



## National Association of Boat Owners

This response contains the comments and evidence provided by The National Association of Boat Owners (NABO) in June 2011 for the Department for the Environment and Rural Affairs Consultation on A New Era for the Waterways.

The National Association of Boat Owners is dedicated to promoting the interests of private boaters on Britain's canals, rivers and lakes. NABO was formed in 1991 and represents over 3000 boaters predominantly on the waterways operated by British Waterways and the Environment Agency.

Views of members are obtained through correspondence, Association publications, surveys, open meetings, and face to face contact with boaters at boat shows and on the waterways.

The structure of the response follows the questions asked in the consultation documents, except that NABO has made some additional comments on specific issues, particularly related to users' needs.

NABO wish to express their appreciation for the opportunity to contribute to the consultation.

Should DEFRA wish to discuss this response, the following contact should be used: Chair David Fletcher at [nabochair@nabo.org.uk](mailto:nabochair@nabo.org.uk)

NABO makes the following comments outside the questions in the consultation.

### **General.**

NABO has been and continues to be very supportive of the NWC, but this support is dependant on four main issues. These are in order of priority:

- That BW indeed does change and becomes a genuine new charitable organisation with a new culture and a new ethos. The indications to NABO are currently that this will be a slow and hard process and is unlikely to be achieved by the current BW management team.
- The NWC must be a membership organisation, and the trust must be set up in such a way that members have some real influence in the management. This is closely related to the first item.
- That there must be clear presumption of the primacy of navigation on the waterways. The IWA and boaters saved the canals when Government could not and would not see any future. Boaters pay and their presence and activities make the difference between navigations and drainage

ditches. Other groups of Waterways visitors do not currently contribute but pay, but come to see the heritage and moving boats.

- There must be enough money to make the new charity viable. NABO believes that the Nation must pay for the heritage, legal responsibilities, environmental compliance, drainage and community neglect of the waterways, in full.

NABO now makes comments on particular aspects of waterway life.

#### **a. The maintenance and condition of the waterways**

NABO has noted the content of page 16 of the Impact Assessment document. NABO has addressed the issue of the condition of the waterways with a survey of boater views in 2009. NABO asked boaters' opinions about the state of the British Waterways and Other Agencies' waterways, including the state of waterways then, compared to 10 years ago.

The results were published and sent to DEFRA, BW and EA at the time. It was referred to in NABO's submission to the consultation for Waterways for Everyone in 2011.

NABO recognises that in the last ten years hundreds of millions of pounds have been spent in necessary maintenance and improvements. But it is also clear that the notional condition of the waterways passed a peak some 5 years ago, and has been in decline since that time. So the trend in the condition of the waterways is a relevant issue for funding and the future.

Taking BW as an example, grant in aid has been cut in recent times, year on year and the maintenance backlog stands again at hundreds of millions of pounds, and is growing by tens of millions of pounds per year. There have been several significant canal breach events which are repaired at great cost without extra DEFRA assistance, and so take resource away from other essential maintenance effort.

It is pure good fortune that no boater or nearby resident has drowned in a breach event. It is very difficult to understand what the long term future will bring with an every increasing backlog and associated safety risk. This issue cannot go understated or unaddressed. It is all very well to talk about risk assessments and inspection, but the primary risk applies to the users of the waterway, particularly boaters, because of the numbers and the time spent on the waterways. NABO does not wish to have users and their family members subject to a lottery of risk assessment by those without that same primary exposure.

Since the survey in 2009, NABO has seen no evidence that that maintenance trend has changed. All discussion with local waterways managers revolves around less money, major works being further delayed, and cuts in service levels. The recent statements by BW confirm that their business strategy is a continuum of delays to major works based on risk assessment. NABO is not convinced by Stewardship Schemes and other data, which are simple spin doctoring of numbers to make the

current situation appear tenable. The fact remains that BW are not keeping ahead of basic issues like enforcement, dredging, lock gate replacement, upkeep of sanitary stations and offside vegetation control. It is not surprising that major works are suffering as well.

As the survey showed, the general condition of the canals is not lost on boaters who are generally very experienced water people and who see the issues day in and day out.

The deterioration of the BW network is detrimental to the ease and pleasure of cruising, and if it continues, threatens the future of the inland waterways leisure industry.

Full details of the surveys are available on:

<http://nabo.org.uk/issues/surveys/64-bw-waterways-condition-survey.html>

## **b. Funding**

NABO is very concerned that the proposed funding for the NWC is not sufficient to start the charity on a sound basis. Of course new money and support in kind will come to the waterway through charitable activities. But the predictions of this give boater no confidence for the future. Those experienced in fund raising advise that in early years the cost of marketing and publicity can be expected to exceed charitable income. This set against the knowledge of the real condition of the waterways leaves a real concern for the future.

BW is no stranger to cuts that have been incurred year on year since David Milliband was the Environment Secretary. Boaters on the other hand have contributed year on year more and more, both through their own boating costs and through their expenditure with the trade and through direct taxation. No other group of the population has contributed anything approaching this amount.

The fact is that year on year cuts have meant that every penny saved by BW or additionally paid by boaters has been taken back the Treasury through reduced GIA. Common sense tells us that the maintenance backlog has been growing for years, and this level of funding based arbitrarily on what DEFRA can afford is just not enough. It is self evident that yet another top down cut of 20% to £39m each year is not a sound basis to finance the NWC. It is important that a full assessment is made of what is needed. Then a realistic plan including new charitable income can be made. The UK can afford it. For once in the modern life of the canals, we should ask "what is needed" and emphatically not ask "how little can we get away with".

Over the years Government has eroded the value of the GIA by the introduction of new legislation and requirements, such as the Reservoir Act 2010 and Waste Management for dredging best practice. These have significant effect on waterway costs which have never been taken into account by adjustment to the GIA. Boaters have just paid more, and BW have made redundancies in staff with core expertise. Government should not introduce new legislation with scant regard for the financial consequences.

While there have been reductions in overall contributions from other users over these last years via the tax system, boaters' costs, including fuel and licences, have increased above inflation. Unsurprisingly, 85% of boaters in the survey were concerned about the trend. Government must heed the warning that a lack of preventative maintenance is threatening the future of one of the UK's most treasured leisure resources. Underfunding cannot continue indefinitely without catastrophic consequences, and loss of confidence in the waterways.

NABO is aware of the responsibility of the Waterways Minister under the Transport Act 1968 to maintain the BW waterways in a satisfactory condition. NABO insist that these are fulfilled unless clear proposals are made and consulted upon. It is the law.

### **c. The community of the waterways**

NABO regrets that the Consultation makes little reference to the contribution to the waterways by the diverse community of boaters who live and play there. Waterways are not inanimate but a unique community and family resource that provides life and vibrancy and in itself contributes significantly, both financially, morally and to the health of the United Kingdom. It is estimated that between 20000 and 50000 people live on boats on Britain's waterways. Boating is a benefit to the waterways in addressing several agendas of both national and local governments.

In many places in the Consultation document, "wildlife" is placed before people. To the boater, this confirms how little the human aspects of the waterways are understood and appreciated by Government and navigation authorities. Of course everybody wants a vigorous healthy wildlife around the water, but on canals the primacy has to be for navigation and people. There are many places in the UK dedicated to wildlife with managed access to preserve this. The inland waterways are not and should never be such a place.

The demand for residential boating is growing due to the lack of low cost housing and the life style that the waterways offer. It is the main area of non commercial waterway use in which demand is rising. This covers boaters wishing to moor in static environments and also those who wish to cruise continuously and widely. This increase is both an opportunity and a threat which goes unrecognized and largely neglected in Government policy. There is need for central policy for navigation authorities and for local authorities on residential status.

In addition we observe that it is well known that boats on the waterway are a catalyst that makes bank side activities attractive and exciting to all visitors. There is always friendly interaction between walkers, anglers and boaters, routine greetings, conversations at lock sides and moorings. A waterway without boats is but a ditch, dull and lifeless. The key contribution needs to be recognized. The interaction with cyclists is rather less convivial.

Boaters invest billions of pounds in hiring and buying their boats, and spend hundreds of millions of pounds every year in licence fees, insurance, fuel and

upkeep. This contributes to the waterside boating business, the UK economy and VAT revenue. NABO believes that the tax contribution of boaters exceeds the grant in aid made by DEFRA every year. NABO suggests that it is not reasonable for the waterways in crisis for funding, to be a profit centre for the UK economy.

#### **d. The Waterway Ombudsman**

NABO agrees that the NWC should continue to have an independent and impartial Waterways Ombudsman to investigate complaints about the NWC. If a complaint is upheld, the NWC should be obliged to provide a suitable remedy. The Ombudsman should remain a full member of the British and Irish Ombudsman Association."

NABO has been consistently disappointed at BW's response to complainants and the Ombudsman's requests as evidenced in the Ombudsman's annual reports. This reflects poorly on BW's management priority and understanding for the need to engage with stakeholders. We look forward to a step change in culture with the introduction of the NWC.

The current Ombudsman scheme does not currently cover legal issues. NABO suggests that it would be cost effective and appropriate for the Ombudsman to consider the legal issues around boat licensing as a last intervention before legal action. Most of these cases are considered in the County Court and are unchallenged by boaters because they do not have the means to assemble a legal defence. As a result there is little transparency or learning from the process and BW are only seen as bullies. An Ombudsman review would add independence and credibility to the process and above all give some hearing to those of limited means without going to court.

#### **e. The Consultation Questions**

*Question 1: Do you agree that, over time, the charity should work towards including other navigations, including the EA Navigations in the next Spending Review?*

NABO congratulates the Waterways Minister in his decision not to include the EA waters in the 2012 launch of the NWC. NABO regards this as a victory for common sense over the dogma of those seeking a common authority without a clear vision of the benefits and risks. NABO notes that the EA waters will not have an easy time in the coming years, and appeal for an even hand in funding so they do not regress to a position that it will be impossible for them to merge with the NWC.

BW and the NWC face many challenges in the next few years, and it is unreasonable for them to be faced during this period with the additional burden of integrating another organisation with a different culture, and a similar dearth of funding. In due course NABO would welcome integration and rationalisation of navigation authorities, but only when a clear case for efficiency and management of risk can be shown. NABO believes that this is best achieved bit by bit.

*Question 2: Do you think that the proposed requirements of the Trust Declaration are the right ones?*

*Are they sufficient/are there others which should be considered?*

NABO does not agree that the requirements are complete. Canals are for navigation and there has to be a presumption of the primacy of Navigation for the BW waters. The Environment Agency understands this for their waters and frequently states their commitment to navigation. It is unacceptable that the NWC is proposed without this clearly stated in the Declaration.

NABO also notes that under 2.5.2 page 15, it is intended that NWC will be committed to providing free access to towpath. NABO strongly objects to this.

Currently it is clear that there is no feasible way to make a charge for towpath access, but this should not be presumed forever. Technology will come in our lifetime to make this possible. Communities currently has access to the amenity of the tow path but routinely abuse it, through vandalism, fly tipping, depositing dog waste, throwing items into the canal, foot fall damage, speeding on cycles, riding motorcycles on the towpath and vehicle bridge strikes, all without any contribution to the costs. This situation is untenable unless, of course Government guarantees to reimburse the NWC for all of this as part of an increase GIA settlement.

*Question 3: Do you agree that the suggested charitable purposes for the NWC are broadly the right ones? Can you think of other necessary requirements?*

NABO believes that the condition of the waterways and the rate of deterioration is a significant issue that must be addressed at this high level. Efficient operation and management is not enough. The 1968 Act requires a standard of maintenance and in the first instance; this obligation should be transferred to the NWC.

The growth of the inland waterways usage cannot continue without consideration being given to improvements to facilitate better access to existing waters. Improvement as well as restoration should be included.

For the reference to free access to the towpath, please refer to the answer to the previous question.

*Question 4: Do you agree with the proposed 'mission statement'? How could it be improved?*

*Question 5: Do you agree with the proposed 'belief' statement? How could it be improved?*

*Question 6: Do you agree with the proposed 'vision' statement? How could it be improved?*

NABO believes that this is all too complex. There should be one single group of statements that cover the issues. However to facilitate comments, NABO does so individually:

- The mission statement should include “navigation”, and also the word “always”. Navigation has primacy and there needs to be the implication that it is there for the long term.
- The belief statement should include a national element because the system is a network, not just local, and “people” come before wildlife.
- The mission statement should include “navigated” before “used”, and valued should be before enjoyed.

*Question 7: Do you agree that the New Waterways Charity should enjoy the same powers and be subject to similar legal duties to maintain the waterways as British Waterways currently is?*

NWC should enjoy the same powers as BW currently holds.

Specifically BW has rights under the Human Rights Act 1998 as a public body. These should be transferred to the NWC.

NABO looks forward to discussing with the NWC how best to precede with the amendments to the BW Acts required to facilitate good management of the waterways community.

NABO has understood from many meetings with BW and DEFRA most recently in May and June 2011 that the Public Bodies Bill would facilitate the transfer of powers from old legislation to the NWC, and that it was specifically not intended to make changes to powers. Indeed NABO’s understanding was that the legal screening was most vigorous to prevent this.

NABO is very concerned to see that BW Board papers for January 2011 published on their web site specifically state:

“The possibility of introducing greater enforcement powers for BW as part of the new legislation was also discussed and Mr Johnson agreed to report back on the subject to the May Board meeting.”

NABO regard this as a breach of faith, as BW has withheld relevant information from stakeholders at consultation meetings. Waterways enforcement has always been a highly emotive subject on BW waterways. NABO has been involved in complaints over many years. It is inconceivable that BW would not know that anything associated with enforcement powers is anything but highly controversial and relevant to the NWC consolation.

NABO is unable to form a view as to the appropriateness of BW’s actions because the details are not available to us, or other waterways stakeholders.

NABO finds this very unsatisfactory.

*Question 8: Do you agree with the proposed governance model for the new charity? What improvements could be made?*

NABO agrees with the proposed model of the new charity as an overview but raises two main issues:

- a. Boaters have become the funding source of default, paying more year on year, whilst Government has contributed less. Those who pay have the right to demand influence. Those who do not pay have no rights. There has to be a presumption over the primacy of navigation which is routinely set aside by BW in an attempt to demonstrate wider appreciation of the canals. This is a false assumption. Visitors come to the canals because they want to see boats moving along tidy waterways and through locks, and to walk safely on the towpath without being molested or run down by cyclists.
- b. Boating groups, restoration groups and the trade are the people who have supported the inland waterways since privatisation and engaged with and supported navigation authorities. As a generalisation, communities have despoiled and financially under supported them whilst taking advantage of the amenity, business and drainage benefits. All recent efforts by Waterways Ministers to encourage Local Government involvement have failed to produce tangible support and the condition of the waterways continues to decline. It is NABO's view that the waterways are far too important to be run by Government and starved of essential resources based on political whim. The current model is not fit for purpose and it is time to move on quickly.

*Question 9: Should funds raised locally by the Local Partnership be spent on local priorities? Why?*

Local funds should be spent locally. The whole basis of funding has to make the link (which has been so absent due to central funding) between local effort and local improvements. Many boaters travel widely on the system, and will enjoy nationwide improvements. Indeed these boaters can readily identify those communities who cherish and enjoy their amenity, and also more commonly those who simply do not care. But more boaters, walkers and other users only move in their own location and are prepared to contribute to this amenity value. They will not be drawn to contribute so easily to part of the system that they cannot see. NABO agrees that local initiative is essential to the future.

*Question 10: Who do you think should be encouraged to sit on Local Partnerships? How should the nominations panel be constituted; who are the essential parties?*

It is NABO's view that local panels are not primarily about representation, but about providing tangible support to the local management of the navigation authority. NABO would expect that each partnership would individually tailor to local needs, although generically local business groups, local authorities, boating and boating trade groups would provide the core. The Local Chair and local manager should select this committee at their sole discretion.

*Question 11: Is between 8 and 12 the right size for a Local Partnership?*

NABO believes that less than 8 would not give the required span of influence, and that more than 13 is getting to big. But there should be no absolute ceiling at this time when there is little experience available. 20 would be too many and



could lead the partnership to become focused on representation rather than “doing”.

*Question 12: Which are the particular subjects or activities you think may require the attention of a specific sub-committee of a local partnership?*

The primary tasks must be to get the community to cherish the waterways, and organise support in cash or kind to make a difference. Local money and volunteering is very important.

The key is to make sure that every town has a clean and safe waterfront where boats can stop to use facilities, people can live aboard if desired, and local people can walk and enjoy a well managed and tidy spectacle.

Local boating groups will need to be encouraged to contribute more. They may feel loss of influence though sponsorship and LG money, but they must be cherished and encouraged because they are a primary and committed resource.

Waterways security and safety are very important for success. Nobody will moor or walk if there is any slight perception of risk. This has to be addressed head on by the local community, as vandalism and crime is a major local barrier to usage and wastes limited resources.

*Question 13: How best can the New Waterways Charity strike the right balance between local needs and the needs of the waterways network as a whole?*

At this time there has been too much centralisation to the detriment of local influence. It needs to be reversed in the short term. After say five years, local groups may indeed be exerting too much influence, but that is the nature of things, and a balancing will have to take place. But we should not be prescriptive now. In the short term, the local committees must be given freedom to explore a new world. We have had too many years of “Watford says no....”

*Question 14: How could the charity encourage effective working between different communities and partnerships who share the same waterway?*

It is already clear that the country and the canal system do not recognise division by the BW regional areas, and would perhaps prefer smaller areas, or alternatives. These divisions will never suit all, so it is incumbent on the Chairs of Partnerships to work together at the interfaces, share best practices, and not behave like war lords. National organisations like NABO spend a good deal of time co-ordinating activities and scrutiny across region and across navigation authorities. This will continue and we have no fear for this aspect. Indeed some competition between regions would be no bad thing.

*Question 15: In what ways could people be helped to become more involved and take more responsibility for their local waterways? What might the barriers be, and how could they be overcome?*

The main barrier has been the Nationalised Industry model, where users paid their licence or registration and then expected unlimited service free. Secondly, it has been supported by the arrogance of BW over the years which has driven

away many supporters and destroyed positive behaviour. There has to be a step change of culture, to one which encourages users to get involved, as both employees or volunteers.

*Question 16: In what ways could more people be encouraged to volunteer for the waterways? What might the barriers be, and how could they be overcome?*

The key for volunteers is sharing the work and the responsibility in a manner that encourages team and social interaction with activities that interest the individual. Examples like the Waterways Trust, the K and A Trust and many restoration projects have achieved the impossible through open minded opportunism and hard work. When volunteers actively support organisations they are good ambassadors in the community. This is just as important as the work they do.

*Question 17: What would a successful volunteer programme look like? What would it achieve?*

Volunteers working alongside employees doing the same work and integrating seamlessly; their efforts are appreciated by employees. They bring valuable experience from other organisations.

*Question 18: Do you agree that the new charity should initially focus on securing fair representation, and move towards a greater element of direct membership over time?*

NABO would be pleased to represent boaters on the Council at inception. However in the longer term we would rather the Council moved to a mutual model with wider representation from Charity membership. NABO would encourage users to join the Charity and exert their influence by voting for elected rather than nominated representatives.

*Question 19: Do you agree with the proposed make up of the Council? Which interests should be represented?*

- a. It is significant for boaters to understand just where the representative influence will be embedded. BW has, since inception, been arrogant and resistive to the needs of paying users and preservationists. If the charity is to succeed, these issues have to be addressed full on with solid representation with power and influence. NABO will not support a Council that is a talking shop of interested but financially uncommitted parties who bring no cash but create costly obligations, and who fail to hold the Trustees to account.
- b. There has to be a presumption of the primacy of navigation and the bodies that contribute to it.
- c. To date, cyclist organisations have not controlled non inclusive behaviour on the towpath and should not be included unless licensing is introduced to police dangerous misbehaviour. They have alternatives in roads and bridleways to enjoy. Too often they are a hazard to themselves and other users on towpaths, and cause damage to the surfaces.

- d. The input of angling representation should be proportional to the almost insignificant income that British Waterways receives from angling. It should also be noted that there is a greatly reduced amount of angling on BW waters now: the majority of angling is done in natural and purpose-built lakes.
- e. Heritage groups should only be involved if they bring expertise and cash, without extra restrictions. There is a danger that special interest groups involvement would result in over-restrictive rules adding to the expense of repair, as has happened with churches. In the Church of England, when the grants from bodies such as English Heritage were reduced, the restrictive rules that they still insisted on have tied the hands of poor parishes, resulting in the deterioration of buildings as costs rise faster than giving.

*Question 20: Should a proportion of the Council be directly elected? If so, who should be entitled to vote?*

Yes. A big proportion should be elected from paying members, though it is recognised that this will take time. NABO suggests that craft licence holders should be members with voting rights as part of the licence or registration fee?

*Question 21: Should the independent chair of the Appointments Committee be chosen by Committee members or the Council? What skills would they need?*

NABO would rather that the chair was appointed by the members of the appointments committee. The skills needed are related to committee management for an open and transparent process, rather than waterways specific. An individual with the time and energy to carry out the task is most important.

*Question 22: Are there other topics that you consider would benefit from Council scrutiny committees?*

NABO would like to see a legal subcommittee. NABO has long campaigned for change to the law relating to BW, following the unsatisfactory outcome of the 1995 Act. BW behaved very badly at that time and there is a need to put matters right. In addition, with the possible merger with other waterways, it becomes even more pressing that a plan is prepared for new primary legislation.

*Question 23: Are there any other activities of British Waterways that would be best placed in the CIC?*

NABO supports the CIC principle as a significant revenue contributor to the waterways.

*Question 24: Government policy is to support the movement of freight on inland waterways, where it is economically sustainable. Do you agree that the status quo is no longer an option?*

*Which of the 5 options do you prefer? What other options should we consider?*

- a. The present commercial operations on BW waterways indicate that the demand from industry to use this mode of transport has declined dramatically over recent years. The infrastructure required to make the use of inland waterways attractive and to generate more traffic is probably going to be so prohibitive as to make this very unlikely.
- b. On other waterways the additional conflicts of interest between the needs of commercial freight carrying operations and the very different demands of the leisure boating sector would make the opportunity for any expansion of commercial operations difficult to justify. Before any commercial waterways are downgraded when commercial activities are reduced, great care should be taken to avoid any lack of maintenance of structures and there should be no reduction in the dredging of these waterways which could be short sighted and are not in the national interest.
- c. Of the 5 options in Annex C, NABO considers that Option 2 best allows for the sustainability of current freight carrying operations to continue with the options to increase capacity on the current commercial waterways if this is needed in the future.

*Question 25: What measures of the effectiveness of NWC's use of public funds (through the Government Funding Contract) would be appropriate?*

- a. NABO considers that it is imperative that the NWC ensures that full accountability of spend which must be transparent and subject to rigorous independent audit. The results of this accountability process have to be open to public scrutiny, and a clear line of management should be established down so that those responsible for spending public funds can be held accountable.
- b.
- c. NABO also maintains that the NWC must take all appropriate measures to seek adequate funding so that there will be no deterioration in the services and facilities which are presently available to waterways users, and indeed they should make all efforts to seek additional funding to eliminate the current funding shortfall. This will enable allow the Waterways to remain sustainable in the mid to long term and may also allow for enhancement of services and facilities where appropriate and desirable.

*Question 26: Are there other areas where you think NWC could:*

*Increase its commercial income  
Its voluntary income  
Its third party income?*

- a. Considering the extremely large footfall from waterway audience participation there is little or no effort made to attract funding from the majority of these waterway users who make no contribution to the overall funding. NABO feels that emphasis should be placed on exploring opportunities to exploit these non-contributory visitors, possibly through a membership scheme using as a model organisations such as the National Trust, the RNLI and so on. It is felt that there is great public support for maintaining the waterways and an appeal to this good will through being made to feel a part of the national Heritage may generate

extra funding. It may also be a source for volunteers who may wish to contribute in other ways by offering their time and expertise.

- b. With regard to third party income, NABO would suggest that more contribution in funding and other resources may be found from those local authorities which have a waterway passing through their district. Many local councils exploit their local canal to enhance their appeal to tourism and it is felt that in some cases their contributions at present do not reflect the benefits that ensue.

*Question 27: Are there other areas where you think NWC could save more money/make greater efficiencies?*

- a. NABO is firmly of the opinion that the formation of the NWC is an ideal opportunity to modernise and streamline many aspects of BW management. The waterways under BW's control are unusual in that many of the waterway users, (BW customers) are also very knowledgeable in how the system functions and especially how they can be organised and run more efficiently. In the last year there has been a positive change in that more attention is paid to this expertise and the NWC should build on this bedrock of knowledge and expertise.
- b. It also has to be said that, in an industry which is suffering from financial constraints, great consideration should be made regarding the remuneration levels at senior levels. It is generally felt that the present excessive salary levels paid to the top executives at BW are not sustainable and there would be great customer support if those executives who transfer to the NWC show leadership by setting their salaries at a more realistic level.

*Question 28: We would welcome any views you have on the analysis in the Impact Assessment and relevant evidence that we could draw upon in finalising the assessment.*

- a. Box 4 O – Condition Profile – dramatically highlights the need for medium and long term strategic planning; without an increase in baseline funding it is difficult to see how the NWC will be able to maintain even a steady state scenario. The impact of an unexpected major breach in a waterway or failure of a Grade D or Grade E will
- b. Greatly reduce the effectiveness of the NWC to deliver on its projections. The growth in the deterioration of Grade D and Grade E assets in particular is extremely worrying and is not the sort of legacy that a newly formed organisation should have to take on.
- c. NABO is strongly of the opinion that this issue must be given a high priority in any initial planning and the NWC must take all steps to avoid the closure of any part of the existing waterway network.

*Question 29: New Waterways Charity (NWC) is just the working title for the new charity. Which of the following suggestions for the name of the new charity do you prefer, and why?*

g) British Waterways Trust – “it does what it says on the tin”. The British Waterways logo already has positive resonances with waterway users of all types. They are used to seeing it on boats (one of the major reasons people love visiting the waterways) and along the towpath.

**This completes the consultation response from  
The National Association of Boat Owners**

draft for last round of comment