

## Kennet & Avon Canal Lock Operations

### Appendix 1

#### Comments and suggestions made by customers

This appendix sets out a selection of the suggestions made by customers in their responses to the consultation. British Waterways' response to the suggestions is given in italics below each comment.

- (1) The proposed scheme will be very costly to administer. The money should be spent on more Enforcement Officers.

*The revised proposals will require additional resource in the Enforcement team.*

- (2) The 'extra' money should be spent on maintenance of the canal itself.

*We endeavour to deliver the highest standards of maintenance that we can within the available funding. The additional resource we've been allocated to reduce licence evasion cannot be transferred to maintenance. However, all additional licence fees collected do come back to the waterway to help fund maintenance.*

- (3) The proposed scheme will be very expensive, surely it won't cover its own costs?

*Our initial calculations indicate that the scheme would cover its costs in the early years. The aspiration would have been to have removed the scheme once non-payers have been converted into regular payers. It's also important to demonstrate that non-paying will not be tolerated.*

- (4) The proposed scheme will be very costly to administer and BW will increase our licence fees to pay for it.

*We will not increase the licence fee to pay for this scheme.*

- (5) BW should employ people on bicycles, foot or boat to go out and gather information about unlicensed craft and who could also report on maintenance and faults. They could also issue 'Fixed Penalty' notices to unlicensed boats that have to be paid as well as the licence.

*On the Kennet & Avon, we currently employ 2 full time Enforcement Officers (formerly known as Patrol Officers) to manage the legal processes of getting unlicensed boats licenced. We also employ 1 full time Data Collection Officer to gather details of unlicensed boats and the positions of boats overstaying on visitor moorings and the towpath. There is also a further Enforcement Officer who works across the South West region to manage the process of boat removal once the legal processes have been concluded. In addition, we employ length inspectors who are responsible for monitoring and recording maintenance issues. There will be a need to increase the team to carry out the proposed random checks. Our current bye-laws do not allow for the issuing of spot fines or fixed penalty notices, but a late payment fee is being introduced.*

- (6) BW should impound boats that are unlicensed and only release them on payment of the licence fee (some respondents would like to see a 10% addition or fixed fine added).

*We do impound unlicensed craft, but only once the proper legal procedures have been followed.*

- (7) BW should hire a crane and just get rid of the unlicensed boats.

*This is how we remove unlicensed boats, however we have to complete the full legal process before taking this action.*

- (8) Where BW lacks the powers to carry out impounding/fines/removal/fix penalties it should seek to get the law changed to enable it to do so.

*This would be a very lengthy and costly process, but it is something under consideration nationally.*

- (9) BW should set up a telephone hotline, email address or website where boaters can report unlicensed boats (some respondents also suggested a reward scheme for people reporting unlicensed craft).

*This is being addressed nationally.*

- (10) BW should promote volunteer wardens who can monitor unlicensed craft.

*We will give this further consideration.*

- (11) BW must address non-compliant continuous cruisers at the same time – overstaying on the towpath and visitor moorings is a real irritation to people who pay for permanent and winter moorings.

*We acknowledge that this is a major concern to our legitimate boating customers. We have made two successful prosecutions this year for failing to pay fines imposed for overstaying on visitor moorings. We are also reviewing the provision of moorings along the length of the canal to try to ensure that we have the right kind of moorings in the right locations.*

- (12) BW should undertake a full review of licence costs and charge more for wide beams/residential boats.

*This is being considered by BW at a national level.*

- (13) BW should fit all structures and boats with an electronic tagging system so that all movements by all boats are accurately recorded.

*This would be extremely costly and would rely on all boaters agreeing to have their every movement monitored.*

- (14) BW staff carrying out licence checks must have access to instant electronic data from head office so that boats who have paid but have not received their licences are not penalised or prevented from continuing their journey

*We accept that there have been some delays in getting licences out to boat owners in a timely fashion with the migration of the boat licensing function from Watford to Leeds. This is being addressed.*

- (15) BW licences should be sold from all K&A Trust outlets.

*This was discontinued some years ago as the process of issuing a licence is complex and requires considerable training.*

- (16) BW should concentrate on the areas where the problem is worst.

*Our Enforcement teams do try to do this. The result of this can be that boats then relocate to an area that isn't receiving quite so much attention and so the 'problem zone' moves to another section of the waterway. For this reason, a data collector will ensure that the whole waterway is covered in any given month.*

- (17) Send information to boat builders about the need for a BW licence that they can give to new boat owners so that new boaters understand that a licence is required.

*This is an excellent idea and one that we will be implementing locally.*

- (18) Carry out checks at all entry points to the canal and slipways.

*We do not have the resources to monitor all craneage points and slipways, but we could include these facilities in our random checks.*

- (19) Lower the licence fee so that people feel more inclined to pay.

*We regret that we cannot see a way to reduce licence fees at present. Experience shows that ability to pay and willingness to pay are not always related and we do have a number of schemes in place to enable customers to spread payments (even for debts) over a period of time.*

- (20) Do a full boat audit 2 or 3 times a year.

*Although the annual boat check is an excellent way of monitoring total boat numbers on the canal and is very useful because we can compare it year on year, it isn't a particularly useful tool for Enforcement purposes. The regular recording that our Data Collectors do out on the towpath recording unlicensed boats (and the positions of overstaying boats) is necessary in order to bring about successful solutions.*

- (21) Can we be consulted on the conclusions again, rather than just having them implemented?

*We feel that further consultation would be unnecessarily costly and cause an unhelpful delay in implementing our proposals. We will, however, be pleased to receive feedback on how the revised proposals are working.*

1 September 2008.