

National Bargee Travellers Association

Response to CRT's 'The Future of Licensing: Report of the Commission on Boat Licensing, October 2025'

January 2026

The Canal & River Trust (CRT) announced that a Commission would review the future of boat licensing on 16th December 2024, and published the Commission's membership and Terms of Reference (ToR), to which the NBTA published its response on 13th January 2025.¹ CRT then commissioned a survey carried out by Campbell Tickell which was published on 3rd March 2025, to which the NBTA published its response on 6th July 2025.² In October 2025, the Commission published its final Report, which includes 36 recommendations and an Annex illustrating a possible model of movement requirements.³

This document presents the response of the NBTA to the Report. The NBTA is the leading national member-led organisation representing itinerant boat dwellers, founded in 2009.

Overall, the NBTA does not accept the Report as a valid basis for changes to boat licensing, because:

1. The Report demonstrates how the absence of meaningful engagement with key stakeholders has led to several recommendations that will be not only unwelcome to many, but unworkable in practice. The Commission had no representation from boaters without a home mooring, despite being created to address licences for this community, misrepresenting one member as a liveaboard 'former continuous cruiser and lifelong boater'.⁴ The Commission declined the offer of a second meeting with NBTA representatives in September 2025.
2. In our response to the ToR, we pointed out that the Commission's chair was appointed and paid by CRT, and the Commission was overseen by CRT's Board of Trustees. The Report provides no further information about its processes, mechanisms or relationship to CRT that would reassure readers of its transparency, independence or impartiality.⁵
3. The Report acknowledges the methodological weaknesses of the survey, which we also pointed out in our response to the survey. Though the recommendations disproportionately affect boats without home moorings, no additional weighting in the Commission's work was given to respondents from that group. An occasional

¹<https://bargee-traveller.org.uk/wp-content/uploads/2024/11/2025-01-13-NBTA-Response-to-Terms-of-Reference-of-CRT-Future-of-Boat-Licensing-Review.pdf>

² <https://bargee-traveller.org.uk/nbta-evidence-to-crt-commission-to-review-boat-licensing/>

³https://canalrivertrust.org.uk/media/document/yF63CZJH6I96w2EoYkYXw/Yf34or-V73Gt7nkKjiB0AOi9PXlj38_jYcm5Qx5Zxs8/aHR0cHM6Ly9jcnRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/019a9292-592a-787a-b0cf-fd1f23fbaa96.pdf

⁴ Statement from Commission member Penelope Barber to NBTA: 'I am not and have never been a continuous cruiser. [...] From July 2001 to July 2021 I lived half on the boat and half in a house. Since retirement in July 2021 I am usually on the boat two or three times a week'. Available in full at: <https://bargee-traveller.org.uk/wp-content/uploads/2026/01/2025-12-22-Penny-Barber-statement-to-NBTA.docx>

⁵ Further to our response to the ToR, an FOI shows that CRT paid for legal and consultant advice and internal briefings to the Commission. The review cost in excess of £55,000. See https://www.whatdotheyknow.com/request/commission_11/response/3248922/attach/3/FOI%20100%2025%20Response%20Letter.pdf?cookie_passthrough=1

towpath user was prioritised equally with a boater whose life will be transformed by these recommendations.

4. The recommendations are at times inconsistent with CRT's own charitable objects and existing policy, and also fail to recognise existing powers.
5. The Report does not provide constructive solutions about how to get currently unlicensed boats re-licensed and back on the move. The recommendations tend to take a punitive, rather than supportive, approach to licence compliance, which we predict will lead to an increase in enforcement issues and a greater number of unlicensed boats, not a resolution of these problems.

Key recommendations

1. We agree with the Report's recommendations to retain the 14 day movement requirement and to count the 14 days as inclusive. Further, we see that there is **no need to alter existing legislation or create new legislation**, as the British Waterways Act 1995 is appropriate as a framework for licensing and enforcement that balances the various needs of waterways stakeholders while protecting the diversity of itinerant liveaboard boating. NBTA believes boats without a home mooring should be licensed in line with the 1995 Act and used for genuine (bona fide) navigation, which entails moving every 14 days to another place unless a longer stay is reasonable in the circumstances.
2. The fact that CRT does not see itself as a housing provider does not mean that people living on boats should be excluded from the legal protections and safeguards enjoyed by people living in buildings. We recommend that **greater eviction powers should not be conferred on a land-owning organisation with charity status** and therefore with relatively weak checks and balances to ensure safe and fair enforcement practices. If CRT maintains it is not a landlord or housing provider and is not regulated as such, it should not have powers that amount to evicting people from their homes.
3. We recommend that licence enforcement mechanisms are put in place akin to a tenancy support model, that is, to **support itinerant boat dwellers to keep their boats licensed, Boat Safety Scheme (BSS) certified, and able to move every 14 days.**⁶ This would decrease the heavy workload and other problems associated with unlicensed boats, and would lead to a more positive relationship between CRT and boaters.
4. Further consideration must especially be given to the **impact of any policy change on groups with protected characteristics or who are vulnerable**, such as disabled boaters, children living on boats, and boaters with caring responsibilities.
5. No action should be taken on the report's recommendations without input and consent from key stakeholders. NBTA welcomes CRT's proposal for a 'reset' in the working relationship between CRT and key stakeholder organisations, and **meaningful engagement must include our consistent participation in consensus-based policy design and implementation**, whereby our recommendations are visible in the final outcomes.
6. Discourse surrounding the publication of the Report has focussed on 'anti-social' behaviour and crime on the waterways. This should be addressed by existing

⁶ For an example of a tenancy support model, see <https://www.nacro.org.uk/for-nacro-service-users/what-to-expect-in-our-housing-services/>

national legislation and the police. **It is not connected to boat licensing, and should not be tackled by a charity.** Boater presence reduces crime on the waterways and boaters should be engaged as stakeholders in stewarding the environment we live in and care about.

1. Legislation

1.1 Section 17 (3) (c) (ii) of the British Waterways Act 1995 stipulates that boats without a home mooring must not remain continuously in any one place for more than 14 days, unless a longer stay is reasonable in the circumstances. It does not set out a movement range. The 14 day limit is not an ‘interpretation’; it is stipulated in the existing legislation. As noted by Judge Halbert in *CRT v Mayers (2013, Chester County Court ONH00407)*:

Section 17(3) ‘requires “bona fide navigation **throughout the period of the licence,**” not “bona fide navigation **throughout the canal network.**” The requirement is temporal not geographical.’

This stipulation is clear and enforceable, and recognises the diversity of itinerant boating.

1.2 As noted in the Report, the majority of licensed boaters accept and comply with the 14 day limit, and in order to protect the diversity of itinerant boating we see no reason to amend or develop new legislation.

1.3 The Report cites as a key problem ‘Movement requirements for boaters with or without home moorings which involve complex determinants of distance and pattern, based on the Trust’s interpretation of the legislation.’ We agree that the complexity of current requirements is produced by CRT’s interpretation of the 1995 Act, and is not inherent to the legislation.

1.4 CRT has chosen to interpret the existing legislation in ways that go beyond its powers to enforce, and that are complex, not transparently publicised or consistently applied. For example, CRT de facto stipulates an annual movement range of 20 miles or 32 km when considering whether to renew a boat licence, but this is inconsistently enforced and the figure has been removed from its public web pages.⁷ This lack of transparency has at times resulted in the unjust unhousing of boaters (including boater families with children, and disabled boaters).

1.5 The Report notes that ‘The charitable objects of the Trust relate to the promotion of the waterways for navigation and other purposes. We believe this should be interpreted as applying to the whole network. The implication is that the licensing arrangements should encourage use of the whole network.’ The Commission does not explain why it believes the object should be interpreted in this way, and it is

⁷ See

<https://bargee-traveller.org.uk/wp-content/uploads/2026/01/Screenshot-from-2017-01-25-CRT-website-distance-statement.png>

illogical. The fact that CRT's charitable object relates to the whole network does not imply that any individual boater should navigate across the whole network, just as no pedestrian waterways user would expect to do so.

1.6 We agree with the recommendation to end the use of the term 'continuous cruiser'.

2. Movement requirements and 'congestion'

We emphasise that Annex 5 represents an 'illustration' of possible movement patterns, rather than a recommendation, but address this section here nonetheless.

2.1 Many of the recommendations that attempt to address movement and congestion are both unworkable and punitive. We recommend that no action should be taken on the Report's recommendations for movement requirements or suggested movement models.

2.2 The Report notes that 'Without a common understanding of the meaning of congestion, and a way of measuring it, it will be difficult to reach consensus on the extent to which it exists.' It seems ill-advised to recommend or implement policy based on an undefined and unmeasured issue that may not even exist. Further, only 4% of respondents to the survey carried out on behalf of the Commission raised 'congestion' on the waterways as an issue.⁸ Boat numbers between 2012 (33,112) and 2025 (33,080), according to CRT's boat count, actually fell by 32.⁹ As a result, we do not see that attempts to address 'congestion' should be a priority for CRT policy going forwards.

2.3 Canal boats *cannot* safely move 3.1km per hour including locks, or 50km in 11 hours. This again shows a severe lack of working knowledge of the realities of boating. The unpredictability of cruising (especially given poor maintenance of the navigation/locks and sporadic services) means that boaters regularly set aside an entire day for every cruise, even those of 1-2km. This recommendation seems to have been made in the absence of knowledge of CRT's current enforcement practice of deeming a boat to have overstayed if it is sighted in the same kilometre length for more than 14 days, effectively requiring boats without a home mooring to travel at least a kilometre in every move. A move of at least one kilometre is achievable, and is relatively uncontested by boaters.

2.4 In some cases the recommendations discard existing incentives to itinerant boaters to navigate more widely across the network. For example, removing the Rivers Only licence would encourage more people in the London area to moor on busier parts of the Regents or Grand Union canals, rather than on the upper Lea Navigation, which is relatively quiet and currently more affordable. This

⁸ <https://bargee-traveller.org.uk/national-survey-results-show-crt-failing-to-get-the-basics-right/>

⁹ <https://canalrivertrust.org.uk/news-and-views/news/national-boat-count-2025>; 2012 figure from private FOI request

recommendation would also penalise boaters who comply with the licence by only using rivers, for example because their boat is unsuitable for canals.

2.5 Stipulating a greater movement range than CRT currently de facto enforce (e.g. 50km) is unsustainable. Boaters who are bona fide navigating still need to be able to travel an achievable distance to access necessary services like healthcare and education, and to work.¹⁰ A greater movement range does nothing to address the issue of some boaters moving less than 5km or not at all. The unsustainability of the recommendation could result in larger numbers of unlicensed boats.

2.6 Large areas of the network are poorly serviced by CRT. For example they may be unnavigable or unmoorable due to insufficient depth of water or unmaintained banks, or lack water points and waste disposal facilities, many of which have been closed down in recent years.¹¹ Many are unsafe to moor in, particularly for women, people of marginalised identities more likely to experience abuse, and children. Better CRT services and cooperation with other stakeholders such as local councils, communities, and boater mutual aid groups could operate as incentives to increase movement range without the need for punitive requirements.

2.7 Differential pricing (such as through congestion charges or local area permits) would be unlikely to reduce congestion, and would simply result in social cleansing. The Report notes that by not charging higher prices for popular mooring spots ‘the Trust is arguably conferring a private benefit on those currently occupying these spaces. This would conflict with its duty to comply with charity law’. This is incorrect when all boaters can access the whole network, including popular spots, as an itinerant population moving at least every 14 days. By charging higher prices for popular spots, CRT would, however, be conferring private benefit on those who can afford to pay for it. This would contradict its principal charitable object to ‘preserve, protect, operate and manage Inland Waterways for public benefit,’ regardless of a particular section of the public’s ability to pay higher prices to access parts of the network. It may conflict with its duty under charity law.

2.8 Further, the suggestion that greater income for CRT in certain areas could result in better services *in those areas* is based on a private corporate rentier model, not a charitable one, and punishes lower-income boaters with bad services. This is morally unacceptable, contradicts CRT’s charitable objectives and duties, and would likely result in reputational problems if CRT wishes to be seen as a charity, not a landlord.

¹⁰ In practice, many GPs refuse to register prospective patients who do not have a home address. Issues with data sharing within the NHS also make it difficult for boaters to switch healthcare providers when moving along the network. Increasing movement range will increase the length of time boaters are far from their providers, which delays diagnosis and treatment for unwell and disabled boaters, and impacts healthcare for pregnant boaters. On healthcare access for boaters, see <https://www.navigatingthesystem.co.uk/>.

¹¹ It is notable that the number of CRT employees paid over £60,000 p.a. doubled between 2013/14 to 2023/24. In the same period, CRT invested in only two drinking water taps and no new sanitation facilities nationwide. And yet in only three years (2020-2023) CRT permanently shut down 21 sewage or rubbish disposal facilities. On further closures, see also: https://canalrivertrust.org.uk/media/document/hhMLoi94aWv6Tmgw4ySO7g/luee_yQAVkaekaER7Csedfalg9TFel3kfgk9GmqfCAQ/aHR0cHM6Ly9jcjRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/019ad9ce-72e0-77f2-8ba9-308413323ef6.pdf

2.9 The Report's comparison between the cost of boat licensing and housing rental prices is illogical because a) most boaters already own the boat they live in, making the licence cost more comparable to council tax, and b) the Commission did not take into consideration how 'time-expensive' itinerant boating is. Ultimately, the comparison is flawed, and should not have been used as a basis for the recommendations.

2.10 Chargeable moorings have been underused and unsuccessful as a source of revenue for CRT and we strongly discourage any further policy based on this model. Chargeable moorings have increased congestion on other parts of the network and made it more difficult for boaters who could not afford to use them to achieve the required range of movement. Their underuse also made areas of the towpath abandoned and unsafe for walkers.¹²

2.11 The recommendation to move two complete 'functional locations' (flocs) is overly prescriptive, unworkable, and shows the Commission's limited understanding of the realities of boating. It would result in unpredictable and anxiety-inducing cruising that complies on paper but is unrealistic in practice given the scarcity of transport access, poor maintenance of the network, the sporadic nature of CRT services, and other important considerations for liveable boating. It would be likely to result in punitive enforcement whereby a boat could be moored a few metres outside of a floc where space is available, and be subject to enforcement. Finally, compliance with the online map is often unfeasible given poor internet access on many parts of the network.

2.12 Towing can be dangerous, in many cases is uninsured, and should by no means be mandatory as part of licence requirements. Most towing is currently prevented by Section 10.10 of CRT's own boat licence terms and conditions. This recommendation again demonstrates how out of touch the report is with the realities of safe, liveable boating and with CRT's own current policy.

2.13 Broken down boats should be encouraged to remain in a safe place that is accessible to professional engineers and sustainable for the boater to live, in order to expedite getting back on the move. The British Waterways Act 1995 permits boaters staying longer than 14 days on the basis of a mechanical failure provided the longer stay is reasonable, and mechanisms are in place to communicate breakdowns to CRT online.

3. Enforcement

3.1 Overall, the Report takes a punitive, rather than supportive or incentivising, approach to enforcement. CRT has already adopted punitive enforcement - for example, through complex and inconsistent interpretations of the 1995 Act, and through not allowing appeals on restricted/refused licences - and this has counterproductively resulted in higher numbers of unlicensed boats and users of

¹² See <https://nbtalondon.co.uk/2024/12/06/chargeable-moorings-remain-underused/> and https://www.whatdotheyknow.com/request/chargeable_moorings_3#incoming-3258590

NBTA's casework service. We predict that, if implemented, more punitive enforcement policies will simply result in higher numbers of unlicensed boats, expense for CRT, and disproportionate negative impacts on vulnerable boaters or those with protected characteristics such as disabilities, caring responsibilities, elderly boaters and children. We recommend a supportive approach to licence compliance akin to the tenancy support model in housing. CRT already has a nominal Welfare Team, who could be trained, resourced and properly equipped to develop this. This would help to address the large number of unlicensed boats currently on the waterways, an issue not resolved by the Report's recommendations.

3.2 We are concerned about greater enforcement powers - most notably the power to use force in boat removal (ie. boater eviction) - being conferred on a land-owning organisation with charitable status and therefore with relatively weak checks, balances and mechanisms to ensure transparency and accountability. This would also be likely to result in serious reputational damage, with CRT increasingly being seen in the media and by the general public as an overly-empowered and aggressive landlord rather than a charity in the typical sense of the term. Existing national legislation is sufficient to address any criminal or 'anti-social' behaviour by boaters or other waterways users, which should be enforced by the police, not by a charity such as CRT.

3.3 The Report is vague on the safeguarding measures needed if more punitive enforcement was in place. Given CRT's track record of unjust enforcement, we are deeply concerned about the lack of robust and independent safeguards being put in place.¹³ The Report provides no definition of the 'capricious' use of greater enforcement powers and this ambiguity is concerning.

3.4 The Report recommends abolishing safeguarding mechanisms relating to the removal of 'abandoned' boats, such as statutory notice periods. This would be extremely dangerous for boaters who have had to spend time away from their boat due to illness or are living elsewhere while saving money for necessary repairs, for example, and is very likely to result in increased and unjust unhousing. The requirement for CRT to pay compensation in the event that the boat was not in fact abandoned at the point of removal is not an adequate check on this power, because boats can be worth relatively little financially but still be a home for otherwise unhoused people.

3.5 The report recommends that CRT should have the power to levy fines for breaches of licence conditions in a manner 'analogous to those possessed by a local authority in relation to parking, with analogous safeguards.' Boats are not analogous to parked cars: they are homes, and must be safeguarded as such.

3.6 We are especially concerned by the recommendation that a boat could be towed away if a fine is not paid within 21 days, or that a new licence could be refused for unpaid fines. This is in no way in keeping with analogous safeguarding for people living in buildings contained in the Housing and related Acts, and would violate the

¹³ <https://bargee-traveller.org.uk/wp-content/uploads/2026/01/2025-06-11-NBTA-Case-report.odt>

rights of boat dwellers under Articles 6 and 8 of the European Convention on Human Rights/Human Rights Act 1998. It also contradicts the Report's prior statement that 'boat removal should only happen after all reasonable steps have been taken to avoid it becoming necessary'. It effectively unhouses boaters who breach licence conditions in potentially minor ways and are unable to save up to pay a fine and/or the high costs of towing and storage. As in other national contexts, civil debt should be addressed through repayment schemes, ideally through mechanisms akin to a tenancy support model. The fact that CRT is not a housing authority does not mean that people living on boats should be exempt from the legal protections and safeguards enjoyed by people living in buildings.

3.7 The current policy of not allowing appeals on restricted or refused licences should be dropped. We predict that this will help more boaters stay licensed and improve compliance, balancing the workload relating to appeals by reducing the far heavier workload and expense relating to unlicensed boats. It will also improve perceptions of CRT among boaters who currently feel powerless in the face of life-shattering decisions.

3.8 The Report recommends that CRT should have the power to refuse a licence based on a vessel's 'fitness for navigation' but is very vague on the definition of 'fitness'. This ambiguity could enable CRT to operate in highly exclusionary ways - for example, essentially on the grounds of a boat's aesthetic, as some private marinas do - which would disproportionately penalise lower-income boaters.¹⁴ The BSS certificate and insurance requirement already assure a boat's safety and mitigate for damage, and we see no reason to extend CRT's powers on this issue. CRT also already has powers to bring a criminal prosecution against the owner of an unsafe boat in Section 7 of the British Waterways Act 1983 and to refuse a licence to a boat lacking safety certification in Section 17 (3) (a) of the British Waterways Act 1995.

3.9 The Report recommends greater powers for CRT to remove boats moored 'selfishly'. Again, this a very vague term and could result in unjust removal at great expense to CRT and negative impact on the boater.¹⁵ CRT already has sufficient powers in Section 18 of the British Waterways Act 1995 to remove boats that are moored in a way that causes obstruction or hindrance to navigation and to prosecute their owners.

3.10 The use of trackers on boats would be deeply unpopular and be seen as criminalising boaters. They could also be manipulated easily for non-compliance, such as taking a tracker to one part of the network without moving the boat. If this proposal was adopted CRT would also potentially be violating the rights of boat

¹⁴Precedents exist, for example CRT's vague and exclusionary use of terms like 'antisocial' boating. See

<https://hansard.parliament.uk/Commons/2026-01-21/debates/5B120B63-AD0F-43F4-98A4-54F70F67E6F6/AntisocialBehaviourOnCanalsAndRiversBath#contribution-D63F111E-6174-4EDD-8A80-F019586CCF74>

¹⁵ Precedents exist, for example in 2019 CRT used the term 'safety zone' to attempt to restrict mooring on the River Lea, but dropped the policy when it was unable to provide evidence that this would increase safety. <https://nbtalondon.co.uk/2021/03/27/share-the-space-stop-the-safety-zone/>

dwellers to privacy under Article 8 of the European Convention on Human Rights/ Human Rights Act 1998.

3.11 A publicly available boat ownership register is akin to publishing a person's home address on the Internet. It represents an obvious and severe risk to individuals, in particular women, minoritised groups, and others who may be targeted for abuse or persecution.

3.12 Underlying all of these points, we disagree that enforcement issues result from a fragmented legislative base. The British Waterways Act 1995 clearly stipulates a 14 day movement requirement that can be easily enforced and is accepted by the majority of boaters, and existing legislation should be retained. CRT also has extensive powers to remove boats under the 1971 and 1983 Acts, as noted above.¹⁶

4. Other licence-related issues

4.1 We welcome the Report's recommendation of greater transparency relating to CRT's use of funds including licence fees, and we further recommend that CRT should be more accountable to its charitable stakeholders and beneficiaries (including but not limited to boaters) with regard to its access to and use of funds. Recent press coverage, for example, has highlighted the very high salaries of CRT executives and conflicts of interest that are already causing CRT reputational damage.¹⁷ CRT should cease to use 'commercial sensitivity' as a reason to hide information from the public.

4.2 We continue to recommend that the surcharge for boats without a home mooring be abolished with immediate effect.¹⁸ The Report states that 'Extent of use is not a criterion applied to licence fees for other leisure boaters', and this rightly undermines CRT's justification of the surcharge on the basis that itinerant boaters use the waterways more than boats with a home mooring.

5. CRT's relationship with boaters

5.1 While we agree that improvements are needed to the relationship, a 'friendlier' tone of communication is simply a veneer over a more fundamental lack of accountability and transparency. Boaters will feel more positive about our relationship with CRT if a supportive approach to licensing is adopted, and if consistent and consent-based consultation takes place whereby our recommendations are visible in policy outcomes and implementation. The current punitive approach adopted by CRT

¹⁶ CRT has extensive legislation that it does not use or enforce. No prosecutions under the General Canal Byelaws 1965-1976 have been brought since long before the inception of CRT in 2012. To our knowledge, no prosecutions under Section 18 of the British Waterways Act 1995 or Section 7 of the British Waterways Act 1983 have been brought in the last 16 years. British Waterways (BW) did not even enforce the 14 day limit set out in Section 17 of the 1995 Act for several years after it became law.

¹⁷ CRT's highest paid executives each earn significantly more than the CEO of the National Trust, despite the smaller scale of the charity. For press coverage on salaries and conflicts of interest, see for example <https://novaramedia.com/2025/12/11/the-uks-waterways-are-run-by-property-developers/>

¹⁸ <https://www.bbc.com/news/uk-england-london-68694486>

has been counter-productive in terms of compliance. If compliance with the law is made more transparent and achievable for boaters without a home mooring, there will be fewer unlicensed boats and the financial and reputational costs to CRT will be reduced.

Conclusion

Walking around the network, many towpath users will currently see posters and stickers in boaters' windows protesting CRT and its policies. This is because we have been excluded from decision-making, and treated as a problem to be suppressed, rather than as stakeholders and partners.

We can imagine an alternative, whereby greater transparency, accountability and cooperation means that boaters are proud to work with the navigation authority to care for the waterways, and the posters in our windows would encourage other towpath users to support this work.

We hope that the crossroads represented by the Commission's work will make such an alternative possible. But we remind readers of a principle fundamental to all successful policymaking: nothing about us without us.