

A report on the consultation by British Waterways on the
TOWPATH MOWING GUIDELINES

October 2005



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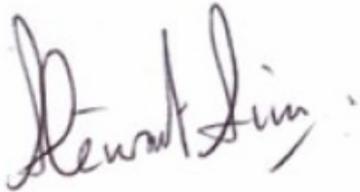
FOREWORD

Public consultations are seen by some as burdensome and unnecessary. I see them as an essential part of the development of any organisation that works as closely with the public as British Waterways. Whilst we do have the expertise in house to manage the waterway network it is very important to listen to the views and to get feedback from the users. It isn't sufficient just to listen, where sensible and workable comments are fed back we will act on them. British Waterways is committed to ensuring that you will have the opportunity to contribute towards the development of other guidance involving environmental matters.

The management of our towpaths is undoubtedly an issue close to the hearts of the majority of our users. This is clearly reflected in the number and variety of comments which have come back in this consultation.

Certain issues have been raised which are not relevant to the Towpath Mowing Guidelines, in particular I am thinking about the growth of trees and woody vegetation on towpaths. These issues are being addressed, work has already begun and long term plans are being put into place to ensure that trees and shrubs are kept under control.

I would like to thank you all for taking the time to give us your frank and constructive comments which will improve the quality of our work in maintaining a vibrant, enjoyable and safe network visited by millions of people.

A handwritten signature in dark ink, appearing to read 'Stewart Sim', with a small flourish at the end.

Stewart Sim
Technical Director
October 2005

INTRODUCTION AND SUMMARY

Towpath management

Towpath management is a key issue for British Waterways and it is important that a high standard is maintained. The Towpath Mowing Guidelines are designed to illustrate a series of mowing regimes which might be employed on a towpath, they do not cover woody vegetation or marginal aquatic weed growth. The way in which mowing is managed depends on the type of towpath and is therefore influenced by the waterway character, the surface type, the structure, width, type of edging, location and level of use. This makes management a complex issue and one approach cannot be expected to “fit all”. Different mowing regimes are essential for the appropriate management of our various types of towpath. Woody vegetation is being addressed separately within British Waterways, saplings and shrubs are being removed whilst plans are being put in place to tackle the more substantial vegetation. The grasses and flowers are generally managed by implementing a mowing regime designed to ensure that our towpaths are safe and enjoyable places to be.

There are various legal influences on how we manage our towpaths, including the Transport Act 1968, health and safety legislation, British Waterways Acts and the Countryside and Rights of Way Act 2000, which has a particular influence over our management of Sites of Special Scientific Interest (SSSI). In addition, British Waterways are committed to ensuring a high standard of work in providing a safe environment, whilst seeking biodiversity gain wherever appropriate.

Ultimately, the decision on how a towpath is managed is a local one, based on good knowledge of the towpath types and uses, safety issues and any areas of biodiversity value. With approximately 3000 km of towpath managed by British Waterways, it is perhaps understandable that the approach to management, and indeed the quality of management, has varied considerably in the past.

A poor standard of management is totally unacceptable; the Towpath Mowing Guidelines (TMG) will address this whilst maintaining the flexibility required to manage such a diverse network. It is essential that British Waterways personnel have a sound understanding of the issues, including the views of those who use the network and that this understanding is transferred to our contractors in order to comply with both the legal and corporate responsibilities. Explaining exactly what is required is not as straightforward as it might appear and can easily be misinterpreted. The TMG will help British Waterways managers to clearly communicate their requirements to contractors. It will also serve to inform our users what they can expect when they visit the waterways. The fundamental statement is “we will provide a towpath that is safe for all users and we will seek to enhance biodiversity wherever we can”. By getting the management right we will achieve our vision of creating a vibrant waterway visited by and enjoyed by millions of people.

The Towpath Mowing Guidelines

British Waterways published a consultation version of Towpath Mowing Guidelines in November 2004. The proposed Guidelines are comprised of introductory text and four different mowing regimes to accommodate both urban and rural scenarios and the varying amounts of foot traffic around the network. The four mowing regimes were each subdivided into three options of varying intensity, designed to cater for the local levels of use, health and safety and biodiversity.

The TMG were issued as a consultation document on a CD to over 40 organisations, primarily specialist user groups with a direct interest in towpath management. In addition it was made available to the wider community through the British Waterways website. It was accompanied by a press release, which was taken up by the waterway press and was featured in the British Waterways *Waterfront* magazine. Consultees were invited to make comment on the general approach and the introductory text as well as each of the mowing regimes.

Consultation summary

In total an encouraging 24 responses were received with a good cross-section of views from a variety of organisations and individuals with an interest in towpath management. To avoid duplication, representative comments have been selected and incorporated into this document. Our response is then set out with clear statements of how the TMG will be taken forward.

Key Consultation Findings

There was general agreement that the TMG will improve local management. There was a clear message that four mowing regimes was too many and that three would suffice. The general feedback section prompted the greatest number and variety of comments, the key issues included:

- safe embarking and disembarking.
- obscuring of sight-lines.
- trip hazards.
- the autumn full-width cut.
- cutting frequency.
- other problem vegetation.

There was general support for all three options in Mowing Regimes One, Two and Three. It was interesting to note that most organisations supported only one or two options out of the three and this support tended to be grouped according to the type of user. It is therefore appropriate to group responses from similar types of user together throughout the comments section of this document. The responses reflect the reality we encounter in that options at each end of the spectrum are preferable to particular sectors of our customers. Where appropriate a response has been given for all issues raised, including some that were considered outside of the scope of the TMG.

Overview of British Waterways Intentions

It has been made clear how the TMG will now develop. The key responses made by British Waterways are:

- the TMG will be taken forward in its current general format with some modifications as a result of this consultation.
- supplementary information will be written to clarify and expand on certain issues.
- Mowing Regime Four will be incorporated into Mowing Regime Three, leaving three regimes.
- the recommendation of a 100 m cut per 600 m (on average) in rural sections will be retained.

- cutting frequency will continue to be governed by time.
- it will be stressed that Spring is the most appropriate time for the full-width cut.

Reading this Report

This report is in five sections, consistent with the consultation feedback form. Section One considers the general comments received, while Sections Two to Five deal with comments made against each of the four originally proposed Mowing Regimes. The general comments were so varied and extensive that this section has been subdivided into categories. In each instance, actual responses are used to illustrate the comments received and a shaded box is used to highlight the response from British Waterways and how British Waterways intends to act on the responses.

Appendix 1 includes a list of respondees with a summary table indicating views on the various Mowing Regimes.

This document represents the ‘white paper’ stage of the development of this document. Every effort has been made to accurately reflect the comments that have been received. However, if you feel that your views or the views of your organisation have been misrepresented or that there is now, previously unavailable, substantive evidence that could influence this document please let us know before December 23rd 2005. Please send your comments to:

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Publication

This report will be sent directly to all that responded. It will also be made available though the British Waterways Customer Services Centre (enquiries.hq@britishwaterways.co.uk or tel. 01923 201120) and available for download at www.britishwaterways.co.uk. The report will also be sent to relevant personnel within British Waterways.

A list of unabridged comments is available from amanda.strang@britishwaterways.co.uk (tel. 01923 201375). No respondent requested that their comments should be treated in confidence.

CONSULTATION COMMENTS AND BRITISH WATERWAYS RESPONSES

British Waterways is committed to ensuring a high standard of soft vegetation management across the waterway network. The Towpath Mowing Guidelines have been designed to ensure that appropriate mowing regimes are employed and that there is a clear understanding of what is to be delivered both by British Waterways personnel and contractors.

It is important that these Guidelines will be a valued tool for local management, and therefore they should be concise and relevant. The various options have been designed to cover the majority of our towpaths.

Do you agree that this approach will improve local management?

There was overwhelming support that this approach will improve local management, only one respondent disagreed. The point was also made that local management must comply and that contractors should not “short cut the work”!

The **Inland Waterways Association** commented:

“IWA agrees with the general approach outlined in the consultation documents. The guidance should be kept as simple as possible.....”

The **British Marine Federation** agreed:

“The basic principles seem sound and are easy to understand when viewed alongside the photos and illustrations. The Guidelines will be a useful tool for the local management.....”

The **International Mountain Bike Association** commented:

“The approach seems very sensible and offers local flexibility to ensure safety of users without resorting to a “one size fits all” approach, which would be undesirable.”

English Nature commented:

“In general, the guidelines are a useful description of the range of options available and are very well presented and we look forward to seeing them adopted.”

The **Steam Boat Association** said:

“I believe a more formal approach may be helpful to local management, and will give boaters a better understanding of what to expect.”

The **Grand Union South Angling Consultative** agreed, but with some words of caution:

“Yes in general but one has to be aware of local nature reserves and SSSI and that the operator does not “short cut” the work”

A canalside resident, Shelagh Rogers, disagreed that this approach would improve local management, commenting:

“No. I think rural areas will continue to be devastated if the document is left as it is. There is no indication here of the main uses of each option within the various regimes and only a very scanty indication of the use of each regime. Nor is it clear who is to take decisions.....”

There was general agreement that this approach will improve local management. Some caution was expressed regarding the need for local managers to be aware of the Guidelines and to comply. There is also a need for the operator or contractor to understand and use the Guidelines.

British Waterways will proceed with this document in its current format, with some modifications, which are described later in this report. All relevant managers and other personnel within British Waterways will receive a copy of the Guidelines and it will be downloadable from the internal website. It will also be available on the British Waterways external website. Hard copies and electronic copies will be sent to all contractors.

There was concern that these Guidelines will not protect rural towpaths. We disagree. It will be clear that a robust process will need to be followed, which will include input from health and safety and ecology experts. The key will be ensuring that all issues are given due consideration to influence the management decisions and in this case the Guidelines will serve their purpose.

These Guidelines will be a working document, we will also issue supporting information, which will not be necessary for the day to day use but will provide useful additional information.

Do you agree that the guidelines give enough scope to allow the majority of towpath mowing to be specified against the options available? Are more options required?

There was a clear message that there are enough options to allow the majority of towpath mowing, and probably too many options, particularly in rural sections.

Nottinghamshire Wildlife Trust commented:

“Generally the options would cover most eventualities, but must have provisos to accommodate the legislation described above [reference to wildlife legislation].”

The **British Marine Federation** commented:

“The number of OPTIONS is sufficient.” And added “The boating businesses take the view that the Regimes do take in to account the different nature of use of a waterway, from city centre through to a very rural area with little towpath walking”

The **Towpath Action Group** commented:

“We would have thought that allowing for two ‘urban scenarios’ and two ‘rural scenarios’ was adequate enough.”

The **Inland Waterways Amenity Advisory Council** agreed stating:

“There are enough options; in fact option four seems redundant”

Further support of this view came from the **Shropshire Union Canal Society**:

“The scheme in our view is already too complicated and will not get compliance due to its complexity. Just three mowing regimes should be sufficient guidance on their own, with modifications.”

The **Chesterfield Canal Trust Limited** (R. Allsop) commented:

“A higher category of mowing in rural areas where lock flights exist is required [examples of lock flights given]. This would permit ‘lock wheeling’ by boat crews wearing boating shoes and clothes.”

The overall feeling was that there are too many Regimes and that three would be sufficient. Four Regimes have been proposed to give a range of different levels of use to cover the network. Having considered these comments and the comments on the individual Mowing Regimes (see below) we are inclined to agree.

We will look closely at Regimes three and four with a view to combining some Options and creating one Regime with three Options. We must ensure that we retain sufficient flexibility within the document to give managers appropriate guidance for all towpath types.

Other General Comments

A number of general comments not relating specifically to the proposals were received, these covered issues such as safety for users and towpath surfaces in general. These comments are particularly helpful in placing this consultation in the wider context of waterways use, some of the comments are shown here for completeness. British Waterways response is shown at the end of each set of comments.

General Comments – Safety

British Waterways has a legal and moral responsibility to provide a safe environment for all users.

Several comments came back reflecting the need to ensure that there is good visibility for both boaters and those on the towpath. Other comments stressed the importance of vegetation not obscuring tripping hazards such as mooring rings and for the need to be able to embark and disembark safely. The proposal to incorporate a ‘100 metre to the edge cut’ every 600 metres in rural sections was generally supported although some did feel that this did not go far enough and the towpath should be mown to the water’s edge wherever it was safe to moor.

The **Shropshire Union Canal Society** commented:

“There is also a requirement for a clear line of sight to be maintained at bridge holes and narrows, especially where these are on bends.....”

The Horseboating Society commented:

“No vegetation should obscure the view of the towline between the boat and horse/bowhauler. Vegetation should not hide holes, mooring rings and bollards, posts and notices – which can trip up the hauler or snag the line – also mooring lines. Vegetation should not hide anglers and their equipment as plenty of time is needed to pass safely. Vegetation should not narrow the towpath – all the towpath is required for users to pass each other.”

In considering ‘why people walk along rural towpaths’ the **Chesterfield Canal Trust Ltd** (D. Blackburn) commented:

“Essentially it is to be in close visual contact with the canal. Where canalside vegetation is tall – reeds, bullrushes, willowherb etc walking in a green ‘tunnel’ between hedge and canalside can quickly become boring.”

Margaret Fletcher IWA North West Region Chair commented:

“Water margin – hard vertical bank – may as well be mown frequently to allow for mooring/fishing as this type of banking is of little use to wildlife. Water margin – soft/sloping bank – no further cut to attract aquatic wildlife”

The above comments indicate concern that vegetation can get too tall so as to reduce visibility and obscure sight-lines, and could also obscure towpath furniture such as mooring rings, bollards and

uneven surfaces.

We agree that this is an important issue. We believe that for Mowing Regimes one and two this will not be an issue because of the mowing frequency. For rural towpaths this could become an issue.

We will re-word the introduction to include towpath sections where visibility is an issue to ensure that such areas receive more cutting to create a safer waterway.

On the offside of a waterway this is also an issue but is more difficult to address because of access problems and often steep bank sides. This is outside the scope of these Guidelines. The issue of emergent aquatic vegetation on both the towpath side and the offside will be highlighted to local management teams and dealt with locally. Where the problem is caused by woody vegetation this is being addressed separately within British Waterways.

The **National Association of Boat Owners** commented:

“Plant growth should not conceal the unevenness of the ground in any place where there is a possibility that persons may need to disembark from boats. [referring in particular to protruding piling; holes and ‘terracing’ too close to movable bridges and locks]”

The **International Mountain Bike Association** commented:

“.....the margins of heavily used paths need to be well maintained to facilitate regular passing by towpath users, and also at moorings, where hidden mooring spikes could be a hazard to cyclists.”

These comments reflect concern that vegetation can obscure trip hazards. In well-used sections of waterway the Options will allow management to employ a mowing regime that will expose trip hazards. The Guidelines also allow for more intensive management in rural areas where health and safety issues are highlighted. The decisions must be taken locally with regards risk and what Option should be used.

We will include further guidance on this issue, either in the introduction or the supplementary information.

The **Barge Association** commented:

“The path itself should be readily usable by walkers at all times. This is necessary to allow access to craft moored to the towpath, or using the towpath as a landing.....people should be able to embark and disembark from craft at all places along the towpath [acknowledging depth limitations]. This is important for safety reasons.....”

The **British Canoe Union** commented:

“Cutting the bank growth in 100 metre lengths every 600 metres would also be of use to paddlers as additional points to land.”

The **Steam Boat Association** commented

“The proposal to mow through to the waters edge for 100 m in 600 m is welcomed on that score [to avoid nettles and thistles when disembarking]. It will also reduce the scope of fishermen to hide in the vegetation, making them more visible and reducing conflict.”

The **Residential Boat Owners’ Association** commented:

“We note the proposal in this section regarding cutting through the vegetation to the towpath edge for a 100 metre cut to the water’s edge at 600 metre intervals, and feel this is appropriate at popular rural locations.”

They suggested an alternative approach believed to be used on the Basingstoke Canal, which is:

“To cut a path from the towpath to the canal verge every 20 metres over a considerable distance. This would allow boaters to disembark and moor safely, whilst leaving flora on uncut stretches between paths, to be enjoyed by both moored boaters and passing walkers.”

The need to embark and disembark from a boat safely, away from formal moorings is recognised and particularly in rural sections towpath vegetation can be an issue. We will continue with the suggestion to local managers to provide a 100 m ‘to the edge’ cut every 600 metres, were it is deemed appropriate.

The introductory text will be reworded to make it clear that this is a guide only and it can be more or less frequent as appropriate. British Waterways will endeavour to maintain a network where there is a minimum of one safe mooring point in every kilometre and on average every 600 metres. This approach will also allow managers to ensure that informal mooring is done at places where it is deep enough and safe enough to do so.

The alternative approach that has been used on the Basingstoke Canal, which is to cut a narrow path to the water’s edge every 20 metres over a longer length will also be included either in the introduction or the supplementary guidance, as an acceptable alternative approach for local management.

The **Shropshire Union Canal Society** disagreed, commenting:

“the suggestion of a 100 m cut at 600 m intervals to the water’s edge is nonsense. A cut to the edge needs to be in place wherever depth of water and the edge is suitable for a boat to pull up so that the margin of the bank can be clearly seen. Since such places are not widely available the overall effect should be equivalent at least to the 100/600 regime.”

The approach suggested above could result in long stretches which become very poor in terms of their biodiversity, making such stretches less enjoyable for most users.

The ‘100/600’ regime will be retained as suggested best practice because it considers the needs of our users whilst creating a balance between health and safety and biodiversity.

The **Chesterfield Canal Trust Ltd** (D. Blackburn) commented

“Stinging nettles and thistles are more of a problem than high grass in low maintenance regimes 3 and 4”

The **Steam Boat Association** also recognised this issue and commented:

“Our boats are generally small, and we sit in them rather than standing on them. Consequently when approaching a landing we tend to get a face-full of vegetation, often nettles and thistles.”

Nettles, thistles and brambles are clearly an important issue and one that should be addressed, particularly at moorings. Such plants cannot always be satisfactorily controlled by mowing, some herbicidal control may be required.

We will include some information on the control of this type of vegetation in the supplementary information. It is considered good practice to consider physical or mechanical control as a first control option. When this is inappropriate an approved herbicide may be used, British Waterways have internal guidance on the safe use of herbicides.

The **British Marine Federation** commented:

“The whole specification refers to walkers who have different types of shoes. It should be remembered that the occupants of boats and cyclists also use the towpath through all the different Regimes. The safest non-slip boat shoes are not suitable for walking on very rural towpaths.”

In the interests of health and safety we would advise any user of the towpath to wear appropriate footwear. In areas where boaters may need disembark to tie up or operate locks or swing bridges etc., the guidelines allow for a more intensive mowing regime.

General Comments – Safety (other)

The Towpath Mowing Guidelines will provide managers with options for the management of ‘soft’ vegetation; grasses and flowers growing on the towpath. They are not designed to cover the issues associated with woody vegetation or vegetation growing out of the water.

Some comments reflected concerns about both the ‘air corridor’ and aquatic vegetation growing in the channel.

The **Barge Association** commented:

“..... vegetation overhanging the path from the non-water side should not be lower than 3 metres above the surface of the path.” And also said “.... no vegetation should overhang the water at an elevation of less than 3 metres above the water surface,”

This point was echoed by the **Grand Union South Angling Consultative**, they commented:

“..... Boughs overhang the towpath and canal and are a hazard to towpath users in particular cyclists.”

Woody vegetation is outside the scope of these Guidelines and this is being addressed separately within British Waterways. However, it should be noted that the annual full width cut practised on all towpaths will prevent the regeneration of woody vegetation.

The **National Association of Boat Owners** commented:

“Reed beds or other aquatic plants should not be on the towpath side of the channel, nor constrict the channel to the lock width of the waterway for more than 50 metres in any continuous length before a space is left for boats to pass.”

The emergent aquatic vegetation growing along the canal margins is outside the scope of these Guidelines. This vegetation can form a valuable wildlife habitat and should be retained except where there are over-riding health and safety issues. The decision how to manage emergent aquatic vegetation is taken locally.

General Comments – Towpath surface and grass cutting

The most critical aspect of the Guidelines is the specifications, making sure that cuts are carried out to the right widths and that towpaths are cut at the right time, as vegetation growth rates vary working safely may be restricted because of the weather and contractors need to programme works well in advance. This has proved to be a complex issue. It has been important to propose a system with enough flexibility within it to allow it to work.

Several comments suggested that vegetation height should be used to determine when cuts should be made. Other comments made it clear that an Autumn full-width cut would be unacceptable and that uncut vegetation should not encroach onto the walking surface.

The **Towpath Action Group** commented:

“the use of “typically” unfortunately allows for managers to go either side of the target, and theoretically allows for a scenario where nothing but the annual full-width cut might be undertaken. We would probably suggest that a national policy allowing such leeway is hardly worth having.”

The **British Marine Federation** commented:

“..... Take into account the effects of the weather on vegetation growth patterns.”

The **Inland Waterways Association** commented:

“..... height would give a better measure of growth than the time period between cutting as growth can take place at different rates. Where a minimum cutting height is given, it would be appropriate for a maximum height to be given also.”

It is accepted that height is the best measure of when to cut vegetation but in practice it is very difficult to put such an approach in place. This issue has been discussed with contractors and we are aware that they programme their work several months in advance and simply cannot constantly be reprogramming works. The approach we have taken will get the best results. There is a definite need here to build good working relationships with contractors and to help them develop a better understanding of our requirements.

The supplementary information will set out very clearly why we have opted to base our cutting frequency on time and not vegetation growth. It will include a note on why it is important to be flexible to allow for cutting to be undertaken when appropriate, it will also be important to ensure that contracts allow for this.

The **Towpath Action Group** commented:

“We would generally advocate a policy of “at least every x weeks”, setting x at such a point to allow managers a certain level of discretion.” they explained the problems with setting x at a “ridiculously high frequency” and went on to say “we would rather the frequency was set at a point, where hopefully it would be bettered in practice on some waterways, and that local users could discuss where necessary from time to time if it was felt that a greater frequency, or an extra one-off cut, might be appropriate.”

We appreciate the point made in this comment but feel that in practice it would be difficult to implement. I suspect that many managers would take the figure 'x' to be the cutting frequency, since the Guidelines would say this is acceptable. If a contractor were to cut at this frequency then a cut could foreseeably be delayed due to weather etc. resulting in unacceptable management. In the current format the larger figure, i.e. the 8 in 6-8 weeks could be seen to equal your proposed 'x' figure, giving a two week window when the cut should be carried out. We believe that this approach makes it absolutely clear to managers and contractors alike.

The **Barge Association** commented:

“All vegetation growing from the towpath between the water’s edge and the towpath wall or hedge be cut to a height of no more than 10cm [at least once a year]” they also added “.... the path should be kept in a condition that allows two people or horses to pass in most places.”

An annual full-width is already being carried out on all of our waterways.

Shelagh Rogers commented:

“Paragraph 3 line 1. The annual full-width cut is best carried out in early Spring – that is a very weak statement and should read “in early spring and before the end of March.””

We will reword this text.

Shelagh Rogers also commented:

“Paragraph 3 line 2/3. “cutting late in the year is acceptable” – NO IT ISN'T! We desperately need seed and insect larvae to feed birds in winter, restart insect/plant populations and provide cover for small creatures. If the cut cannot be finished in March, the plants will be at their full height through the main boating season, so they can well stand until the following March and then done first!. October is far too late to allow of any subsequent re-growth. In extreme necessity surely the end of July would be better, but please don't encourage the contractors to do this.”

We fully appreciate these comments. The main reason for this alternative, which was always accepted as being less than ideal, was in situations where a spring cut was not done due to inclement weather or other reasons. Not cutting could then result in health and safety issues as a result of unchecked growth.

This approach will be retained but the text will be reworded to make it absolutely clear that an Autumn full-width cut must only be done for health and safety reasons.

The **Inland Waterways Association** commented:

“IWA agrees that the central pathway should be kept easily walkable at all times”

In rural scenarios overhanging grasses, particularly when wet can reduce the effective width of the towpath to less than 60cms.

The suggested cut width is given as a minimum and can be increased to allow for this, we will incorporate appropriate text in the supplementary information.

General Comments – Woody and problematic vegetation

The issue of woody vegetation on towpaths is outside of the scope of the Guidelines. However, the importance of this issue is reflected in the high number of comments and we have included some of these and a response below.

The **National Association of Boat Owners** commented:

“All woody vegetation should [be] removed entirely, so as to facilitate unhindered bow-hauling in emergency, or horse towage”

Margaret Fletcher IWA North West Region Chair commented:

“Saplings should be cut back with the early spring cut.”

The **Macclesfield Canal Society** from commented:

“Our only concern on towpath mowing is that mowing can be done to the waterwall. That is why we cut down the saplings growing there.....and towpath walkers can see the canal!”

The **Horseboating Society** commented:

“No vegetation should snag the line (trees, bushes) or cause it to drag (tall heavy vegetation).”

The annual full width cut practised on all towpaths will prevent the regeneration of woody vegetation.

The **Nottinghamshire Wildlife Trust** commented:

“The same [protected species surveys] should apply to management of hedgerows and canalside trees and scrub.”

The presence or absence of any protected species and other key species is verified prior to any works or management and appropriate action is taken.

The **Inland Waterways Amenity Advisory Council** commented:

“What does the sentence starting with “Good hedgerow management can---” mean?”

Managing hedgerows appropriately can have a dual benefit; firstly by creating a more effective barrier and a better hedgerow in biodiversity terms and secondly by increasing the amount of grassland.

General Comments – Wildlife

Health and safety is a key influence over these guidelines but British Waterways has a legal requirement to “further the conservation of flora and fauna”. Towpaths can be very important in biodiversity terms and British Waterways will seek to maintain and improve that biodiversity where opportunities permit.

Several comments made the point that our rural towpaths in particular should be managed with biodiversity in mind. Other comments included the benefits of removing grass clippings and the problems with pollution which could result from towpath management.

English Nature commented:

“.....it is appropriate that you have suggested that within SSSIs, mowing regimes should be discussed and agreed with the appropriate conservation organisation. Any guidance on mowing regimes should be included in any management plans or statements pertaining to a particular SSSI. Could a statement to this effect be added into the introductory section?”

We agree that where the towpath is included in the SSSI citation that the mowing regime will be included in the site management statement or plan.

We will include a statement to this effect either in the introduction or the supplementary information.

The **International Mountain Bike Association** commented:

“..... in the lightly used rural situation we would prefer a low maintenance regime which is aimed at preventing the spread of noxious weeds on to the towpath while having a minimal effect on natural vegetation and wildlife.”

The **National Boat Owners Association** commented:

“NABO is in favour of wild flowers and a variety of plant growth between the towpath and the boundary.”

The **British Canoe Union** commented:

“Elsewhere [away from locks, moorings, access and egress points] and in very general terms, we would prefer to see a less manicured and more environmentally friendly form of management for the canal verge and aquatic margin resulting from a 100 mm annual full width cut.”

The **Nottinghamshire Wildlife Trust** commented:

“It is disappointing, however, that a stronger emphasis is not placed on the importance of biodiversity conservation in the document, particularly in the context of British Waterways’s statutory and legal responsibilities in this regard.” They went on to say “General reference is made to biodiversity and knowledge of local flora and fauna in the introductory paragraphs, but this requires considerable expansion and explanation.”

The **Nottinghamshire Wildlife Trust** also commented:

“the guidance should clearly state that it will be necessary to survey for such species [protected in law] prior to work being undertaken and for vegetation management to be delayed if they are found to be present.”

English Nature commented:

“.... The corridor should be managed in a way to provide the greatest benefit to wildlife. We recognise that on the wider waterway network other users may require a more intensive mowing regime and the different regimes in the guidelines reflect this. However, within the four regimes the three options represent a range of intensities. In general Option 1 within each regime is the most intensive and least wildlife friendly. Could consideration be given to including a note discouraging option 1, except where there are overriding reasons for doing so? Perhaps further guidance could be provided on when the different options within a regime might be appropriate. Additionally, perhaps ‘Option 2’ could appear as the first in each regime as the ‘middle way’ with the two other options appearing as alternatives in either high use or low use scenarios.”

We agree that towpaths can and do make up a considerable biodiversity resource and British Waterways are very much aware of our legal conservation responsibilities. We believe that we will meet those responsibilities using these Guidelines.

We will:

- include additional information to this effect in the supplementary information.
- ensure that there is an input in the decision making process from a local ecologist.
- alter the format of the Options to bring the second Option first.

The **Nottinghamshire Wildlife Trust** also commented:

“The cutting information does not appear to state that arisings will be removed. Generally we would support removal, particularly where the banks are botanically diverse.”

We acknowledge the importance of removing arisings in some areas, but this does represent a significant cost. The decision regarding whether arisings will be removed will be taken locally but text encouraging their removal will be included in the supplementary information.

General Comments - Pollution

The **Angling Conservation Association** supported this point, stating:

“..... Any mowing of towpaths occurs in such a way to prevent significant deposition of polluting matter of whatever description into watercourses, whether this is large quantities of vegetation, or indeed, herbicidal spray.”

Arisings getting into the canal can be a problem for angling. We will include some guidance encouraging good practice in the supplementary information.

Only those herbicides cleared for use in or near water are allowed to be used on our towpaths. British Waterways have internal guidance on the safe use of herbicides

General Comments – Miscellaneous

Several miscellaneous comments, which don't fall into the above sections, have been included and responded to below.

The **Inland Waterways Amenity Advisory Council** commented:

“Regrettably the guidelines do not in the alternative regimes include boaters as users, they are only mentioned in the guideline pages.”

The Guidelines will ensure a safe environment for all users. The description of each type of towpath is based on the level of use, walkers are included as 'typical' towpath users, there is no intention to exclude any type of user.

Shelagh Rogers commented:

“Column 2 “Key areas such as around locks, mooring and access points need more management” – Please ensure that farm bridges which have no vehicular access are no longer treated as access points.”

Where bridges are not used for either vehicular or pedestrian access then they are not included as 'key areas'.
Further explanation will be included in the supplementary information.

Shelagh Rogers also commented:

“I think you should close the accountability gap between the contractors and BW management. It should not be possible for a contractor to take important decisions without consultation with BW staff. I cannot see from this document who is taking decisions.”

And went on to say:

“.....The document ought to include guidelines about the decisions the contractors ought to refer back to BW.....”

Contractors must operate within the terms of the contract and where it is necessary, for whatever reason, to operate outside of the contract British Waterways must give approval. We anticipate a better understanding by the contractors and an improved relationship, in some cases a very good relationship already exists, which will improve the standard of work undertaken.

The **Towpath Action Group** commented:

“We have been somewhat surprised ourselves at the angst that has seemingly been wrought over this issue.....” going on to say “..... from our own limited membership, towpath management is not

a major concern, though it has to be acknowledged that our members tend to be more at the ‘hardened walker’ end of the scale, who are not averse to tackling collapsed banks and driving through waist high brambles. They are generally less likely to complain about the height of grass around a bench.”

Comments raised, on a regular basis, at both national and local user group meetings suggest that towpath management is an issue, which needs to be addressed.

The **Shropshire Union Canal Society** commented:

“Have you considered the cost implications of the frequencies you propose?”

Costs are always an issue and in some cases the cost of towpath mowing will increase. It is accepted within British Waterways that an increase may be necessary if we are to maintain a safe and enjoyable environment.

The **Inland Waterways Amenity Advisory Council** also commented:

“There is no mention of cutting all vegetation to a low level on both sides of the canal in order to expose the edge at narrows for stop plank slots and bridges.”

Stop planks are generally used very infrequently at any one location. When necessary vegetation is cut to enable work to be carried out safely.

The **Inland Waterways Amenity Advisory Council** also commented:

“All the regimes except No. 1 show the canal to have a sloping edge, this is far from the case, how is the ‘margin’ managed when there is a hard edge?”

Vegetation on a hard-edged towpath can still have biodiversity value and will be managed accordingly. The diagrams are used to illustrate the mowing regime and apply irrespective of the type of edge.

The **British Marine Federation** also commented:

“It is important that they are not “cast in stone” and that the results are reviewed on a local basis with the benefit of local experience.”

Point taken. We have tried to build flexibility into the Guidelines to allow for local variation. We

want to create a high quality document from the outset but would never rule out a review if the need to do so were identified.

The **Inland Waterways Association** commented:

“As well as keeping the canal towing path clear for boaters and anglers and for walkers to walk and see the canal, keeping the towing path sufficiently mown also enables horse-boating to take place.”

Comment noted.

Comments on the Mowing Regimes

The Towpath Mowing Guidelines have been designed to give managers a range of options that could be used on any particular type of towpath. It has been important to incorporate flexibility into the document to allow managers to make appropriate local decisions, taking into account health and safety and biodiversity needs.

Mowing Regime 1

There was support for all three options but also suggestions that options one and three would be inappropriate for this towpath type. A selection of comments has been included.

The **Shropshire Union Canal Society** commented:

“Option 1 This seems to be the only acceptable option.”

The **Chesterfield Canal Trust Limited** (R. Allsop) commented:

Options 1 and 2 “Preferable to Option 3 but each section should be looked at individually”

The **Horseboating Society** supported option 1 commenting:

Option 1 “there needs to be plenty of room for users to pass each other.”;

Option 2 was not supported, comments included “If the towpath is narrowed due to higher vegetation, cyclists pass far too close to the boathorse...”

Option 3 was least favoured “Very worst option as cyclists, wheelchairs have so little room to pass.....”; “..... much of the time, one cannot see the waters edge”; “Long grass also hides dog droppings” and “Long vegetation by wall is unsuitable for town shoes. This option is unsafe in a honeypot location.”

The **Towpath Action Group** favoured Option 2 but considered all options to be “over the top”, they commented:

Option 1 “This seems way over the top for what is essentially a hard surface on which only occasional weeds are likely to invade the main walking corridor”

Options 2 and 3 “.... we feel sure that one full cut a year should be sufficient in most cases.” adding “an edge trim every 2-3 weeks does however seem excessive and we would have thought that in most cases every four weeks would be sufficient.”

Shelagh Rogers appeared to prefer Option 3 commenting:

Option 1 “Bare, boring and bleak. The introductory page said that this would be used at all locks, access points and moorings..... Surely you could leave some wild flowers on the hedge verge at moorings!”

Option 2 “Suggesting appropriate uses for each option need not tie a manager down, but might extend his/her thinking. It would also be useful when explaining your cutting decisions to members of the public if you had clear reasons for choices”

Option 3 “This one is a bit better – at least something might grow under the hedge and get as far as seeding. What kind of areas of the urban canal do you envisage being able to treat in this way?”

The **Residential Boat Owners’ Association** commented:

“Option 2 is the preferred option. the shorter vegetation would be less likely to collect unsightly litter than the “once per year” cut of option 3. however, there may be some places where it might be advantageous to leave the wall margin uncut where this could soften the appearance of the backing wall/fence.”

The **Grand Union South Angling Consultative** preferred Option 3 and made the following comments:

Option 2 “Wall margin cutting gives rise to the problem of litter some of which is paper and plastic which will be cut up by machines and become more unsightly. More solid litter will damage machines.”

Option 3 “Am in favour of this option as it leaves a natural uncut edge for most of the year.”

There was support for all three Options. Generally the boating community favoured Option 1, whilst the more conservation orientated organisations and individuals favoured Option 3, with Option 2 getting mixed support. This suggests that all three Options have a place in the final document, whichever Option is ultimately implemented will be the decision of the local management team. The key is to give that the team sufficient flexibility in order that they can select the most appropriate approach. The input of a health and safety advisor and an ecologist will be essential to ensure that a high standard of management is delivered.

Mowing Regime 2

There was support for all three options but also suggestions that options one and three would be inappropriate for this towpath type. A selection of comments has been included.

The **Chesterfield Canal Trust Limited** (R. Allsop) commented:

Option 1 “Preferable.”

Option 2 “Acceptable.”

Option 3 “No”

The **Nottinghamshire Wildlife Trust** preferred Option 3, commenting:

Options 1 and 2 “We would hope that this would be used only in extremely limited circumstances.....”

Option 3 “..... it would be improved if:

- The minimum cutting height at the waters edge and by the hedge was raised to at least 200 mm
- The extreme margins were cut every 2 years rather than annually.

The above would provide a more sustainable, less ephemeral habitat.....”

The **British Marine Federation** supported Option 1 and commented:

Options 1, 2 and 3 “There is concern that this specification only requires the vegetation close to the water’s edge to be cut to 100 mm once per year”

Option 1 “The area is frequently used and justifies the cut to 50 mm every 3-4 weeks 0.5metres either side of the towpath and around the benches.”

Option 2 “The concept in Option 1 of cutting back the hedgerow to allow grassland to re-establish between the towpath and the hedge, if required makes more sense.”

Option 3 “The 6 – 8 week would not be sufficient and 100 mm cut is too high for frequently used towpath margins.”

The **Inland Waterways Amenity Advisory Council** suggested that Option 1 was most appropriate and commented:

Option 1 “This option is the most appropriate but not entirely satisfactory as if the edge is left for a whole year between cuts it will grow too long, becoming in most cases a bed of nettles and dangerous for boaters jumping off their boats. There seems to be no reason why the cut to the rear of the path should not be to the 50 mm as in regime 1.” they also commented: “The towpath edge is more likely to be a hard edge than as shown and should be shown as an alternative for towpaths in these areas.”

Options 2 and 3 “The vegetation around the seat will be far too long if it is only cut every six to eight weeks.

The vegetation levels between the towpath and the water’s edge are not acceptable.”

Option 3 “100 mm minimum cut length is rather long and cutting every six to eight weeks is too long a period, in particular when starting from 100 mm minimum.”

The **Grand Union South Angling Consultative** preferred Option 3 and made the following comments:

Option 3 “The most favoured profile for anglers and will reduce wear and tear on natural surface.”

There was support for all three Options. Generally the boating community favoured Option 1, whilst the conservation orientated organisations and individuals favoured Option 3 with Option 2 getting mixed support.

All three Options will be included in the final document, whichever Option is ultimately implemented will be the decision of the local management team. The key is to give that the team sufficient variation in order that they can select the most appropriate approach. The input of a health and safety advisor and an ecologist will be essential to ensure that a high standard of management is delivered.

Mowing Regime 3

There was support for all three options but also suggestions that options one and three would be inappropriate for this towpath type. A selection of comments has been included.

The **Shropshire Union Canal Society** commented:

Option 1 “This is probably the most satisfactory of the options although we would prefer to see a maximum length of say 200 mm which can be cut to 100 mm. Alternatively why not a full width cut twice a year, subject to biodiversity restraints.”

The **Aire and Calder Cruising Club** commented:

Option 2 “.....more acceptable with the suggestion that the cut should be completed every 3-4 weeks, this is due to the rapid growth of the canal vegetation (which is mainly nettles).....”

The **National Association of Boat Owners** preferred a modified version of Option 2 with an extra full-width cut, commenting:

Option 2 “NABO would suggest that short lengths of aquatic margin could be allowed to grow naturally to allow biodiversity provided no growth exceeds 600 mm, alternative with 100 mm mowed lengths to allow safe mooring.”

Shelagh Rogers appeared to prefer Option 3 commenting:

Option 1 “I am appalled by this regime. The description given above, “rural locations, moderately used by recreational walkers” means that most of our canal villages are likely to be treated under this regime, options 1 and 2. All our village canal; walks will be deprived of their wild flowers.”

Option 2 “I cannot see why you need a second option which is nearly as severe as the first one” going on to say “I think the whole of Mowing Regime 3 should be reconsidered”

Option 3 “If the surface is hard as shown in the picture, then a single annual cut would work well, but if it was a grassy path, as suggested in the inscription, I think that not running a mower along the actual walking area will lead to lots of complaints. I don't think a canal manager is likely to choose this option, for that reason....”

The **Residential Boat Owners' Association** commented:

“Option 3 is the preferred option. Our preference in many rural areas is for the canal verge to be allowed to grow, so that grasses, sedges, rushes, irises, etc. can be enjoyed by all users of our waterways.....”

The **British Marine Federation** supported Option 1 and commented:

Options 1, 2 and 3 “There is concern that this specification only requires the aquatic margin vegetation close to the water's edge to be cut once per year.”

Option 1 “For this type of use, the grass path does need cutting to 50 mm every 6-8 weeks. the full width cut is needed at least once per year.”

Option 2 “the 100 mm cut for the path once per year for moderate usage would not be enough.”

Option 3 “An all over cut once per year is not sufficient.”

There was support for all three Options. Again, generally the boating community favoured Option 1, whilst the conservation orientated organisations and individuals favoured Option 3 with Option 2 getting mixed support. The input of a health and safety advisor and an ecologist will be essential to ensure that a high standard of management is delivered.

Comments about Mowing Regimes Three and Four suggest that there are too many options for rural towpaths. This regime will be merged with Mowing Regime Four. Comments will be considered and where appropriate will be incorporated. The revised Mowing Regime will be of the same format as One and Two with three Options.

Mowing Regime 4

There was a general feeling that a fourth mowing regime is not required and that it could be merged with Mowing Regime Three.

The **Shropshire Union Canal Society** commented:

“Do we really need this option? Surely it can be catered for by an amalgamation of 3 and 4. In rural locations the mowing should not be dictated by the number of walkers.”

The **Horseboating Society** expressed concern about long vegetation wetting clothing in all three options in Mowing Regime 4 but favoured Option 1 and commented:

Option 1 “Aquatic margin should not be allowed to grow too tall if it obscures the sightline between boat and boathorse. Towline must not drag through vegetation. Lovely grass towpath, soft to feet and hooves.”

Options 2 and 3 there was concern about the vegetation hiding anglers and the growth of “nettles, thistles, brambles, trees.....”. Both of these options were described as “unpleasant.” and “Not a historic/heritage environment for the canal system built for horseboating.”

Option 3 “Dangerous for horseboating crew who can get pulled off the boat while trying to pull the towline through trees.....”

The **Towpath Action Group** commented:

Option 1 “..... would prefer delineation of the towpath proper, so option 1 less attractive

Option 2 “..... we would prefer a system which treats the walking surface more regularly. Option 2 is the only one shown that does so....” adding “As with other regimes we would prefer the full-width cut to be specified as “at least once per year”.”

Option 3 “Inadequate and absolute, neither of which makes it attractive.”

The **Nottinghamshire Wildlife Trust** preferred Option 3, commenting:

Options 1 and 2 “This is not acceptable in a rural location, the management is too intense and frequent; any existing biodiversity would be severely compromised and there would be no opportunity for biodiversity enhancement.”

The **Inland Waterways Amenity Advisory Council** did not support any of the options and commented:

Option 1 “How does BW know that serious walkers having boots etc will be the only people wishing to use the towpath? Surely this is discrimination against those not familiar with the standards and particular towpaths. there must be an assumption that people should be able to walk all towpaths without the need for special clothing” they also made the point “What is to be cut every 6-8 weeks, it is not shown? If it is only the towpath the option is not acceptable.”

Options 1 and 2 “The vegetation levels between the towpath and the water’s edge are not acceptable.”

Option 2 “Not acceptable as vegetation will [?] before too long.”

Option 3 “This option is not acceptable as soon after cutting the whole path will be too long to walk or for access for boaters from the canal.”

The **Grand Union South Angling Consultative** preferred Option 1 commenting”

Option 1 “Preferred but with a managed hedge.”

There was support for all three Options, but less support for Option 3 than in the other Regimes. This Regime is going to be merged with Mowing Regime Three taking comments from this consultation into account.

Miscellaneous comments

Many comments submitted in response to this consultation were not directly relevant to the Guidelines. In many cases, these have been included within the main document. Other comments have been included in this section, these are not appropriate for inclusion in the revised guidelines but have been noted by British Waterways.

The **Residential Boat Owners’ Association** commented:

“Whilst we appreciate the need for hard surfacing, we do not favour the use of a very fine material such as ash, as it becomes engrained in ropes when mooring, making them rough to handle and reducing their life.”

The **Nottinghamshire Wildlife Trust** in reference to Mowing Regime 3 Option 3 and Mowing Regime 4 Option 3, commented:

“The hedgerow should be managed by cutting no more frequently than every two years in late Winter and preferable laid every 10-20 years, with hedgerow trees left to grow to maturity”

The **Barge Association** commented:

“Characterising the required guidelines as primarily concerning mowing is unfortunate, as they should also involve control of overhanging trees, bushes, etc. It might be better to name them “Vegetation control guidelines”.”

The **National Association of Boat Owners** commented:

“Litter/dog faeces bins should be provided close to benches.”

The **Barge Association** commented:

“it should be possible at all locations to tow craft from the path in case of mechanical breakdown or if a craft is dumb or horse drawn”

The **Grand Union South Angling Consultative** commented:

“There are places where the towpath profile is substandard ie where the towpath and bank (Fig 2) edge is lower than the shuttered edge.”

APPENDIX 1 - LIST OF RESPONDEES & SUMMARY OF RESPONSES

List of respondees

The following is a list of organisations and individuals who responded to the consultation. The acronyms are for reference in the table include over the page.

	Organisation	Acronym	Response received
1	Anglers Conservation Association	ACA	6 Dec 04
2	Grand Union South Angling Consultative	GUSAC	1 Dec 04
3	British Canoe Union	BCU	14 Feb 05
4	International Mountain Bike Association	IMBA	18 Jan 05
5	Horse Boating Society	HBS	4 Feb 05
6	Steam Boat Association	SBA	3 Feb 05
7	Towpath Action Group	TAG	26 Jan 05
8	Aire & Calder Cruising Club	ACCC	25 Jan 05
9	Chesterfield Canal Trust Ltd (R. Allsop)	CCTL 1	8 Feb 05
10	Chesterfield Canal Trust Ltd (D. Blackburn)	CCTL 2	8 Feb 05
11	Macclesfield Canal Society	MCS	20 Jan 05
12	Shropshire Union Canal Society	SUCS	17 Jan 05
13	English Nature	EN	14 Feb 05
14	Nottinghamshire Wildlife Trust	NWT	17 Feb 05
15	Shelagh Rogers canalside resident	SR	11 Dec 04
16	Inland Waterways Amenity Advisory Council	IWAAC	1 Feb 05
17	Inland Waterways Association	IWA	14 Feb 05
18	Margaret Fletcher (NW Region IWA)	MF	20 Jan 05
19	National Association of Boat Owners	NABO	14 Feb 05
20	Residential Boat Owners Association	RBOA	17 Feb 05
21	Barge Association	BA	6 Dec 04
22	British Marine Federation	BMF	14 Feb 05
23	Wyvern Shipping Co. Ltd	WSCL	21 Jan 05
24	Waterways World	WW	16 Dec 04

Summary of responses

	Organisation	*Question 1	*Question 2	*Question 2a	REGIME 1			REGIME 2			REGIME 3			REGIME 4		
					Option 1	Option 2	Option 3	Option 1	Option 2	Option 3	Option 1	Option 2	Option 3	Option 1	Option 2	Option 3
1	ACA															
2	GUSAC	Yes					Preferred					Preferred		Preferred		
3	BCU				Preferred	Preferred										
4	IMBA	Yes	Yes	No												
5	HBS				Preferred			Preferred			Preferred			Acceptable		
6	SBA	Yes	Yes	No												
7	TAG	Yes	Yes	No		Preferred		Preferred			Preferred				Preferred	
8	ACCC	Yes		No		Preferred						Preferred				
9	CCTL 1	Yes	No	No	Preferred	Preferred		Preferred	Acceptable		Preferred	Preferred		Acceptable	Acceptable	
10	CCTL 2	Yes	Yes	No	Preferred	Preferred			Preferred		Preferred	Preferred				
11	MCS															
12	SUCS	Yes	Yes	No	Preferred			Preferred								
13	EN	Yes														
14	NWT	Yes	Yes	No			Preferred			Preferred			Preferred			Preferred
15	SR	No	No				Preferred					Preferred				Preferred
16	IWAAC	Yes	Yes	No	Preferred	Acceptable		Preferred			Preferred					
17	IWA	Yes														
18	MF															
19	NABO				Preferred				Preferred			Preferred			Acceptable	
20	RBOA					Preferred		Preferred					Preferred		Preferred	
21	BA															
22	BMF	Yes	Yes	No	Preferred	Acceptable		Preferred			Preferred			Preferred		
23	WSCL															
24	WW															

NOTE 1 –The responses for the General Comments section were so varied that a summary was not possible, please refer to main document.

***QUESTION 1** - Do you agree that this approach will improve local management?

***QUESTION 2** - Do you agree that the guidelines give enough scope to allow the majority of towpath mowing to be specified against the options available?

***QUESTION 2a** - Are more options required?

Yes
 No
 Preferred
 Acceptable