

**ALL PARTY PARLIAMENTARY GROUP FOR WATERWAYS**

**INQUIRY INTO CANAL & RIVER TRUST  
21<sup>st</sup> JULY 2014**

**SUBMISSION OF EVIDENCE BY  
THE NATIONAL BARGEE TRAVELLERS ASSOCIATION**

National Bargee Travellers Association  
30, Silver St  
Reading  
Berkshire  
RG1 2ST

Tel: 0118 321 4128

Fax: 0870 314 3161

E-mail: [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)

WWW: [www.bargee-traveller.org.uk](http://www.bargee-traveller.org.uk)

## 1 INTRODUCTION

The All Party Parliamentary Group for Waterways (“APPGW”) has announced that it will hold an inquiry into various matters surrounding the operation of the Canal & River Trust (“CRT”) since its inception <sup>[1]</sup>. CRT took over responsibility for the management of certain inland waterways previously falling within the jurisdiction of British Waterways (“BW”) in July 2012. The public function of BW (navigation authority) was also taken over by CRT.

The scope of the inquiry has been stated as covering:

- (1) Funding (including the use of volunteers)
- (2) Mooring problems
- (3) CRT's relationship with the Environment Agency (EA) and the transfer of EA navigations over to CRT
- (4) CRT's response to recent flooding
- (5) CRT's relationship with the wider waterways community

APPGW will be taking evidence on 21<sup>st</sup> July 2014 <sup>[2]</sup>. At the time of writing, the NBTA has not been formally invited to submit evidence but is nonetheless submitting this paper.

APPGW has called to give evidence the following people:

- (1) the Waterways Minister (Dan Rogerson MP)
- (2) 2 executives of CRT (Tony Hales, Chairman and Richard Parry, CEO)
- (3) 3 executives of the EA; and
- (4) a representative from each of two boater groups
  - (a) the Inland Waterways Association (“IWA”) (Les Etheridge, Chairman); and
  - (b) the British Canoe Union (Tamsin Phipps, Government & Public Affairs Manager)

Established in 2009, The NBTA supports live-aboard boaters who travel the waterways of the UK. With a membership that includes a substantial proportion of the travelling boater community the NBTA supports vulnerable boat dwellers to protect themselves from the draconian actions of navigation authorities. The NBTA is a membership organisation and is managed on a consensus basis by its members with the support of a Committee of 8 members <sup>[3]</sup>.

The NBTA notes that the IWA acts as secretariat to the APPGW <sup>[4]</sup>. The NBTA also notes that Sir Tony Baldry, Chairman of the APPGW, is closely connected to the IWA. It is apparent to the NBTA (from “local knowledge” and considerable historic and contemporary evidence) that

- (1) the IWA represents the interests of recreational boaters and specifically those who do not necessarily use their boats as their homes
- (2) the demographic of the membership of the IWA is not generally supportive of the needs of itinerant live-aboards
- (3) Sir Tony Baldry is closely connected to the IWA; and
- (4) in any event Sir Tony Baldry has made derogatory comments about itinerant live-aboard boaters and the NBTA <sup>[5]</sup>.

The NBTA also notes that the witnesses called to give evidence to the APPGW specifically excludes representation of the wider itinerant live-aboard boating community. This is despite the fact that three of the items falling within scope of the inquiry relate specifically to the itinerant live-aboard boating community and the other two items are of close interest.

The NBTA also notes that the inquiry was not announced apart from by means of IWA press release and this announcement excluded either a point of contact for the submission of evidence or a deadline for the filing of evidence. Further, it was only by separate, unconnected, press coverage that the deadline for filing evidence became publicly known. It is also unclear whether the announced scope of the inquiry is definitive of merely a starting point for discussion.

This combination of factors makes it plain that the APPGW is not engaging in this inquiry in a way that is democratic. A fundamental property of democracy is that engagement by government is conducted in a manner that is transparent and does not exclude minority groups. Clearly the APPGW has set out to do precisely the opposite. These are matters of regret. Consequently the NBTA requests that it be placed on the mailing list of the APPGW.

## **2 TREATMENT BY CRT OF ITINERANT LIVE-ABOARD BOATERS**

“Mooring” falls at the centre of the lives of itinerant live-aboard boaters navigating within the jurisdiction of CRT. This is because vessels are licensed under s.17(3) of the British Waterways Act 1995 (the “95 Act”) and s.17(3)(c)(ii) of the 95 Act requires a boater without a “home mooring” to be engaged in bona fide navigation and to move to a new “place” (mooring or stretch of moorings in a given geographic place) every 14 days.

Thus the lives of itinerant live-aboard boaters are dominated by mooring at a given place then being obliged to move on to a new place and to do this every 14 days. The ability to moor is also directly controlled by certain mooring restrictions and indirectly affected by the condition of the bank and the depth of water. Non-compliance results in the summary seizure and removal of the vessel pursuant to s.8 of the British Waterways Act 1983 constituting the loss of the itinerant live-aboard boater’s home.

The exercise of retaining compliance with s.17(3)(c)(ii) of the 95 Act is a complex one. It is also the root of the majority of disputes between itinerant live-aboard boaters and CRT and BW before it <sup>[6][7]</sup>.

CRT overlays its own interpretation on s.17(3)(c)(ii) of the 95 Act of the statute that is at odds with the intention of Parliament when casting the 1990 Waterways Bill (as documented in the minutes of the Select Committee in 1993 and 1994) including specific protections for itinerant live-aboards. Both CRT and BW before it have circumvented these protections through this “creative” interpretation.

Through its case work the NBTA has been exposed to the excesses of CRT in the operation by CRT of its mooring policies. Obviously the NBTA committee and all the full members are itinerant live-aboard boaters and thus subject to the regime of s.17(3)(c)(ii) of the 95 Act and CRTs overlaid interpretations. Both Nick Brown and Pamela Smith participated in the Kennet and Avon Mooring Strategy Steering Group in 2010 -11 in a programme established by BW management. In 2013 Nick Brown also contributed to the development of policy of identical scope within a programme established by the CRT Trustees. Other members of the NBTA Committee have participated in the London mooring strategy development.

CRT have blamed alleged congestion at visitor moorings on itinerant live-aboard boaters. There has been no evidence deployed to back up this assertion. On the strength of this assertion, arrangements for visitor moorings have been unlawfully changed in a manner that specifically targets itinerant live-aboard boaters <sup>[8]</sup>.

The targeting of itinerant live-aboard boaters was taking place under the jurisdiction of BW. However there is some anecdotal evidence that suggests that this has worsened since the advent of CRT. The NBTA has (unattributable) intelligence that a member of senior CRT personnel stated that it was possible for CRT to do this now in a way that BW could not do so in the past.

The NBTA is not aware, through anecdotal evidence, of congestion at visitor moorings. An analysis of BW enforcement data conducted by NABO in 2011 concluded that boaters with home moorings were more likely to overstay at visitor moorings than itinerant live-aboard boaters <sup>[9]</sup>.

In September 2012 Sally Ash (Head of Boating CRT until 30<sup>th</sup> June 2014) gave a briefing to the CRT Council on "Non-compliant Continuous Cruisers" <sup>[10]</sup>. The document refers to this demographic on a derogatory basis but without evidence.

The IWA has a large influence on CRT policy. Two of the four CRT Council private boating members are IWA Trustees, one is a Regional Chair and the fourth is an IWA member. There are no representatives from the static boat dwelling or the itinerant live-aboard communities on the CRT Council <sup>[11][12]</sup>.

From its work the NBTA is acutely aware of the difficulties surrounding moorings within the jurisdiction of CRT. In particular the NBTA has identified the following prime movers that fuel the disputes between itinerant live-aboard boaters and CRT:

- (1) Effective lobbying by, among others, the IWA seeks to develop the inland waterways as the preserve of the commercial rental market and private recreational boat use; this ignores (a) that there are other users present including itinerant live-aboards (b) that the use of the canal system for freight carrying had as a secondary effect, the use of boats as homes; CRT has responded with a range of policies that promote this aspiration
- (2) Lobbying by owners of canal-side properties carries the agenda of the removal of people mooring outside their homes; CRT is thus inclined to amend arrangements for "24-hour" moorings, allocating them in such locations; itinerant live-aboards are thus obliged to find other places to moor; however "24-hour" moorings are usually adjacent to centres of population and thus services required by itinerant live-aboards

- (3) CRT, in spite of its new-found freedom to raise revenue and capital, is operating a loss-making budget; pressure on revenue is therefore acute and one chosen vehicle to raise revenue is rental fleet income; the rental fleet operators are then pressurised to raise their own income; this gives to a rise in rental promotion initiatives; the recent advent of “stag weekend” marketing has evolved; this gives rise to an marked increase in the incidence of reports of hire boats being helmed whilst the skipper is under the influence of alcohol; boat collisions taking place and boorish behaviour including bad mooring habits; complaints to rental fleet operators is now effectively organised by the boating community through social networking but CRT plays no heed to these complaints
- (4) CRT deploys s.43 of the Transport Act 1962 Act to create Terms and Conditions ultra vires s.17(3)(c)(ii) of the 95 Act; CRT plays fast-and-loose with its interpretation of s.17(3)(c)(ii) of the 95 Act through the development of mooring strategies; itinerant live-aboard boaters, far better connected than before, now know how to find out what the law actually entitles (and doesn't entitle) CRT to do, to seek help and otherwise challenge these acts; CRT persists in its objective with a fresh initiative and the vicious circle propagates
- (5) There have been many calls for enforcement by CRT to be conducted “lawfully, fairly and consistently”; it is asserted that if this is done then many of the mooring issues will dissipate. CRT is not doing this, instead it regularly acts ultra vires, employing personnel not known for being fair; enforcement coverage is patchy and CRT uses a law firm that is renowned for its impropriety.
- (6) Even though CRT agreed to carry out a public consultation on the Kennet and Avon Towpath Mooring Plan in 2013, the consultation was conducted at odds with the obligations of the HM Government Code of Practice on Consultations <sup>[13]</sup>. Having completed the consultation CRT inserted several previously un-aired but contentious items into the final document which it then promulgated; this is now the subject of a complaint.

Richard Parry, CEO of CRT, has held regional public meetings in which he engaged personally with members of the boating community. Representatives of the NBTA have attended each of these meetings and asked specific questions about the treatment by CRT of itinerant live-aboard boaters. It follows that Mr Parry is personally cognisant with these issues.

CRT publicly ridiculed the NBTA in documents circulated to third parties. Following a complaint made by the NBTA to the Waterways Ombudsman, the WO instructed CRT to withdraw the offending comments <sup>[14]</sup>. CRT has not done this. In early 2014 Mr Parry also wrote to the the NBTA and stated that CRT has excluded the NBTA from meetings between user groups and CRT <sup>[15]</sup>.

In conclusion it is recognised that there are a number of prime movers that control the actions of CRT in relation to the establishment of mooring policy and thus underpin the “mooring problems”. The NBTA suggests:

- (1) that CRT accepts the use of an independent Mediator to assist in resolution of disputes over moorings (thus saving cost); the NBTA recognises that the proposed Welfare Officer will assist in this objective;

- (2) that a forum consisting solely of representatives of itinerant live-aboard boater groups be established, attended by CRT and used as a forum for discussion of contentious issues rather than resorting to the courts for resolution; that the CRT personnel member that attends reports directly to the CEO;
- (3) that CRT be required to redraft its policy on mooring, with external legal support, scrutiny and through a process of consultation – *and then heeds this work*; and
- (4) that a programme of re-training of enforcement personnel takes place further to these elements.

### **3 OBLIGATIONS OF CRT UNDER THE EQUALITY ACT**

Proper compliance with the Equality Act 2010 by CRT is a factor that is central to mooring. This is because, in particular, of the presence of the phrase “reasonable in the circumstances” in s.17(3)(c)(ii) of the 95 Act.

It has become evident through the case work conducted by the NBTA that CRT is conducting itself in a manner that is non-compliant with the Equality Act 2010. In particular it has become apparent through the case work that CRT has been actively targeting disabled, elderly and vulnerable boat-dwellers. The core of this treatment relates to how CRT addresses these people using mooring space on the towpath.

The NBTA understands that CRT conducted an audit in January 2014 of its obligations under the Equality Act. It is unclear whether this audit took place or what the outcome was if it did take place. The NBTA prepared a briefing paper on the obligations of CRT under the Equality Act with specific reference to itinerant live-aboard boaters. This was sent to CRT in January 2014. No acknowledgement of this paper was received by the NBTA from CRT.

The Trustees of CRT were due to discuss these obligations at the Trustees Meeting of 9<sup>th</sup> July 2014, following the Annual Meeting of CRT the previous day. The outcome of this discussion is not yet known.

The Equality and Human Rights Commission (“EHRC”) does not usually take up specific case work instead focussing on what amount to class actions. However in one specific instance (without identifying the individual casework details) the EHRC has intervened and has required CRT to conduct itself in accordance with its obligations under the Equality Act.

A recent petition <sup>[16]</sup> entitled “Stop Evicting Disabled, Elderly and Vulnerable Boat Dwellers” has attracted 5,705 signatures. A paper copy of the petition was given to the CEO of CRT at the General Meeting on 8<sup>th</sup> July 2014.

The Protected Characteristics of certain members of the itinerant live-aboard boater demographic have direct bearing on their ability to moor safely. This is a further element of “mooring problems” and CRT requires additional guidance on this subject.

## 4 GOVERNMENT UNDERTAKINGS IN RELATION TO CRT

In the preparatory work leading up to the issue by the Waterways Minister of the Transfer Order in July 2012, a number of undertakings were made to Parliament by the Government that supported the needs of itinerant live-aboard boaters. These were as follows:

- (1) That CRT would take the needs of the itinerant live-aboard community into account when introducing new legislation (specifically bye-laws or statutory instruments) <sup>[17]</sup>;
- (2) that CRT would not operate the procedure defined by s.8 of the 83 Act to seize a boat that was someone's home before first engaging in due process <sup>[17]</sup>; and
- (3) that the public functions of CRT would continue to be subject to Parliamentary scrutiny <sup>[18]</sup>

### 4.1 New Legislation

In the transfer order of July 2012 CRT was granted the powers solely to promote new bye-laws and statutory instruments.

However by virtue of s.43 of the Transport Act 1962 CRT is empowered (it claims) to impose terms and conditions for navigation licences. The Terms and Conditions are contractually binding and thus CRT appears to have a prima facie route to circumvent this undertaking.

It is clear to the NBTA from case work that it has been involved in that CRT is indeed doing precisely this. As a large proportion of this circumvention takes the form of erosion of mooring rights of itinerant live-aboard boaters and those with "home moorings" alike, this is in effect materially modifying the effect of s.17(3) of the British Waterways Act 1995. The 95 Act is primary legislation and so in essence CRT is circumventing this undertaking.

Without going into the details of specific case work, the NBTA has been assisting boaters on the Gloucester and Sharpness Canal. These boaters have been hounded and pressurised to "move on", under direct threat of seizure and loss of their boats, in a manner that takes them beyond the limits of the canal.

Going beyond the canal takes them into the tidal River Severn, at Sharpness at one end and Gloucester Docks at the other. The River Severn constitutes some of the most dangerous waters of the United Kingdom. Narrowboats are neither equipped nor certified under the Recreational Craft Directive to navigate these waters unless specifically provisioned to do so. Should a narrowboat come into distress then clearly the emergency services would be called, thus in turn endangering the lives of these crews. Obviously danger to a vessel can also endanger other vessels.

However the Gloucester and Sharpness Canal encompasses a number of "places" and so it is possible to be compliant whilst remaining on the canal. This factor has been ignored by CRT.

On the Kennet and Avon Canal the 12-month Interim Local Plan <sup>[19]</sup> defines “place” (in itself ultra vires) but does so in a manner that defines “place” as being larger than the statute (and Parliament) requires and excludes a number of named geographic locations. In addition the mooring strategy also requires a movement of 20km, again something that is ultra vires. CRT is about to publish such unlawful definitions of “place” for the whole of its waterways.

In London an attempt was made by BW to do the same in 2011 but was abandoned in the face of overwhelming opposition.

The NBTA recommends that CRT abandons regional and national “mooring strategies” instead explaining in clear, understandable *and lawful* terms what the statute means. So far the efforts of the NBTA to encourage CRT to do this have been robustly rejected.

#### **4.2 Due Process following s.8 Enforcement**

When enforcement action against a vessel that is deemed to be unlawfully moored within the jurisdiction of CRT is engaged, under s.8 of the 83 Act, CRT may remove the vessel from the water. This may be done without notice and without the owner of the vessel having the opportunity to defend his actions. In addition CRT habitually also seeks an injunction against the registered owner preventing them from returning the vessel to the water. This is draconian and Parliament accepted this as such in May 2012.

However the obligations of CRT under Art 6 ECHR require that due process is observed, in particular that the occupier of the vessel is given the opportunity to defend himself. This in essence requires the engagement of due process by CRT which in turn means the service on the boat of a claim form by the Court. The boat owner then has the opportunity to file a defence.

In addition where the boat is lived on Art 8 ECHR is also engaged. CRT is thus required to demonstrate that the action is proportionate. A defence may therefore include elements that attack the action of CRT on the grounds of disproportionality. Further, because s.17(3)(c)(ii) of the 95 Act allows a boater the opportunity to stay longer if the circumstances require, and neither the circumstances nor who defines what circumstances are admissible are defined, it is open to the Court to examine “reasonable in the circumstances” and possibly overturn the s.8 action. This cannot be done unless the Court has intervened beforehand.

It is clear from casework conducted by the NBTA that several boaters have returned home to find that their home isn't there any more. One boater was forced from her home and her home taken from her. This is clearly both unlawful and circumvents the undertaking given by the Minister. Further, when either the boater, the NBTA or the solicitor to the boater made complaint to CRT, CRT failed to return the vessel to its owner.

The NBTA also observes further elements to this.

Firstly security of home is considered by the European Court to be the most important concepts <sup>[20]</sup> yet CRT is happy to engage in the summary removal of vessels and violation of boat dwellers' rights to respect for their homes.



Secondly it is regularly the case (and is certainly the experience of the NBTA) that a significant proportion of itinerant boat-dwellers fall into the bottom income quartile. In other words they have little (if any) disposable income. They are most vulnerable to seizure of their home both in terms of being able to deal with the situation or being able to recover the boat. There is some anecdotal evidence available to the NBTA, through casework, that there is correlation between s.8 actions and this demographic. It appears to the NBTA that CRT is actively targeting this demographic.

Finally itinerant live-aboards live on their boats as a means of housing themselves. It is evident that the UK has for some years been suffering from a critical housing shortage and in particular housing for those on lower incomes. Part of this crisis appears to stem from inflated house prices within the UK and increasing income inequality. This crisis doubly affects itinerant live aboard boaters because of the difficulty of dealing with CRT. For this community “mooring” is central to the use of a vessel.

### **4.3 Parliamentary Scrutiny**

When the draft Transfer Order was being scrutinised by Parliament the Minister gave an undertaking that the public function of CRT would continue to be scrutinised by Parliament. Clearly the prospect of transfer gave rise to the general concept that the transfer of the canal network, as a public asset, amounted to privatisation. It was in the national interest that this asset should remain subjected to public scrutiny. Further as CRT would be the recipient of public funds this is an additional reason for scrutiny of its conduct by Parliament. Finally as a navigation authority it should also be subjected to Parliamentary scrutiny of its compliance and good governance.

It was however unclear how this was to be performed. Lord Taylor of Holbeach gave an undertaking to Parliament on behalf of the Government that DEFRA would provide Parliament with a Written Statement setting out the financial position of CRT two years after the transfer from BW to CRT <sup>[17]</sup>. That time is now but the NBTA is unaware of the production of such a statement. CRT has released its accounts and forecast budget for 2015-16. However DEFRA remains silent on any form of analysis.

APPGW is performing an advisory function and has no force in relation to the public purpose of CRT (as Navigation Authority). The previous inquiry of APPGW into the CRT Local Waterways Partnerships (“LWP”s) did not amount to scrutiny of the public function of CRT because the LWPs do not form part of the public function of CRT.

The declared scope of APPGW is:

*“To consider matters relating to the system of navigable rivers and canals in the UK, estuaries and lakes upon which boating takes place, and associated activities”* <sup>[4]</sup>

Further, the APPGW observes that it

*“...sees its role as to listen to all those with a legitimate interest pertaining to the inland waterways ... so that following debate it can make constructive suggestions on issues affecting the future of this important element of our natural and built heritage.”* <sup>[21]</sup>

The question therefore arises as to whether “consider” or “listen” amounts to “Parliamentary Scrutiny”. Certainly the operation of APPGW in terms of financial scrutiny fall somewhat short of the aspiration to :

*“... provide a document which sets out the operation of financial scrutiny which is publicly available. Where relevant, the views and experiences of members of the public and interested groups should be sought and should feed into the parliamentary process.” [22]*

So far, therefore, APPGW does not play a role in the scrutiny of the public function of CRT. If APPGW does indeed consider that its role is to scrutinise the public function of CRT then it has not declared this.

Boaters have written to the Waterways Minister in relation to specific dispute with CRT and have either not been responded to or been requested to speak to CRT direct on the grounds that CRT is no longer a public body.

However the NBTA acknowledges that mooring (as part of navigation) falls under the head of “public purpose” and thus the instant inquiry is examining the public function of CRT.

However it does appear that the Minister has fallen short of his undertaking to provide for Parliamentary Scrutiny of the public function of CRT. Hitherto APPGW appears to have no powers to carry out this function, and elements of its membership are biased.

Indeed on 16<sup>th</sup> March 2013 the NBTA submitted a 5-page evidence document [23] to APPGW for its deliberation on CRT Local Waterways Partnerships. In the final report of APPGW of 19<sup>th</sup> April 2013 [24], under the heading of “Appendix D - List of Written Submissions” the NBTA is conspicuous by its absence. It is apparent therefore that the APPGW is excluding input from the NBTA. This is a matter of regret and the NBTA hopes that this report will be admitted.

The NBTA looks forward to a time when APPGW demonstrates not simply a more encompassing and impartial role but one that recognises the needs of a vulnerable community and then takes steps to ensure the needs of that group are met and their rights lawfully upheld. The role of Parliament is to make law in the light of circumstances unfolding in society. A situation has unfolded and yet Parliament appears to be silent in response.

Nick Brown  
Secretary and Legal Officer

National Bargee Travellers Association  
30, Silver St, Reading, Berkshire, RG1 2ST  
Tel: 0118 321 4128  
Fax: 0870 314 3161  
E-mail: [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)  
WWW: [www.bargee-traveller.org.uk](http://www.bargee-traveller.org.uk)

## References

- [1] <https://www.waterways.org.uk/news/view?id=122&x%5B0%5D=news/list>
- [2] <http://www.boatingbusiness.com/news101/industry-news/New-Parliamentary-CRT-inquiry>
- [3] <http://www.bargee-traveller.org.uk>
- [4] <http://www.publications.parliament.uk/pa/cm/cmllparty/register/waterways.htm>
- [5] <http://www.publications.parliament.uk/pa/cm201213/cmgeneral/deleg1/120626/120626s01.htm>
- [6] Brown v Canal and River Trust [2014] EWHC 588 (Admin)
- [7] Moore v BW [2012] EWHC 182 (Ch)
- [8] “Major Issues for the Trustees to Address at Future Meetings – TT06”, CRT, 22<sup>nd</sup> September 2011
- [9] “Enforcement”, NABO, 6<sup>th</sup> June 2011
- [10] “Briefing Paper – Non Compliant Continuous Cruising”, CRT, 27<sup>th</sup> September 2012
- [11] [https://www.waterways.org.uk/news\\_campaigns/campaign\\_news/crt\\_council\\_election\\_results](https://www.waterways.org.uk/news_campaigns/campaign_news/crt_council_election_results)
- [12] <http://www.narrowboatworld.com/index.php/news-flash/4201-iwa-gets-three-places-on-cart>
- [13] Code of Practice on Consultation, Department for Business Innovation & Skills, July 2008
- [14] Waterways Ombudsman, case reference 722, Letter of Notification, 1<sup>st</sup> August 2013
- [15] E-mail Richard Parry to Nick Brown 1<sup>st</sup> May 2014
- [16] <http://you.38degrees.org.uk/petitions/stop-evicting-disabled-elderly-and-vulnerable-boat-dwellers>
- [17] <http://www.publications.parliament.uk/pa/ld201213/ldhansrd/text/120625-gc0001.htm>
- [18] <http://www.publications.parliament.uk/pa/cm201213/cmgeneral/deleg1/120626/120626s01.htm>
- [19] “Kennet & Avon interim 12-month local plan: guidance for boaters without a home mooring”, CRT, 17<sup>th</sup> April 2014
- [20] KAY v UK [2010] ECtHR (Application no 37341-06)
- [21] “Memorandum from the All-Party Parliamentary Group on Waterways: The Future of the Waterways”, APPGW, 14<sup>th</sup> July 2011
- [22] “The Fiscal Maze - Parliament, Government and Public Money”, Hansard Society, 15<sup>th</sup> June 2006
- [23] National Bargee Travellers Association: Evidence Submitted to All-Party Parliamentary Waterways Group Inquiry into CRT Local Waterway Partnerships”, NBTA, 16<sup>th</sup> March 2013
- [24] “The APPG for Waterways - Report into the Inquiry into the Progress and Future Aims of the Canal & River Trust Waterway Partnerships”, APPGW, 19<sup>th</sup> April 2013