



The trade association for the boating industry

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Monday, 15th March 2010

Dear Sir or Madam,

Further to your publication of the consultation for the England and Wales inland waterways strategy, '*Waterways for Everyone*', I am pleased to provide the Department with the British Marine Federation's (BMF) views on its proposals. In responding to this consultation we have gathered and expressed the views of our inland constituent associations who have an interest in Inland Waterways, the names of which are:

Association of Pleasure Craft Operators
BMF Thames Valley
Broads Hire Boat Federation
British Hire Cruiser Federation
Canal Boat Builders Association
The Yacht Harbour Association
All BMF regional associations

The BMF is the Trade Association for the leisure boating industry, representing around 1,500 member companies. Our members provide the boats, equipment, facilities and services that enable 3.7 million adults to enjoy their recreation afloat on the coast and inland waterways of our country. The BMF also operates the London and Southampton International Boat Shows via its subsidiary National Boat Shows. Our industry is comprised of small and medium-sized enterprises, with over 98% of our companies employing less than 50 people. In total, the UK leisure marine sector

directly employs over 34,300 FTE and generates annual revenue of £3.16 billion, of which nearly 40% is derived from export sales. Over recent years the leisure marine sector has been recognised by Government as a manufacturing success story and a growing and valuable contributor to the UK economy.

A large number of BMF companies have interest in inland waterways markets, with many operating waterside businesses located on the canal network, navigable rivers and Norfolk and Suffolk Broads. These companies are all small and medium sized enterprises and many could be categorised as ‘micro-companies’ These businesses are wholly reliant upon the waterways for their existence, and the navigation authorities are the sole organisation responsible for the quality of the environment in which they operate.

The BMF welcomes the publication of DEFRA’s *Waterways for Everyone* document, as the first Government policy paper since the publication of *Waterways for Tomorrow* in 2000. Participation on the waterways has seen a steady increase over the past decade, while the potential of waterways to drive regeneration projects has been realised across the country. Despite these successes, significant funding shortfalls and maintenance backlogs continue to hinder the work of Inland Navigation Authorities and jeopardise the future of canals and navigable rivers across the national network.

By publishing this document, the Government has the opportunity to secure the future of the industry that operates on inland waterways and ensure that the value of the inland network, first identified in *Waterways for Tomorrow*, is maintained long into the future.

Regulatory Reform

The inland marine economy spans a wide range of Government Departments besides DEFRA. The DfT, BIS, DCMS, DCLG, HM Treasury and the Home Office, (in addition to their associated agencies), all have a significant influence on the running and future prosperity of our members’ businesses. The BMF certainly appreciates that regulation must be updated to reflect the UK’s European obligations, as well as to ensure the safety of the public. We have a strong track record of working across Government to support the creation of beneficial and proportionate legislation.

However, a number of our members have expressed concern with the rising regulatory burden across their businesses and are finding it increasingly difficult to keep up with the changes required of them, in addition to maintaining a viable cost base. While they also understand that certain regulations are essential for safety reasons, there are occasions where new requirements (from the perspective of the business owner) appear to have negligible benefit, while causing significant disruption to their operations. This is particularly visible during the current economic climate, where profit margins are narrowing and there is little room to absorb unexpected costs. This perception can also be further exacerbated when, on the rare occasion, separate regulations appear to be contradictory.

From the perspective of the BMF, there has been a significant increase in the publication of Government consultations over the past 12 months, having responded

to proposals from departments and agencies at a rate of nearly one per week over that period.

The BMF appreciates that it is not DEFRA's responsibility to coordinate the legislative agenda of HM's Government but, in the context of this consultation, we would encourage the Department to continue to widen its cross-departmental engagement. It is now widely accepted that waterways issues and interests are cross-cutting across Whitehall Departments. We feel that improved internal communication of departments would benefit the Government and our members in the following ways:

- 1) Help to avoid unintended consequences and conflicts with existing regulation
- 2) Improve understanding and appreciation of inland waterways in new regulation
- 3) Help to identify ways to mitigate costs to business as a result of new regulation (improve the effectiveness of impact assessments)
- 4) Help to educate and inform businesses on how and why regulation has been introduced

Residential Boating

The BMF recently held a workshop for our members to discuss the future opportunities and challenges for inland waterways businesses. A number of matters were discussed but the most pressing issue raised was the uncertain status of various forms of residential boating. In this regard, The BMF is surprised by the lack of mention this crucial issue is afforded in DEFRA's strategy for the future of the waterways.

The ambiguous distinction between residential boating and continuous cruising has led to confusion for both our members and the Government and we are eager for this situation to be resolved. Residential use of the waterways is not a new development but there are reports of the trend experiencing a significant rise in popularity during the current recession. As evictions rates rise, coupled with the relative affordability of living on the waterways, it is easy to see why such a lifestyle would be appealing.

The BMF is not, in principle, against the growth of residential boating on the waterways. Indeed, increased use of the waterways in this manner offers our members with increased opportunity to supply their services to a growing market. However, we believe that such expansion must occur in a well-regulated and sustainable environment. Unfortunately, from the perspective of members, this appears to be far from the case.

In our response to an AINA consultation on the subject, we welcomed reassurances surrounding security of tenure and supported calls for greater cooperation and understanding from local authorities (Annex A). We remain clear in our assertion that it is not the role of a Navigation Authority to take on the responsibility of a local authority or provide affordable housing, but to ensure the navigability of the waterways for recreational use.

We believe that a holistic strategy is required on the subject of residential boating at Government level. We also believe that *Waterways for Everyone* provides the perfect platform from which to launch such a strategy. We encourage DEFRA to review our views on the matter, and those of all affected stakeholders, before publishing the finalised document. Without such clarity the BMF is concerned by the increasing likelihood of conflict between the very stakeholders who hold the key to a prosperous and vibrant future for the waterways. We would also encourage the establishment of a cross-departmental working group, with a particular focus on DEFRA and DCLG, to tackle this complicated issue. Such a group would allow the exploration of what role the waterways can play in resolving the affordable housing shortage (if any) while also affording a better appreciation within local authorities of how incorrectly classifying craft as places of permanent residence can seriously harm the marine industry and the enjoyment of the waterways as a whole.

The BMF would be pleased to outline further its views on this specific matter if so desired.

Funding

The BMF appreciates the need for stringent controls on Government spending in the difficult economic and fiscal climate. We remain realistic in our expectations that the Government is not currently in a position to radically increase funding for inland waterways. Nonetheless, we are concerned that the Grant in Aid for Navigation Authorities has consistently decreased, year-on-year, while maintenance backlogs continue to rise. According to a recent research report from the House of Commons Library (Annex B)¹, British Waterway's maintenance shortfall is in excess of £30 million, while the Environment Agency endures a further £13.9 million deficit². We believe that this is creating a public safety risk that Government needs to be cognisant of.

Therefore, we welcome the Department's statement:

'Maintaining investment in the quality and quantity of waterway infrastructure during times of recession to support these opportunities for economic growth should be considered by Government and its agencies at all levels.'

We clearly believe in the utility of the waterways. They support a thriving economy, provide for thousands of jobs and offer a uniquely British recreational and tourist asset - but they must be adequately maintained to realise their full potential. Central Government must demonstrate its commitment to its vision for the waterways by sourcing the funding needed to restore the waterways to a sustainable footing.

The discussion on how such funding can be acquired is broad ranging within the consultation. We commend any study that seeks to identify partnerships and more efficient ways of working. However, proposals such as British Waterways entering the third sector, the creation of a single national navigation authority or the

¹ British Waterways Standard Note, SN/BT/3184, 8 December 2009 Louise Butcher, Business and Transport Section, House of Commons Library

² <http://www.environment-agency.gov.uk/research/policy/40151.aspx> Environment Agency: Frequently Asked Questions

encouragement of greater public-private partnerships must all clearly demonstrate how they benefit the long-term sustainability of the waterways and should not be seen as an opportunity for Government to diminish its fiscal responsibilities. Indeed, the proposal put forward to widen the funding sources for waterways recognise that funding shortfalls cannot be bridged without an increase in capital investment from Central Government and its agencies³.

Q1. Do you agree that the range of benefits of inland waterways identified above and expanded upon in the following chapters are correct? Are there any benefits that we have missed or overstated?

The BMF recognises the benefits of inland waterways identified by the Department. However, we do not believe that these benefits, and their associated stakeholders, can exist without conflict in the absence of effective management. In order to derive the greatest benefit from inland waterways, for all stakeholders, the Department and its agencies must ensure the efficient management of the network.

Equally, the Government must ensure that, while it works to broaden participation on inland waterways, the traditional custodians of the network are not displaced in the process. Since the creation of the Transport Act in 1968, it has been widely recognised by Government that the primary source of support and revenue for inland waterways has been derived from recreational activities on the water. Since that time, the steady growth of the inland marine economy has been a vindication of this view. The BMF believes that any policy that focuses on improving the waterways should therefore identify the maintenance and growth of navigation as its main catalyst. We are eager to hear more from the Department on its views on how navigability can be improved across the inland network and would welcome the opportunity to work with DEFRA to identify specific measures that would benefit the waterways and our members.

Chapter 2: Our Inland Waterways Today

Q2. Do you consider that waterways are in a better condition now than they were 10 years ago? What have been the main achievements over this time and what could have been done better?

After the publication of *Waterways for Tomorrow*, the BMF and the wider industry felt optimistic about the future of the inland network and investment, up until the middle of the last decade, demonstrated the Government's commitment to securing a lasting legacy. However, it is undeniable that, over the last 5 years, much of this work has been undone by significant funding shortfalls resulting in maintenance backlogs.

Reports of significant incidents such as long-term lock closures and canal collapses are on the rise. A number of navigable waterways are close to becoming impassable due to insufficient dredging, threatening the businesses models of those members that rely on them. This matter is compounded by regulation that makes the cost of removal and treatment of dredged materials excessively costly and puts the already strained

³ *Setting a New Course: Britain's Waterways in the Third Sector*, 2009: 'Funds raised would not be sufficient to fill the long-term funding gap'.

maintenance funding models of the Environment Agency, the Broads Authority and British Waterways under additional pressure.

Equally, the aesthetic appeal of some waterways has radically declined in the past few years due to inadequate funding for tow path maintenance. We note the Department's observation in section 9.5:

[...] A good visitor experience will generate more visits, increasing both the amount and security of revenue. [...]

Marinas and hire boat operators have also been encouraged by Visit Britain and the national tourism authorities to offer the best quality of experience possible for their customers and, at a recent BMF Tourism Summit, we explored ways to improve customer service and marketing for the sector. Despite this, delegates at the summit expressed the view that such efforts will yield little reward for businesses if the very waterways that perpetuate their existence are in parlous condition and felt that this was becoming a growing problem. With the help of excellent work by the Government over many years the once poor condition of network was restored but, with the appearance of some historic and beautiful canals and rivers in such a steep decline, there is a risk that all this work will be undone by only a few years of relative neglect. Priority must, of course, be given to maintaining the navigability of the waterways but it is essential that the waterways remain attractive for tourist or recreation use, if the Department wishes to realise its objectives in this area.

Chapter 3: Place Making and Shaping

Q3. Do you agree that it is important for regional development bodies and local authorities to work closely with those responsible for managing the Inland Waterways to ensure that the potential benefits in respect of place making and shaping are maximised? Do you have any ideas as to how this can be achieved?

The BMF strongly supports the inclusion of RDAs and local authorities within this consultation. Our *Economic Benefits of Inland Marinas* (Annex C.) clearly demonstrates the benefits of such developments to local communities in driving regeneration. We particularly agree with the Department's observations that canals provide a distinctive brand for many of England's prominent industrial cities. Where traditional industry has declined, it is invariably the waterways, that once provided the pathways for freight, that now act as focal points for regeneration.

The BMF have met with varying degrees of success when trying to promote the value of inland waterways, and their associated businesses, to regional government at an RDA and local authority level. While many councils take full advantage of the benefits offered by inland waterways, few have access to the funding to provide a meaningful contribution to their upkeep.

Q4. What more can navigation authorities do to encourage local authorities to consider using waterways to improve the quality of life of their local communities?

The BMF would encourage Navigation Authorities to strengthen their relationships with RDAs and local authorities. We believe, however, that equal emphasis should be

placed by Government on encouraging these institutions to work with navigation authorities. We would encourage DEFRA to open a dialogue with DCLG and the Local Government Association to encourage them to recognise the value that waterways bring to their communities. We also believe that, in the context of this consultation, local authorities have a role to play in funding the proposed expansion of use on waterways. In the same way that public footpaths are funded by local authorities for the benefit of the broader population, the use of towpaths for similar purposes should also be supported by local government.

Q5. What do you think the barriers are to local authorities taking more interest in waterways in respect of place making?

Our suggestion for a contribution to inland waterways from regional institutions would likely be met with opposition from RDAs and Local Authorities. While they are open to recognising the benefits of the network to their own objectives, it is clear that current funding constraints limit their capacity to contribute. If reports are to be proven correct, local Government will be entering a period of further austerity with stringent spending controls, limiting their options further. To overcome this, the BMF would suggest that DEFRA enter discussions with DCLG to explore the possibility of ‘ring-fencing’ specified funding for the development of the waterways as a hub for improving health and well-being, as well as encouraging regeneration.

Chapter 4: Climate Change

Q6. Do you agree that inland waterways offer an opportunity to help the UK mitigate and adapt to the effects of climate change? Are there any areas you consider that should be explored further in this context, including how the waterways themselves will need to adapt?

The question of climate change, and how it will affect inland waterways, is complex. On the one-hand, inland operation of craft supplies a very small percentage of the carbon emissions that contribute to global warming, and yet the waterways themselves are particularly vulnerable to the effects of climate fluctuations in the United Kingdom.

Boat users and marine businesses have a long standing reputation for appreciating and acting to protect their ecological surroundings. The same applies to their carbon output. Some hire boat operators are taking advantage of licensing incentives to transfer their crafts’ propulsion to electric while many more are installing photovoltaic cells to supplement their on-board power.

The Green Blue initiative, a collaborative project between the BMF and the Royal Yachting Association (with the support of various Government Agencies, including the Environment Agency and the Crown Estates), promotes environmentally responsible use of the waterways and has issued guidance of its own on mitigating climate change. More information about the Green Blue, including its guidance on climate change, can be found at <http://www.thegreenblue.org.uk/>

The BMF notes the Department’s inclusion of the initiative in section 4.10 as a case study and thanks it for its recognition of its work. The Green Blue would be pleased

to continue to work with the Department in helping it to achieve the goals it has set out in *Waterways for Everyone*.

We note, however, the Department's statement in section 5.7:

[...] mitigating the effects of boat traffic by imposing speed limits and use of best practice, as proposed by the Green Blue initiative; [...]

While we agree that the Green Blue works to promote environmental best practice, it certainly does not advocate the introduction of speed limits across inland waterways. The Green Blue operates to *promote* environmental best practice, but the policies and research from which this advice is derived stems from the work of the BMF and RYA. While we have always advised users and our members to regulate craft speed, depending on its surroundings and conditions, we have not proposed, nor would we support, the introduction of national speed restrictions over and above those laid down in existing regulation. We would be interested to know how the Department came to such a conclusion - in order to avoid any further confusion in future.

While no definitive data exists that identifies the carbon emissions attributed to recreational boating, they are certainly insignificant when considered in context with the national output. Despite this, and as we have already mentioned, inland boaters and businesses enjoy a good reputation as environmentally responsible citizens. The BMF supports any measures proposed by the Department to encourage the growing awareness of boaters' impact on the climate but it is essential that this continue on a broadly voluntary basis. We would also welcome the opportunity to work with the Department on exploring specific incentives for businesses producing and adopting eco-friendly technologies on the waterways.

As the climate changes, pressure on water resources will increase. Demand for water within canals and rivers for abstraction, whether for industrial or agricultural uses, continue to put pressure on water supply in the summer months and this trend will only increase as the UK's weather becomes more unpredictable. The BMF encourages DEFRA, in concert with Department for Energy and Climate Change, to commission research on the future of water resources on the inland waterways, based on the most up-to-date climate change model and usage forecasts, to help inform a strategy and to identify proportionate mitigating measures in addition to those contained within the Flood and Water Management Bill.

Paradoxically, the threat posed by climate change also poses an opportunity for marine businesses. The UK's climate, though temperate, is often cited as a reason for domestic tourists to travel to warmer countries abroad. This inevitably involves the use of aviation and results in significant carbon emissions. The down-turn in the economy has seen the rise of the 'staycation', and hire-boat providers have benefited from increased bookings as a result. We examine the benefits of the waterways to tourism in Chapter 9, but it is clear that by promoting tourism on the network, DEFRA has an excellent opportunity to support industry while helping to realise tangible environmental benefits.

Finally, canals offer an important asset in establishing a sustainable drainage system in the UK. We all remember the terrible consequences of the flooding experienced in

2007 and the Government has worked hard to avoid a repetition of this disaster. Canals, of course, provide a ready-made drainage channel in such circumstances and there is significant merit in expanding the network for such purposes. While probably a long-term project, the Department should not dismiss any opportunity to reopen or expand waterways to alleviate possible flooding risks in the future. By taking this approach, the Department would also be bringing the benefits of regeneration that they have identified to new areas, allowing the growth of marine businesses and broadening participation.

Effective dredging can also help to alleviate flood risk as it allows waterway depth to be increased, and thus its carry capacity as well as reducing 'choke-points' and the risk of flash flooding.

Chapter 5: The Natural Environment

The BMF is encouraged by the consultation's reference to the fact that boating poses little or no threat to aquatic life on the waterways. As we have mentioned in our response to the Climate Change chapter, boaters generally take a pro-active approach to supporting the natural environment that is such a crucial part of the appeal for their pastime. The Green Blue also helps in this regard, championing environmentally sensitive best practice to operators and boaters alike. This includes advice on the discharge of grey water, information on anti-fouling paint and how to report injured animals to the responsible bodies.

Measures such as these, coupled with the progress made by navigation authorities in improving the chemical makeup of surface water (as referenced within the consultation materials) has ensured that the waterways offer sanctuary to countless *flora* and *fauna*. Much of this natural beauty adds to the appeal of the waterways to tourists and our members recognise the benefit a diverse ecosystem can bring to their businesses.

The BMF recently responded to Department's consultation on the Water Framework Directive. We were generally pleased that navigable rivers fell within the definition of artificial or heavily modified waters and hence protective ecological measures could be taken within the context of the waterways primary use as a means of navigation. We note the following statement:

5.10 In the Government's view there is no reason why implementation of environmental legislation should threaten navigation. The Government will work with waterway authorities and regulators to ensure that the implementation of environmental legislation takes proper account of the need to sustain navigation and recreation and their associated public benefits.

We consider such methodologies as an example of how to produce the best possible outcomes for as many stakeholders as possible, while ensuring that desired ecological outcomes are achieved. We would welcome the opportunity to open a bi-lateral dialogue with DEFRA, in addition to standard consultation methods, to ensure that it is well informed about the ecological views and concerns of our members, as the main businesses users on the network.

Chapter 6: Cultural Heritage

Q7. Do you agree that the unique cultural heritage associated with inland waterways provide a key benefit to those who use and visit waterways? How can these resources be used to further enhance and encourage use of the waterways?

Q8. Do you consider the protection of the natural and built heritage to be one of the waterway authorities primary tasks?

Q9. What area of waterway heritage do you consider most under threat?

The cultural heritage of our canals tell a story of the rise and fall of an empire, marked the emergence of modern industry and gave rise to some of our largest cities. Their importance to our cultural identity cannot be overstated and they represent a lasting and tangible legacy of one of the most important periods in our history. Equally, the rivers of the UK provide the backdrop for some of the most important historical events of the country. From the origins of modern democracy, through the signing of the *Magna Carta* at the Runnymede, to the Thames acting as focal point for the forthcoming 2012 Olympic Games –waterways lie at the core of British identity.

Our members cherish this unique and priceless heritage but, unlike most legacies of history, they continue to use the waterways to maintain thriving businesses. It is a true testament to their value that waterways have evolved and remain as relevant as they did when they were first built, all-be-it in a very different manner to what was intended. It could be said that our members provide the opportunity for the public to experience the UK's 'living heritage'.

In this sense, the BMF does consider the protection of the waterways' natural and built cultural heritage as a very important task. However, the responsibility for this does not remain exclusively in the purview of navigation authorities. From the tourist point of view, the canals cannot be considered in isolation from their historic surroundings. In many historic towns, the mills and factories that used the canals have disappeared and with them the historic appeal of the region. We believe that, in order for our members to flourish into the future, a balance must be achieved in providing modern and convenient facilities while maintaining the historic attractions that draw so many to the waterways in the first place. We encourage Navigation Authorities to work with organisations like English Heritage to protect the atmosphere of canals *and* their surroundings. Such partnerships have the potential to deliver benefits for both organisations as well as businesses operating on and off the water.

Furthermore, we do not believe that our cultural heritage lies purely in the historic buildings alongside the waterways, but within the practices that were undertaken within them. Boating and the skills that are involved are certainly not archaic memories of a by-gone era and our members would prefer that their heritage be preserved as living history *and* vibrant businesses rather than merely retaining the buildings that once housed them. DEFRA should consider the value of heritage and emphasise that the spirit of marine sites should be retained in regeneration projects by accommodating them rather than remodelling their buildings as office blocks or residential property.

Of particular concern is the rapid disappearance of historic wharves from our waterways. These unique structures are under serious threat across the country and many have already fallen victim to redevelopment. The BMF has issued planning guidance on this matter which is attached as Annex D.

Chapter 7: Health, well-being, recreation and sport

Q10. Do you agree that inland waterways, including their paths and surrounding environments provide an important resource for outdoor recreation, sport and improving public well being? What more can be done to protect and improve these important resources?

Q11. What needs to be done to make waterside paths more accessible and better appreciated by local communities?

The BMF recognises the health benefits associated with the use of waterways. They offer outdoor recreation, both on and off the water, as well as pathways for exercise and relaxation in urban and rural environments. We also recognise that greater use of the waterways for such purposes will lead to further investment in the network and exposure to the waterways will drive interest in the products and services on offer from our members.

In order for the appeal of the waterways to be significantly broadened an improvement to general facilities, such as signage, refreshment points and public amenities, will be needed. Lighting in certain areas will also need to be improved to provide better security and safety for those travelling on the tow path at night. Our members who operate marinas have examined the possibility of opening their services, including parking, to stakeholders beyond the boating fraternity to help improve access and the appeal of the waterways. We invite DEFRA to enter into a dialogue with us to identify what benefits, for both parties, can be derived from such arrangements. Equally, we also believe our earlier assertion that a well maintained and aesthetically pleasing towpath and waterway is essential to encouraging recreational use of the waterways.

We believe that more work needs to be undertaken to promote the health benefits of the outdoor pursuits of boating. Funding is readily available for sporting projects through *SportEngland* for sporting projects but it is far more difficult to find such money for other healthy, outdoor pursuits on the UK's waterways. We would welcome any advice that DEFRA could provide on accessing funding streams to promote the health and well-being benefits of recreational boating.

The BMF notes the Department's observation in paragraph 7.18 that no public body currently holds explicit responsibility for the maintenance of the towpath. We share the Government's concern about this unfortunate situation and refer it to our response to chapter 3, and specifically our thoughts on improved partnerships with local authorities to resolve this matter.

Chapter 8: Sustainable Transport

Q12. Do you agree that waterside paths offer considerable potential for increasing green commuting, both for pedestrian and cyclists? What more can be done to encourage this further?

In a similar vein to our response to Chapter 7, the BMF feels that there is potential for the inland waterways to be used as commuting conduits but this depends on sufficient investment in towpaths paths for it to be effective. Walkers and cyclist using paths alongside rivers and canals are likely to be deterred by poorly lit, uneven surfaces in close proximity to water. There is also a significant health and safety perspective that needs to be fully understood. The Department also needs to be realistic on what it can achieve in encouraging such use. It is quite likely that, where conditions are ideal for such use, paths are already heavily used for commuting purposes as an alternative to travelling on busy roads. Where potential exists to *expand* their use, there also lies the likely necessity for significant investment in order to realise that potential.

Equally, waterside paths and, indeed, the waterways themselves need to be located in areas where there is a need for a commuting channel. The BMF can see little sense in creating extensive cycle paths in rural areas to facilitate commuting but can fully understand the logic of such measures in and around major towns. One way to ensure the use of towpaths for sustainable transport use is to encourage development of businesses and industry on the water. By supporting a vibrant waterside economy, the Department also ensures that the means by which employees access these businesses are located on the waterside as well, thus helping the growth and regeneration in an area to incorporate a more sustainable transport infrastructure.

Given the sentiments we have expressed in this section, we again reiterate the key role that local authorities should take in realising these objectives.

We feel that a thorough consideration of how a large increase in walkers and cyclists on the waterways would have on other existing stakeholders is necessary. There are questions surrounding the security of private property, for example, that may make the expansion of commuter traffic on the waterside undesirable in certain circumstances. Where large-scale changes to the use of waterside paths are proposed the BMF would strongly recommend a rigorous process of local public consultation.

Q13. What can be done to reverse the decline in freight on the inland waterways in recent years? Which elements of the commercial waterways have the greatest potential for freight use? How should the planning process ensure the protection of freight interests in those areas with greatest freight potential?

As the use of canals for freight declined in the middle of the last century, the Transport Act 1968 recognised recreation as the main purpose of inland waterways. As the representative of the biggest industry sector that operates and supports the waterways, the BMF feels that transporting freight should remain a secondary concern to that of maintaining general navigability for recreational use.

Nonetheless, the BMF recognises the capacity to move more freight by water and the benefits this could bring. Many of our recreational boat yards also operate in a limited commercial capacity and their services could support a resurgent freight service on

the waterways. We believe that a feasibility study for expanding freight use on the waterways, as proposed in the consultation document, would be a sensible suggestion at this time and we would be happy to work with the Department in helping it to map the network and its facilities.

However, based upon our interpretation of the consultation materials, we do not believe that the Department fully appreciates the scale of investment required to make the movement of large quantities of freight on the waterways practicable or cost effective. While, with the right studies and research, there would be limited impediment to moving significant amounts of cargo on the water, there is the question of how such cargo moves to and from the water and is then transported on to its next destination.

Slip-ways of sufficient size to accommodate trucks are rare, as is the appropriate lifting equipment to move the goods. It is true that moving freight onto the waterways would help to alleviate motorways of traffic but it would also mean that HGV's would be diverted to waterside facilities that are often located in smaller towns and villages where the roads are not suitable. The BMF is not in a position to offer definitive guidance on the number and type of areas that might be suitable for such activities but we believe them to be very few. It is clear that measures to increase the number of suitable facilities could be prohibitively expensive and would require significant investment by Government.

Chapter 9: Tourism and Business Development

Q14. How can we best encourage a common purpose between different users of the waterways? What can be done to better manage potential conflicts?

Q15. What do you believe should be done to maintain and increase the number of boat registrations on our inland waterways?

Q16. How can the waterways increase their share of the holiday market?

Protecting and developing tourism and marine waterside businesses defines the purpose of the BMF for its inland members. Much of our responses to the various chapters contain our views on the impact these proposals will have on our members. Their main priority is to maintain the navigability of inland waterways in order to preserve their business model. We have already discussed the problems caused by maintenance backlogs, insufficient dredging and the degradation of the waterways' aesthetic appeal. In such circumstances, we believe that the Department's priority should be to restore the waterways to a better footing before exploring ways to increase boating registrations (although the two are intrinsically linked).

The BMF acknowledges DEFRA's use of statistics from our Economic Benefits of Marinas, the executive summary of which is attached as Annex C.

In the South West, we have enjoyed success in jointly appointing a regional manager with SWRDA. This post has helped to support and promote marine businesses in the area and develop regional policies that take into account the valuable contribution that marine businesses make to the community. Both parties have found the appointment

to be enormously successful and we are currently exploring similar arrangement with other RDA's. In areas with a strong inland element, we feel that an advocate for marine businesses could be invaluable in helping to realise the business focused objectives of *Waterways for Everyone*. We would welcome any interest that DEFRA would have in promoting such an arrangement to the DCLG and other RDAs. We also feel that *Waterways for Everyone* is ideally placed to encourage such measures.

Beyond the waterways, the Department is right in its observation that our inland members are small and medium sized enterprises. In that sense, they are as exposed to macro-economic issues as any other business. The BMF has worked hard to highlight problems in the administration of Government initiatives, such as the Enterprise Finance Guarantee Scheme, and we would encourage the Department and its agencies to frame its regulation with an appreciation for the business conditions in which our members currently operate.

Another project that the BMF has been working on is its "On the Water" campaign:

Box 1

***On the Water* is a new initiative from the BMF which aims to raise the awareness of boating, breakdown the barrier to entry and, most importantly, encourage regular participation in boating. Ultimately, the goal is to increase the number of active boating participants from the current 3.7 million.**

The project will consist of new partnerships, events, marketing and PR projects that will help people to make their boating decisions and get on the water. The ultimate resource will be a consumer website www.onthewater.co.uk which includes ideas to get on the water and advice on buying a boat. We also highlight the services and boating experience offered by our members.

The BMF is working closely with user group such as the RYA and BCU to improve collaboration on such participation initiatives.

Fig. 1: The *On the Water* website: www.onthewater.co.uk



We generally feel that marketing is a key success factor in ensuring that the waterways remain relevant. Boating attracts a specific and enthusiastic demographic but this must expand in order for waterside businesses to grow. We have already mentioned the work being done through the 'On the Water' campaign but we also encourage the work of the individual Navigation Authorities to promote the lifestyle and improve accessibility through their own marketing. Holiday time, for most people, is very precious and while many may have a fascination with boating and would never rule out a holiday on the water, those who have not boated before invariably miss the opportunity in favour of a week in the sun. We believe this is mainly due to a lack of understanding, amongst the risk-averse general public, of what to expect from a boating holiday. By raising the profile of the waterways and demonstrating the appeal of a waterways holiday, this barrier can be reduced. We are working very hard to raise this awareness and we welcome any commitment by Government to support us in this regard.

As we have also mentioned in our response to Chapter 2, it is very important that the unique visual appeal of the waterways is maintained and that funding is available for the beautification of the waterways.

As respects the proposals put forward for broadening the appeal of waterways, the BMF is encouraged by the steps proposed by the Department but wishes to reemphasise that it does not believe that boaters, and their associated businesses, should be expected to meet the cost of such improvements. With the exception of anglers, boaters are the only major financial contributors to the up-keep and maintenance of the waterways outside of Government. The cost of licenses and tolls across the network have consistently increased over the last few years and our members unanimously agree that the measures proposed should not be paid for through existing charging models. Marinas are prepared to work with the Department to explore ways in which they can encourage broader participation (see chapter 7) by opening their facilities but would, understandably, be resistant to increased operating costs during this period of economic uncertainty.

We have already made our views clear that the benefits DEFRA seemingly wish to encourage the most (social inclusion, sustainable transport, fairer communities etc.) are almost exclusively the purview of local authorities and RDAs off the water. We do not perceive a distinction between their responsibilities on the water, in this regard, and we fully support an improved working relationship between Navigation Authorities and Local Government. Another possibility of gathering additional funding is the introduction of an environmental levy on water rates. The Government has introduced similar schemes within its *Digital Britain* strategy, where a £6 annual charge is appended to telephone bills to gather the necessary investment to deliver faster broadband, and the associated economic and social benefits this brings. We believe that, as a major user of the waterways, water companies could integrate a similar charge that could be invested in the general upkeep and the refurbishment of the network, while enhancing their own corporate and social responsibility profile.

It is important for the Department to recognise that many of the businesses on the waterways are operated as a lifestyle choice as well as a business. Very small businesses do not have the capacity or the expertise to submit to burgeoning

regulatory requirements and we urge any proposals for future regulation to be proportionate to these businesses' operations, and to incorporate simple routes to compliance (please see our comments on regulatory reform for more details).

Finally, the BMF is very pleased with DEFRA's appreciation of the opportunity to make better use of the waterways as a hub for skills and training. The BMF training Department, in cooperation with the Sector Skills Council (SEMTA), has worked to design a number of marine based apprenticeships and training programmes. Our Marina Management Course provides staff with the understanding of the waterways they need to run successful facilities and a substantial element of this training revolves around environmental responsibility. We can provide the Department with a full list of the training regimes we provide on inland waterways, should they require it. The BMF needs to ensure that the skills and trades that have developed over hundreds of years in boat construction and boat yard operation are passed on the new generations in order for the sector to continue to excel.

Chapter 10: Fairer, stronger and more active communities

Q17. Do you agree that there is scope for increasing waterway related volunteering activity? How can this be achieved?

The BMF supports volunteering on the waterways. We consider any growth in participation as the main source on an increased number of volunteers on the waterways. The inland network is fortunate in that it benefits from a core group of enthusiasts who selflessly take time out of their lives to help improve conditions on the rivers and canals. Their contribution is invaluable to the future of the waterways and Navigation Authorities should take the time to recognise and commend these people for their efforts.

We are however, somewhat concerned about the lack of detail contained within the proposals brought forward by British Waterways (BW) concerning its entry into the third sector and how it will increase volunteering. Within BW's paper, *Setting a New Course*, it is implied that a transition of the authority from a public body to charity could deliver a significant increase in volunteering on the inland network. We imagine that an increase would indeed occur, but question if the levels would approach those expected within the report.

As we have said, volunteers on waterways are a committed and enthusiastic group who dedicate their time due to their love of Britain's canals and rivers. Any transition to the third sector is unlikely to alter their perception and they will simply continue to do those things they have always done. On the other hand, we do not find the potential for expanding volunteering through appealing to general altruism significant. Those who are committed to undertaking general charity work are unlikely to choose the preservation of the waterways as a compelling cause over international welfare, child protection or health charities. The report itself makes the following observation:

To engage support in today's third sector, BW's low profile as a third sector organisation means that it would need to make a powerful and compelling presentation of its cause, and not just market itself as a worthy organisation.

The BMF finds it difficult to envisage how such a cause could be established that would exceed the attraction of the well established causes that dominate the third-sector. We would welcome the opportunity to explore both the Department's and the navigation authority's ideas on how such an issue could be overcome.

Q18. How can schools and colleges be encouraged to make greater use of the waterways for educational purposes?

The BMF is currently undertaking a review of its strategy on how it currently engages with schools and colleges. We run the successful School's Marine Challenge and support the teaching of marine related studies across the country. We believe that the UK possesses some of the most skilled craftsman in the global marine sector and we are committed to ensuring that the industry's reputation for innovation and apprenticeships is maintained. The BMF will be pleased to provide the Department with our new strategy, upon its completion, as a supplement to this consultation response.

Q19. What can be done to help NCBA to increase the use of waterways to improve social inclusion?

The NCBA is to be congratulated on the excellent work it has done in organising and training volunteers. Many of our members also volunteer through the NCBA and their work should be supported at every level of Government. We will continue to encourage our members to get involved in fund-raising activity.

Q20. What can be done to overcome barriers to achieving greater diversity among boaters and anglers using the waterways?

Boating is undeniably a male dominated activity but we do not believe that there are any significant impediments to woman participating on the water. 'The On the Water' campaign has, as one of its many objectives, the goal to increase the appeal of boating to women, and identifies this as a potential area of significant growth. Similarly, we do not perceive any barriers to participation for ethnic minorities and believe that, as participation is more generally widened, so will the diversity of people enjoying the water.

Of all marine sectors, the inland network is enjoying the largest growth in participation by women, with nearly 170,000 recorded visits in 2009. The BMF produces a participation report, which breaks down the demographics of the waterways and we have appended this to the consultation for the Department's use (Annex E: attachment). The data clearly demonstrates a steady narrowing of the gap between male and female use of the waterways over the last decade.

The question of disabled access is a somewhat more complicated one, due to the logistics on the waterways. A small number of our members offer disabled access on their hire fleets, while larger numbers of passenger boats also offer access. There are significant health and safety issues that act as an impediment to extensive use of craft by disabled persons, particularly in the case of wheel-chair access, and the costs for accommodating such requirement are so prohibitive that our members are usually only able to offer the service on one boat within their fleet. We call on the Department

to take a sensible approach when considering the issue of disabled access, with an appreciation for the significant physical barriers that prevent large scale use of the network. It should be noted that our members take every possible step to make disabled individuals safe and comfortable on their boats and will attempt to accommodate any person who wishes to use their services.

We would also encourage the Department to broaden its consultation to include the views of minority groups in order to ascertain what concerns and priority they place on broadening their stakeholders' participation on and around the water. Given that HM's Government has significant experience in encouraging diversity in communities we are confident that it will support our industry with useful and proportionate proposals.

Chapter 11: The Way Forward

Q21. In view of the pressure on public finances, how can waterway authorities make the most of their resources over the next few years? Would mutual or third Sector status for British Waterways be beneficial in this respect?

We have already touched on our thoughts concerning BW's document '*Setting a New Course*'. Having reviewed the proposals we agree the authority could effectively operate in the charitable sector. We recognise the benefits that increased flexibility and independence from Government could bring to BW's operations while we also appreciate the potential savings this could deliver to HM Treasury. Nonetheless, we have yet to be convinced that such a change would be desirable for our members. In addition to our scepticism surrounding increased volunteering, we note that the proposal does not solve the main problem on the waterways;

'Funds raised would not be sufficient to fill the long-term funding gap'⁴

Given that one of the main concerns of our members is the increasing maintenance backlog on BW's network, we do not see these proposals as particularly effective. Furthermore, the strategy provides little in the way of financial data and so it is difficult to ascertain the advantages of the scheme beyond the broad assertions made in the document.

While we remain open to the idea of BW entering the third sector, we feel that significantly more work needs to be done to ascertain the feasibility of such a change before we can fully support the plan.

The following observation within the document raises particular cause for concern:

Moving to the third sector would also liberate staff to further exercise their passion about the waterways. It would be clear to everyone that the results of their efforts would be reflected in the state of the waterways and the innovative ways in which they were being used.

⁴ *IBID.*

We do not understand why BW, in its current form, cannot encourage staff to fully exercise their passion for the waterways already. We certainly hope that BW encourages its staff to ensure they work for the greater benefit of the waterways and fail to see how charitable status would change this. The document also talks about third-sector status allowing BW to work more closely with other partners. Again, we do not see any reason why BW, in its current format, cannot thoroughly improve upon their partnerships with other bodies and we would encourage them to do so.

Q22. What scope is there for enhanced partnership working to improve the resources available to protect and enhance the benefits delivered by inland waterways?

In the course of responding to the previous paragraphs of this consultation, the BMF has already proposed strengthening partnerships with local authorities, RDAs, English Heritage and the DCLG. We strongly believe that partnerships offer a way to involve numerous stakeholders, promote the value of the waterways and secure funding for specific projects. However, we remain committed to the view that, in order for the waterways to survive long into the future, a significant proportion of its upkeep will inevitably have to be funded through HM Treasury.

Q23. What activity should be undertaken to monitor the benefits delivered by the inland waterways over the coming years?

From the perspective of the BMF, the benefits of the waterways are self-evident and broad ranging. We do understand, however, the need to catalogue such value through economic and social indicators. A report, perhaps issued once every two years from the Department, could provide a common frame of reference from which to judge the performance of the network in the whole. Many of the Navigation Authorities produce reports that take into account Key Performance Indicators' which could then be drawn into a single document by AINA, in partnership with Government. This could then be used to judge the effectiveness of the waterways against the main chapters of this consultation. We feel that, despite the success of *Waterways for Tomorrow*, many of the goals it set out were not adequately followed up in the absence of effective auditing and monitoring. Such a report would ensure accountability and drive the initiatives of *Waterways for Everyone* forward. From the point of view of the BMF, we feel that any quantitative KPI's should include:

- Tourism – revenue, participation
- Waterside businesses: revenue, number
- Marine services: revenue, number
- Boat licensing numbers: revenue, number issued
- Berth numbers – on and offline

The BMF regularly commissions research on our members' businesses and general levels of participation and we would be pleased to have an input in arriving at these figures. We feel that it is also important to consider less tangible, qualitative benefits including social inclusion, restoration and retention of historic sites and stakeholder cooperation.

The BMF, on the whole, is supportive of the measure proposed in this consultation. In general terms we would value the opportunity to examine more detailed proposals


under the various chapter headings. We note that the specific and ambitious objectives contained within *Waterways for Tomorrow* have only been replicated in general terms in this new document and we hope that the current economic climate does not have a lasting and negative legacy on the inland network.

We are particularly encouraged by the Department's clear appreciation of the businesses that operate on the waterways and how they are crucial to securing the future of the UK's canals and navigable rivers. We hope that the suggestions we have provided in this response will prompt debate within Government and demonstrate the flexibility of our sector.

On the whole, we do feel that a broader focus will be needed in the finalised documents as many of the proposals put forward by the Department appear to focus on the future of British Waterways and does not fully consider the fate of other Navigation Authorities. Again, we also feel that a better balance of priority should be afforded to navigable rivers and their, in addition to the suggestions made for the canal network.

We have also made various suggestions on how the BMF and the Department can work more closely together to achieve its objectives and we look forward to further discussions with Government. Should you have any questions regarding this submission please contact my colleague and BMF Policy Executive, Christopher Ford on cford@britishsmarine.co.uk.

Yours faithfully,



Howard Pridding,
Executive Director.

Annex A: BMF response AINA strategy, *Residential use of the Waterways*

Friday, 19th February 2010

Dear Philip,

I am writing to you in response to your draft, Residential Use of the Waterways document.

The British Marine Federation is the trade association for the leisure boating industry, representing around 1,500 member companies. Our members provide the boats, equipment, facilities and services that enable 3.2 million adults to enjoy their recreation afloat on the coast and inland waterways of our country. The BMF also operates the London and Southampton International Boat Shows via its subsidiary National Boat Shows. Our industry is comprised of small and medium-sized enterprises, with over 98% of companies employing less than 50 people. In total, the UK leisure marine sector directly employs over 34,300 FTE and generates annual revenue of £3.16 billion, of which nearly 40% is derived from export sales. Over recent years the leisure marine sector has been recognised by Government as a manufacturing success story and a growing and valuable contributor to the UK economy.

The BMF is very pleased that AINA have acted to clarify the situation surrounding residential boating. We believe that any effort to clarify the regulations surrounding this classification of use of the waterway will ensure a better understanding of the responsibilities of all parties and reduce any future potential conflicts.

Our members have mixed views on the impact that residential boating has on their businesses and we have endeavoured to ensure we have presented a balanced response to the proposals in this document.

Moorings

The details provided in section 1.6 outline the different types of moorings found on the UK's waterways but it does not make the distinction between offline and online moorings. While elementary, we feel that a distinction of this nature must be made to contribute to the clarity of the guidance. We draw to AINA's attention that most of the mooring types they have indentified in this section could come in both offline and online varieties.

We have also recently responded to British Waterways' consultation on its moorings policy. This document references AINA's approach to residential boating as its main source of guidance for dealing with residential boating and we would urge both parties to work closely in developing a policy that can be practically applied on BW's network.

The need for clarification and simplification of the rules

The BMF strongly agrees with AINA's observation that general planning regulations, presented without the benefit of relevant guidance, is an inadequate method of dealing with the question of residential boating. We have consulted widely with our members on this issue and the overwhelming impression we have received is that confusion reigns in this area. The BMF is grateful that AINA have moved to clarify how planning law applies to residential boating but believes that the only truly effective way in which to resolve any potential conflict between residential and business users of the waterways is for the Government to issue clear and unambiguous guidance to Local Authorities, subject to a full and proper consultation process.

Indeed, the guidance provided by AINA is littered with caveats (see the concluding paragraph of page 15, for example), stating that no definitive guidance can be provided due to the 'complexity' of residential boating's planning status.

This ambiguity has, inevitably, lead to areas of guidance that appear open to interpretation. Advice that continuous cruisers do not require planning permission as long as they do not remain in the same 'location' for more than 28 days is one such example. Can the same location be interpreted as the same mooring, or the same stretch of tow path or marina? The guidance does not make this distinction clear and we would be grateful if AINA could further explain its meaning of 'location'.

Equally, the guidance does not cover navigable craft that are not used for official residential use, whose occupants reside within a marina and have supplied an alternative residential address to the operator. We believe that, in such circumstances, planning permission should not be required on the proviso that the craft in question vacate the marina on at least one occasion per year.

With these ambiguities in mind, the BMF would urge AINA to work with its members to lobby the Department for Communities and Local Government to produce clear and proper guidance on the issue of residential boating, as mentioned earlier. There is also a need for greater recognition of residential boating by local authorities. While residential boating constitutes a very small proportion of their overall housing responsibilities, LA's cannot afford to ignore their obligations and must work with the Navigation Authorities to recognise the existence of such domiciles and regulate them appropriately. Further Government guidance would undoubtedly serve to encourage such an understanding.

Water Discharge

The BMF notes AINA's comments in regard to the unregulated discharge of grey water by residential boaters. The BMF, in collaboration with the RYA and with the support of various Government agencies, runs the GreenBlue initiative. This promotes environmentally responsible use of the waterways and has issued guidance of its own on the discharge of grey water. We would encourage AINA to make reference to this in the final release of its document. Full details about the GreenBlue, including the afore mentioned guidance, can be found at <http://www.thegreenblue.org.uk/>

The Question of Security of Tenure

One of our inland members' deepest concerns is the potential acquisition of security of tenure by those residing within their marinas. As a matter of course, our members generally stipulate that their mooring agreements entitle customers to access to a mooring within the facility but do not guarantee which one it is. Additionally, customers are usually required to sign an agreement that they will not use their craft to live in as a permanent residence, while in the marina, and must provide an alternative postal address for billing purposes.

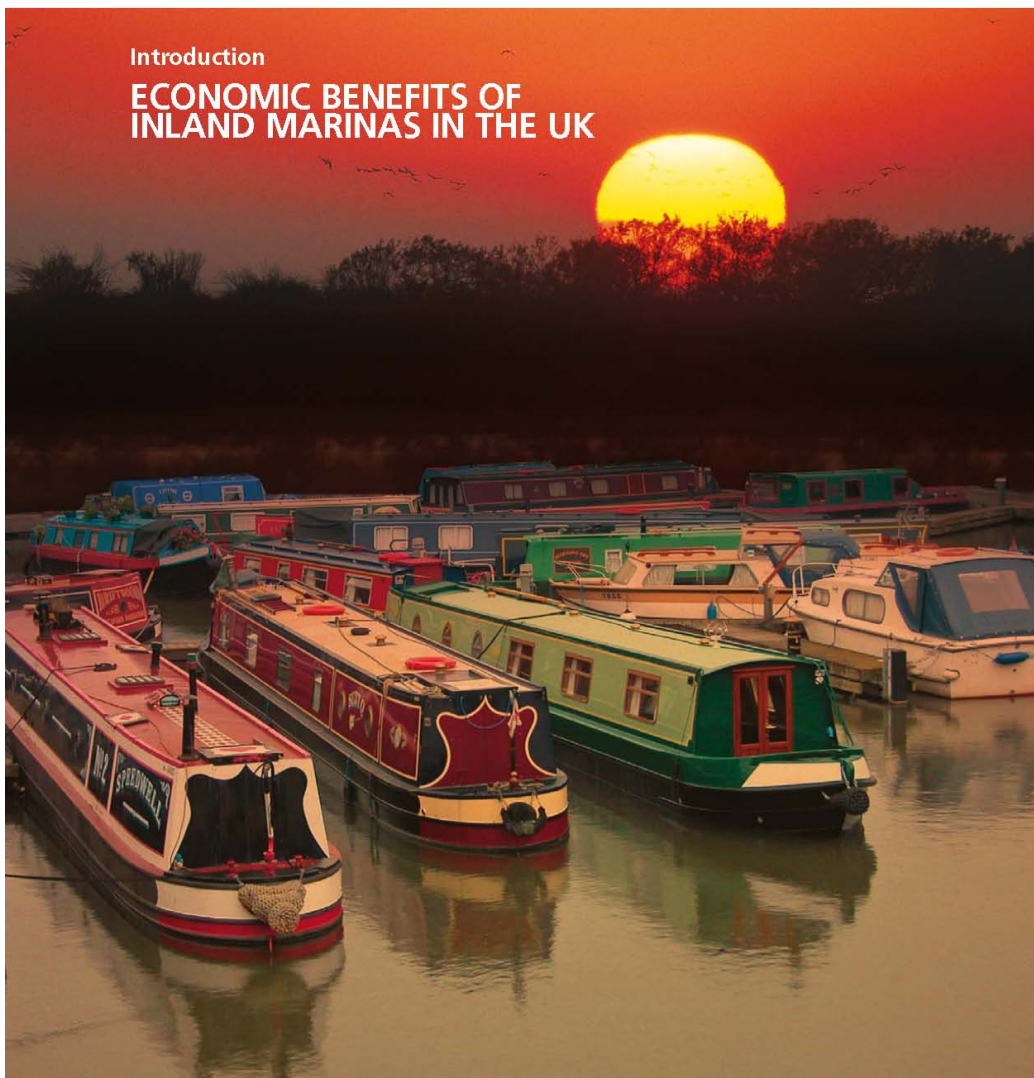
AINA's observation that rights of tenure do not apply, in almost all cases, is a welcome reassurance to our members. Equally, if no right of tenure can be expected on a marina mooring, which is essentially run as a leisure business, the BMF also expects that the valuation office would not consider craft moored within marinas as being liable to valuation. We therefore consider that the facilities provided by the operator would be covered under any applicable business rates.

The BMF is very encouraged that AINA is issuing guidance of this nature to the wider waterways community. The status of residential boaters has long been a source of concern to our members and, beyond the concerns we have highlighted in this response, we are very

supportive of the advice provided in the document. Should you have any further queries please feel free to contact my colleague, Christopher Ford on cford@britishmarine.co.uk.

Annex B: British Waterways Standard Note, SN/BT/3184, 8 December 2009 Louise Butcher, Business and Transport Section, House of Commons Library (attached)

Annex C: Executive Summary, British Marine Federation: *Economic Benefits of Inland Marinas*



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OVERVIEW

The British Marine Federation (BMF) has undertaken a study of the economic benefits of inland marinas in the UK. British Waterways (BW) and the Environment Agency (EA) were partners in the study, with additional support provided by the Broads Authority (BA) and The Yacht Harbour Association (TYHA).

The report presents a national assessment of the economic significance and impacts of inland marinas in the UK. A series of 16 more detailed case studies, based on primary research, provide contributions to the local economy.

The comprehensive report of over 100 pages is essential reading for planners and decision makers as well as those considering investing in this sector.

There are at least 227 UK inland marinas in total accounting for 27,700 offline berths. The revenue of the core operation of inland marinas is worth over £47 million and employs almost 900 people. The Gross Value Added (GVA) for this marina activity is £23 million. However, the provision of berths further supports associated businesses on-site such as boatyards, boat hire, brokerage and dealers, and restaurants/pubs.

Inland marinas are also economically and socially linked to wider tourism and retail in the local area and along the waterways accessed from the marina base.

- For every job in the core inland marina activity, a further 10 jobs are generated in the local economy, through on-site businesses, suppliers and as a result of visitor and employee expenditures in the wider economy.

Therefore, inland marinas support around 10,000 FTE jobs in local economies across the UK.

- The overall economic impact of inland marinas on Gross Value Added (GVA) is estimated to be 7 times larger than that of the core inland marina activity.

Therefore, inland marinas support around £155 million of GVA in the UK.

REPORT CONTENT

Provides a comprehensive overview of the UK inland marina sector including:

- Current supply and demand of berths (national and regional)
- Recent and future marine developments and expansions
- Supply, restrictions and constraints
- Sector trends
- Regeneration effects
- Potential barriers to development
- Recommendations for policy makers

Evaluates the economic benefits of UK inland marinas:

- Turnover, employment, wages, taxes and profitability
- Gross Value Added estimates (national and regional)
- Influence of marinas on marine sub-sectors and supply chain
- Tourism and leisure impacts including participation and spend

Profiles 16 marina case studies:

- Direct impact of marina operators and on-site businesses, including tenants
- Purchases from local suppliers
- Indirect and induced effects from suppliers and employees
- Impact on tourism and the wider economy

The 16 case study sites within this report cover the whole spectrum of marinas on the inland waterways and their contribution to their local economy.

MARINA	BERTHS	INLAND WATERWAY	REGION
Penton Hook Marina	579	River Thames	South East
Brundall Bay Marina	320	Norfolk Broads	East of England
Swanley Bridge Marina	317	Llangollen Canal	North West
Braunston Marina	240	Grand Union & Oxford Canal Junction	East Midlands
Calcutt Marina	240	Grand Union Canal	West Midlands
Windermere Aquatic	182	Lake Windermere	North West
Hartford Marina	180	River Great Ouse	East of England
Waveney River Centre	150	Norfolk Broads	East of England
Nottingham Castle Marina	143	Nottingham & Beeston Canal	East Midlands
Bourne End Marina	110	River Thames	South East
Willowtree Marina	95	Grand Union Canal	South East
Staniland Marina	84	Stanforth & Keadby Canal	Yorkshire
Caley Marina	60	Caledonian Canal	Scotland
Kingfisher Marinas Ltd	60	Grand Union Canal	East Midlands
Macclesfield Canal Centre	55	Macclesfield Canal	North West
Alvechurch Marina	52	Birmingham & Worcester Canal	West Midlands

Annex D: BMF Watersports Participation Survey (Attached)
Annex E: BMF Planning Guidance (Attached)