

# IWA's views on the opportunities arising from CRT's licensing consultation

The Inland Waterways Association welcomes Canal & River Trust's current licensing consultation as it offers an opportunity to address some of the issues caused by the current licensing system, and in particular the effect of the continuous cruising option introduced by the British Waterways Act 1995, which removed the requirement for all boats to have a home mooring.

IWA has submitted a number of suggestions to CRT for their consideration. IWA expects whatever changes CRT decides to adopt to be revenue neutral at the point of implementation, but some of IWA's suggestions would give an opportunity for CRT's income from licensing to increase over time. Existing boat owners may be impacted in different ways and IWA suggests that changes should be implemented so as to minimise the impact of significant changes on individuals, such as phasing in of higher increases.

IWA's main suggestion is that licence fees should be based on a simple calculation based on the area of a boat and increased by an amount comparable to average mooring fees. There would then be significant discounts for boats with home moorings and boats that were genuinely continuously cruising, with a range of lesser discounts and multipliers for commercial and trading boats.

IWA has made the following suggestions to CRT, with the expectation that CRT might adopt some of these suggestions rather than all of them:

- Licence fees to be charged by area (length x beam) rather than just length. This would be fairer because it more accurately reflects the space the boat uses on the waterways. It also makes smaller boats more affordable to encourage young people and families to get afloat.
- One licence should continue to cover all the connected CRT waterways, existing and future, to encourage people to travel the system as widely as possible.
- Fees for licences could be significantly increased (to an amount that would be similar to paying for both a licence and a mooring at present). A substantial discount (back down to current licence fee levels) would then be available to boaters who pay mooring fees to CRT or third parties or are genuinely continuously cruising. Other discounts could continue to be available as now, eg for electric propulsion, historic boats, museum boats, towed butties and licences for short disconnected waterways.
- Licences for the various categories of hire/commercial/trading boats would be subject to a multiplier of the private boat fee.

- To encourage more people to discover inland boating, particularly younger people and families, licences for smaller powered and all unpowered boats need to remain inexpensive. Cheaper “starter” licences for the first year could be considered to encourage people to try boating.
- Short term visitor licences should continue to be available, for a variety of time periods, and IWA suggests that these should be charged pro-rata as if the boat had a home mooring with a fixed administration fee added.
- Where reciprocal arrangements exist with neighbouring navigation authorities, these should be formalised and continued.
- IWA supports a progressive increase to the distance that continuous cruisers are expected to travel annually to one that it considers more appropriate to that lifestyle. IWA suggests the following indicative figures, within seasonal and canal maintenance limitations:
  - a significant distance per annum (eg 300 miles)
  - a minimum range ‘start to maximum distance from start’ during the period of the licence (eg 100 miles)
  - a minimum distance travelled per quarter (eg 60 miles)

The mileage figures quoted are all suggested as indicative figures. All boats that are continuously cruising should be able to travel these distances without restrictions due to their size.

- There is a clear and growing group of boaters who wish to adopt the residential boating lifestyle, but are unable or unwilling to find a residential mooring or comply with continuous cruising rules. IWA wants to see innovative options for providing reduced price facilities for these boaters (eg inexpensive new mooring sites), in parallel with continued enforcement of those not boating within the rules. IWA supports a proactive approach by navigation authorities to provide a range of affordable moorings for those who would prefer to take this option up, and any new licensing structure will need to accommodate this. IWA has previously made a number of suggestions about potential new mooring sites in the London area.
- “Rivers only” licences should only be available to boats which due to their size are genuinely restricted to the river on which they are based. There should also be a proviso that boats issued with those licences could not declare themselves as continuously cruising.
- Tracking devices are already used by owners to protect cars, motorbikes, cycles and other valuable items. This technology could be used by navigation authorities to provide valuable information on boat movements, asset utilisation, and compliance with mooring and travel guidelines. This could also improve the interactions of CRT and marina/ mooring owners on licensing.

- IWA considers that any boat with a private pleasure licence must not be let out for monetary return in any situation. Anyone wishing to hire out their boat, or a room on their boat, should have a business licence/registration and approval from the relevant navigation authority, with the hire-boat level of boat safety examination and appropriate insurance. A new licensing structure can reinforce this. Any boat being licensed with the intention of being let out for residential use must have permanent moorings; such boats should not be eligible to be declared as “continuously cruising”.