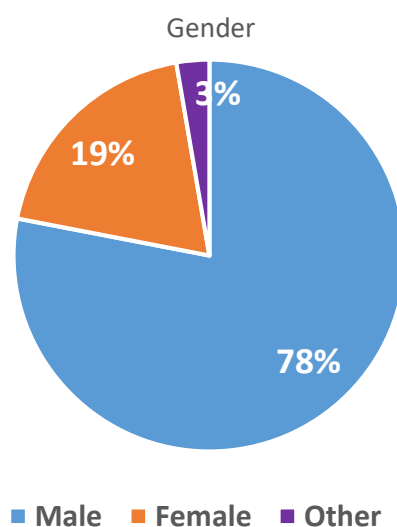


**Q27. Impact of any changes following the consultation. Please tell us how fair you think each proposal is**

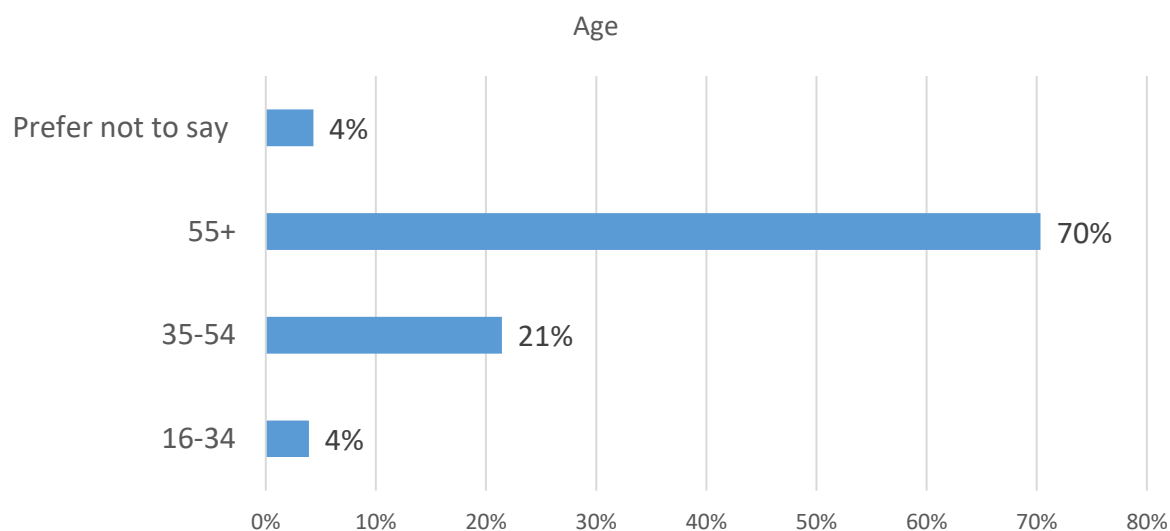


## APPENDIX C. CHARTS FOR RESPONDENT DEMOGRAPHICS

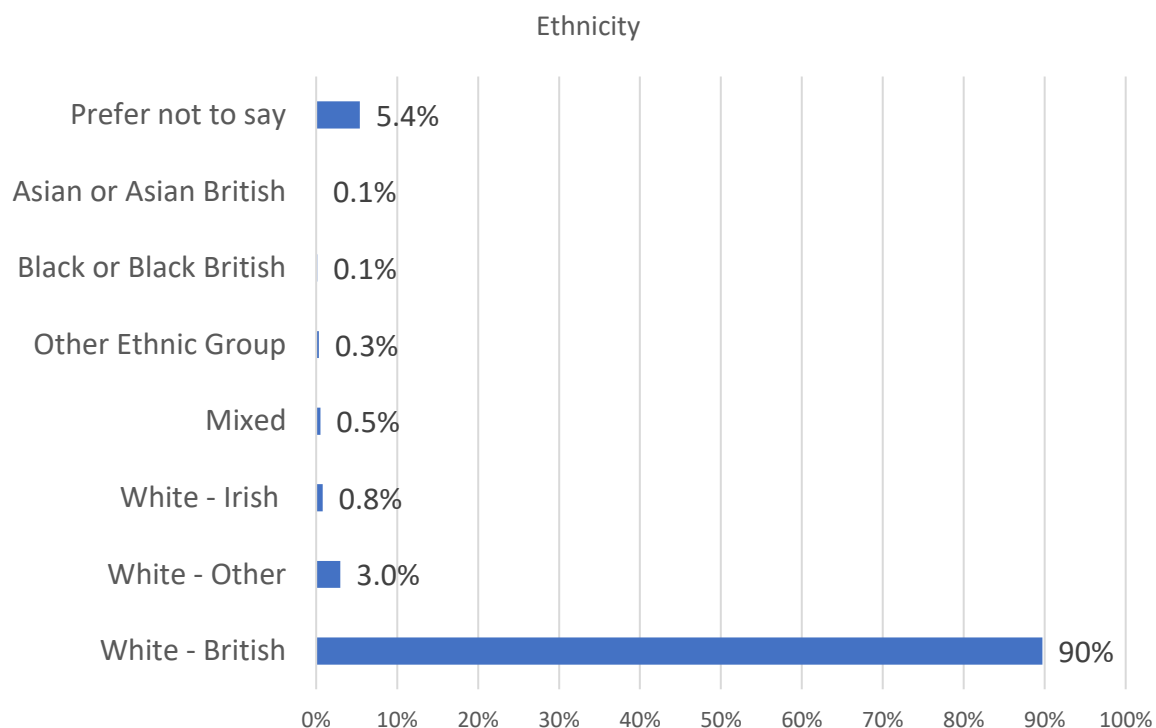
### GENDER ( $n=6,559$ )



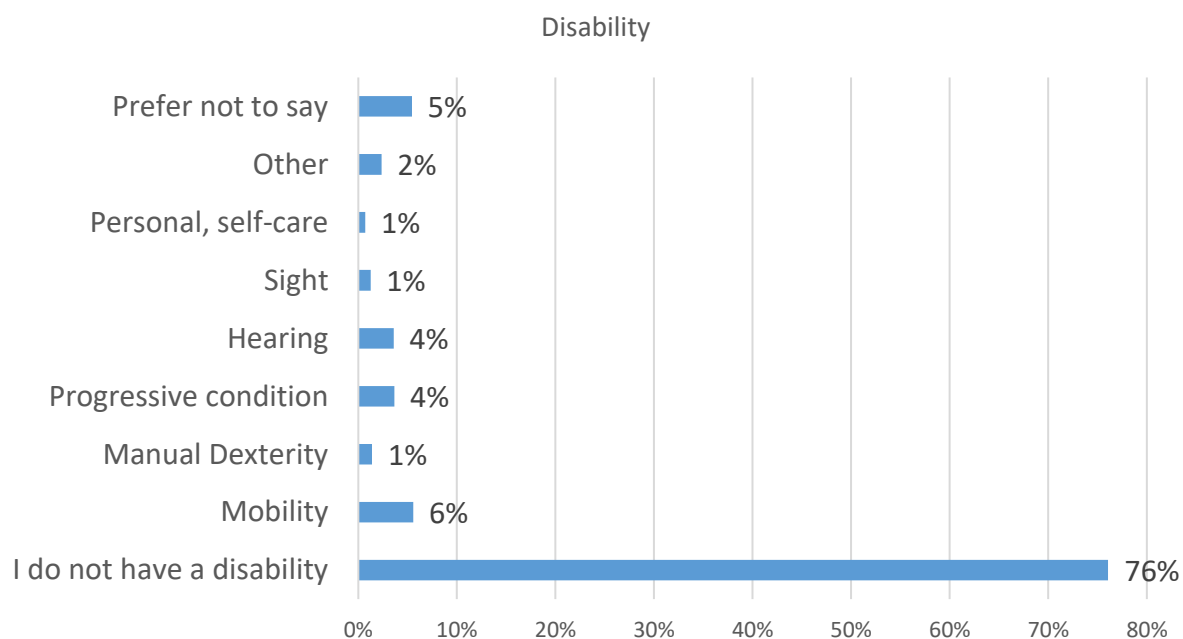
### AGE ( $n=6,492$ )



### ETHNICITY ( $n = 6,268$ )

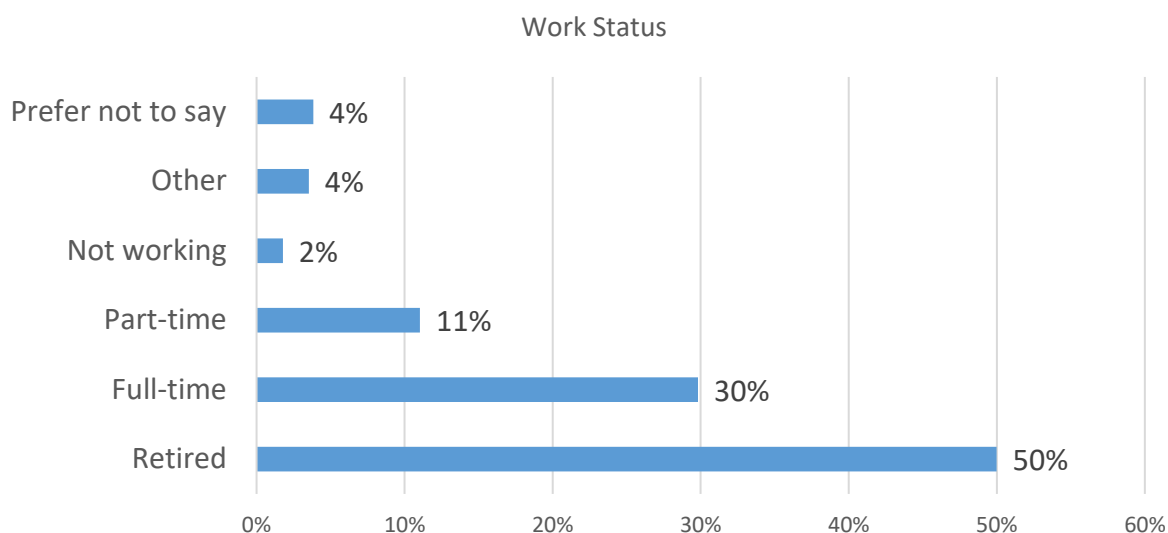


## DISABILITY (*n* = 6,586)

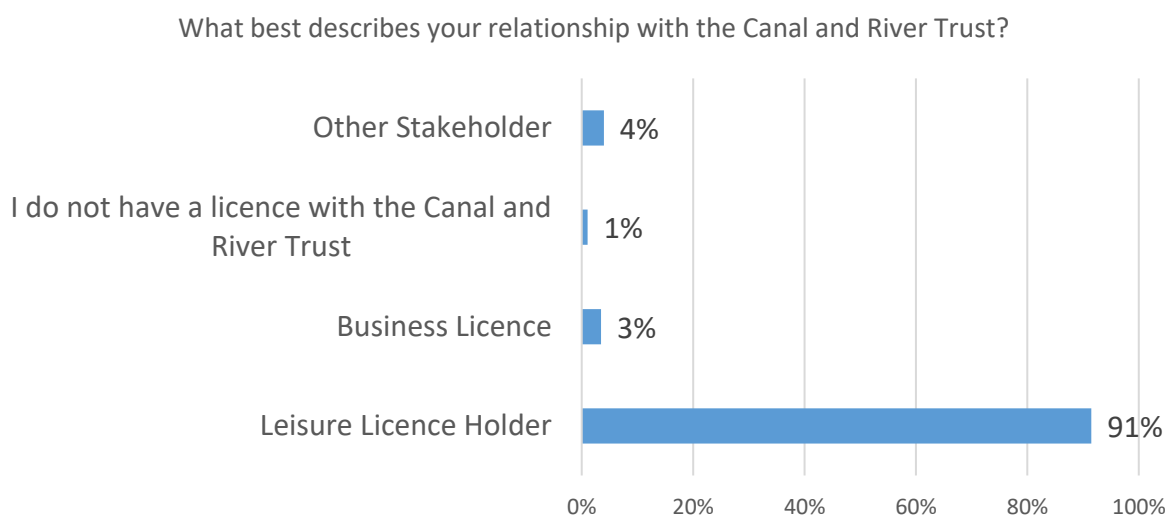


## WORK STATUS (*n*=6,447)



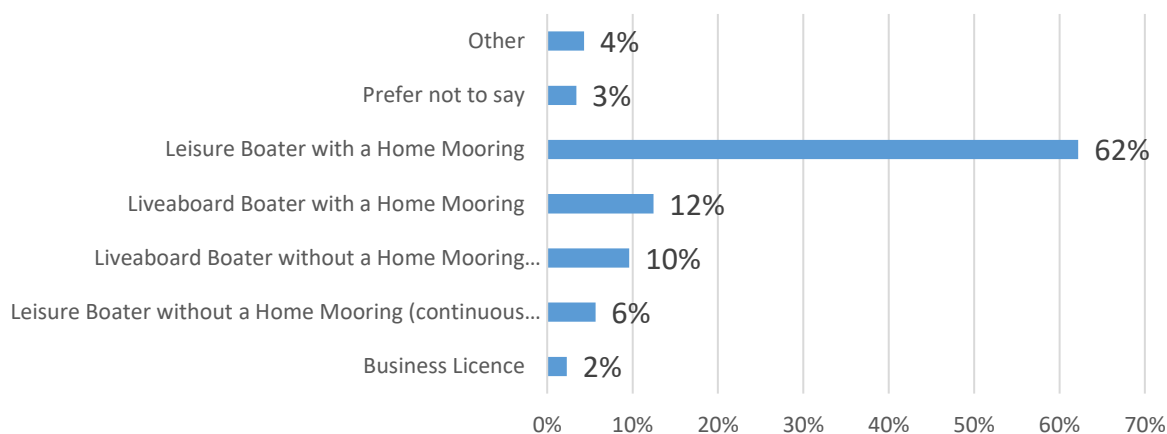


## RELATIONSHIP WITH THE TRUST ( $n=6,848$ )



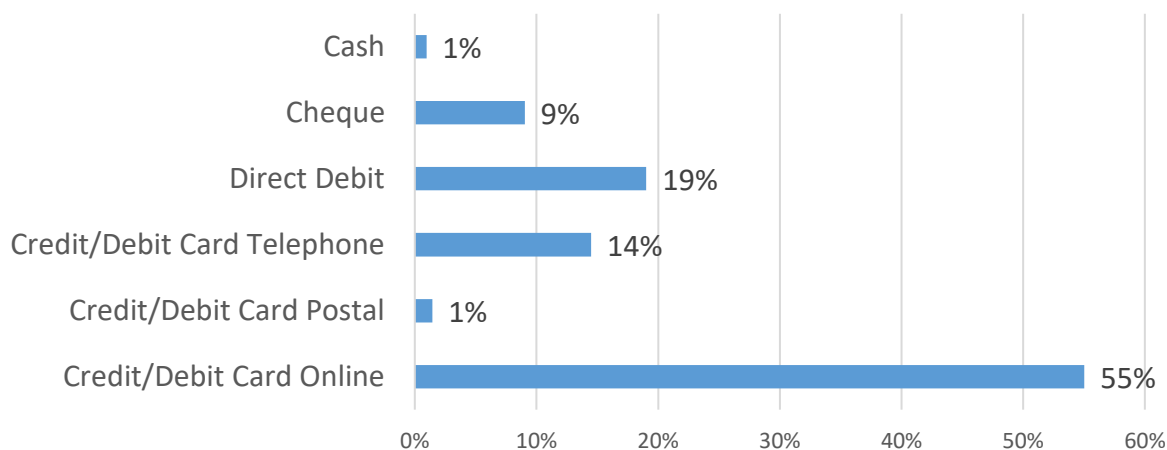
## LICENCE TYPE ( $n=6,663$ )

### What best describes the licence you hold with the Trust?

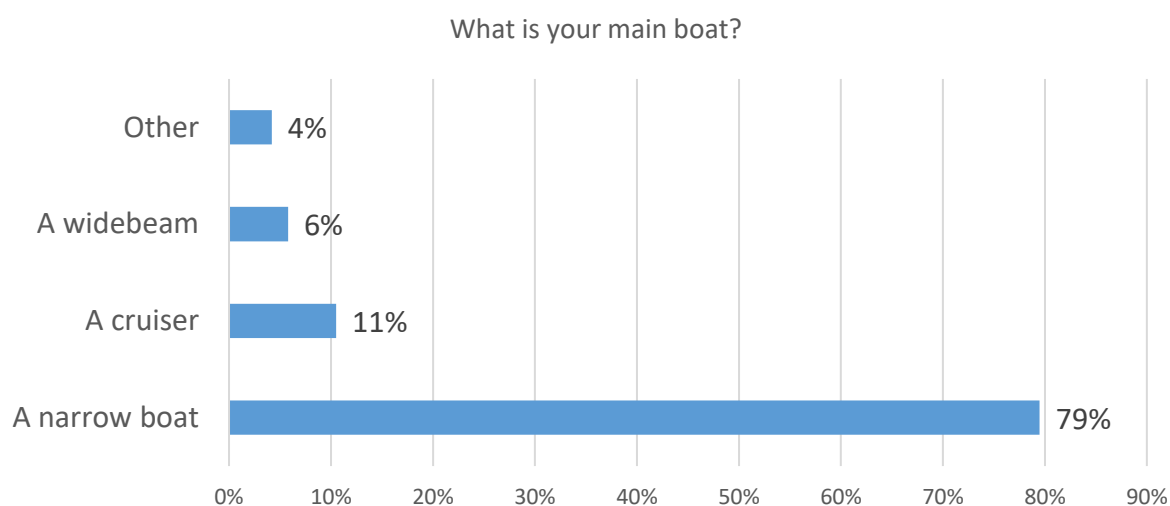


### LICENCE PAYMENT METHOD (n=6,513)

It would be useful for us to know how you currently pay for your boat licence?

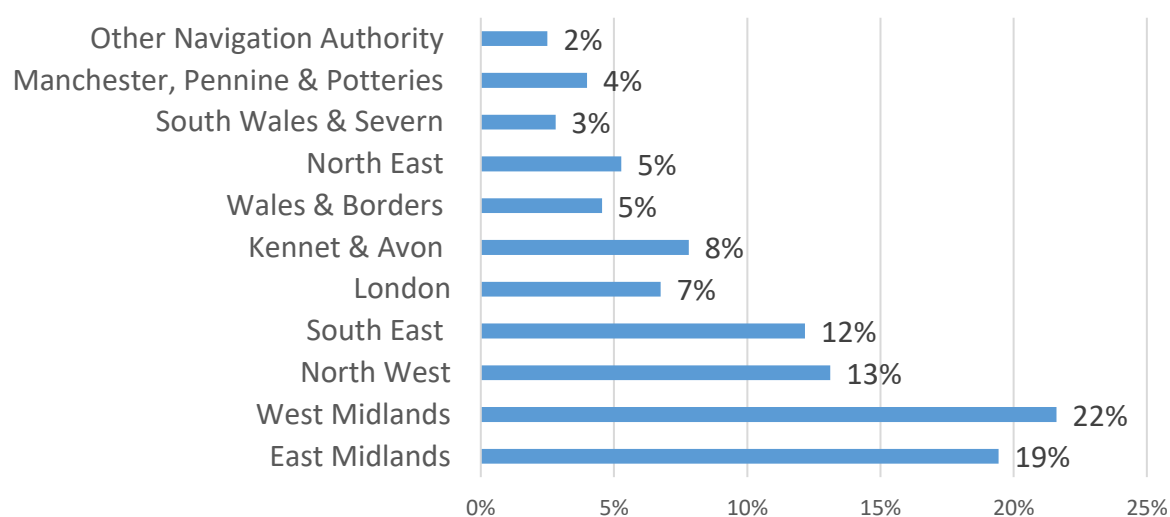


### MAIN BOAT TYPE (n=6,508)



### MAIN REGION FOR BOATING (*n=6,443*)

What was the region in which you did most of your boating in the past 12 months?



## **APPENDIX D. LIST OF STAKEHOLDER ORGANISATIONS THAT RESPONDED**

### **National Organisations and Groups**

Association of Waterway Cruising Clubs (AWCC)  
British Marine  
Dutch Barge Association (response from Chairman)  
Inland Waterway Association (IWA)  
Maritime Heritage Trust (formerly Heritage Afloat)  
Residential Boat Owners Association (RBOA)  
Committee of the National Bargee Travellers Association (NBTA)  
National Inland Navigation Forum (response from General Secretary)

### **Local organisations/groups**

Birmingham Canal Navigations (BCN) Society  
The Kennet & Avon Canal Trust  
Kennet and Avon Trade Association (response from Vice Chair).  
Yorkshire Ex-Commercial Barge Club  
Broken Cross Boat Club (Northwich) (response from Commodore)  
Association of Waterway Cruising Clubs (response from President of North West Region)  
Commercial Operators Group (COG)  
Mon & Brec (response from chairman)  
Monmouthshire, Brecon & Abergavenny Canals Trust (response from committee member)

### **A number of respondents indicated that they were members of organisations/clubs including;**

Boaters Advisory Group Member  
Canal & River Trust Adoption Group  
Canal & River Trust Navigation Advisory Group  
Canal Preservation Group  
Canoe Rowing Club members  
Friend of the Canal & River Trust  
Historic Narrow Boat Club  
Inland Waterway Association  
Leicester line - several groups  
Member of a Waterway group.  
BSS Advisory Committee

SBC  
Saturn Project  
South East Waterways Partnership  
Various Canal Restoration Trusts