



Sian Barnes
Definitive Map and Commons Registration Officer
Countryside Services
Powys County Council

17 February 2019

Dear Sian,

Upper Glas-y-Bont Survey

Thank you for the opportunity to contribute our views to your proposed 'management scheme' for canoe launching at Upper Glas-y-Bont. We have chosen to respond by letter rather than your online survey, as we do not wish our views to remain anonymous to you.

As you are aware, the South Wales Outdoor Activity Providers Group (SWOAPG) has consulted its members before submitting this collective response, although we hope that many of them will also submit separately their individual views to you.

We understand that your aim is to reduce the impact of canoeing activity on fishing during peak periods (mostly summer weekends), so we have addressed below each of the questions posed in your survey in this context.

Please can you firstly state what your interest is in responding to this survey?

Other: we represent the interests of a wide range of outdoor activity providers in the South Wales area, comprising commercial operators, educational providers and voluntary groups, many of whom are regular and frequent users of the stretch of river from Glasbury to Hay.

There are now 11 proposals being considered. We had seven to start and feedback given by operators and those already involved in the voluntary Code of Conduct have fed back another four. Please could you consider each one and state whether you think they could work or not. With regard to those options you felt *could or would work*, it would be helpful to know your reasons and what you feel the key benefits of these options would be for all users. Similarly, for those that you ruled out or *where you think there could be some issues with those you ruled in*, could you share your reasons and thoughts about any problems, so we get a better understanding.

Option 1 - Restrict the times or days when commercial canoe companies operate/use the river

We don't think this option would work and would rule it out.

This would only reduce the impact on fishing significantly if it included weekend restrictions (e.g. commercial canoeing on Saturday or Sunday only). This would have a hugely detrimental effect on tourism income and on the potential for public wellbeing (effectively halving opportunities at peak times), out of all proportion to the impact caused to fishing.

Option 2 - Provide guided trips for those wishing to hire canoes to reduce numbers on the river

We don't think this option would work and would rule it out.

It is not clear exactly what you mean by this. We support the principle of operators providing guided trips, but we assume the implication here is to restrict the number of *unguided* trips. You have previously described this as "allowing launching for guided groups only on certain days of the week but allow unguided groups on other days – This would apply to commercial operators only" – which we have interpreted as meaning that unguided groups would be restricted to certain days, while guided groups would not be restricted at all. This would raise the same issues as Option 1.

Option 3 - Install water indicators so canoeing only takes place when water levels are at a sufficient level to reduce issues for those fishing the river (e.g. taking rods in and out of the water can be an issue when water levels are low)

We don't think this option would work and would rule it out.

It is not clear that this would address the issue at hand, since water level is not correlated directly with peak periods – and it would have a disproportionate effect since it would impact all canoeing activity and not just 'commercial' trips. While anglers may in theory have more difficulties removing their rods in low water, we suspect they are also less likely to be trying to fish then anyway. This could also displace traffic downstream (Hay to Whitney). We believe that environmental level restrictions would be acceptable to all canoeists, on the advice of NRW, but summer 2018 has already shown that these would be set at a level much lower than that required to reduce any impact on fishing.

Option 4 - Introduce a commercial canoeing quota

We don't think this option would work and would rule it out.

You have previously described this as “to set a quota for commercial usage each day, e.g. through having a set number of tickets per day. This would apply to commercial operators only”. We believe that this would be impractical to administer and enforce, would likely discriminate against some operators and might simply displace traffic across a longer 'peak' period or to other launch points or river sections

Option 5 - Set up a financially funded scheme which allows for monitoring and enforcement of the Code of Conduct

We think this option *could* work.

However, it is not an option we are keen on, since charging for access would be an unwelcome precedent and might simply displace traffic to other launch points or river sections. If charges were to be introduced, they should be reasonable, transparent (clear where the money goes) and used only for direct support of the scheme (facilities and enforcement). We also suggest that charges should be considered for all users, not just commercial operators. A 'passport scheme' (akin to the Brecon Beacons Reservoir Passport Scheme, which we were instrumental in setting up with BBNPA and Dŵr Cymru Welsh Water) might be more appropriate / acceptable to commercial operators than a 'pay-per-use' scheme.

Option 6 - Increase the visibility of anglers (e.g. by flags on trees) to canoeists, to allow more time for canoeists to avoid them and so reduce possible disturbance.

We think this option *would* work.

We believe that this option – combined with effective briefing of clients by operators – could reduce significantly the potential for conflict by enabling canoeists much more often to manoeuvre away from anglers, avoiding the need for them to remove their rods. 'Flags' would need to be of consistent design / colour and positioning for this to work effectively.

Option 7 - Erect signage in sensitive areas on the river, so that canoeists can more easily identify those locations where fishing takes place and act accordingly (e.g. “please pass quietly for the next 500m”)

We think this option *could* work.

While we would not wish to see the river looking like a high street, a minimal number of sensitively positioned signs / position markers – again combined with effective briefing – could assist unguided groups in knowing where they are on the river and where they need to take particular care to avoid conflicting with other users.

Option 8 - Establish group size restrictions – these could restrict the size and number of groups that any one commercial company may send down the river on any one day.

We think this option *could* work.

We understand that conflict may often result from large, uncontrolled groups and we believe this could be reduced by requiring *all* groups of 20+ to be guided (by commercial staff or the group's own suitably qualified leaders) and by limiting individual operators (commercial or otherwise) to a maximum total of 40 boats per day. We also recommend that existing guidelines used by some operators to manage the behaviour of groups should be shared and encouraged as 'best practice' where appropriate.

Option 9 - Reduce 'Launching Window' times so that launching for commercial operators would only take place between certain times on peak days, thus allowing canoe traffic to have cleared the river for other users by mid-afternoon.

We think this option *could* work.

We suggest that a reduced 'window' for commercial operators travelling downstream from Glasbury between 9.30am and 2.30pm (or 10am-3pm if an earlier start was not permissible) during the coarse fishing season (April-September) could reduce the scope for conflict arising between the two activities (while retaining the Hay-by-5pm requirement and the option for 10am-4pm launching for groups remaining at Glas-y-Bont).

Option 10 - Reduce 'Launching Window' times for unguided groups only on peak days. This would apply to groups launched by commercial operators only.

We don't think this option would work and would rule it out.

We see no reason to limit a reduced launch window to unguided groups only.

Option 11 - Set up a financial contribution to an organisation or activity (e.g. charity) that is felt to benefit the river as a whole, rather than an individual or business, or even a completely different nominated charity. Contributions could be required from commercial operators and invited from others.

We think this option *could* work.

However, the same comments apply to this as to option 5: this is not an option we are keen on, since charging for access would be an unwelcome precedent and might simply displace traffic to other launch points or river sections. If charges were to be introduced, they should be reasonable, transparent (clear where the money goes) and used only for direct support of the scheme (facilities and enforcement). We would therefore prefer any funding to go to the local community than to an 'anonymous charity'. A 'passport scheme' (akin to the Brecon Beacons Reservoir Passport Scheme) might be more appropriate / acceptable to commercial operators than a 'pay-per-use' scheme.

Continued...

Considering your answers to the previous few questions could you now rank the options in order of preference with your first choice being ranked number 1 and so on and so forth.

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| 1 | Option 6 - Increasing the visibility of anglers (e.g. by flags on trees) to canoeists, to allow more time for canoeists to avoid them and so reduce possible disturbance. |
| 2 | Option 7 - Signage in sensitive areas on the river, so that canoeists can more easily identify those locations and act accordingly (e.g. "please pass quietly for the next 500m") |
| 3 | Option 8 - Group Size Restrictions – these could restrict the size and number of groups that any one commercial company may put down the river on any one day. |
| 4 | Option 9 - Reduced 'Launching Windows' times so that launching for commercial operators would only take place between certain times on peak days, to allow this canoe traffic to have cleared the river for other users by mid-afternoon. |
| 5 | Option 5 - Set up a financially funded scheme which allows for monitoring and enforcement of the Code of Conduct |
| 6 | Option 11 - Set up a financial contribution to an organisation or activity (e.g. charity) that is felt to benefit the river as a whole, rather than an individual or business, or even a completely different nominated charity. Contributions could be required from commercial operators and invited from others. |
| N/A | Option 1 - Restrict the times or days when commercial canoe companies operate/use the river |
| N/A | Option 2 - Provide guided trips for those wishing to hire canoes to reduce numbers on the river |
| N/A | Option 3 - Install water indicators so canoeing only takes place when water levels are at a sufficient level to reduce issues for those fishing the river (e.g. taking rods in and out of the water can be an issue when water levels are low) |
| N/A | Option 4 - Introducing a commercial canoeing quota |
| N/A | Option 10 - Reduced 'Launching Window' for unguided groups only on peak days. This would apply to groups launched by commercial operators only. |

If you have an alternative proposal that you would like to put forward, please use this space to provide details.

Taking all these comments into account, we believe that a 'package' of measures along the following lines would be sufficient to address the concerns of anglers while being acceptable to providers:

- a) increasing the visibility of anglers to canoeists (e.g. by 'flags' of consistent design / colour and positioning), to allow more time for canoeists to avoid them and so reduce possible disturbance;
- b) a minimal number of sensitively positioned signs / position to assist unguided groups in knowing where they are on the river and where they need to take particular care to avoid conflicting with other users;
- c) effective briefing of clients by operators on behaviours and measures needed to minimise conflict;
- d) sharing and encouraging 'best practice' and guidelines for managing the behaviour of groups (this could, for example, be achieved through annual SWOAPG workshops); and
- e) requiring all groups of 20+ to be guided (by commercial staff or the group's own suitably qualified leaders);
- f) limiting individual operators (commercial or otherwise) to a maximum total of 40 boats per day (with rules like those used in the SWOAPG gorge-walking concordat to prevent 'subcontracting' from circumventing this restriction);
- g) a reduced 'window' for commercial operators travelling downstream from Glasbury between 9.30am and 2.30pm (or 10am-3pm if an earlier start was not permissible) during the coarse fishing season (April-September), while retaining the Hay-by-5pm requirement and the option for 10am-4pm launching for groups remaining at Glas-y-Bont;

- h) charging for access from Glas-y-Bont only if this was demonstrated to be the only practicable mechanism for managing these arrangements, in which case any charges should be reasonable, transparent (clear where the money goes) and used only for direct support of the scheme (facilities and enforcement, preferably within the local community) – where charges should be considered for all users, not just commercial operators; and where a ‘passport scheme’ (akin to the Brecon Beacons Reservoir Passport Scheme) should be investigated as an option to a ‘pay-per-use’ scheme.

If you have any other comments or concerns that you'd like to raise about any of the options, please use this space to give details including the Option Number and your view. Thank you.

We have no further comments to make – and have not included answers to your demographic questions since we are responding as an organisation rather than an individual.

We trust that you will find our views helpful as you continue your deliberations on this sensitive subject; and we would welcome the opportunity to continue to work closely with you as you plan and implement the details of any new scheme.

A handwritten signature in black ink that reads "Steve". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Steve Rayner OBE
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