

ASSOCIATION of INLAND NAVIGATION AUTHORITIES



WATERWAYS FOR EVERYONE

The Government's strategy for inland waterways in England and Wales

The Association of Inland Navigation Authorities (AINA) is pleased to offer the following response to the Defra consultation, Waterways for Everyone: The Government's strategy for the inland waterways of England and Wales. AINA's comments are offered largely from the perspective of the smaller navigation authorities, many of whom will not have made individual responses to the consultation.

About AINA

AINA is the industry body in Great Britain for those authorities with statutory or other legal responsibility for the management and operation of navigable, non-tidal inland waterways for navigation and wider use.

There are 21 AINA members drawn from the public, private and third sectors. They include British Waterways, the Environment Agency and the Broads Authority, in addition to local government authorities, national park authorities, private canal companies, internal drainage boards and a variety of public and charitable trusts.

Most AINA members are defined as navigation authorities by their own Acts of Parliament (some of them more than 250 years old) which regulate the operation of their waterways. Others, such as local government authorities, have inherited the status of navigation authority through various statutes.

Between them, AINA members have responsibility for more than 5,500 km of inland waterways which include canals, river navigations and lakes.

General comments

Waterways for Everyone sets out clearly the benefits that waterways can deliver and AINA particularly welcomes the fact that it encourages national Government departments and regional and local authorities to embrace waterways much more positively in their plans. In the current economic climate, the need for a partnership approach to delivering these benefits and the attracting the necessary funding is rightly stressed in the document. A key element of the strategy appears to be to encourage navigation authorities to take the lead in building partnerships with local authorities and other stakeholders in order to release funding from these sources. While navigation authorities have already demonstrated some success in this area, AINA is concerned that the document does not make it clear what, if any, obligation may be placed by Government on local authorities in particular to do more for the waterways within their boundaries of jurisdiction. Therefore, in the current economic climate it is difficult to see how many of the aspirations set out in the document will be delivered in practice.

Despite this advocacy for partnerships with key stakeholders, AINA is concerned that too much expectation is placed in the document on 'waterway authorities' in delivering the widespread public benefits which have been identified. AINA believes that such an aspiration is unrealistic given that British Waterways and the Environment Agency are the only inland navigation authorities to receive any public funding for the maintenance and operation of their waterways.

The huge disparities between navigation authorities in terms of their financial resources should be addressed in the document. Of the smaller navigation authorities, some receive public sector resources from a variety of sources such as local authority budgets, Regional Development Agencies, the National Lottery and in some cases grants for flood protection. The smallest AINA members in the charitable sector have more erratic sources of income and in some cases this lack of financial security not only stifles their attempts to discharge their statutory duties to maintain their waterways for navigation, but even threatens their survival as independent organisations. Secure and stable funding for these smaller navigation authorities is therefore a crucial issue just as it is for British Waterways or the Environment Agency.

Despite these financial insecurities, the document should acknowledge more strongly that navigation authorities already offer excellent value in terms of the public benefits they deliver in that the costs of doing so are borne by them, while the benefits are received by local communities and by the nation as a whole. The majority of these public benefits are in the form of public goods which cannot be recovered by the navigation authorities through charging.

Perhaps most importantly, despite recognising the need for monitoring to identify progress in delivering the strategy, the document lacks a specific action plan. There are a number of paragraphs in bold text inter-dispersed throughout the document which indicate that Government action is required, but these are generally vague in description and light on specifics.

Chapter 1. Introduction

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?

AINA welcomes the recognition that inland waterways have a multifunctional role and provide public benefits across a wide spectrum of interests. The list seems comprehensive.

Chapter 2. Our inland waterways today

Paragraph 2.3

AINA would like to see a clearer distinction made in the document between 'waterway authorities' and 'inland navigation authorities' as AINA seems to have been caught up with the former here which sets a misleading tone for the remainder of the document. AINA's members, with the exception of the Port of London Authority, all have responsibility for statutory, non-tidal waterways which are both navigable and operational in terms of significant numbers of boat movements. As such, the 21 AINA members represent a complete coverage in Great Britain of waterway authorities which satisfy these criteria.

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?

Yes. The waterways are in a better condition now than they were 10 years ago. However, waterway operation and management over this period of time has become more difficult, more complex which has put further strain on navigation authorities' resources. In addition, public expectation for the waterways has risen over the same period of time. This expectation is that the condition of our waterways will continue to improve and this implies that sufficient resources will be available to deliver such improvement.

A major achievement since the publication of Waterways for Tomorrow in 2000 is that navigation authorities now have, through AINA, a single voice on issues pertaining to waterway management and operation which is heard by the UK Government – a status which few, if any of the smaller navigation authorities could realistically hope to achieve individually – and one which benefits the larger navigation authorities too.

AINA's representations to Government, regulators and others on key operational issues facing navigation authorities are testament to the influence that speaking with a unified industry voice can have. During this time, AINA has extended considerably its range of good practice guidance material and has made direct representations to Ministers, government officials, regulators and others on a variety of matters which have either directly or, where particular caution has been needed, indirectly affected navigation authorities. Our communications with respect of developing legislation and regulation have been of benefit to both Government and AINA members. Without AINA, important elements of the Government's public policy agenda and their interface with waterways would not be communicated, let alone addressed, and the job of drafting legislation and regulation with implications for our sector would become much more difficult for Government and its agencies without the ability to draw on a single industry view through AINA. In addition, without AINA the smaller navigation authorities would lose a valuable and affordable source of information, expertise and operational guidance which they could not expect to receive from elsewhere.

The archaic and disjointed nature of many navigation authorities' legal powers has not been addressed over the past decade and remains a critical issue. Paragraph 2.10 acknowledges AINA's previous work on this issue, which will shortly be followed up by AINA with a report detailing the costs and benefits of a range of options for securing uniform legislation for inland waterways. The crucial inter-linkage and inter-dependency between the aspirations of

Waterways for Everyone and the need for navigation authorities to be granted a more modern legislative framework must be recognised and addressed by Government. Without such recognition and action, these aspirations are in danger of being thwarted or being simply paid lip service and there are considerable limits on the abilities of some navigation authorities to become fully involved. AINA asserts that there is no other industry or sector in Britain where statutory undertakers discharge their duties without any public subsidy or any legal powers to raise revenue through reasonable fees and charges.

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?

Yes. AINA fully supports this objective and acknowledges that Defra Ministers have done what they can to raise the profile of the inland waterways with RDAs. AINA made this objective a key theme within its annual conference in November 2008 by celebrating and championing the work of the East Midlands Development Agency in funding waterways regeneration projects. This event helped to precipitate dialogue between British Waterways and the Environment Agency and the other RDAs in England in 2009 and was also carried forward by discussions within the Inter-Departmental Group on inland waterways.

Paragraph 3.13

The fact that waterways are a form of local infrastructure that local authorities have a degree of responsibility to protect and enhance for the benefit of local communities and economies should be emphasised here.

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?

AINA believes that much could be learnt from those local authorities which are also navigation authorities within the AINA membership. These are Bristol City Council (Bristol Floating Harbour and City Docks), Cardiff Harbour Authority (Cardiff Bay and the Rivers Taff and Ely), Cheshire West & Chester Council (River Dee), Derbyshire County Council (Chesterfield Canal), Devon County Council (Grand Western Canal), Exeter City Council (Exeter Ship Canal), Hampshire and Surrey County Councils (Basingstoke Canal) and City of York Council (River Foss).

AINA could help to showcase the experiences of these navigation authorities and their approaches to engaging local communities with their waterways such that other local authorities may better understand how waterways can help to contribute towards, for example, local area agreements and key performance indicators.

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

Many local authorities do not appear to recognise or value the benefits that waterways provide and can deliver across the breadth of their policy and public service areas. Increased pressures on public funding are likely to make this situation more challenging in the foreseeable future.

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 introduction of measures to contribute to climate change mitigation should be a responsibility for all industrial sectors and the inland waterways sector should not be excluded from having such a responsibility. However, while mitigation measures might help to lessen the scale of the climate change problem, AINA believes that the contribution of navigation authorities (particularly the smaller ones) in this regard can only be minimal when considered in the context of their budgets and the emissions of greenhouse gases from other industrial sectors. Conversely, AINA regards the need for navigation authorities to better understand how they may prepare for and adapt to the anticipated effects of climate change to be of much greater priority in order to reduce their vulnerability and increase their long-term resilience to such changes.

In February 2010 AINA hosted a facilitated workshop for navigation authorities to consider the IWAC report of July 2009. Defra officials attended this workshop and the workshop report has been issued to Defra for information. In summary, the conclusions of the workshop were; with regard to mitigation:

- it is essential that the inland navigation sector collects data to show that it has a full understanding of its limited impact in terms of energy consumption within the UK and that it can also show how much it has reduced its energy consumption over time to meet corporate and Government targets. The collection, sharing and long term retention of water levels and data must become a priority to allow navigation authorities to measure and monitor the impact of climate change on a local basis.

And with regard to adaptation:

- the main areas of activity/support required by navigation authorities appear to be methodological and procedural rather than technical, at least in the first instance. Whereas cost-effective technical adaptation solutions may well be needed in due course to enable authorities to deal with the specific effects of more frequent high or low flows, or changes in dredging or vegetation management, it appeared from the workshop that the more immediate needs for navigation authorities (say in the next 1-5 years) are capacity building, guidance on methodological tools, integrated water management, additional research and future proofing their maintenance and asset management programmes to ensure that any new infrastructure or assets are designed with likely climate change impacts in mind.

Chapter 5. The natural environment

Inland waterways offer unique aesthetic, wildlife and landscape value, and often scientific interest. Each of the four components of the navigable system – canals, rivers, lakes and reservoirs, has its own level of sustainability ranging from canals which would not continue to exist without continual maintenance, to rivers which would always flow without human intervention though not necessarily in a navigable state. For nature conservation, the impact of the waterways stretches beyond the immediate limits of the water, creating a wide variety of habitats which can attract visitors in their own right.

Paragraph 5.10

We welcome this statement and urge Defra to engage more with AINA to assist the development and implementation of legislation and regulations in a more cost-effective and proportionate way to minimise unnecessary or inappropriate cost burdens for navigation authorities. There are increasing demands made on navigation authorities through

environmental legislation and regulation and this is of great concern to us as we strive to reduce our costs. Within the Government's regulatory regime, inland waterways are often not understood and navigation authorities are often unwittingly the victims of regulations meant to deal with non-waterway issues. For example, over recent years a great deal of navigation authorities' resources have been spent identifying and understanding the implications for the industry of regulation concerning waste management from dredging operations and the Water Framework Directive, and we are pleased to see the document reference AINA's work in paragraphs 5.6 and 5.13.

Although well intentioned, new regulations can have very serious detrimental effects on the waterways if the intricate balance of users, heritage and environment are not properly understood. AINA seeks to work with Government and its regulators to understand the implications of new legislation and regulations and to voice legitimate concerns – in particular that Government needs to understand the disparity between a growing regulatory requirement for navigation authorities and their lack of funding to implement it.

Paragraph 5.19

AINA fully supports the Government's commitment to gain a greater understanding of the drainage function of waterways and the associated benefits. However, no mention is made as to what steps may be taken to achieve this.

Chapter 6. Cultural heritage

Q7. Do you agree that the unique cultural heritage associated with inland waterways provides 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?

Yes. The cultural heritage of the waterways is one of the main reasons why people visit and use them. However, there is untapped potential for built and historic assets to encourage greater use of, and interest in, the waterways if funding can be accessed and suitably allocated to address the following:

- More baseline data is needed. In particular, the need to establish the nature and extent of the waterways heritage resource nationally, across all navigation authorities. By creating a national register of assets, their commercial and historic value could be assessed, along with the level of investment required to protect them.
- The need to retain traditional practical skills and the use of traditional materials, while integrating contemporary skills and materials where possible. Existing and potential opportunities for heritage skills training should be signposted through appropriate partnerships involving navigation authorities and a national register of such skills developed.
- The practical realisation of the educational value of waterway landscapes could be helped by the development and publication of more educational materials based on the historic legacy of the waterways.

AINA could assist delivery of each of these needs with sufficient funding from Government, in addition to taking a lead in developing guidelines for promoting public awareness of the waterways heritage as is suggested in paragraph 6.6.

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

Yes. Most navigation authorities have statutory duties in this regard and therefore regard it as a core responsibility.

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

The maintenance of the waterways themselves is most under threat through the lack of financial resources available to navigation authorities.

We are also concerned that the document does not place enough emphasis on the role that cultural heritage plays in defining the unique character and 'sense of place' of individual waterways, and the importance of protecting and conserving the integrity of individual waterways.

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

Paragraph 7.6

No justification is given as to why it should be AINA's responsibility to identify opportunities for boating expansion. Nevertheless, should this indeed be so where is the incentive for those navigation authorities who do not have adequate and appropriate legal powers to generate revenue from boat licensing or registration, or to apply modern safety controls in relation to boating on their waterways?

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?

Yes, waterway paths provide a setting for a very wide range of activities. They are used by walkers, anglers, joggers, cyclists, birdwatchers and others including those with an interest in industrial heritage. Schools activities lend themselves to the use of waterway paths and their flat terrain makes them valued by those who require disabled access.

However, more users and a greater diversity of users inevitably bring more pressure. AINA advocates the development of waterside paths for multiple uses wherever possible. Multi-use paths need to be carefully planned and issues such as path width, access points, visitor safety, environmental factors and opportunities for external funding need managing. In addition, a navigation authority will want to maximise opportunities for external funding, while at the same time consider long-term management issues.

AINA considers local partnerships as the means to secure the funding necessary to develop and maintain multi-use waterway paths. Navigation authorities should seek to build partnerships with, amongst others, local authorities, highways authorities, Regional Development Agencies, Sustrans and Sport England in order to achieve outcomes such as influencing Section 106 consents and Local Transport Plans.

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

Perceived barriers preventing greater use of waterside paths include a lack of circular routes and connectivity with areas of population and poor lighting in the hours of darkness as waterside paths can be considered 'no go' areas owing to their remoteness contributing to a poor sense of safety and security, particularly in urban areas.

Chapter 8. Sustainable transport

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

Yes. Waterside paths have the potential to do this and to enhance access in the process. Waterside paths benefit from an absence of gradients and a traffic-free environment. They are attractive and offer relatively easy routes for walking and cycling. In addition, many routes link towns with their surrounding countryside and therefore provide new opportunities for travelling between them.

Their use for commuting by both pedestrians and cyclists could be encouraged further by linking the benefits with those identified in Chapters 7 and 9 and AINA's comments in relation to those chapters. Investing through partnerships in waterway paths has the potential to contribute to a broad range of local authority and community objectives. These include promoting healthy activity, urban and rural regeneration, local engagement and economic activity, as well as sustainable transport benefits.

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?

Given that only a very small minority of AINA members have any interest in water freight, AINA took a policy decision in 2006 to exclude water freight issues from its future work programme.

However, with sponsorship from the Department for Transport and Defra, AINA did produce a guidance document in 2004 entitled, *Planning for Freight on Inland Waterways* which was published by DfT as part of its Transport Energy Best Practice series and we believe that this document could usefully be referenced in Chapter 8.

Chapter 9. Tourism and business development

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

Different users of waterways and different interest groups often defend their own interests and points of view with considerable vigour. Moreover, some of these groups can often demonstrate an unwillingness to consider the demands of others or opportunities for mutual gain which could be achieved through working together with other interest groups.

AINA believes that building a greater understanding of these different standpoints is central to diffusing potential conflicts and to that end AINA advocates that all navigation authorities invest the right level of time and energy into ensuring the efficacy of their consultative arrangements with their customers and that they are publicised and communicated effectively.

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

Modernising the desperately archaic legal powers of a number of navigation authorities would make a significant difference.

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

AINA supports the responses to this question made individually by AINA members, and by the Broads Authority in particular. It is true that without tourists, many waterways would not survive economically. A key issue is that the tourist market is fragmented – some elements such as passenger boats, hire boats and hotel boats are directly related to the waterway, while others such as bankside accommodation, restaurants, pubs and retail enterprises serve a wider range of customers. This fragmentation, and the lack in many cases of a direct and tangible link with the waterway, makes it more difficult for navigation authorities to define their strategies and approaches to tapping into the considerable potential which the tourist market offers.

One potential opportunity would be for planning authorities to assist in permitting the sympathetic development of waterside holiday lets using innovative architecture and sustainability features such as self-sufficiency through renewable energy. In Norway, every lake seems to have a cluster of “eco-huttes” for hire.

AINA welcomes and supports the recent initiative by IWAC to partner Visit England and engage waterway stakeholders in practical discussions to determine how the inland waterways can best fulfil their potential as visitor destinations. There is a great deal that navigation authorities can learn from the marketing expertise of agencies like Visit England. One immediate example of the benefit of this fresh perspective is the need to better understand not just the numbers of waterway visits, but the nature and purpose of those visits and the opportunities to navigation authorities which they could bring. To this end, AINA supports IWAC’s suggestion that Chapter 9 be re-titled, *The visitor economy and business development*.

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?

Based on discussions during the successful AINA annual conference on volunteering and the inland waterways held in November 2009, AINA believes that it is likely that there is significant scope for increasing waterway related volunteering activity, but the true extent of this scope is not known. Similarly, the monetary value of this activity is not known. Consequently, there is a need for evidence of the value both to the waterways and to society of volunteering, in addition to the value to volunteers themselves.

AINA is addressing these deficiencies in our knowledge in its current project to quantify the extent and value of current volunteering activity on AINA members’ waterways and this project objective should be described more accurately than is currently described in paragraph 10.13.

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

There is potential for the success of British Waterways’ Wild Over Waterways initiative to be applied by other navigation authorities.

Placements need to be developed for young people to experience the variety of jobs and roles of waterway staff and volunteers. This would help them to gain key skills and develop their interest in pursuing professions linked with waterway services such as engineering, volunteer management, marketing etc.

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

Navigation authorities work with a range of non-profit making organisations, including NCBA, to improve social inclusion and a number of excellent case studies exist across the

navigation authorities which demonstrate effectiveness. For example, AINA's 2005 succinct good practice guide, *Making more of our waterways*; and IWAC's 2009 report, *Using inland waterways to combat the effects of social exclusion*.

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

As indicated in the response to Q19, relevant case study material exists across the inland waterways sector.

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 believe that the role of AINA over the next few years will become even more valuable to navigation authorities, large and small, as wider cooperation between them will be necessary. Through AINA, opportunities for the sharing of navigation authorities' resources and efforts with respect to building effective partnerships with waterways stakeholders and the delivery of mutual benefits to local communities can be explored. It is therefore essential that Defra's financial contribution to AINA continues, is not reduced and is formalised by way of a new agreement going forward.

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

As we have said in response to other questions above, AINA welcomes the document's emphasis placed on partnership between navigation authorities and waterway stakeholders including voluntary organisations and local authorities, and we support the call for greater consideration of waterways within local and regional planning and development initiatives. However, greater pressure from Government should be placed on such stakeholders to do more for the waterways. If waterway stakeholders do not embrace such partnerships by rising to this challenge, in the current economic climate it is difficult to see how many of the aspirations set out in the document will be delivered in practice.

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

We believe there is much work to be done to determine the targets and measures that should be used to monitor benefits, and AINA is keen to play a part in this by working with Defra, other Government departments through the Inter-Departmental Group, and other stakeholders. AINA would like to see measurements based on specific outcomes which demonstrate the progress and value of waterways across different policy areas.

However, it must be recognised that the delivery of many of these wider public benefits, although very important, are by-products of navigation authorities' day-to-day operation, maintenance and management of their waterways. Therefore, if there are significant reductions to their incomes from whatever funding sources, navigation authorities will be forced to focus on their core statutory activities and their delivery of non-statutory activities leading to wider public benefits are likely to be reduced or stopped entirely.

Association of Inland Navigation Authorities

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