

**National Bargee Travellers Association
Consultation response**

DEFRA Air Quality: Consultation on the draft National Air Pollution Control Programme July 2022

4.1 General questions

1. Would you like your response to be confidential?

No

2. What is your name?

National Bargee Travellers Association (NBTA)

3. What is your email address?

secretariat@bargee-traveller.org.uk

4. What is your location?

Other – please specify

The NBTA is a UK-wide organisation.

5. Which of the below best describes you?

Other – please specify

Volunteer-led community association. The NBTA is a volunteer organisation formed in 2009 that campaigns and provides advice for individuals who live on boats on UK inland and coastal waterways and who do so without having a permanent residential mooring (Bargee Travellers). Such boaters live in an itinerant fashion, moving regularly from place to place as is either permitted or required under a number of pieces of legislation. There are as yet no accurate statistics but we estimate that there are around 15,000 to 50,000 people living on 7,200 to 24,000 boats without permanent moorings on the UK waterways. The NBTA has members on all the major navigation authorities' waterways and beyond.

4.2 Policy related questions

6. Do you agree or disagree with the balance of measures across the 7 NAPCP packages as set out in section 2.6.1 of the NAPCP document, for the abatement of fine Particulate Matter (PM 2.5)?

Disagree

7. Do you agree or disagree with the balance of measures across the 7 NAPCP packages as set out in section 2.6.1 of the NAPCP document, for the abatement of Ammonia (NH₃)?

Neither agree or disagree

8. Do you agree or disagree with the balance of measures across the 7 NAPCP packages as set out in section 2.6.1 of the NAPCP document, for the abatement of Nitrogen Oxides (NOx)?

Disagree

9. Do you agree or disagree with the balance of measures across the 7 NAPCP packages as set out in section 2.6.1 of the NAPCP document, for the abatement of Non-Methane Volatile Organic Compounds NMVOCs?

Disagree

10. Do you agree or disagree with the balance of measures across the 7 NAPCP packages as set out in section 2.6.1 of the NAPCP document, for the abatement of Sulphur Dioxide (SO₂)?

Disagree

11. After the publication of this NAPCP, UK government and devolved administrations will continue to develop our policy measures and approaches. Please inform us of any further measures you think we should consider to help achieve the UK ERCs most effectively.

Proposals should be evidence based. Please select a country from the list below to which your measure(s) relate to and use the text box and file upload button to describe the proposed measure and supporting evidence.

UK wide

Proposal 1: The measure that can most easily be adopted by the boat dwelling community to help achieve the UK ERCs most effectively would be a supported roll-out of Hydrotreated Vegetable Oil (HVO) as a replacement for white or red diesel; HVO can be used without having to adjust engines or undergo an extremely costly retro-fit or engine replacement. The Government should provide practical measures to support the replacement of red and white diesel supplies to boats on both inland and coastal waters with HVO. As an incentive, it should be sold at a reasonable price that is lower than the existing cost of diesel.

Proposal 2: The Government should fund the installation of solar panels, wind generators and additional batteries in boats used as homes; the upgrading of solid fuel stoves; and possibly the retro-fitting of engines with emission limiting devices, if the technology were to be available. This would replace the use of diesel or petrol engines and generators to generate electricity for domestic use on boats used as homes. Although many people living off-grid do have solar and wind generators etc, not all can afford the initial cost of buying these. This would reduce emissions, especially in summer. The Government should also incentivise their use by re-instating and extending Feed In Tariffs to solar and wind generators that are used on boats, vehicles and caravans used as permanent homes and to other off-grid homes.

Proposal 3: The Government should fund research into the development of a low cost, low emission, carbon-neutral solid fuel for heating; this would benefit all who live off-grid, for example in caravans and remote houses as well as boats.

Proposal 4: Government intervention both in preventing unnecessary, unwanted boat movement and in facilitating the provision of more temporary and permanent mooring space for boats used as homes would significantly mitigate emissions from vessel propulsion.

We would recommend that Government look at mitigating the effects of navigation authority legislation, policy and enforcement, all of which force boats without a permanent mooring to travel more than they need to and thus to emit more air pollutants than they need to. For example, on Canal & River Trust waterways the legislation requires boats without a home mooring to be used bona fide for navigation without remaining for more than 14 days in any one place. In addition, Canal & River Trust introduced an *ultra vires* policy in 2015 of requiring boats without a permanent mooring to travel a range of at least 20 miles within their licence period. The 2015 policy requiring a 20-mile range causes Bargee Travellers to make unnecessary journeys purely in order to prevent their homes being seized and removed from the waterways.

On other navigation authority waterways, for example those managed by the Environment Agency or Middle Level Commissioners, similar policies, legislation or enforcement on the part of riparian owners or navigation authorities results in Bargee Travellers being moved on unnecessarily, in most cases contrary to the Public Right of Navigation that includes the right to moor for undefined temporary periods.

Proposal 5: Please see the attached response from NBTA to the Department of Transport consultation in 2019-2020 on Air Pollutant Emissions from Domestic Vessels and Inland Waterways for detailed background information and further proposals.

4.3 Technical related questions

12. Do you agree or disagree with the scale of the potential emission reductions for each of the 7 packages of PaMs as set out in table 2.6.1 of the draft NAPCP?

Disagree (too high)

If you answer disagree (you feel the scale is either too low or high) please provide views and information to support your view.

Emission reduction measures relating to residential and domestic solid fuel stoves, diesel engines and petrol and diesel generators must be applied proportionately in recognition of the very small number of households that rely on them as their only source of heat, cooking fuel, hot water and domestic power. The Government estimates that there are 400,000 households in the UK who are off the main electricity grid and/or with no electricity connection, compared to 29 million households on the main electricity grid (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1096205/energy-bills-support-scheme-government-response.pdf).

That is less than 1.4% of all households. The emissions created by 1.4% of households are minimal compared to the other 98.6% of households. The 1.4% of households whose

homes are off-grid must be protected from any measures that make their domestic heating, lighting and power more expensive or untenable.

13. We have outlined the uncertainty of projections in the 'UK NAPCP additional factors' above. Please provide any additional information on potential changes over the next 8 years which may impact emission projections. Please also select the category that your information relates to.

Economic

The current rate of inflation and cost of living crisis means that more people, including those who already live off-grid, who are likely to be on low incomes, will be less able to afford to retro-fit or convert to renewables or lower emission fuel. They may experience fuel poverty or become destitute and resort to using foraged wet wood, illegal cheap bituminous coal, or other dangerous and polluting fuels for cooking and heating.

Other (please specify)

Demographic

Due to social and economic changes, all age groups but especially younger people are less likely to be able to afford to live in housing. There has been an accelerating growth in people living in boats, vehicles and caravans, both nomadically and on a permanent mooring or site, and in 'tiny homes' and low impact structures on land. Most of these households will not have access to the electricity or gas grid and will be heating, lighting and powering their homes using a mix of renewables, solid fuel, LPG and diesel/ petrol engines and generators. Given the current rate of inflation and cost of living crisis, the number of people living off-grid is certain to increase. The 2021 Census was carried out before the current crisis began to have an impact, but will provide statistics for the number of people and households not in mainstream housing in March 2021. This demographic change will need to be taken into consideration when looking at alternative fuels and emissions reduction.

14. In revising the NAPCP the UK has followed the format set out in EU implementing decision 2018/1522. Do agree or disagree that the format of the NAPCP could be improved?

Agree

If you answer agree and think the format could be improved, please provide views on how the NAPCP can be improved. This can be either presentational (the format or content required), or effectiveness/usefulness of the document. If you disagree and don't think the format of the NAPCP could be improved, please provide your views on the content and/or effectiveness/usefulness of the current format.

The content of the NAPCP could be improved by including a recognition that there are around 400,000 households in the UK who do not have a domestic electricity connection and therefore to some extent live off-grid. These households include people who live in boats, caravans, vehicles, or on the land in houses or low impact homes without mains services. Special consideration should be given to ensuring that these households are not left completely without the means of cooking, heating and lighting their homes, heating

water, and moving their homes where this is necessary to access services or required by law.

People who live off grid may be able to use solar and wind power, but the amount of power renewables can generate if your home is a boat, vehicle or caravan is limited, especially in winter. Most of these households rely wholly or partly on diesel engines or generators, petrol generators, bottled LPG gas, heating oil, solid fuel and wood to heat and light their homes and to cook and heat water.

People living off-grid are typically either working people on low incomes, or pensioners. Research carried out in 2011 showed that 51% of the liveaboard boater community were likely to have an annual income below £20,000, and 40% were likely to be earning minimum wage or less (1). The communities of people who live off-grid include some of the most disadvantaged and vulnerable people in the UK and the Government must ensure that their homes do not become uninhabitable as a result of emissions reduction measures.

1. See <http://kanda.boatingcommunity.org.uk/wordpress/wp-content/uploads/2011/10/KA-boaters-survey-interim-report.pdf> . The Canal & River Trust's 2012 Boat Owners Survey also shows similar statistics. See <https://canalrivertrust.org.uk/media/library/1902.pdf> .

National Bargee Travellers Association
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