

CYNGOR SIR CEREDIGION COUNTY COUNCIL

Report to: Cabinet

Date of meeting: 20 February 2024

Title: Ceredigion Harbours Management Policy Review

Purpose of the report: To update Cabinet on the outcome of the Consultation process, and to seek approval to adopt the revised Ceredigion Harbours Management Policy

For: Decision

Cabinet Portfolio and Cabinet Member:

Cllr. Keith Henson, Cabinet Member for Highways and Environmental Services and Carbon Management

Introduction

The current Ceredigion Harbours Management Policy was approved by the Council on 19 October 2010 and has provided a clear, useful, and appropriate framework for the delivery and management of activities at the Council's Harbours at Aberaeron, Aberystwyth and New Quay.

It has been considered timely and necessary to review the current policy to recognise and reflect that the Harbours are multi-use, shared use facilities and the Council's overall intention is to strengthen the Policy so these can continue to be managed in a fair, transparent, and balanced way for the benefit of all stakeholders.

A draft updated Policy has been prepared (Appendix A), consulted upon, and reported to the Thriving Communities Overview and Scrutiny Committee at its meeting on 18 December 2023. A copy of the report presented is included as a background paper.

At its meeting on 18 December 2023, the Thriving Communities Overview and Scrutiny Committee recommended that the revised Ceredigion Harbour Management Policy is approved for subsequent implementation subject to, an amendment that all commercial mooring holders (to include commercial fishing and commercial passenger moorings) are permitted to sell their vessel with the option to transfer the mooring currently allocated to it, should it be necessary. This is in addition to the inheritance arrangements that are already afforded to Commercial moorings in the draft updated policy.

Should Cabinet be minded to accept the Scrutiny Committee's recommendation, then Officers would suggest that the following wording on pages 8 and 14 of the draft updated policy are amended in the final version of the policy as follows:

Page 8:

6.2 Both types of commercial moorings, once allocated, are not transferable.

Page 14:

Mooring and Facility Transfers

18.1 There are no transfer rights in relation to moorings or facilities within Ceredigion managed Harbours.

To read as:

Page 8:

6.2 Both types of Commercial moorings, once allocated are not transferable to a third party without the Council's prior written consent. Any transfers will be in accordance with 18.2 of this policy.

Page 14:

Mooring and Facility Transfers

18.1 There are no transfer rights in relation to Leisure Moorings or facilities within Ceredigion managed Harbours.

18.2 Transfers related to Commercial moorings are subject to the Council's prior written consent. Any consent given will be subject to the vessel currently allocated to the mooring remaining on the mooring following completion of the transfer.

Where consent is granted, a mooring transfer fee will be charged by the Council to the applicant taking on the mooring (please see current 'Fees and Charges'). In addition to the transfer fee, the full mooring fees applicable to the vessel for the season will also apply (please see current 'Fees and Charges'). Completion of the transfer will only take place on receipt of payment of these fees in full.

Wellbeing of Future Generations:

Has an Integrated Impact Assessment been completed? If, not, please state why.

Provided as Appendix B.

Summary of Integrated Impact Assessment:

- Long term:** The proposed Policy balances the short- and longer-term requirements of stakeholders.
- Collaboration:** The Harbour Service engages and collaborates with stakeholders in various ways as set out in the response to the consultation feedback.
- Involvement:** The Harbour Service engages with and involves stakeholders in various ways as set out in the response to the consultation feedback.
- Prevention:** The development of a clear Policy prevents risks that would otherwise arise through providing a clear, transparent and fair framework for the management of the harbours.
- Integration:** The Harbour Service is integrated as part of the County Council. This ensures that corporate systems, policies and protocols are applied.

Recommendation(s):

1. To note the content of the report and feedback from the Thriving Communities Overview and Scrutiny Committee.
2. To approve the Ceredigion Harbour Management Policy (Appendix A), subject to the following changes, as set out in the report:

Page 8:

“6.2 Both types of Commercial moorings, once allocated are not transferable to a third party without the Council’s prior written consent. Any transfers will be in accordance with 18.2 of this policy.”

Page 14:

“Mooring and Facility Transfers

18.1 There are no transfer rights in relation to Leisure Moorings or facilities within Ceredigion managed Harbours.

18.2 Transfers related to Commercial moorings are subject to the Council’s prior written consent. Any consent given will be subject to the vessel currently allocated to the mooring remaining on the mooring following completion of the transfer.

Where consent is granted, a mooring transfer fee will be charged by the Council to the applicant taking on the mooring (please see current ‘Fees and Charges’). In addition to the transfer fee, the full mooring fees applicable to the vessel for the season will also apply (please see current ‘Fees and Charges’). Completion of the transfer will only take place on receipt of payment of these fees in full.”

Reasons for decision:

To adopt and implement a Harbour Management Policy which supports and facilitates the fair, consistent and transparent management of the harbours for the benefit of all harbour users.

Overview and Scrutiny:

Thriving Communities Overview and Scrutiny

Policy Framework:

Not applicable

Corporate Well-being Objectives:

Creating sustainable, green and well-connected communities

Finance and Procurement implications:

N/A

Legal Implications:

N/A

Staffing implications:

N/A

Property / asset implications:

N/A

Risk(s):

N/A

Statutory Powers:

The Council's powers as a Harbour Authority and under relevant related Harbour Acts

Background Papers:

Thriving Communities Overview and Scrutiny Report 18.12.23

Appendices:

Appendix A – Ceredigion Harbours Management Policy

Appendix B – Integrated Impact Assessment (IIA)

Corporate Lead Officer:

Rhodri Llwyd, Corporate Lead Officer: Highways and Environmental Services

Reporting Officer:

Katy Spain / Owen Morgan

Date:

28 January 2024

Agenda Item 3

CYNGOR SIR CEREDIGION COUNTY COUNCIL

Report to: Thriving Communities Scrutiny and Overview Committee

Date of meeting: 18 December 2023

Title: Ceredigion Harbours Management Policy Review: Consultation

Purpose of the report: Update the Committee Members with on the outcome of the Consultation process

Reason Scrutiny have requested the information: Policy review

1.0 Background

The current Ceredigion Harbours Management Policy was approved by the Council on 19 October 2010.

The Policy has provided a clear, useful and appropriate framework for the delivery and management of activities at the Council's Harbours at Aberaeron, Aberystwyth and New Quay. It is, however, now considered appropriate and timely to review and update it to reflect relevant changes since the Policy's implementation and, to address any gaps between the Policy and current Harbour related activities which have been identified and/or arisen from experience.

The proposed changes build on the current Policy which has served stakeholders well for over a decade. The changes recognise and reflect that the Harbours are multi-use, shared use facilities and the Council's overall intention is to strengthen the Policy so these can continue to be managed in a fair, transparent and balanced way for the benefit of all stakeholders.

2.0 Current Situation

A draft updated Policy has been prepared and, as part of the policy change process, a consultation has been undertaken providing stakeholders with an opportunity to provide their feedback.

2.1 Consultation Process

The consultation was launched on the 20 September 2023 and was open until 20 October 2023.

Further details on the process can be found at. [Ceredigion Harbours Management Policy Public - Ceredigion County Council](#) and is provided as **Appendix 1** for ease of reference.

In total 108 (105 on-line and 3 hard/paper copies) responses were received via the prescribed consultation process.

In addition to the feedback received through the prescribed process other feedback was also received and noted.

To provide some context the following sets out the number and type of mooring holder at the three harbours:

Aberystwyth

Leisure Mooring Holders: 72

Commercial Fishing Mooring Holders: 4

Total: 77

Aberaeron

Leisure Mooring Holders: 88

Commercial Passenger Mooring Holders: 3

Total: 91

New Quay

Leisure Mooring Holders: 168

Commercial Passenger Mooring Holders: 4

Commercial Fishing Mooring Holders: 6

84 kayak rack holders

Total: 264

Grand total: 432

2.2 Consultation Feedback

- i. Tables summarising the quantitative responses received from stakeholders (on-line and hard/paper copy) is provided as **Appendix 2**.
- ii. The qualitative feedback received from stakeholders (on-line and hard/paper copy) is provided in **Attachment 1**.
- iii. Written correspondence, provided outside the prescribed consultation process, is provided as **Attachment 2**.
- iv. The Harbour Service's responses to the qualitative feedback is provided as **Appendix 3**.

2.3 Summary of Feedback

As can be seen some of the feedback received was specific or personal in its nature while other feedback was more general.

While in the overall context of the Policy the proposed changes can be considered as tweaks rather than transformational the feedback has, in the main, focused on three main issues.

The main general issues, relevant to the Policy, which generated feedback were relating to the following proposals (and the rationale behind these):

- To remove parking permits from the mooring offering (deemed to be an inappropriate and disproportionate benefit)
- To remove the transfer of mooring arrangements

(to increase transparency, fairness and improve opportunities to access a mooring)

- To remove the inheritance of mooring arrangements (to increase opportunities to access a mooring)

Other feedback was received in respect of issues such as the fees and charges with regards how these are set and administered. While this is not directly relevant to the review of the Harbour Management Policy, as they form part of wider processes and systems applying to all Council services, responses have been provided explaining this.

2.4 Amendments further to the consultation feedback

Further to the feedback received through the consultation process amendments have been incorporated into the latest draft of the new Policy. This version is provided as **Attachment 3**. The changes are provided as 'track changes' for ease of reference,

3.0 Conclusion

The feedback received has been noted and considered. Some of this relates to what can be considered as day-to-day management issues and will and should rightly be dealt with as such. Other feedback represents personal views or opinions which have also been noted.

As with any consultation related to any change in policy it will not be possible to respond positively to all the feedback, suggestions and comments received. Indeed, there can be direct conflict between the aims, aspirations and expectations of the different stakeholders.

The intention is to have an overarching policy framework which supports and facilitates the fair, consistent and transparent management of the harbours, recognising the variety of stakeholders that make use of the facilities. It is accepted that not everyone will approve or agree with the detail and implications. However, these are Council operated facilities and, ultimately, it is for the Council to determine how they, and the activities undertaken therein, are best managed.

Wellbeing of Future Generations:

Has an Integrated Impact Assessment been completed? If, not, please state why. Provided as **Attachment 4**.

Summary of Integrated Impact Assessment:

Long term: The proposed Policy balances the short- and longer-term requirements of stakeholders.

Collaboration: The Harbour Service engages and collaborates with stakeholders in various ways as set out in the response to the consultation feedback.

Involvement: The Harbour Service engages with and involves stakeholders in various ways as set out in the response to the consultation feedback.

Prevention: The development of a clear Policy prevents risks that would otherwise arise through providing a clear, transparent and fair framework for the management of the harbours.

Integration: The Harbour Service is integrated as part of the County Council. This ensures that corporate systems, policies and protocols are applied.

Recommendation(s):

That the Committee

- i. notes the content of the report.**
- ii. recommends to Cabinet that the latest version of the draft Ceredigion Harbour Management Policy, incorporating the amendments included following the consultation process, is approved for subsequent implementation.**

Reasons for decision:

To adopt an implement a Harbour Management Policy which supports and facilitates the fair, consistent and transparent management of the harbours for the benefit of all harbour users.

Contact Name: Gerwyn Jones, Katy Spain, Owen Morgan

Designation: Corporate Manager Environmental Services, Service Manager Transport Services, Ceredigion Harbour Manager

Date of Report: 01 December 2023

**Acronyms:
Not applicable**

Appendix 1

Ceredigion Harbours Management Policy Public Consultation

The Harbours are much loved and valued assets, from a range of commercial and leisure perspectives and which have an important role in contributing towards the Council's Corporate Strategy Objective of:

Boosting the economy, supporting businesses and enabling employment

The management of the Harbours is undertaken by the Harbour Services Team. The Ceredigion Harbour Management Policy provides the strategic framework that underpins and informs how we fulfil our obligations as a Harbour Authority and how we deliver the Service. The current Policy was approved and adopted by the Council on the 19 October 2010 and, as such, a review is now timely.

Your views are important to us, so please take the opportunity to have your say on the draft Policy by responding to the questions posed in this consultation. This will ensure that your response can be effectively and efficiently collated and, ensure that it is considered as part of the consultation response evaluation.



Councillor Keith Henson

Cabinet Member for Highways and Environmental Services and Carbon Management

1) Why are we reviewing and updating the Ceredigion Harbours Management Policy?

The current Policy was approved and adopted by the Council on the 19 October 2010 and, as such, a review is now timely.

In reviewing the Policy, we have looked to retain the elements that have worked well over the years, whilst proposing to change and update some aspects to reflect experience and feedback. This includes addressing any gaps between the Policy and current Harbour related activities which have been identified and/or arisen from experience.

The proposed changes can be considered as tweaks rather than transformational, thus building on the Policy which has served stakeholders well for over a decade. The overall

Policy and, the proposed changes, recognise and reflect that the Harbours are multi-use, shared use facilities and the Council's overall intention is to strengthen the Policy so these can continue to be managed in a fair, transparent and balanced way for the benefit of all stakeholders.

2) Invited Participants and Organisations

Any stakeholders with an interest in the Harbours are invited to participate in the consultation.

3) Where can you find the current and proposed Ceredigion Harbour Management Policies?

The current Ceredigion Harbours Management Policy can be found by following the below link:

[Ceredigion Harbours Management Policy](#)

The proposed Ceredigion Harbours Management Policy can be found by following the below link:

[Ceredigion Harbours Management Policy](#)

Alternatively paper copies of these documents can be viewed/obtained at the locations referred to below.

4) Consultation Arrangements

This consultation has now closed.

The consultation survey can be accessed via the following link:

[Ceredigion Harbour Management Policy Review Consultation Survey](#)

Completing the survey via this link will enable us to efficiently collate and review the responses however, if you are unable to do so, alternatively you may complete the survey found in Appendix 1 and return it to Harbours Management Policy Consultation, Ceredigion County Council, Canolfan Rheidol, Rhodfa Padarn, Llanbadarn Fawr, Aberystwyth, Ceredigion, SY23 3UE.

Alternatively you can obtain, complete and return copies of the survey at the following locations.

Harbour Offices (hours subject to staffing availability)

Aberystwyth

Address: Aberystwyth Harbour Office, Aberystwyth Harbour, Aberystwyth, Ceredigion, SY23 1JX

Aberaeron

Address: Aberaeron Harbour Office, Aberaeron Harbour, South Beach, Aberaeron, Ceredigion, SA46 0BE

New Quay

Address: New Quay Harbour Office, New Quay Harbour, The Pier, New Quay, Ceredigion, SA45 9NW

All harbour offices can be contacted by:

Telephone: 01545 570 881

Email: cllc@ceredigion.gov.uk

Council Offices/Libraries (During opening hours)

Opening times for Council Offices/Libraries can be found on the [Branch Locations page](#).

Aberaeron

Address: County Hall, Stryd y Farchnad, Aberaeron, SA46 0AT

Telephone: 01545 572500

Email: library@ceredigion.gov.uk

Aberystwyth

Address: Canolfan Alun R. Edwards, Queen's Square, Aberystwyth, SY23 2EB

Telephone: 01970 633717

Email: library@ceredigion.gov.uk

Cardigan

Address: Council Offices, Morgan Street, Cardigan, SA43 1DG

Telephone: 01545 574110

Email: library@ceredigion.gov.uk

Lampeter

Address: Market Street, Lampeter, SA48 7DR

Telephone: 01570 423606

Email: library@ceredigion.gov.uk

Llandysul

Address: Canolfan Ceredigion, Llandysul, SA44 4QS

Telephone: 01545 574236

Email: llyfrgell@llandysul.cymru

New Quay

Address: New Quay Community Library, Room 4 Memorial Hall, Towyn Road, New Quay, Ceredigion, SA45 9QQ

Telephone: 01545 560803

Email: newquaylibrary@gmail.com

The completed paper surveys can be handed in at these locations.

5) Who to contact if you require any further information before completing the survey

If you have any questions about the survey or require the information in another format, the Harbour Manager can be contacted via cllc@ceredigion.gov.uk or 01545 570881 or alternatively by post at Ceredigion County Council, Canolfan Rheidol, Rhodfa Padarn, Llanbadarn Fawr, Aberystwyth, Ceredigion, SY23 3UE.

Appendix 1 – Ceredigion Harbour Management Policy Review Consultation Survey

Ceredigion Harbour Management Policy Review Consultation Survey

How we use your information

Your information will be used to inform the review of the Ceredigion Harbours Management Policy.

The proper handling of personal information by Ceredigion County Council is very important to the delivery of our services and maintaining public confidence. We comply with our obligations under the General Data Protection Regulation (GDPR) and the principles of the Data Protection Act 2018 (DPA).

The lawful basis for the processing of your information is to carry out a task in the public interest provided by the Well-being of Future Generations Act (Wales) 2015 and the Equalities Act 2010.

Your Data Protection rights

For more information about your rights and to obtain contact details for our Data Protection Officer, please visit [Ceredigion County Council's website](#) and search 'Privacy Notice' or visit the [Privacy Notice page](#).

Consultation Survey details

The consultation opens on *start date* and closes on *end date*. Completed survey forms can be returned by email to cllc@ceredigion.gov.uk or alternatively by post to Ceredigion County Council, Canolfan Rheidol, Rhodfa Padarn, Llanbadarn Fawr, Aberystwyth, Ceredigion, SY23 3UE.

Appendix 2

Are you responding as:	Count
A Facility User	5
Commercial Fishing Harbour User	6
Commercial Fishing Harbour User and Commercial Passenger Trip Harbour User	3
Commercial Fishing Harbour User and Commercial Passenger Trip Harbour User and A Facility User	1
Commercial Passenger Trip Harbour User	4
Leisure Harbour User	75
Leisure Harbour User and A Facility User	6
Other	5
Total	108

Which harbour(s) do you use?	Count
Aberaeron	11
Aberystwyth	10
New Quay	51
Aberaeron and Aberystwyth	1
Aberaeron and New Quay	22
Aberystwyth and New Quay	1
Aberaeron, Aberystwyth and New Quay	9
Aberaeron and Other harbour not managed by the Council	1
Aberaeron, New Quay and Other harbour not managed by the Council	1
Aberaeron, Aberystwyth, New Quay, Other harbour not managed by the Council	1
Total	108

Were you aware that a Policy existed prior to seeing this consultation?	Count
Yes	75
No	32
No response	1
Total	108

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied	Total
To what extent are you satisfied with the current Ceredigion Harbours Management Policy which has been in place since 2010?	5	18	31	29	25	108

	To what extent are you satisfied with the current Ceredigion Harbours Management Policy which has been in place since 2010?					
Were you aware that a Policy existed prior to seeing this consultation?	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied	Total
No	2	3	5	17	6	33
Yes	3	15	26	12	19	77
Total	5	18	31	29	25	108

	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied	Total
To what extent are you satisfied with the reviewed/proposed Ceredigion Harbours Management Policy?	0	6	13	25	64	108

	To what extent are you satisfied with the reviewed/proposed Ceredigion Harbours Management Policy?					
To what extent are you satisfied with the current Ceredigion Harbours Management Policy which has been in place since 2010?	Very Satisfied	Satisfied	Neutral	Dissatisfied	Very Dissatisfied	Total
Very Satisfied	0	0	0	1	4	5
Satisfied	0	2	2	5	9	18
Neutral	0	2	10	6	13	31
Dissatisfied	0	1	1	10	17	29
Very Dissatisfied	0	1	0	3	21	25
Total	0	6	13	25	64	108

	Count
Dissatisfied or Very Dissatisfied with current policy and Dissatisfied or Very Dissatisfied with proposed policy	51
Dissatisfied or Very Dissatisfied with current policy and Neutral, Satisfied or Very Satisfied with proposed policy	3
Neutral, Satisfied or Very Satisfied with the current policy and Dissatisfied or Very Dissatisfied with proposed policy	38
Neutral, Satisfied or Very Satisfied with the current policy and Neutral, Satisfied or Very Satisfied with proposed policy	16
Total	108

Appendix 3

Responses to matters raised as part of the Ceredigion Harbour Management Policy review Consultation Process

1.0 General Overview

1.1 Consultation Process and Timelines

The process and timelines for the consultation process are deemed to have been proportionate and appropriate in the context of the current and proposed Policy.

The consultation process was live between 20 September and 20 October 2023. Various awareness raising activities were implemented including a press release and contact being made directly with harbour users.

The design of the consultation was developed with a view of generating meaningful, relevant and proportionate feedback and input which could be usefully considered as part of the policy review process. The arrangements have been consistent with those applied in other similar policy development processes and benefitted from the input of a corporate service who specialise in consultation and engagement activities.

That 108 responses received suggests that the process was positively implemented.

Much of the qualitative feedback received fell into a number of generic themes or areas. As such responses to these are provided below.

Other representations were also received outside of the prescribed process. With a view of being as open and inclusive as possible these have been noted. As with the qualitative feedback generated through the prescribed consultation process the issues raised fell into a number of general themes or areas which are responded to below.

The Authority has sought to respond to the issues raised whether they were deemed relevant to the specific subject of the consultation or other wider issues related to the harbours and how they are operated/managed. The response to the feedback has been structured with a view of reflecting this. However, it would not be possible, appropriate, relevant or beneficial to respond individually to all the comments and feedback provided as well as statements made although these have been noted.

To provide a flavour of the feedback provided, 33 of the respondents to the consultation stated they were unaware of the existence of the current policy but still provided a view on it (23 of the 33 who were unaware of the current Policy noted that they were dissatisfied or very dissatisfied with it).

2.0 Feedback Directly Relevant to Consultation

2.1 Inheritance

The proposal to remove the inheritance arrangements was made with a view of improving opportunities for the general public to have a reasonable chance to gain access to a mooring at the CCC managed harbours.

The current inheritance arrangements are not a provision that is afforded in any other similar scenario by CCC (e.g. Private Car Park Permit Holders, Property Leases in an individual's name).

The retention of the inheritance arrangements is deemed to support the perception that opportunities to access the harbour services and moorings, especially, is something of a '*closed shop*'.

It has been recognised from the consultation process that there is a difference between the commercial and leisure moorings in that over, in some cases, an extended period businesses have built up capital in having been afforded ongoing use and access to those moorings. With this in mind, it is intended to retain the inheritance arrangements for commercial moorings but remove them from the leisure moorings.

The Council will, as part of the Fees and Charges setting process, be reviewing whether the charging mechanism and structure for the commercial operations in the Harbour remain relevant, valid and are in the overall best interest of the Council.

When a bereavement occurs relating to a leisure mooring this will be dealt with sensitively by the Harbour Service. A period of three months will be allowed for arrangements to be completed.

2.2 Transfer of Moorings

The arrangements currently in place for the transfer of vessels is now deemed not to be appropriate and as such it is proposed to remove it. The arrangement undermines the waiting list arrangements and could result in substantial premiums being paid for vessels which are perceived to be purchased with an existing mooring.

The retention of the transfer of moorings arrangements is deemed to support the perception that opportunities to access the harbour services and moorings, especially, is something of a '*closed shop*' and / or limiting access to those who are able and willing to pay the premium.

2.3 Car Parking

It is no longer deemed appropriate to provide the benefit of free parking permits at CCC managed car parks to harbours users as part of the seasonal mooring arrangements. This is partly because the free parking provision has a significant value in its own right.

This is not a provision that is afforded in any other similar scenario by CCC. (e.g. allotments, leasing a building that doesn't have private parking).

2.4 Waiting Lists

The arrangements in place, as they are, need to be understood. Feedback received as part of the consultation process, and from discussions at the most recent Harbour Users Consultative Committee meetings, suggest strongly that they are not.

It is now proposed to:

- introduce a non-refundable fee as payment to join the appropriate waiting list- the fee will be set as part of the wider annual fees and charges setting process.
- only allow one entry per person onto any individual waiting list.
- remove the limits on the numbers allowed on the waiting lists.

Redacted versions of the waiting lists can be made available and have been shared as part of the document pack for recent Harbour Users Consultative Committees. It is intended for this to be a standing item at future meetings.

2.5 Harbours Team

The Job Descriptions and Person Specifications for the posts in the Harbours Team can be made available and have been shared as part of the document pack for recent Harbour Users Consultative Committees.

We are fortunate to have qualified and dedicated employees within the Harbour Service who are committed to ongoing personal development.

2.6 Facilities

The facilities the Council are able to provide should be reflected in the charges levied. Currently this is not the case and the Harbour Service is significantly subsidised. While we look to address this, it must be noted that increase in related costs or improved provision has to be passed on to the service users. This will include in respect of provisions the Harbour Authority is required to make such as those relating to the Port Waste Management Plan.

2.7 Discretionary Service

The services and facilities offered at the harbours, and the related terms, are discretionary in terms of people have a choice as to make use of them or not. The Council fully respects the public's right to exercise their prerogative.

2.8 Shared Use Facilities

The harbours are shared use facilities and the Council's intention is to manage them in a fair and consistent way for all stakeholders. It is accepted that not all stakeholders will agree with this and while they are entitled to these, it is not necessarily the case that they do, or should, have any undue or disproportionate influence.

2.9 Current vs New Policy

Views on the changes between the current and new Policy varied considerably. Some believed that there was little or no real change while others believed it was a substantial change.

2.10 Deep Water Moorings.

It is proposed to remove the limitation to deep water moorings in the new Policy.

3.0 Other Matters

3.1 Roles and Responsibilities

It appears appropriate, timely and relevant to review and recalibrate views and expectations with respect to the management of the harbours with particular reference to roles and responsibilities.

The Harbours Service forms part of the wider County Council. It is subject to the same policies, protocols, standing orders as other services of the Council. This is also true in respect of the management structure, performance management, audit and political accountability.

While stakeholders, including customers and interested parties, may have their own views, opinions, aims and aspirations these do not have precedence or sway over the arrangements in place for the management and discharging of services as a County Council service. This includes with respect to issues extending from governance, receiving and responding to communications, processes associated with financial transactions which includes invoicing and associated terminology – these are applied across Council services and do not only apply in the harbours' context.

It is appreciated that some stakeholders may not agree or welcome certain aspects of how the harbours are managed and while this is respected it may have no direct influence over the way in which the facilities are managed.

Both current and proposed policies are used as a management tool for the Harbour Manager and Harbour Service. The role of the Harbour Manager is to implement the Policy applying the level of discretion as defined. Further details are included in the Job Descriptions for the roles in the Harbours Service.

3.2 Setting of Harbour Fees

Harbour fees and charges are set as part of the wider fees and charges setting process forming part of the Council's annual budget setting process. This is subject to political scrutiny, overview and approval prior to implementation.

The Council has an *Income Generation and Cost Recovery Policy* which should apply in respect of the Harbours. It currently does not provide for full cost recovery and the Harbour Service is subsidised, as the income generated does not meet the costs of making the provision.

It is not appropriate for the Council to subsidise a discretionary service while having to rationalise and reduce other, core statutory services. The Council will look to ensure that the Harbour service arrives at a position which it at least, covers its costs.

The fees for leisure moorings are set on a meterage basis, rather than type of craft. There is no imperative or justification to change this arrangement.

3.3 Seasons

The seasons, in the context of the Ceredigion managed harbours, are:

- Summer 1 April – 30 September
- Winter 1 October – 31 March

This provides clarity, consistency and simplicity and there is no imperative or justification for changing these.

3.4 Realistic, Proportionate, Relevant and Appropriate Expectations

The expectations of stakeholders need to be realistic, proportionate relevant and appropriate in the context that the services provided by the Harbour Service are discretionary.

Customers can choose whether or not to make use of the facilities and services on the basis they are provided.

3.5 Harbour Users Consultative Committees

In their current form these are not deemed to be fit for purpose and have moved away, which includes in respect of membership and attendees, from the constitutional arrangements underpinning them. A review will be undertaken with a view of arriving at something more appropriate, relevant, productive and beneficial.

3.6 Views and Opinions

The Harbours Service respect and values the views and opinions of stakeholders in the context of that being what they are.

Some of the feedback has referred to subjective individual views and opinions with little or no evidence to support. In some cases there have been contradictions (e.g. not knowing there was a current Policy but stating it was good/bad).

3.7 Engagement

The following summarise the main ways the Harbour Service engages with stakeholders:

- Harbour Users Consultative Committees (twice a year)
- Harbour Surgeries (monthly)
- Regular presence by Harbours Team at the Harbours (regular and ongoing) with an open-door approach/policy
- Calm Waters (twice a year)
- Contact via Clic (letters, e-mail, phone, feedback forms)
- Notices to Mariners
- Group e-mails to Mooring Holders
- Dedicated pages on the Council website which includes access to the Harbour Management Policy.

The above exceeds, by some way, the level of engagement the Council is able to sustain or offer any other similar discretionary service users (e.g. car park customers, trade waste customers, allotment customers).

3.8 Implementation of Policy

The Policy provides an overall framework for the day-to-day management of the harbours by the Harbours Team which is led and managed by the Harbour Manager. The Manager is supported and consults with senior managers within the wider service in discharging the duties. This will include with respect to any appeals against

decisions made or instructions issued. This is consistent with the approach adopted in other service areas.

4.0 Operational Matters

4.1 Disabled Access

The Ceredigion Harbours are historic working harbours and, in some cases, listed infrastructure.

While we look at pragmatic and affordable ways of improving access the scope to do this may be limited. We will continue to look for, consider and progress opportunities in this respect.

4.2 Dredging

Dredging is undertaken on an as required basis as deemed by the Harbour Manager and as finances allow.

4.3 Individual and Specific Operational Matters

Some specific or individual operational matters, not directly related to the Policy, were referred to in some of the consultation feedback received. These are most appropriately raised directly with the Harbour Service in person, which could include at the regular and scheduled surgeries, at the Harbour offices or via Clic.

4.4 Allocation of Moorings and other facilities

This is done in accordance with the Policy and with a view of optimising the available capacity.

The proposed Policy if approved will improve mooring availability in each harbour. As the Council is proposing to remove the provisions for moorings transfers (for commercial and leisure moorings) and inheritance (for leisure moorings) the waiting lists at each harbour will be more active.

4.5 Protection of Marine Wildlife

The Harbour Service actively promotes and supports the principles and ways of working set out in the Ceredigion Marine Heritage Coast, Cardigan Bay Special Area of Conservation (SAC) and Pen Llyn a'r Sarnau SAC.

Attachments

Attachment 1

The qualitative feedback received from stakeholders (on-line and hard/paper copy).

Attachment 2

Written correspondence, provided outside the prescribed consultation process.

Attachment 3

Ceredigion Harbour Management Policy (showing amendments further to the consultation feedback.)

Attachment 4

Integrated Impact Assessment.

Attachment 1

ID	Are you responding as:	Were you aware that a Policy existed prior to seeing this consultation?	Which harbour(s) do you use?	To what extent are you satisfied with the current Ceredigion Harbours Management Policy which has been in place since 2010?	In relation to your answer in question 6 please outline up to three reasons for your response:	To what extent are you satisfied with the reviewed/proposed Ceredigion Harbours Management Policy?	In relation to your answer in question 8 please outline up to three reasons for your response:
1	Leisure Harbour User;	Yes	Aberaeron;	Neutral	The current policy nor previous policy offer any explanation as to the role of the harbour management. Whilst the title exists it appears they have little to no responsibility, if their responsibility isn't to be listed in the policy I would encourage there job role/description to be made public via your website.	Neutral	It's very close to the previous policy. Nothing stands out as relating to the modern needs of the harbours.
2	Leisure Harbour User;	Yes	Aberystwyth;	Satisfied		Satisfied	
3	Leisure Harbour User;	Yes	New Quay;Aberaeron;	Satisfied		Neutral	Overall it is reasonably clear. I think the start of the season should be defined as 1st April or Monday before Easter, which ever comes first. Under commercial section no mention of research and monitoring vessels or XXXX - I vital facility to encourage training, development and safe use of the water. Finally there should be some facility for passing on moorings to children of deceased. The adult siblings are unlikely to be on the mooring waiting list.
4	Leisure Harbour User;	Yes	New Quay;	Very Satisfied		Very Dissatisfied	There is no right of appeal or independent arbitration if the council issues notice of termination. Clause 16.1 of the old policy has been removed - it has been custom and practice for many year that families could continue to use the facility in the event of the named Mooring holder death. There needs to be a right of transfer in the event of the vessel sale as there is a limited market for vessels in the area and acquirers of vessels will naturally look to acquire existing vessels. If you are on the waiting list with a vessel you can't use it, if you are allocated a mooring you need to find a vessel. The current transfer arrangements should be at a fee payable to the council and not for gain by the mooring holder
5	Leisure Harbour User;	Yes	Aberaeron;	Neutral	Most Harbour Users are unaware of the Policy. There have been failures to apply it. There have been inconsistent interpretations and applications of it.	Very Dissatisfied	The best way to consider the proposed policy would be for CCC to list the changes rather than expecting people to read the old and the new policies. There is a statement about Car Park passes as part of the mooring fee which will greeted with concern. Similarly the statement on Partnerships.
6	Leisure Harbour User;	Yes	New Quay;	Satisfied	Functioning management of the facility. Appropriate maintenance of the facility. Reasonable cost of the facility.	Satisfied	Correct level of engagement with harbour users. Continuation of provision of service.
7	Leisure Harbour User;	Yes	Aberystwyth;	Neutral	No rubbish bins, electric points provided. Harbour dues increase each year but no improvement to services/ amenities	Neutral	
8	Commercial Fishing Harbour User; Commercial Passenger Trip Harbour User; A Facility User;	Yes	New Quay;	Neutral	As a public facing Policy document the previous iteration seemed hurried and poorly crafted. The new document is better but still lacks substance. A Policy doc. Should clearly and unambiguously state Policy that actions can be measured against.	Satisfied	Section 1.7 caveats the entire Policy and leaves differing ways of working outside of Policy open to the Harbourmaster and therefore his or her line managers. Surely a Policy is a Policy otherwise this document should be strategic or a process doc. In b 4.6 vi please name the commercial vessels and their owners and if a mooring is empty state it as empty. Clearer guidance is needed regarding refueling of commercial vessels in the harbour.

9	Leisure Harbour User;	Yes	Aberystwyth;	Neutral		Neutral	
10	Leisure Harbour User;A Facility User;	No	Aberystwyth;	Neutral	Condition and upkeep is poor. Very little engagement with users until you want payment. Preferential treatment given to innappropriate parties e.g XXXXXXXXXX.	Neutral	There is very little content related to leisure craft and their rights and obligations.
11	Leisure Harbour User;	Yes	New Quay;	Neutral	I struggle to access my double kayak on the top of the rack on the slip on Penpolion New Quay. Unless I can find someone to swap with and we both attend Aberaeron offices, an unlikely event, this can't change. I'd like some mention in the policy that moorings must be suitable for the person paying. I'm too short to easily put the kayak on or off and others are in a simile position. I shouldn't have to ask for help from a taller person.	Neutral	
12	Leisure Harbour User;	Yes	Aberaeron;Aberystwyth;	Neutral	state of harbour needs dredging . mooring chains need refixing. better spacing for tenders	Neutral	
13	Leisure Harbour User;	Yes	Aberaeron;	Very Dissatisfied	Lack of consultation with harbour users, lack of response to their concerns, lack of response to problems brought to their attention.	Very Dissatisfied	Lack of consideration for boatowners, lack of communication with that, lack of response
14	Leisure Harbour User;	Yes	New Quay;	Very Dissatisfied	Lack of maintenance	Satisfied	Getting a mooring is far too difficult and residents should be prioritised. People should be limited to one leisure mooring
15	Leisure Harbour User;	Yes	New Quay;	Very Dissatisfied	Pricing local people out. Im fourth generation, welsh first language family to be born in new quay and to use the harbour, you target everyone as second home owners with stacks of cash. You're penalising genuine local people who cant afford the prices. im related to the founder member of plaid, but Im conflicted moving forward. This isnt the plaid that has been.	Very Dissatisfied	As above, local people cant afford the continued price hikes
16	Other - please specify below in Question 2;	No	New Quay;	Dissatisfied	Considering the importance of the New Quay Harbour to 1. tourism & 2. local enjoyment &3. Commercial fiscal importance.	Neutral	Will wait & see how the consultation is dealt with.
17	Leisure Harbour User;	No	New Quay;	Very Dissatisfied	The costs, the maintenance,attitude of harbourmaster	Very Dissatisfied	No consultation with users
18	Leisure Harbour User;	Yes	New Quay;	Neutral		Dissatisfied	Car Park facility taken away, Lack of Dinghy facilities in New Quay on the pier, Bins No longer on the beach, now my dinghy becomes convenient for that purpose!!
19	Leisure Harbour User;	No	Aberaeron;	Dissatisfied	Fees, maintence	Dissatisfied	
20	Leisure Harbour User;	No	Aberystwyth;Aberaeron; New Quay;	Very Dissatisfied	There is no qualified management of Ceredigion Harbours	Very Dissatisfied	A review by users and professionals sea users is required

21	Leisure Harbour User;	Yes	Aberaeron;	Neutral		Neutral	The policy is very wordy. As an Aberaeron harbour user I would prefer to see a subsection indicating how moorings can be allocated on a fairer basis. It has been my understanding that the allocation of moorings in Aberaeron takes into account that when moorings become available they should be first offered to those persons who have a less favourable mooring. This process needs to be stated as without a detailed process there is a possibility of corruption. While the stated aim is to encourage harbour use I feel it is more likely to put users off.
22	Commercial Fishing Harbour User;	No	New Quay;	Dissatisfied	My main one as a fishing working harbour when our landing days come !! Fisherman are not able to get in while pleasure boats have decided to load passengers up in front planned pick ups as had to be done on tides so priority should be given as it's not everyday usually can be once a week !!of	Dissatisfied	In place about transfer of moorings I can understand non family but what happens if like me are married and something god forbid happens to husband and can't fish and need to have someone family to take over or keep our livelihood going !! Can't marriage be as one ? I am concerned as both me and my husbands family have fished for years and it's always gone down the family is the beginning of a end of families traditions
23	Leisure Harbour User;	Yes	New Quay;	Very Dissatisfied	1. Disabled access very poor or non existent in New Quay Harbour 2. Pier unsafe for wheelchair users 3. No suitable loading or unloading point for wheelchair users	Very Dissatisfied	1. No mention of improving disabled access. 2. No mention of improving disabled facilities around the harbour. 3. Lack of understanding of disabled users needs.
24	Leisure Harbour User;	Yes	New Quay;Aberaeron;	Very Dissatisfied	Lack of mooring availability. Lack of dredging in NQ harbour.	Very Dissatisfied	It doesn't address the key problems of access and maintenance of the harbours
25	Leisure Harbour User;	Yes	New Quay;	Dissatisfied	1.No differentiation between dinghies and larger boats. The dinghy places have been progressively reduced and replaced with car parking spaces and large, hazardous pieces of commercial equipment. The particular aspect I'm concerned about is fees for dinghies and access to the pier. Even very recently there was boat parking space at reasonable cost on the main pier. Boats have been progressively evicted to accommodate cars and general storage of fishing gear, most of which seems to sit there year round. The very limited space that now exists is charged at the same rate per meter as a yacht in the harbour, rounded up to the nearest meter. This means that a child starter boat like an optimist (2.3m) is charged at 3m. The next size up, for example a topper (3.38m) is charged at 4m. A typical youth boat like a laser (4.19m) is charged at 5m. The fee last year was £51 per meter and has now increased to £66.50. At the moment boats are being stored on the sand on the main beach (possibly free, no one knows) or the Sandy Slip by the lifeboat house, though that space is full and we think will be charged at the above rates. In contrast, Cardiff Bay YC charge £85 for optimists and toppers and £105 for a laser and anything bigger £158 pa. This gives space on concrete, with tie downs so boats don't blow about in gales, in a locked compound. These smaller boats are the entry to the water. The XXXXXXXXXXXXX has done a great job of getting local youngsters on the water - if you come down any Saturday morning you will see lots of them out. An entry level optimist or topper can be picked up for a few £100s. Sailing is also potentially a much bigger source of income than it currently is - places like Pwllheli make millions from hosting dinghy	Dissatisfied	1.No differentiation between dinghies and larger boats. The dinghy places have been progressively reduced and replaced with car parking spaces and large, hazardous pieces of commercial equipment. The particular aspect I'm concerned about is fees for dinghies and access to the pier. Even very recently there was boat parking space at reasonable cost on the main pier. Boats have been progressively evicted to accommodate cars and general storage of fishing gear, most of which seems to sit there year round. The very limited space that now exists is charged at the same rate per meter as a yacht in the harbour, rounded up to the nearest meter. This means that a child starter boat like an optimist (2.3m) is charged at 3m. The next size up, for example a topper (3.38m) is charged at 4m. A typical youth boat like a laser (4.19m) is charged at 5m. The fee last year was £51 per meter and has now increased to £66.50. At the moment boats are being stored on the sand on the main beach (possibly free, no one knows) or the Sandy Slip by the lifeboat house, though that space is full and we think will be charged at the above rates. In contrast, Cardiff Bay YC charge £85 for optimists and toppers and £105 for a laser and anything bigger £158 pa. This gives space on concrete, with tie downs so boats don't blow about in gales, in a locked compound. These smaller boats are the entry to the water. The XXXX has done a great job of getting local youngsters on the water - if you come down any Saturday morning you will see lots of them out. An entry level optimist or topper can be picked up for a few £100s. Sailing is also potentially a much bigger source of income than it currently is - places like Pwllheli make millions from hosting dinghy sailing events. 2.Inheritance and partnerships. Most boats are owned by families but registered in a single name. My RIB is used heavily by myself, my wife and my two adult children and their families. I have had the mooring for almost 20 years. If I were to die, my wife would presumably have to sell the boat. Similarly, my adult children would not be able to keep using it. The blockage on sharing within de facto partnerships is unfair to long term supporters of the area and its tourist industry. While I can see that turnover of moorings is potentially desirable, this policy seems to be

26	Leisure Harbour User;	Yes	Aberaeron;Other harbour not managed by the Council;	Very Dissatisfied	The employment of assistant 'harbour managers' that sit in their office during their working hours and do not patrol the harbour or undertake any other useful function. Inadequate facilities provided by CCC to both resident and visiting harbour users (water +electricity provided by XXX NOT CCC), Poor harbour maintenance such as failure to adjust CCC harbour chains, dangerous state of slipway and failure to maintain navigation lights, combined with ruinously high mooring fees.	Dissatisfied	C. 3.5 No mention of XXXX as the primary promoter of annual harbour events which would not happen were it not for the voluntary actions of XXXX members, 12.2 the previously successful system in which the 'harbourmaster' inspected and recorded the insurance details of vessels using Aberaeron harbour has been discontinued and there is no longer a check on valid insurance of any vessel (dinghy's sailboards etc. included) which is an abdication of CC responsibility, 24.3 As the various harbour assistants do not enter the harbour, just how is this clause checked and enforced? There are several more Reasons that should be included but for obvious avoidance of responsibility this questionnaire has restricted replies to only three thus restriction the ability of harbour users to enter full and valid comments.
27	A Facility User;	No	New Quay;	Neutral	I wasn't aware that there was a policy	Neutral	
28	Other - please specify below in Question 2;	Yes	Aberystwyth;	Neutral	More work needs doing on dredging harbour entrance to enable us to launch at low water for rescue purposes , repairs to Landing stage at main beach are urgently needed for us to be able to land casualties to the care of other emergency services	Satisfied	
29	Commercial Fishing Harbour User;	Yes	New Quay;	Dissatisfied	Not answering	Very Dissatisfied	Objections to No inheritance related to mooring 2 No mooring transferable on both leisure and commercial. 3 car parking No transferable
30	Leisure Harbour User;	Yes	Aberaeron;New Quay;	Very Dissatisfied	Insufficient space to discuss.Makes consultation farcical	Very Dissatisfied	Insufficient space to enumerate. Also makes consultation farcical
31	Leisure Harbour User;	Yes	New Quay;	Neutral	there is not much done by the council for the annual fee we pay.	Dissatisfied	i think moorings should be transferable with sale of boat also the parking ticket should continue with mooring and any empty moorings should be offered to local people,there are a lot of families from England who have more than 1 mooring
32	Commercial Passenger Trip Harbour User;	Yes	Aberaeron;New Quay;	Neutral	inappropriate mooring allocated to commercial 10 metre vessel. Lack of shoreside facilities. No plan to improve access to all vessels at low water on the larger tides or maintain the existing harbour structures.	Very Dissatisfied	Inability to pass on my existing boat business developed over nearly 40 years (benefiting the local economy and community and supporting the research and conservation work of the Wildlife Trust South and West Wales) to the next generation of my family, Welsh speaking individuals born and bred in New Quay
33	Leisure Harbour User;	No	New Quay;	Satisfied	Easy to understand	Neutral	No issues

34	Commercial Fishing Harbour User;	Yes	Aberystwyth;	Very Dissatisfied		Dissatisfied	To whom it may concern I am writing this statement in response the current consultation on the proposed Ceredigion harbour management policy. I am responding to specific points set out below: 15.1 Inheritance rights, My father has had commercial berths in Aberystwyth harbour for the past 57 years. Over the past 25 years, since I left school we have worked hard to develop our now family owned business. We employ 6 local people and bring regular trade to several local trades people within the Aberystwyth area. However, while I have equal shares within the business, my father manages the berths within this arrangement. The inheritance rights proposals within the consultation document as currently written, would mean that if something unforeseen were to happen to my father. Our business and life's work would be put in jeopardy. Due to the size of our vessels, there are no other harbours which my vessels could operate out of in Wales and continue to fish in our traditional fishing area. We have four commercial vessels and as mentioned above employ several local staff, if we were to lose the berths in Aberystwyth my business would be destroyed, and my crew would be out of work. I personally would be unable to provide for my family and face bankruptcy. While I recognise the inheritance rights may be a suitable and appropriate approach for pleasures boats, this proposal is not suitable for commercial boat owners in Ceredigion where businesses are family run and I am strongly opposed to this proposal
35	Leisure Harbour User;A Facility User;	No	Aberystwyth;	Dissatisfied	Dredging not completed to a good standard the last time this was done the displaced material was placed on the mouth of the Ystwyth river, this was then pushed by the river flow and has made Aberystwyth bar shallower. The contractors were not even wearing life jackets during this work even though it was being observed by ccc managers	Satisfied	I understand the rules and birthing allocation but there needs to be consideration to the overall lack on compliance on the harbour lifting regs, ladder inspections fork lift operations general tidying and safe storage of equipment.

36	Leisure Harbour User;	Yes	New Quay;	Dissatisfied	I believe there are flaws in the previous Policy that have not been addressed in the Draft amendment. The following is a short-list of some of my suggestions: A Lack of Review Period and Review Process and Appeals Procedure: The original CHM Policy does not state a review timescale, nor a consultation process to ensure Harbour User views are accounted for. It also fails to state procedures that an individual should follow to appeal any decision made against them. 4.6 Deep Water Moorings: As an Internationally qualified Sailing Instructor/Examiner and regular user of many UK and overseas harbours, I believe that there is plenty of room within New Quay Harbour area for many more 'Deep Water' moorings to be added, thus enabling additional short and long-term use, and providing a better safe-haven for visitors and local Harbour Users alike. Thus, the statement at Paragraph 4.7 that 'the number of deep-water moorings has reached maximum capacity' is incorrect and this policy should be rescinded in order to add more moorings to attract visitors and to expand the availability for local users; such a positive change would also pay for itself, or more likely increase income for CCC. 5.1 Leisure Mooring Waiting List: The current Waiting List Policy is not transparent, provides no indication of when a space becomes available, fails to show where individuals are on the List and does not provide indication of historic average waiting times to provide context to subscribers. GDPR has been quoted as a reason for lack of transparency, but that is incorrect as if permission to publicise names and vessel/mooring requirements was made a requirement to be included on the List then a more transparent system could be provided. Without such openness, the	Very Dissatisfied	Consultation: I believe the Review of the Harbour Management Policy is a great opportunity to improve and expand the use of Ceredigion Harbours by bringing the policies, services and User experiences up to date and more aligned to best practice. However, only allowing 3 points to be raised via an online form is insufficient to undertake a proper consultation. To do so, I recommend the current online Consultation is made more inclusive and responsive to the Harbour User's needs by extending the consultation period and by including face-to-face discussions with nominated Users and representatives, such as the recently formed Ceredigion Harbours' Users Consultative Committee (CHUCC). Without improving this Consultation, I do not believe that the CCC will achieve the 'Gunning Principles' as directed by the Local Government Association and laid down in law. I believe there are flaws in the Draft amendment and that some of these will restrict, rather than expand harbour use. The following is a short-list of some of my suggestions: 14.1 Prohibition on Assignment/Sub Letting of Mooring Facilities: I agree that sub-letting should be prohibited; however, if a mooring has been paid for and is normally used by the designated craft, there should be no reason that whilst that vessel is temporarily away on a passage, or undergoing maintenance, that the empty mooring should not be utilised by another craft on agreement with the rightful user. This more flexible approach will assist Harbour User safety, particularly when weather and/or tide preclude a vessel's return to the assigned mooring, especially through use of an available deep-water mooring. 16.1 Inheritance & 19.1 Partnerships: If a family's option following death, or incapacity, to apply for a mooring is to be removed (which I disagree with) then an amnesty period of 8 months should be provided for current Users to add new partners and/or family members to the vessel's name/registration at NO COST before this fundamental policy change is implemented. 17.1 & 17.2 Change of Vessel, Watercraft, or Other Equipment: I agree with the aim of increasing turnover and usage of moorings, but I believe preventing a boat owner who does not wish to keep their mooring the opportunity to sell and transfer a mooring with that
37	Other - please specify below in Question 2;	Yes	Aberystwyth;	Dissatisfied	Greater provision for the protection of marine wildlife needed, namely speed controls and restrictions on high-speed vessels in the harbour and bay	Dissatisfied	Greater provision for the protection of marine wildlife needed, namely speed controls and restrictions on high-speed vessels in the harbour and bay
38	Leisure Harbour User;	Yes	Aberaeron;New Quay;	Neutral	It was vague but allowed some use of judgement and had some reference to governance and appeals.is	Dissatisfied	We do not believe this consultation is effective or the policy fit for purpose. We wish greater consultation with those using the harbours with the Ceredigion Harbour Users Consultation Committee as the main voice for the users.
39	Leisure Harbour User;	Yes	New Quay;	Neutral	Please refer to CHUCC minutes / open letter.	Very Dissatisfied	Please refer to CHUCC minutes / open letter.
40	Leisure Harbour User;	Yes	New Quay;	Very Dissatisfied	Increased harbour fees on mooring	No inheritance Sale of boat Very Dissatisfied	As aboveChu

41 Leisure Harbour User;	Yes	Aberystwyth;Aberaeron; New Quay;	Dissatisfied	<p>1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. Lack of transparency, engagement and the effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, with no process for appeal/redress. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for or take into account National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	Very Dissatisfied	<p>Please read in full the following open-letter from CHUCC to CCC which has been copied to local councillors, MPs, MSs and the press. An easier to read pdf is available on request from the below email address. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose.Ceredigion Harbours' Users Consultative Committee (CHUCC) – 1 Oct 2023 at New Quay Crows' Nest Minutes of Meeting and Open Letter to CCC regarding proposed Harbour Management Policy (HMP) and Consultation Process In attendance: over Ceredigion 30 Boat owners/operators XXXX (New Quay CHUCC Rep) as Secretary Agenda Discussion Items relating to Harbour Management Policy (HMP): a. Lack of Governance/Authority/Structure b. 'Inheritance' policy c. Sale of Boats/Moorings policy d. Waiting List Process e. Fee Structure f. Partnerships/Joint Owners g. New Quay Deep Water/Visitors' Moorings h. Sub-Letting i. Harbour Users Meetings j. Document Terminology k. Service Level Agreement l. Missed Opportunities m. Consultation Process The above points were discussed in some detail with respect to the current management of Ceredigion Statutory Harbour Authority (SHA): a. Lack Governance/Authority/Structure (Para 1). A policy document such as the HMP should clearly state and define the following: i. The overarching legal authority of the policies therein. ii. The SHA governance structure (including duty holders and responsible persons etc). iii. Terms of reference, any required qualifications and training of SHA team and Committees. iv. The accepted means of compliance (including alternative means of doing so) with policies. v. Any penalties/remonstration for non-compliance. vi. Processes that allow for review and challenge. Sadly, there is no mention in the draft HMP of the overarching legislation and guidance such as the Harbours Act 1964, the Harbours, Docks and Piers Clause Act 1847, nor any related guidance documents for the effective management of Harbours. Infringement of the Aberporth Range By-Law of 1976 should also be mentioned. There is no definition of the reporting structure of the SHA and the responsibilities, qualifications and required skills of any staff, nor of their training. There is no mention of the DfT/Welsh Government requirements of the Ports'</p>
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42 Leisure Harbour User;	Yes	Aberaeron;New Quay;Aberystwyth;	Dissatisfied	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to Mr XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
43 Leisure Harbour User;	Yes	Aberystwyth;Aberaeron; New Quay;	Very Dissatisfied	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>

44 Leisure Harbour User;	Yes	New Quay;Aberaeron;	Neutral	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	Very Dissatisfied	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to Mr XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
45 Leisure Harbour User;	No	New Quay;Aberaeron;	Dissatisfied	<p>1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	Very Dissatisfied	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
46 Leisure Harbour User;	Yes	New Quay;Aberaeron;	Very Dissatisfied	<p>The harbour authorities did/do not uphold their own rules laid out in the policy especially regarding many aspects to the "Waiting List" of which I have been on for many years, and having to pay for the privilege to be on it.</p>	Very Dissatisfied	<p>Too many to mention here, a maximum of three is ridiculous.</p>

47	Leisure Harbour User;	No	Aberaeron;New Quay;	Neutral	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.	Neutral	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.
48	Leisure Harbour User;	Yes	New Quay;Aberaeron;	Neutral	lack of transparency re waiting lists - allowing some moorings to be held for years without the boats leaving the mooring	Very Dissatisfied	removing inheritance rights insensitive at best, likely to cause financial loss, spouses and civil partners are by law equal partners. lack of governance or appeal. sale of boats could be offered to mooring list on an initial - transparent basis. No mention of "not for Profit" commercial users covering education, training and research.
49	Leisure Harbour User;	Yes	Aberaeron;New Quay;Other harbour not managed by the Council;	Very Dissatisfied	1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.	Very Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur.

50	Leisure Harbour User;	Yes	Aberaeron;	Neutral		Very Dissatisfied	1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.
51	Leisure Harbour User;	No	Aberystwyth;Aberaeron; New Quay;	Neutral	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.	Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.

<p>52 Leisure Harbour User;</p>	<p>No</p>	<p>New Quay;</p>	<p>Dissatisfied</p>	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
<p>53 Leisure Harbour User;</p>	<p>No</p>	<p>New Quay;</p>	<p>Dissatisfied</p>	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>

54	Leisure Harbour User;	Yes	New Quay;Aberaeron;	Neutral	Please see response from the Ceredigion Harbour Users Consultative Committee, which I support in full.	Very Dissatisfied	Please see response from the Ceredigion Harbour Users Consultative Committee, which I support in full.
55	Leisure Harbour User;	Yes	Aberaeron;New Quay;	Dissatisfied	1. Thin in governance and oversight processes (compounded by reduced availability of any skilled staff fir the majority of the year, with no means of redress and referral. A secret, shambolic and ineffective moorings waiting list process that was by passed often. Missed opportunity to encourage local young, old and disabled people to get on water while completely ignoring any encouragement to meet conservation initiatives.Complete review required.	Very Dissatisfied	No great difference from answer above, in fact, arguably worse than previous policy and even likely to be non-compliant with Harbours Act 1964 and PortsGood Governance Guide 2018, with even less definitive due proces and structure. The intent to increase waiting list turn-over has meant the process has becom completely jumbled and will not achieve its intent especially as it is tied to fe structure that favours the rich over local residents - old young and disabled. Still there is no addressing of policies to promote the conservation of the environment or improvement of access to water-sports. The whole policy needs a re-write with the input of all stakeholders to produce a jointly owned document that addresses these and many other shortcomings in this draft.
56	Leisure Harbour User;	Yes	Aberaeron;New Quay;	Neutral	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.	Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.
57	Leisure Harbour User;A Facility User;	Yes	New Quay;	Dissatisfied	Sailing dinghies (eg 3m Toppers) charged at same rate as large (12m+)craft. Very limited space available for sailing dinghies resulting in decline of sailing in NQ. I agree with points made inCHCC meeting summary/open letter.	Very Dissatisfied	Too short timescale for response. Only asks for 3 reasons. No mention of next step after consultation .
58	Leisure Harbour User;	Yes	New Quay;	Dissatisfied	Poor condition of harbour,high mooring fees,inability to use Pier to load and unload	Very Dissatisfied	Inability to pass on mooring to my family,higher mooring fees lack of outer mooring availability.

59 Other - please specify below in Question 2;	Yes	Aberystwyth;Aberaeron; New Quay;Other harbour not managed by the Council;	Very Dissatisfied	1The 2010 policy names XXXXXXXXI (XXX) but makes no distinction between it and tour operators or commercial fishing. The policy does not recognise the unique role the school has in training the safe use of power and sailing vessels in the county of Ceredigion. This training has undoubtedly contributed to the low incidences of marine accidents in this area since its inception in 2002. 2The 2010 policy does not afford financial benefit to XXX in its status as a recognised charity (no. XXXXXXXX) where it has received both Mandatory and Discretionary Relief from non-domestic rates since 2006. 3The 2010 policy could have initiated ground breaking environmentally advantageous distinction between sailing boats and power boats by charging lower harbour dues to wind powered vessels reflecting their lower use of fossil fuels and carbon emissions.	Very Dissatisfied	1.Loss of parking permit. XXXX (XXXX) uses several different RYA Instructors to deliver courses using the vessels on our allocated moorings. Courses are typically held over two days. This inflicts extra financial pressure on volunteers making it more difficult to recruit. We would like to suggest that parking permits are retained but issued against the name of the vessel not the vehicle thereby allowing instructors to benefit from this financial advantage. It would in addition credit Ceredigion County Council as supportive of the charity rather than punitive. 2.Commercial mooring does not recognise or distinguish between a person and an organisation. XXX employs a manager who is responsible for registering vessels but it is XXX that owns the vessels. We therefore consider that revised policy should have capacity to register the organisation as the mooring holder not the manager as the latter will be subject to change. 3.The 2023 Proposed Harbour Management policy like the 2010 policy does not afford financial benefit to XXX in its status as a recognised charity (no. XXXX) where it has received both Mandatory and Discretionary Relief from non-domestic rates since 2006. Offering relief from harbour dues would credit Ceredigion County Council as supportive of its locally based training charity rather than punitive. This would help reduce the burden from the organisation further empowering it to deliver low cost courses and sessions to local people.
60 Leisure Harbour User;	Yes	New Quay;	Very Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.	Very Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.
61 Other - please specify below in Question 2;	No	New Quay;	Neutral	I don't have a boat, but my family do - I want that to continue. Boats are a key part of New Quay and what it is about and my sister and I sailed and rowed, our children are and I want my grandchildren to have that opportunity	Very Dissatisfied	It is unfair that moorings cannot be transferred within families

62	Leisure Harbour User;	No	Aberaeron;New Quay;Aberystwyth;	Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.	Very Dissatisfied	A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.
63	Leisure Harbour User;	Yes	New Quay;	Satisfied	The policy in the main is appropriate to the running of the harbours and is reasonable	Very Dissatisfied	1. My main and biggest objection is to the changes to inheritance in clause 15.1. This is an unnecessary blunt way to 'churn' moorings through an unfortunate and sad event. The existing policy approach is appropriate. 2. I object to clause 5 with regards to the sale of a boat and mooring. This makes it harder to sell boats, more likely for older boats to stagnate and is an unnecessary change to something that has successfully operated for decades. The council could benefit from an increased transfer fee. 3. I am concerned about the apparent blanket powers and heavy wording within the policy without an appropriate appeals process. For example (but not exclusive), if as has been the case for the past few years, that CCC does not acknowledge and invoice an application until after the deadlines set out in the policy (but the application was made in good time) where does this stand?
64	Leisure Harbour User;	Yes	New Quay;	Neutral		Dissatisfied	

65 Leisure Harbour User;	No	New Quay;Aberaeron;	Dissatisfied	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	Dissatisfied	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
66 Leisure Harbour User;A Facility User;	Yes	Aberaeron;New Quay;	Dissatisfied	<p>1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	Very Dissatisfied	<p>1 - Propose changes to inheritance Policy. Current policy should remain in place as it allowed for sensible discretion and it would be common practice to presume in favour of 'inheritance' of family/legal partners etc and that this should be included in any new policy. 2 . Sale of Boats/Moorings Policy. The same rationale (increased waiting list turn-over) for this policy was presumed. Generally, the meeting thought its introduction was understandable, as sale of boats with moorings had been a way for people to 'by-pass' the waiting list; which, of course, could seem very unfair to those on the list and stagnated 'churn'. However, not being able to sell a boat with a mooring sometimes made negotiating the sale of the boat very difficult and by not allowing a 'transfer' option, meant the SHA was missing out on income, as well as opportunities to get the waiting list moving. A solution might be for the SHA to ensure that an owner wishing to sell both boat and mooring must first offer any boats for sale to those people on the waiting list, which would also ensure that the moorings and are matched to the boats on them, speeding up the process. 3 - Waiting List Process : List must be transparent and favour residents of NQ.</p>

<p>67 Leisure Harbour User;</p>	<p>Yes</p>	<p>Aberaeron;Aberystwyth; New Quay;</p>	<p>Very Dissatisfied</p>	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
<p>68 Leisure Harbour User;</p>	<p>Yes</p>	<p>Aberystwyth;Aberaeron; New Quay;</p>	<p>Very Dissatisfied</p>	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
<p>69 A Facility User;</p>	<p>No</p>	<p>New Quay;</p>	<p>Very Dissatisfied</p>	<p>Very Dissatisfied</p>	

70	Commercial Fishing Harbour User;	Yes	New Quay;	Satisfied	I believe the existing policy covers all bases from a commercial point of view and requires none of the 'tweaks ' outlined in the proposed update	Very Dissatisfied	I would like to see the commercial aspect of the tweaks to transfer rights and inheritance of commercial moorings removed,I believe they are unnecessary and pose a very real threat to the existing businesses that run in Ceredigions harbours.
71	Leisure Harbour User;A Facility User;	Yes	Aberaeron;	Very Dissatisfied	Lack of understanding of harbour users and usage. Cost of moorings with low level of service by CCC. Lack of quality of harbour bottom and not allowing harbourmaster to properly assist boat owners.	Dissatisfied	The policy doesn't seem to reflect the interests of harbour users whether they are boat owners or tourists enjoying the environs.
72	Leisure Harbour User;	Yes	New Quay;	Very Satisfied	My views are represented by CHUCC	Dissatisfied	My views are represented by CHUCC
73	Leisure Harbour User;	No	New Quay;	Dissatisfied	Orders are coming from 'on high' to presumably make the harbour better, but it doesn't. 2.The Harbour is slowly silting up and every year I have less water under my boat. 3. The harbour is particularly filthy this year. Old chains everywhere, dumped sand from dredging which smells (is it sewage.) Crushed Whelk shells on the beach which cuts kiddies feet needing a trip to Cardigan Care Centre. .	Dissatisfied	1. More instructions making less sense if you have a mooring. 2. Problem passing on moorings to family (I had a Cardiac Arrest this year, but mercifully recovered. 3. Your ideas on cleaning up the harbour , guarantee it wont happen.
74	Leisure Harbour User;	Yes	Aberaeron;	Satisfied	The harbour is full.	Dissatisfied	The fact that moorings do not go with boats.
75	Leisure Harbour User;	No	Aberystwyth;New Quay;	Dissatisfied	No provision for visiting boats (cruisers) in particular recognised anchorages, provision for tender landing and access to water and waste disposal.	Dissatisfied	It is all about mooring provision and fails to address the needs of visiting boats from outside the area. This could be an important tourism enhancement. There are few safe natural anchorages on this coast. Once past Fishguard, there is only New Quay and that is only safe when there is no northerly wind. Aberystwyth marina is an option for shelter but aberaeron is too shallow and needs dredging.
76	Leisure Harbour User;	No	New Quay;	Dissatisfied	1. the current practise of selling a boat with its mooring is unfair. It allows the purchaser of a boat to acquire a mooring at the expense of someone who may have been on the waiting list for many years. The storage of the pleasure boat ramp on the main slipway at New Quay has meant the loss of many dinghy spaces and associated revenue the council. I would be interested to learn whether any harbour fees are paid for this and if so, how much	Very Dissatisfied	1. I do not agree with the withdrawal of the free parking facility for the Church Street car park. 2. I consider that in the event of the death of the mooring holder that the right to that mooring should pass to his/her spouse, partner or children. 3. I note that the proposal do not include any right of appeal or the right to refer any dispute to arbitration. I do not agrre with this.
77	Commercial Fishing Harbour User;	No	Aberystwyth;	Satisfied	Harbour runs itself fishermen do there best to keep clean and tidy .	Dissatisfied	Mooring holders need safety of births large amounts of money are spent on boats gears etc by mainly local people that have a vested interest in the town .
78	Commercial Fishing Harbour User;Commercial Passenger Trip Harbour User;	No	New Quay;	Dissatisfied	The council have allowed commercial moorings which were licenced for 12 passengers to be increased to 25 passengers, this could lead to several other boat owners wishing to do the same.	Very Dissatisfied	XXX started doing boat trips in a 15 foot dinghy at a very tender ageand in XXXX I worked with my father,fishing and doing boat trips. Unfortunately he passed away in XXXX and my brother and I carried on the business and in the late sixties we bought our first multi passeger vessel and another three in the early seventies. I am still fishing but on a smller scale and very involved with the trip boats and the business is successful and I fully expected to pass this business on to my children as is the normal thing in all other walks of life as far as il know.
79	Commercial Fishing Harbour User;	Yes	New Quay;	Satisfied	It has served to be a management policy very well	Very Dissatisfied	As a commercial operator I am very concerned about the proposed changes to transfer and inheritance rights
80	Commercial Fishing Harbour User;	Yes	New Quay;	Neutral	The current policy has served its purpose well	Very Dissatisfied	As the founder of one of the commercial ventures based in Newquay I am extremely concerned at the proposed changes to commercial mooring rights

81	Leisure Harbour User;	Yes	New Quay;	Satisfied	Fairly flexible and fair	Very Dissatisfied	Do not think that the mooring should be non transferable and believe those who have invested in property and have a commitment to NQ and it's charm and beauty should be able to pass on a mooring on death.
82	Commercial Passenger Trip Harbour User; Commercial Fishing Harbour User;	Yes	New Quay;	Neutral		Very Dissatisfied	XXXX firmly objects to Ceredigion County Councils' proposed policy change, within the draft Ceredigion Harbour Management Policy Consultation document, that removes the right to inherit or sell a viable business as a going concern. If implemented this business, in common with all commercial businesses that operate vessels out of Ceredigion Harbours, will be irretrievably devaluedtgeir benefits permanently lost to the local community and economy.
83	A Facility User;	Yes	Aberaeron;Aberystwyth; New Quay;	Neutral	Morning Management is good. Management of sea defences poor.	Neutral	Actions rather than words. It is difficult to answer this without seeing action.
84	Leisure Harbour User; A Facility User;	Yes	New Quay;	Satisfied	The current Policy appears to have worked with few exceptions	Dissatisfied	The proposed policy is not considered to be fit for purpose and requires considerable discussion and consultation with stakeholders before reconstruction in a manner acceptable to both CCC and stakeholders
85	Commercial Fishing Harbour User;	Yes	New Quay;	Very Satisfied	1) Transferring ownership of a mooring allowed people to pass their boat to a family member or friend of the family who had been sharing the responsibility of looking after a boat for a number of years. 2) The expectation to inherit a family boat on the death of a parent is logical as many boats are used by the whole family and I dont see why i should be prevented from passing my fishing boat onto my son or other family member. 3) Joining the waiting list only required a deposit and your name. I would like to know how I was on top of the list when XXXX was HM but now I am told I am no longer at the top but nearer the bottom. How can I have been moved down the list since XXXX arrived?	Very Dissatisfied	1)Removing inheritance right is cruel and creates complicated issues for people at a difficult time in their lives why does Ceredigion have the right to control peoples lives? 2)Removing the right to transfer a mooring prevents young fishermen coming into the business on the promise of taking over one day in the future. 3)Partnerships should be permitted at any point not just at the moment of application. The restriction of all of these things makes future planning impossible. Ceredigion just want to control everything themselves, why?

<p>86 A Facility User;</p>	<p>No</p>	<p>New Quay;Aberaeron;</p>	<p>Very Dissatisfied</p>	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: (add yr own selection if required). 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion</p>	<p>Very Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>
<p>87 Leisure Harbour User;</p>	<p>No</p>	<p>New Quay;Aberaeron;</p>	<p>Dissatisfied</p>	<p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy and greatly undermines this survey. However, as the harbours' policy will undoubtedly be replaced eventually, there is little point in listing the issues in full - but here are 3 very concerning issues with the 2010 version and not addressed by the proposed draft: 1. Very thin governance processes and the lack of any defined structure of oversight including the lack of Harbour Management Committees, along with the overall non-compliance with Harbours Act 1964, Ports Good Governance Guide and Port Safety Management Codes. 2. A lack of transparency, engagement and effective communication with stakeholders - as epitomised by the confused, secretive and ineffective waiting list system, often by-passed and abused, with no process for appeal/redress for this - or any other of the policies. 3. Lack of an agreed service level agreement with stakeholders, aligned to a rapidly-escalating fee structure since 2017, way above the rate of inflation, which does not then provide for, or take into account of, National and Regional legislation and for Equality, Diversity or Conservation. This has led to many missed opportunities to promote water-sports that could improve the mental health and well-being the young, the old and less-able residents of Ceredigion.</p>	<p>Dissatisfied</p> <p>A limit of only 3 objections is grossly insufficient for over 100 'lines' of policy. Please read in full the Minutes/Open Letter from CHUCC meeting of 1 Oct 2023 (representing the majority views of the attending harbour users from Aberaeron, Aberystwyth and Cei Newydd to CC) and with which I concur. I can provide a pdf copy but the Open Letter has been copied to XXXX CCC, local councillors, MPs, MSs and the press. In sum, CHUCC believes the current and proposed Harbour Management Policies are not fit for purpose and require much remedial action. I believe we can do so much better with a collaborative effort to update the policy. I understand that CHUCC and all stakeholders would expect and be willing to help in the production of a more fair, reasonable, transparent and effective harbour management policy and process.</p>

88	Commercial Passenger Trip Harbour User; Commercial Fishing Harbour User;	Yes	New Quay; Aberaeron;	Satisfied	The ability of a commercial mooring user to pass their moorings down to their children is a must to protect family businesses equally the ability to transfer for the same reason but prior to the death of the person who's name is on the historic mooring. In my family's case the original application was before I was born, so its logical that if he wants to retire someone needs to take over the business or a dozen people will have no job in the morning. The existing policy of not recognising partnerships could have been improved. Why force an owner to pay a high transfer fee and transfer the mooring into a new company name when a simple admin fee would be more appropriate to change the names on the mooring. This seems like profiteering. Lastly, there is a legal classification of small commercial vessel which allows most boats of sufficient size to become passenger carrying boats, there is a maximum number for passengers in the class of vessel and it is 12. Why is there not a banding for this number?	Very Dissatisfied	I have written separately on behalf of all the commercial mooring holders in New Quay and two in Aberystwyth of our objection to the removal of inheritance and transfer rights. In addition to this, I would add the two points I raised about the existing policy which remain in the new policy ie If the moorings are discretionary and annual then why are partnerships not recognised upon the annual submission of the mooring application ? Followed by my feeling that a banding which recognises the legal maximum of 12 passengers for most boats is missing from the pricing structure. Lastly the 'Use it or Lose it' policy is draconian in the policy and should include exceptional circumstances which is merely to put in writing the discretion shown by the harbour master already.
89	Leisure Harbour User;	Yes	Aberaeron;	Very Dissatisfied	no true consultation prior to implimentation	Very Dissatisfied	see correspondence from CHUCC to CCC (chairman XXXX)
90	Leisure Harbour User;	No	New Quay; Aberaeron;	Dissatisfied	Lack of harbourmaster presence. Parking of commercial vehicles allowed on NQ slipway. No visibility of waiting list.	Dissatisfied	Restrictions on passing on mooring on death. Part ownership of boats is normal and so should not impact mooring rights. Dinghy and small boat use should be encouraged.
91	Leisure Harbour User;	Yes	New Quay;	Neutral		Very Dissatisfied	XXXX stated in his introduction that the proposed HMP is tweaking the existing policy. I disagree. The maintenance and management the Harbour is pivotal to the success of New Quay. The proposed HMP cancels the historic 'right of tenure' of the fishermen, trip boats owners and leisure boat owners. This is a fundamental change. It is unreasonable, questionable in law and will undermine investment. The HMP should include the responsibilities of CCC. The HMP should include an arbitration clause as it is impossible for it to cover all eventualities and disputes/misinterpretations are inevitable.
92	Leisure Harbour User;	Yes	New Quay;	Very Dissatisfied	poor service, aggressive behaviour, unfair unreasonable treatment	Very Dissatisfied	Unfair , discriminatory, aggressive
93	Leisure Harbour User;	Yes	New Quay;	Satisfied	With the exception of the structure and process regarding the waiting list and allocation of mooring when available the existing policy has worked well by giving the harbour master discretion in applying the policy.	Very Dissatisfied	Please see response from Ceredigion Harbours' Users Consultation Committee although there are many other points to be made. Such as for example: waiting lists where by under category/order of priority a person on the waiting list as a resident of Ceredigion (priority 1) would be penalised by the death of a partner as then entitled to a single person discount and is therefore no longer a full Council tax payer. There is no mention or details of any complaint/appeal process regarding decisions of the Harbourmasters regarding the three harbours.eredigion
94	Commercial Passenger Trip Harbour User;	Yes	Aberaeron; New Quay;	Satisfied	Moorings are able to be transferred and inherited meaning my job is stable however partnerships are not allowed and as a skipper, in the future I would like the option of buying a stake in the company but this isn't possible.	Very Dissatisfied	Moorings are not able to be inherited or transferred meaning if XXXX was to die there is a high possibility my job is not secure at all also partnerships still aren't allowed.
95	Commercial Passenger Trip Harbour User;	No	New Quay;	Satisfied	My job is safe, the company I work for owner and employees is safe.	Very Dissatisfied	When my boss passes away, due to his son not being able to inherit the moorings with the new policy it means that I will lose my job that I love - as will all the employees for the business. The business which has been operating for 70 years will potentially be forced to close.

96	Leisure Harbour User;	Yes	New Quay;	Neutral		Very Dissatisfied	I agree with CHUCC
97	Commercial Passenger Trip Harbour User;	No	New Quay;	Very Satisfied	I like the right to be able to transfer moorings over and the right to inherit moorings	Very Dissatisfied	I'm not happy with potential new owners on the "list" being able to take over existing moorings and not being able to be inherited by one of my bosses in the future would put me out of a job. I also am not happy that there isn't the ability to go into partnership either as this restricts the expansion and growth of the company
98	A Facility User;	Yes	New Quay;	Dissatisfied		Very Dissatisfied	1. The revised Harbour Management Policy should be used to embrace environmentally supportive initiatives such as distinguishing between sailing vessels (auxiliary engine only) and power driven vessels, by charging lower harbour fees to wind powered vessels, thus reflecting their lower use of fossil fuels and carbon emissions. 2. The revision of the Harbour Management Policy should be used as an opportunity to develop environmentally sound sports for both young and old, and at a cost and availability similar to many harbours around the UK. To enable this, XXXX supports the reduction of car parking spaces on the Harbour slipway and a return to more dinghy storage, including pricing to match similar locations. XXXX has many competitive dinghy sailing Members including the Welsh Youth and Junior Topper Class Champion and such positive young role models can be supported by more effective management of New Quay Harbour's real estate. 3. Ceredigion Harbour commercial moorings should be identified by the Organisation's title and not by an individual's name. XXXX Volunteers are responsible for registering vessels that are owned by XXXX to support its activities. We therefore recommend that the revised Policy should include the need to register an organisation as the mooring holder, not a specific Club Volunteer, as the latter is subject to regular changes.
99	Leisure Harbour User;	No	Aberaeron;	Dissatisfied	Too much discretion with the Harbour Manager without taking responsibility. Harbour accounts should be more detailed and transparent.	Dissatisfied	Same as Q7 but new policy is even more
100	Leisure Harbour User;	No	Aberaeron;New Quay;	Very Dissatisfied	Inheritance of moorings should remain 2 larger boats should have facility of an outside mooring 3 waiting list should be transparent and publicised	Very Dissatisfied	1please see Chucc document supplied by XXXX.
101	Leisure Harbour User;	No	Aberaeron;	Very Dissatisfied		Very Dissatisfied	Does not do enough for the mental health and wellbeing of harbour user
102	Leisure Harbour User;	Yes	New Quay;	Dissatisfied	No governance. Lack of communication. Lack of engagement	Very Dissatisfied	More extensive response from Ceredigion Harbour users consultative committee. Lack of governance. Inheritance policy. Lack of sufficient space to go into problems in depth
103	Leisure Harbour User;	Yes	New Quay;	Satisfied		Very Dissatisfied	1. While I understand the desire to keep the waiting list moving, I fully object to Clause 15.1 'Inheritance' as I believe this is a disrespectful and unethical approach. I would recommend a clause that allows for a direct family member to be given the option of keeping the mooring upon the death of the mooring holder. For most the boat is a key part of the mooring holders immediate families hobbies. 2. In my opinion the policy is missing any reference to an arbitration clause to cover any misinterpretations or disputes. 3. I support the open and constructive response letter from the Ceredigion Harbours Users Consultative Committee (CHUCC)
104	Leisure Harbour User;	No	New Quay;	Dissatisfied	Lack of communication	Very Dissatisfied	Not being able to pass mooring on to my family .
105	Leisure Harbour User;	Yes	New Quay;	Satisfied		Dissatisfied	Please read the open letter from the CHUCC meeting of 1 October with which I agree.

106	Leisure Harbour User;	Yes	Aberaeron;New Quay;	Neutral	Please see attached copy of the minutes of the meeting of the chucc 01/10/2023 which I fully support	Very Dissatisfied	As above
107	Leisure Harbour User;	No	New Quay	Very Satisfied	It has worked for years we had a harbour master! who could be contacted and if we had a problem it could be sorted	Very Dissatisfied	DRACONAIN
108	Commercial Fi	Yes	Aberystwyth;	Satisfied		Dissatisfied	1. DO NOT LIKE CHARGE FOR PASSING BERTHS TO SON ON RETIREMENT 2. REALISE REASON FOR THIS BUT PROBLEM SHOULD BE SOLVED ADHOC 3. REGARDING 1+2 THIS IS NOT A PROBLEM AT ABER AND I DON'T THINK EVERY HARBOUR SHOULD BE TREATED THE SAME BECAUSE EACH ONE HAS VERY DIFFERENT CHARACTERISTICS AND HISTORY - THIS IS MY MAIN CONCERN

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[REDACTED]
Cyngor Sir Ceredigion County Council
Canolfan Rheidol
Llanbadarn Fawr
Aberystwyth SY23 3UE

02.10.23

[REDACTED]
On the 20th September 2023 the Ceredigion Harbour Services Team published a revised harbour management policy and launched a public consultation survey with a foreword by Cllr. Keith Henson, in which he stated that ***"The proposed changes can be considered as tweaks rather than transformational"***.

Our members are acutely aware of the considerable impact the proposed changes will have. We are not seeking to denigrate the office of the harbour services team nor the Cabinet Member for issuing the statement but we strongly refute it.

The description of the proposed changes as tweaks betrays a lack of understanding of the impact they will have. We are rightly concerned that the cabinet is informed about the ramifications of the new policy and we are anxious to have our voices heard over and above a public survey, the outcome of which could have a catastrophic impact on many people's lives.

Losing access to such a fundamental part of a business as a commercial mooring while grieving for a recently deceased parent is unconscionable in itself. Moreover it is essential that it is understood that the livelihoods of many people depend on a commercial mooring, not just the person who pays the mooring fees.

The discontinuation of a thriving multigenerational business because the mooring was is the name of the deceased will not only end the next of kin's ability to continue to provide for their family and keep a roof over their head but in some cases a commercial mooring is the engine which drives a multifaceted business employing many people directly and indirectly. Collapsing this pyramid will end contractual obligations with suppliers and buyers and create untold disruption in the supply chain. Serious consequences will be laid at the door of the policy makers as bank loans may no longer be affordable and homes may be lost.

Every business will be affected comprehensively by the new policy as each business will be brought to an end prematurely by the removal of rights which currently exist to inherit or transfer a commercial mooring to secure the continuation of the business and the livelihood of its employees. Many people will be forced into unemployed as a result of the implementation of this new policy and this will undoubtedly lead to unnecessary suffering and hardship.

We the undersigned, request, the harbour services team retract the threat of ending both inheritance and transfer rights for commercial moorings to avoid unnecessary hardship to the families and employees dependent on the commercial moorings.

To continue with the consultation survey in its current form is contemptuous of the hard working people of Ceredigion harbours who rely on their commercial moorings for their livelihoods and bring untold socio and economic benefits to the county and country.

We, the [REDACTED] recommend that decision makers should be able to recognise the apparent contradiction of these proposed changes and Ceredigion council's own corporate strategy objective of supporting local business and enabling employment.

Yours faithfully

[REDACTED]

[REDACTED]

The following statements and letters are submitted as evidence of the impact which the new harbour management policy would have if it was to be approved.

1) [REDACTED]

Dear Sir/Madam,

We write to you in response to the recent airing of the draft Harbour Policy update. Some proposed updates to the policy will affect all commercial mooring holders including myself.

I shall outline as follows, in no order of importance how our business will be affected.

1. The grey area around transfer affects hugely a buyout of one of our boats by a young, motivated fisherman (of which there are precious few in Ceredigion). This individual is a 40% owner in monetary terms but not on paper nor the mooring. This is not a partnership but an agreement that was verbally ratified by a previous harbour employee.

2. I own a second vessel in a separate partnership, when the partner drops out I enter another grey area in that the mooring may not be transferred to my name solely.

3. Even in the event that both of the above scenarios do not play out I assume that both of us will have to pay the proposed increased transfer fee of £2300 to continue our businesses.

4. Regarding the inheritance clause, [REDACTED] I would not like to see them not have the same chance of taking over this business. As above, we have precious few young motivated people coming into the industry, I don't think placing another hurdle in front of them is conducive to a continuance of the industry in New Quay.

5. Apart from the fishing side of the businesses, we also run a factory processing our own shellfish. A loss of the moorings will affect us on two counts.

A) Our USP is we supply handpicked crab caught by our own vessels, we are one of only two businesses in Ceredigion that can do this. Without moorings or vessels we will have to buy in product which apart from removing our USP leads to the next potential problem.

B) [REDACTED] was successful in obtaining grant money from a very niche EMFF funding stream to set up our second factory unit, one of the main conditions of this grant is that we process and supply our own product caught on our own vessel. Without moorings nor boats this will be impossible to achieve and we will fail to meet our required target objectives and markers. At this point WG will fail the business and require that [REDACTED] pay back the grant money. While I am happy to disclose the sums at a later date if required, all that needs to be said at the moment is if the above scenarios play then [REDACTED] will cease to exist, we will be forced to enter voluntary bankruptcy, ending a [REDACTED] family business and curtailing any chances of the next generation carrying on the business.

It's an irony that this email ends on such a note when the opening introduction to the policy plays heavily on supporting local businesses.

Yours sincerely

[REDACTED]

2)

To Whom it may concern

Re Draft Harbour Management Policy Sept 2023

My father [REDACTED] and my grandfather [REDACTED] started running boat trips from New Quay [REDACTED] on the family fishing boat to make ends meet. [REDACTED] has spent his life as a fisherman in New Quay and now my dad and I have the pleasure of working side by side with each other. I have a young son who I would like to run the business with me one day too. There are few things as rewarding to a boy as taking after your father in a family business and making your father proud.

My grandfather died very suddenly one day while my dad was still at university and fortunately my [REDACTED] and his brother [REDACTED] were able to inherit the mooring along with the family boats and dad left university to take after his dad and become a fisherman. They worked together in partnership until Idris wanted to be bought out so he could buy a hotel in the village.

Our family business has been running for almost seventy years in New Quay and this would not have been possible if the current harbour services proposal to revoke inheritance rights and transfer rights were in place. If dad was subject to the new proposals my grandmother [REDACTED] may have been made destitute as the family would not have had any way to survive without grandad's mooring and [REDACTED] would have not been a fisherman !

During the tourist season we now employ fifteen people plus a few youngsters and some relief staff . The upheaval which would be caused to our staff if we were forced to close our business because dad died suddenly and I wasn't next on the waiting list would be crazy.

I do hope the harbour authority sees sense and retracts its plans to even consider such changes. These new proposals would rip up the socio economic fabric of the village and make no sense to anyone.

Thank you

[REDACTED]

3) [REDACTED]

To whom it may concern

I am writing this statement in response the current consultation on the proposed Ceredigion harbour management policy.

I am responding to specific points set out below:

15.1 Inheritance rights, My father has had commercial berths in Aberystwyth harbour for the past 57 years. Over the past 25 years, since I left school we have worked hard to develop our now family owned business. We employ 6 local people and bring regular trade to several local trades people within the Aberystwyth area. However, while I have equal shares within the business, my father manages the berths within this arrangement.

The inheritance rights proposals within the consultation document as currently written, would mean that if something unforeseen were to happen to my father. Our business and life's work would be put in jeopardy.

Due to the size of our vessels, there are no other harbours which my vessels could operate out of in Wales and continue to fish in our traditional fishing area. We have four commercial vessels and as mentioned above employ several local staff, if we were to lose the berths in Aberystwyth my business would be destroyed, and my crew would be out of work. I personally would be unable to provide for my family and face bankruptcy.

While I recognise the inheritance rights may be a suitable and appropriate approach for pleasures boats, this proposal is not suitable for commercial boat owners in Ceredigion where businesses are family run and I am strongly opposed to this measure.

Thanks [REDACTED]

[REDACTED]

4) [REDACTED]

To whom it may concern:

Thank you for your email attaching the new proposals for the harbours. I must say I am a little bit surprised when you start by saying the harbours are a much loved and valued asset. I am only able to speak for Aberystwyth which seems to be treated more like a hindrance than an asset.

I wish to make the following points:

1. To keep the commercial businesses successful in these times, when the fishing industry is in dire straits all over the country, I find the new commercial birth management to be quite astonishing. The harbour at Aberystwyth, the fishing sector employs approximately 15 people and yet we are not given any security of moorings at anytime. To have to apply for you birth every 12 months quite honestly is totally inadequate. No other business could be run successfully on that basis.
2. The small port of Aberystwyth brings very close to one million pounds of revenue into the town each year and on our part the investment in equipment, vessels, licences, etc is phenomenal. Fishing is not a one person job - every fisherman will involve his/her family, children, wives, etc to build up a business and then find that there could be a situation at the behest of the council where you could not pass this business on and your children not guaranteed a mooring is very short-sighted.
3. I think it is imperative that the mooring holder be able to pass this on to his family. I understand the council, like every other institution, is having to make cutbacks but it's very difficult to make a cutback in Aberystwyth when there is already so very little given. I do expect once again this year for there to be an increase in the cost of mooring fees like there has been over the past 5/6 years.
4. I notice you mention waste generated by the fishing vessels which is minimum and saying that I don't think we have had a regular waste collection of any sort for at least the last 10 years, even though the council is obliged to provide one.
5. I understand that the council feels the need to change things but I don't think it's a good idea to change things that already work. The harbour in Aberystwyth has run very smoothly for many years with only a handful of incidents.
6. I also notice that if the day after you pay your moorings by some unlucky twist of fate o you pass away, the council issues no refund of the mooring fees, but will be able to pass your mooring onto someone else I think that is unfair .
7. One thing I would like to see improved, the harbour now seems to be used as a walking area for dog walkers who do not clear up their dog mess after them. I think this needs to be addressed.

Yours sincerely

[REDACTED]

5) [REDACTED]

[REDACTED] of New Quay, unequivocally and resolutely expresses its strong dissent regarding the proposed policy modification put forth by Ceredigion County Council within the comprehensive draft of the Ceredigion Harbour Management Policy Consultation document. The proposed alteration in question seeks to eliminate the longstanding entitlement to inherit or transfer ownership of a thriving business as a viable ongoing concern.

In the event that this proposed policy change is enacted, the ramifications would extend far beyond the immediate scope of [REDACTED] impacting a broader spectrum of commercial enterprises engaged in vessel operations within Ceredigion Harbours. The implications are indeed profound, as such an alteration would inexorably erode the inherent value of these businesses, rendering their assets and operations considerably less attractive for both potential investors and those seeking to continue their maritime legacies.

Furthermore, it is crucial to acknowledge that these businesses, including [REDACTED] have long played an indispensable role in bolstering the local community and economy. Their contributions span across multiple facets, encompassing the creation of employment opportunities, provision of essential services, and the generation of income streams that flow into the broader economic ecosystem of Ceredigion. Thus, any diminution of these enterprises' viability would lead to a permanent and detrimental loss of these substantial benefits, significantly affecting not only the businesses themselves but also the residents and stakeholders of the local community.

In summary, [REDACTED] vehemently opposes the proposed policy shift, recognizing its profound and far-reaching consequences for the entire spectrum of commercial enterprises navigating the waters of Ceredigion Harbours. This stance is grounded in a deep commitment to preserving the economic vitality of the local community and ensuring the enduring prosperity of its residents, both now and for generations to come.

6 [REDACTED]

I would like to register my objection to Ceredigion County Councils' proposed Policy change, within the draft Ceredigion Harbour Management Policy Consultation document, that removes the right to inherit or sell a viable business as a going concern.

I have been running my boat business from New Quay harbour since 1987. My son has always shown a strong interest in running the business as I stand back from day to day operations but the proposed policy change jeopardises this smooth transition . If i were to die unexpectedly, all my son would have are the boats I own with no moorings to run them from and no benefit to himself or the wider community from the business I have built up over nearly forty years. In common with many other commercial boat based businesses in Ceredigion harbours, the next generations would not be able to continue their family businesses unlike land based businesses that can often continue from generation to generation.

May I urgently implore the council to re consider this policy change that will inevitably devalue businesses and their benefits to the wider community and have devastating effects on families wishing to continue businesses well established through the hard work of previous generations.

[REDACTED]
[REDACTED]

7 [REDACTED]

[REDACTED] firmly objects to Ceredigion County Councils' proposed Policy change, within the draft Ceredigion Harbour Management Policy Consultation document, that removes the right to inherit or sell a viable business as a going concern. If implemented, this business, in common with all commercial businesses that operate vessels out of Ceredigion Harbours, will be irretrievably devalued and their benefits permanently lost to the local community and economy.

8) [REDACTED]

To Ceredigion County Council,

As a STAKEHOLDER and commercial fisherman of New Quay and born raised in Newquay I have seen a lot of unnecessary changes under the control of Ceridigion Council. As for the new Harbour management policy drafted and have read the new changes involved I am truly objecting to certain new rules added into it .

Object Ref 6.2 Both types of moorings are not transferable? Why?

OBJECT :This will affect my business if boat is sold commercial 2/ i can't transfer mooring to a new owner example to my son or new purchaser .3 Regarding leisure this stops my father transferring mooring me or to the above reason stated above .

Object Ref 6.4 Carpark not transferable? Why?

OBJECT: As reasons in 6.2 this is necessary for having a onsite vehicle this would affect my business.

Object 15.1 Inheritance : The are no inheritance rights in relation to the moorings .Why?

Over generations in New Quay and other ports in the UK When fathers get to old and hand down their business to their sons or daughter they pass on the rights to continue that business and service for their family's. CCC are taking this away and i object to the right a son or daughter has to inheritance the business if the mooring is not transferable to them the boat can not continue to operate.this is totally wrong and is to be stop. This would truly affect my business as it restricts me to pass it on to my son in the next 5 years.

Object to18:1 There are no transfer rights in relation to moorings or facilities within ceredigion managed harbours. WHY?

Yours faithfully

[REDACTED]

[REDACTED]

9) [REDACTED]

[REDACTED]

29th September 2023

Dear Sirs

Re: Draft Harbour Management Policy

As a commercial fisherman I write with alarm at the new draft proposed policy that the Council is putting forward without, it seems, any consideration to the impacts it will have to present local fishermen and boat operators.

I have been a fisherman for many years now and my son joined me in the business some 15 years ago. As a business we have constantly evolved to meet different fishing methods etc and the change in climate. This has meant huge financial implications with a lot of assistance from the bank and Welsh Government. At the moment we don't employ people, but in the past we have and who knows if this will change?

My son [REDACTED] now has a young family and is actively looking to buy a house. I expect that he too will carry on investing in the future business for his son hopefully to take over the business in good health.

Obviously if the new policy to end my mooring rights in New Quay is approved, then, if I drop dead anytime and the Council removed [REDACTED] from the harbour then the bank would not only take my son's livelihood away but also his house.

I hope with the above that the Council will not approve the draft policy but in fact engage with us, especially my son, to give him some certainty for the future.

Yours faithfully

[REDACTED]

10) [REDACTED]

Dear Sir or Madam,

I am writing to you today in the hope of changing your mind on the decision to change the rights for commercial mooring users which will have devastating effects on me and so many others.

In fact it will no doubt eventually put a end to many of these unique, long run and well loved businesses that not only bring in a living for the owners and its employees but also for many it plays a key part helping to bring in tourists that keep our villages thriving, allowing us and so many others to live and work in the place we all call home.

I am a fisherman in my late twenties and I have worked in my fishing village called New Quay for most of my life and I've been lucky enough to have worked on some of the boat businesses here.

I have worked hard from scratch for everything that I have and now as of the last few years I've finally gone into partnership with the intention of owning a hundred percent of this business therefore leaving me with no mooring and no place to work from if this change goes ahead with commercial mooring being included in it. Leaving our employees at risk to losing their jobs and income. And leaving me at risk to losing my business and its income completely or forcing my family and I to leave our home and relocate out of Ceredigion County.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Owen Morgan
Ceredigion County Council

6th October 2023

Formal response to Ceredigion Harbours Management Policy Consultation

This company has made use of Ceredigion County Council's limited survey response form in respect of the above Consultation and now responds formally with specific concerns in respect of CCC's proposed changes to mooring transfer rights.

[REDACTED] firmly objects to Ceredigion County Councils' proposed Policy change, within the draft Ceredigion Harbour Management Policy Consultation document, that removes the right to inherit or sell a viable business as a going concern. If implemented, this business, in common with all commercial businesses that operate vessels out of Ceredigion Harbours, will be irretrievably devalued and their benefits permanently lost to the local community and economy.

Thereby rendering [REDACTED] et al worthless; undoing years of brand building, create a total loss of work for our employees, isolate thousands of returning customers per annum and place its directors into financial ruin. All of this would all have measurable impact on the local economy.

And instead allow an individual, who idles on a historic commercial mooring waiting list and has not been subjected to any due diligence by CCC in respect of their background, financials or most importantly need; can take the mooring and do what with it?

The monetization of the commercial mooring waiting list: - If this Policy change is made CCC have monetized said waiting list as 'next in line' individuals, those holding higher positions on the list, may be offered significant sums of money by those lower on the list, not to take up their claim to a mooring. Large sums of money of 'black money' could potentially change hands, thereby enhancing (not reducing as intended) a 'black market' for commercial moorings.

A valued business: - This business has built itself from scratch into a leading provider of Fishing Trips in Wales. We have built a brand, a business and a customer base in a wholly professional and totally committed manner. Our graft, our acumen, our passion and our own work have grown [REDACTED] [REDACTED] into a position where the business now plays a significant role in New Quay and Ceredigion. We directly bring tourists into Ceredigion to stay, eat and spend their money. In order to protect the Directors and employees of the Company we must be able to sell as a going concern.

[REDACTED]

A loss of revenue to the Exchequer: - A commercial mooring should be able to be sold as a going concern. A business should be able to sell out for its full legitimate value, business, boat, brand etc. This would allow a maximised value (not just a boat value as enforced by the new Policy) and allow a fuller application of Capital Gains Tax to flow into the Exchequer.

Your sincerely,

██████████

██████████

From: [REDACTED]

Sent: 01 October 2023 21:08

To: Ceredigion Technical Services <technical_services@ceredigion.gov.uk>

Subject: Re: Ymgyngforiad ar Boli: Rheoli Harbyrau Ceredigion - Ceredigion Harbours Management Policy Consultation

To whom it may concern:

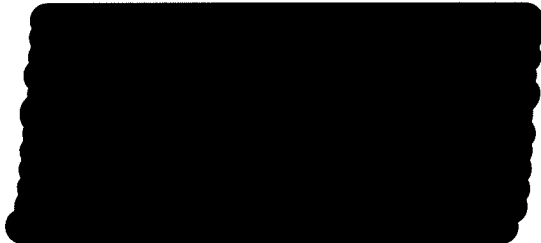
Thank you for your email attaching the new proposals for the harbours. I must say I am a little bit surprised when you start by saying the harbours are a much loved and valued asset. I am only able to speak for Aberystwyth which seems to be treated more like a hindrance than an asset.

I wish to make the following points:

1. To keep the commercial businesses successful in these times, when the fishing industry is in dire straits all over the country, I find the new commercial berth management to be quite astonishing. The harbour at Aberystwyth, the fishing sector employs approximately 15 people and yet we are not given any security of moorings at anytime. To have to apply for you berth every 12 months quite honestly is totally inadequate. No other business could be run successfully on that basis.
2. The small part of Aberystwyth brings very close to one million pounds of revenue into the town each year and on our part the investment in equipment, vessels, licences, etc is phenomenal. Fishing is not a one person job - every fisherman will involve his/her family, children, wives, etc to build up a business and then find that there could be a situation at the behest of the council where you could not pass this business on and your children not guaranteed a mooring is very short-sighted.
3. I think it is imperative that the mooring holder be able to pass this on to his family. I understand the council, like every other institution, is having to make cutbacks but it's very difficult to make a cutback in Aberystwyth when there is already so very little given. I do expect once again this year for there to be an increase in the cost of mooring fees like there has been over the past 5/6 years.
4. I notice you mention waste generated by the fishing vessels which is minimum and saying that I don't think we have had a regular waste collection of any sort for at least the last 10 years, even though the council is obliged to provide one.
5. I understand that the council feels the need to change things but I don't think it's a good idea to change things that already work. The harbour in Aberystwyth has run very smoothly for many years with only a handful of incidents.
6. I also notice that if the day after you pay your moorings by some unlucky twist of fate o you pass away, the council issues no refund of the mooring fees, but will be able to pass your mooring onto someone else I think that is unfair.
7. One thing I would like to see improved, the harbour now seems to be used as a walking area for dog walkers who do not clear up their dog mess after them. I think this needs to be addressed.

Yours sincerely

Ceredigion County Council
Highways & Environmental Services



[REDACTED]
[REDACTED]

19th October 2023

Dear Sir/Madam

Re: Ceredigion Harbours Management Policy Consultation: Aberystwyth, Aberaeron & New Quay:

I am writing on behalf of [REDACTED] in response to Ceredigion County Council's proposed changes to Ceredigion Harbours Management Policy consultation. Whilst [REDACTED] does not have a direct interest/stake in Ceredigion Managed harbours, our regional members and the respective communities do.

[REDACTED] support and represent tourism-related businesses throughout Ceredigion and the wider Mid Wales region, and [REDACTED] members have raised concerns regarding proposed changes to the Ceredigion Harbours Management Policy and the potential effect on long-standing tourism related businesses that depend on commercial moorings in Ceredigion.

The tourism business sector in Ceredigion is vital to the rural economy, and coastal towns and harbours are key components of the tourism offer in the county which accounts for 12.9% of employment. In addition, the agriculture, forestry and fishing industries accounting for about 4.5% of the enterprises in the Ceredigion economy.

Our understanding is that the new policy proposal is to replace section 16.1 of the current Harbour Management Policy;

"Where a member of a family wishes to continue using the named vessel on the allocated mooring after the death or incapacity of the existing holder, he/she must gain written consent from the council to do so".

Specifically, section 15.1 of the new proposed draft policy relating to Inheritance states:

'there are no inheritance rights in relation to moorings or facilities in Ceredigion harbours' and Section 5.2 which now states the 'moorings once allocated are not transferable'






This new policy sections is likely to have unintended consequences for family-owned Leisure and Sightseeing Boat trips organisers operating on Commercial Moorings and the change could directly affect commercial tourism enterprises impacting on future generations that may now be unable to continue to operate well-established boat trip businesses.

We would suggest that an annual application/allocation process is already an unnecessary uncertainty for active commercial and fishing local family businesses. The proposal in section 1.3 to introduce a seasonal application approach is, in our considered opinion, an unnecessary policy change for commercial moorings/facilities.

There are circumstances that should be considered by the authority in the case of transfers for a commercial mooring/facilities holder. The inclusion of 'exceptional circumstances' in the new policy would provide the opportunity for a commercial mooring holder or his/her appointed agent to provide an explanation to the council's satisfaction prior to facilities or mooring re-allocation.

 recognise that Ceredigion Council has a difficult task in maintaining a balanced approach in respect of all harbour users. We would urge the council to carefully consider a separation of harbours management policies to include an appeals procedure within a standalone commercial users policy agreed in consultation with local commercial businesses.

This would help to ensure that long term harbour management policies are consistent with the council's corporate strategy and aligned to the needs of local fishing/commercial businesses to ensure business continuity, sustainability, succession for this and future generations.

Yours Faithfully




[Redacted]

[Redacted]

Email to: CLIC@ceredigion.gov.uk

17th October 2023

Ceredigion County Council Highways & Environmental Services:

Ref: Proposed Ceredigion Harbours Management Policy Consultation 20/9 – 20/10/23: -

Aberystwyth, Aberaeron & New Quay:

We thank you for the opportunity to respond to the Ceredigion County Council's proposed new harbours management policy consultation.

[Redacted]

Whilst the [Redacted] does not have a direct interest/stake in the Ceredigion harbours of: Aberystwyth, Aberaeron and New Quay our regional members and the respective communities do.

We agree that policy review is healthy, particularly given the extraordinary events of recent years and the ongoing cost of living pressures. That said, we are not persuaded that the proposed changes could be considered 'tweaks rather than transformational', neither do the proposals appear consistent with the Council's corporate strategy objective of: Boosting the economy, supporting businesses, and enabling employment, or the sustainable development duty under the Wellbeing of Future Generations (Wales) Act 2015.

We are aware of the existing/current Ceredigion Harbours Management Policy and limit our response to the draft policy changes that according to our members will directly and immediately affect local fishing and commercial enterprises notwithstanding any safeguarding requirements/policies necessary for future generations to prosper and contribute to the economy of already fragile coastal communities in the county.

[REDACTED]

The Gunning Principles are the founding legal principles applicable to all public consultations in the UK, first laid in 1985.

We note, with concern, that a digital first-online survey appears inconsistent with the Gunning Principles 1, 2 and 3 in order to ensure a prescription for fairness thereby compromising principle 4, *"The product of the consultation is conscientiously taken into account by the decision makers"*. In consideration of the above the [REDACTED] response will be submitted by email only and to the extent that we can will include the concerns raised by stakeholders in respect of the three named Ceredigion harbours within the limited time available.

Introduction:

Section 1.3 of the draft policy amends section 1.2 of the current 2010 Ceredigion Harbours Management Policy removing;

"each mooring and associated facility is allocated on an annual basis only"
and replacing with

"each mooring and associated facility is allocated subject to application on a seasonal (Summer 1st April – 31st October, Winter 1st November – 31st March) basis only".

We would argue that an annual application/allocation process is already an unnecessary uncertainty for active commercial and fishing local family businesses, the proposal in section 1.3 to introduce a seasonal application approach is, in our considered opinion, a completely unnecessary policy change for commercial and deep-water moorings/facilities.

Section 1.4: Proposes a consistent, fair and equitable approach and is applied to new, existing and potential mooring holders and harbour users. In our considered opinion, whilst we understand the principles and the authorities roles and responsibilities, we do not agree that commercial and leisure/recreational activities policies can be treated fairly or consistently as one application policy for all and would respectfully suggest that any harbour use, facilities and moorings for commercial users must be managed separately to ensure business continuity, sustainability, succession.

Objectives of the Policy:

Sections 2.1 (i) & (ii)

Whilst inferred, we think these objectives would be strengthened by including the respective commercial operations i.e. *fishing boat operations*.

Commercial Moorings – Waiting Lists:

Section 6.2 of the proposed/draft policy states:

"Both types of commercial moorings, once allocated, are not transferrable".

In the context of the current policy whereby

"once allocated, commercial moorings are not transferrable to a third party without the council's prior written consent", we would welcome an explanation/justification for introducing a restriction to commercial moorings in the draft policy that does not consider the unplanned/unforeseen realities that can and do change a business dynamic necessitating a transfer for legal and succession purposes in our view transfers need to be considered and designed to accommodate commercial stakeholder necessities/realities particularly as many of the mooring holders will be long established family businesses.

Section 6.3 acknowledges the significant contribution to Ceredigion's local economy made by passenger vessels and commercial fishing vessels. Whilst we recognise the 'use it or lose it' approach we would strongly advocate the inclusion of 'exceptional circumstances' providing the opportunity for a commercial mooring holder or his/her appointed agent to provide an explanation to the council's satisfaction prior to re-allocation. There are many unforeseen/unplanned events that must be fairly and properly considered by the authority that in the case of transfers could constitute 'force majeure' for a commercial mooring/facilities holder.

Duration of Mooring, Landing & Facility Agreements

Long term moorings:

Section 8.1 of the draft consultation on harbours management policy proposals replaces and adds to section 8.1 of the current management policy.

Please see our comments in relation to section 1.3 above.

Moorings Facilities & Launching Charges & Rules:

Section 9.3 and 9.6 of the draft Ceredigion Harbour Management Policy Proposals: -

Please refer to our response to section 6.3 above.

Renewal of Allocated Mooring/Facility:

Section 10.2 of the Draft Ceredigion Harbours Management Policy Proposals. We consider the introduction of 10.2 to be entirely inappropriate for commercial mooring/facility holders. Please note our response to section 6.3 'exceptional circumstances'.

Inheritance:

Section 15.1 of the Draft Ceredigion Harbours Management Policy Proposals;

"There are no inheritance rights in relation to moorings or facilities within Ceredigion managed harbours".

Proposes to replace section 16.1 of the current Harbour Management Policy;

"Where a member of a family wishes to continue using the named vessel on the allocated mooring after the death or incapacity of the existing holder, he/she must gain written consent from the council to do so".

We understand that, with the exception of Grandfather Rights, no property right is either inferred or conferred under the current policy given that the maximum duration of a mooring agreement is 12 months commencing 1st April. Given our previous comments we see no justification to change the provisions under the current management policy section 16.1 as the rule provides the necessary flexibility for Harbour Authorities to respond and adapt to unforeseen change in respect of commercial operations/mooring holders. In our opinion this underlines the need for a separate application/management policy for commercial moorings that facilitate business continuity and succession supporting and maintaining the significant economic contribution employment and related trades and services to the local economy.

[REDACTED]

Minutes of Meeting and Open Letter to CCC regarding proposed Harbour Management Policy (HMP) and Consultation Process

In attendance: over Ceredigion 30 Boat owners/operators

[REDACTED]

Agenda Discussion Items relating to Harbour Management Policy (HMP):

- a. Lack of Governance/Authority/Structure
- b. 'Inheritance' policy
- c. Sale of Boats/Moorings policy
- d. Waiting List Process
- e. Fee Structure
- f. Partnerships/Joint Owners
- g. New Quay Deep Water/Visitors' Moorings
- h. Sub-Letting
- i. Harbour Users Meetings
- j. Document Terminology
- k. Service Level Agreement
- l. Missed Opportunities
- m. Consultation Process

The above points were discussed in some detail with respect to the current management of Ceredigion Statutory Harbour Authority (SHA):

- a. Lack Governance/Authority/Structure (Para 1). A policy document such as the HMP should clearly state and define the following:
 - i. The overarching legal authority of the policies therein.
 - ii. The SHA governance structure (including duty holders and responsible persons etc).
 - iii. Terms of reference, any required qualifications and training of SHA team and Committees.
 - iv. The accepted means of compliance (including alternative means of doing so) with policies.
 - v. Any penalties/remonstration for non-compliance.
 - vi. Processes that allow for review and challenge.

Sadly, there is no mention in the draft HMP of the overarching legislation and guidance such as the Harbours Act 1964, the Harbours, Docks and Piers Clause Act 1847, nor any related guidance documents for the effective management of Harbours. Infringement of the Aberporth Range By-Law of 1976 should also be mentioned. There is no definition of the reporting structure of the SHA and the responsibilities, qualifications and required skills of any staff, nor of their training. There is no mention of the DfT/Welsh Government requirements of the Ports' Good Governance Guide and how exactly the SHA will meet the requirements of the Ports Safety Management Code. As result, HMP was considered of little substance as a policy document because its authority and governance could not be determined. Furthermore, without a defined and fair process for appeal/redress over harbour staffs' decisions, the HMP is undemocratic and open to abuse/personality clashes and even inappropriate influence from above. The fact that each harbour does not have a Harbour Management Committee indicates a lack of clear, accountable and transparent governance.

OUTCOME: OPPOSE ENTIRELY - MAJOR REVIEW REQUIRED/FORM HARBOUR MANAGEMENT COMMITTEES FOR EACH HARBOUR

- b. Inheritance Policy (Para 16). This was discussed at length. It was thought that CCC were attempting to increase the turn-over of the waiting lists which was understandable but overall, this approach was condemned by the meeting as a very blunt instrument - being unethical, insensitive and lacking in compassion at what could be a stressful time for the families, as well as not being best-practice in other Harbour Authorities. Research shows that such a policy could not be found in other SHAs, in fact, we understand both Gwynedd and Pembrokeshire SHAs had rejected such policies as likely to attract adverse media attention. It was thought that the policy statement in the previous HMP allowed for sensible discretion. (See para f below) and it would be common practice to presume in favour of 'inheritance' of family/legal partners etc and that this should be included in any new policy.

OUTCOME: OPPOSE ENTIRELY- MAJOR REVIEW REQUIRED

- c. Sale of Boats/Moorings Policy (Para 5). The same rationale (increased waiting list turn-over) for this policy was presumed. Generally, the meeting thought its introduction was understandable, as sale of boats with moorings had been a way for people to 'by-pass' the waiting list; which, of course, could seem very unfair to those on the list and stagnated 'churn'. However, not being able to sell a boat with a mooring sometimes made negotiating the sale of the boat very difficult and by not allowing a 'transfer' option, meant the SHA was missing out on income, as well as opportunities to get the waiting list moving. A solution might be for the SHA to ensure that an owner wishing to sell both boat and mooring must first offer any boats for sale to those people on the waiting list, which would also ensure that the moorings are matched to the boats on them, speeding up the process.

OUTCOME: OPPOSE - FURTHER REVIEW/RE-WRITE REQUIRED

- d. Waiting List Process (Paras 4-7 and Appendix 1). The Waiting List process has been a major bone of contention for many years. The list is secretive and never published while, historically, some people have managed to apparently by-pass the list, even with new boats. As a result, it is nigh on impossible to get on the waiting list because no-one knows when a space has become available. Because the list is unavailable on request (contrary to national FOI legislation), public confidence in the fair and reasonable management of waiting lists has evaporated entirely. CCC's excuse for this lack of transparency is always "GDPR". However, it is understood that this is not correct and there are ways for a Waiting List to be seen, and even published, whilst meeting requirements of GDPR - as demonstrated by other SHAs. It was agreed that the priorities (Para 5.3) for locals were a step in the right direction, but it was believed that the Waiting List process needs a complete stem-to-stern overhaul as a separate work-stream, in which the [REDACTED] would be keen to participate and lend their considerable local knowledge.

OUTCOME: OPPOSE ENTIRELY- MAJOR REVIEW REQUIRED

- e. Fee Structure (Para 9). Whilst not directly addressed in the proposed HMP, (CCC's 'Fees and Charges' covers cost rates), there had been another workstream undertaken by the [REDACTED] to address the disputed fee increases, which is still gathering evidence because CCC have re-buffed any consideration of reductions going forward, making further engagement pointless. In fact, it is understood that CCC will further increase fees for boat owners/facilities in 2024. Even at the present 2023 levels, the fee structure is unjustifiably excessive and that it is discriminatory against locals, the old, the young and the disabled. This is actively preventing the uptake of water-borne activities in contravention of numerous CCC and WG initiatives and legislation. This issue requires an entirely separate, wholly inclusive and transparent review.

OUTCOME: OPPOSE ENTIRELY - MAJOR REVIEW REQUIRED

- f. Partnerships/Joint Owners (Para 19). The concept of joint and co-ownership of vessels is not covered well as many boats can only be afforded by 2 or more parties being joint or co-owners. All costs are shared and paid for equally, including insurance and mooring dues (in most other SHAs). Para 19 makes no sense because the ownership of shares when a boat is 'first registered' could be completely different as the years go by e.g marriage, death birth of offspring of any (or all) of the joint owners. It would seem excessively harsh, unreasonable and discriminatory to prevent such arrangements. It is suggested that when partnerships change, then the Harbour Master should be allowed some discretion and common sense....as in the case of inheritance (see Para a above).

OUTCOME: OPPOSE ENTIRELY - MAJOR REVIEW REQUIRED

- g. New Quay Deep-Water (DW) Moorings/Visitors Moorings (Para 4 and 7). In both of the HMPs there appears to be a limit on the number of deep-water moorings but no reason is given. Clearly, there is enough space for a number of extra deep-water/visitors' moorings, which could increase the revenue to the harbour. Furthermore, allocating any future DW moorings only to commercial vessels was not seen as sufficiently equitable. There should be the capacity to cater for DW moorings for large or bilge keel yachts, especially as the lack of dredging by CCC and the recent proliferation of sandbanks, means these deeper-keeled yachts can be 'neaped' (stuck on the sandbank during neap tidal periods – 2 per lunar month). Obviously, this can significantly reduce seafaring opportunities during the season. However, there are not many of this type of yacht left, in New Quay at least, as people are 'downsizing' in the face of increasing fees and so, the SHA is further losing revenue for harbours. This policy needs further review.

OUTCOME: OPPOSE - FURTHER REVIEW REQUIRED

- h. Sub Letting (Para 14). It would seem perverse for the CCC CEO to suggest that Harbours do not generate enough income when the HMP prevents increased revenue through schemes such as sub-letting. Failure to allow HM-controlled 'sub-letting' prevents people (perhaps those on the waiting list with a boat already) from getting on the water when a mooring IS available in the harbour – if only for a short period - say, because the current mooring holder could not launch because of illness/boat repairs etc. In this case, if short-term sub-letting was permitted (with Harbour Master oversight/approval of similar boat/size etc), not only would the SHA get the money from the allocated owner but also the additional costs of sub-letting.

OUTCOME: OPPOSE - FURTHER REVIEW REQUIRED

Also discussed at length were other shortcomings within the HMP which further undermined the authority and effectiveness of the proposed document:

- i. Harbour Users Meetings and SHA Communication. Whilst the recent introduction by the HM of 'Surgeries' and an online pamphlet, 'Calm Waters', are welcome, the surgeries are infrequent and not easily accessible by all harbour users, while copies of Calm Waters are not widely available. Neither does the pamphlet carry much useful information. In addition, there are only 2 Harbour Users' Meetings per year but they are now online Zoom-type meetings and access has to be requested. Even when given access, minutes and agendas can be hard to find and the meetings only last 45 mins per harbour which means they cannot cover anything in great depth. These meetings are viewed only as 'one-way transmission' with little evidence of actions, so are considered an insufficient and ineffective means of communication with harbour users. Also, many people are irritated by being labelled 'debtors' in emails from CCC; even when not yet invoiced, or the period for payment has not yet lapsed and no alerts have been sent. Invoices regularly do not arrive until after the cut-off date and even then,

receipts are often not sent once paid. Use of 'clit' and the response times (checked only once a week) are wholly inadequate. Overall, communication from CCC requires urgent improvement and softening – if nothing else, appreciating that harbour users are *customers* and not mega-wealthy and 'privileged' gin-palace owners would help. The financial system worked far better when done by the Harbour Masters themselves. In addition, the whole communication process should be completely reviewed and be clearly defined in the HMP.

OUTCOME REQUIRED: Ceredigion SHA to improve and define agreed two-way communication practices with harbour users, including face-to-face Harbour Users Meetings. Re-introduce Harbour-Master-centred invoice and payment processes (as well as an on-line option) with the hastened provision of receipts.

- i. Document Terminology. The origins of the HMP can be traced back to documents copied from Saundersfoot and Devon harbours before 2010. In the intervening time, maritime terminology has changed and moved on. It is suggested that the HMP should use the current terminology and definitions of the MCA/DFT/RYA as a matter of course. For example, vessels should be classified as Commercial Vessels (using up-to-date codes), Pleasure Vessels or Intended Pleasure Vessels (IPVs) etc and the HMP should reflect best practice as outlined in Marine Guidance Notices (MGNs).

OUTCOME REQUIRED: Ceredigion SHA to use present MCA terminology throughout HMP.

- k. Service Level Agreement (SLA). There is no defined and agreed level of Service that Ceredigion SHA is required to provide for the fees they charge. Clearly this needs rectifying. However, the CEO for CCC, in a letter to ████████ members when discussing fees/services provided and FOIs, included the following list of Services that he claims the SHA provides:

- Main chains
- Slipway access
- Dredging
- Provide and maintain Aids to Navigation
- Harbour maintenance (eg remedial works to infrastructure)
- Staff (including presence at harbour offices and engagement through meetings/surgeries and the Calm Waters publication)
- Port Waste Management Plan facilities
- Crown Estate Licence
- Free parking (current 9 month parking season ticket costs £370)
- Winter hard standing provision
- Water

However, it is abundantly clear that the list is very-much flawed because many of the services have not been provided by the SHA to an acceptable level (reduced slipway access, no dredging, poor navigation aids, broken fairway markers'/lights, little maintenance and waste disposal behind locked doors, along with the failure to remove obstructions, floating ropes on moorings/pots etc - despite repeated requests and their extant inclusion in the HMP. According to the draft HMP, discounted parking will no longer be offered to any harbour users and harbour staff are considerably less available, less qualified and are no longer considered at SME-level.

OUTCOME REQUIRED: CCC/ SHA to provide an agreed SLA to all Harbour Users against which the SHA is held to account. This needs to be done as a collaborative project with all stakeholders. Failure to meet SLA levels in a Harbour should result in some form of financial redress for boat owners. Review staff levels, skills, pay and training.

l. Missed Opportunities. The re-vamp of the HMP appears to have missed a golden opportunity to reform the use of harbours in Ceredigion to meet national initiatives relating to the conservation of the environment, inclusivity, health and well-being, alongside possible development of the harbours for increased participation in water-sports and tourism. There are a number of possibilities that exist to help local young, old, disabled and low-income (residents and visitors) to get on/in/by the water but the HMP seems intent in ignoring such advances. For example, there could be discounts and dispensations for fees for the categories of user listed above, the SHA could lead on improved facilities for commercial operations, fishermen and amateur sports clubs, the creation of more-affordable, effective space for sailing dinghy, kayak and board users of all abilities in all harbours and even the expansion of the Cardigan Bay Water-Sports Centre in New Quay. For this to happen, a complete review of the HMP is required and the SHA needs to be more aligned and engaged with its customers, so that co-operation and transparency can become much improved.

OUTCOMES REQUIRED: Ceredigion SHA to review fee structure and development policies to encourage increased water-sports participation that is effective, environmentally friendly, inclusive and to embed this in the HMP. SHA to lead on future developments in conjunction with commerce, trade and tourism depts of CCC.

m. Consultation Process. Overall, it was agreed that the very short timescale for the online consultation tool to be completed, aligned to an inappropriate question structure was highly unlikely to meet established principles of local government consultation. Simply, any such consultation needs to happen early, with sufficient reason for change, while allowing for intelligent consideration and response before any decision is made. Harbour users have not been involved in the consultation process early enough, while the reasons for policy changes have not been communicated clearly; nor were the changes identified in copies of the new HMP; which would have been helpful. Furthermore, the on-line consultation tool does not appear to allow for more than 3 possible objections, which is considered grossly insufficient for over 100 policies lines. Likewise, the timescale of only a few weeks is far too short and there is no guidance or indication on what number of responses would constitute a 'valid' objection – just one negative response? Or over 10/50/75% of respondents? That is even before any implementation of any changes is considered. As a result, there is no confidence in the whole consultancy process and it was even thought possible that any objections might not get considered at all by CCC officers. Ultimately, the [REDACTED] believes the proposed HMP and its consultation process is not compliant with a wide gamut of legislation and can only be classified as 'not yet fit for purpose'. Therefore, we oppose any implementation of any HMP without a great deal more work; ideally in collaboration. However, we acknowledge that the intent to improve the management of harbours is a seed that needs to be carefully tended and nurtured if it is to grow and capture those opportunities in para l above. It is only through collaboration, with focused engagement and transparency, that the Harbours and their management will improve - both as the shop-windows of our communities and as amenities for all walks of the local population as well as for the visitors - who provide the majority of the income to Ceredigion coastal businesses. To date however, CCC has shown little sign of wanting to engage collaboratively and openly with harbour users to achieve those aims.

OUTCOME DESIRED: CCC to cease the present HMP and Consultation Process and engage more openly and effectively with all harbour users to conduct an end-to-end rewrite of the HMP.

MEETING DECISION:

1. It was decided that, because of the many objections listed above, the proposed HMP and the associated consultation process was considered **Not Yet Fit for Purpose** and it would need considerable review. However, [REDACTED] would be keen to help the SHA conduct this review.
2. It was decided that those individuals and organisations in attendance might wish complete the on-line consultation only in brief - and refer instead to this [REDACTED] meeting minute summary/open letter as their considered response, sharing the letter wherever possible.

ACTION:

- a. Individuals to use the above comments as 'intelligent consideration' when replying to the on-line consultation tool. It may prove necessary to do so in writing because the online tool is of limited functionality.
- b. [REDACTED] Rep to send the above minutes to Local Councillors, MPs and HM (via Clic email) and in hard copy and co-ordinate any further engagement.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Received from [REDACTED]

Date and time [REDACTED]

To Recipients: Clic@ceredigion.gov.uk

Cc Recipients:

Subject: Objection to CCC's draft Harbour Management Policy.

Body:

[REDACTED]

Dear Sirs,

I wish to register my firm objection to Ceredigion County Councils' proposed Policy change, within the draft Ceredigion Harbour Management Policy Consultation document, that removes the right to inherit or sell a vessel on its mooring.

If implemented, this Policy change, will undermine the fabric of Ceredigion's coastal communities by introducing an unmanageable state of constant flux within the harbours. Where, upon my passing, those on a historic waiting list, (that has had no due diligence applied to it by CCC), are more entitled to my boat and its mooring than my own children.

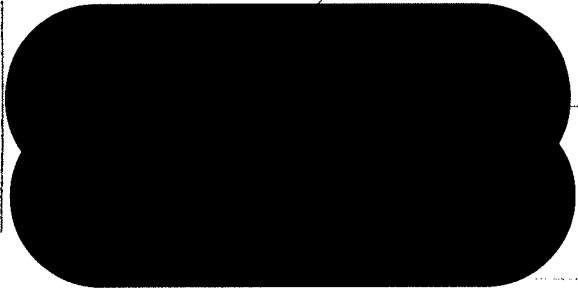
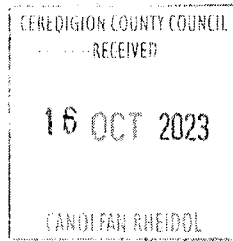
Please do not overlook the reality that a leisure boat is, almost without exception, bought for the enjoyment of a family, or families in the case of co-ownership. The children in that family(s) would, naturally, share in the pleasure, effort and cost of owning a boat over time. Consequently, they become invested in a very real sense – not just in the boat and mooring but in the Ceredigion community at large.

The principal of "successor in title" is a very well-established principal in the Laws of England and Wales. This applies to capital assets which hold value beyond the life of the current owner. This is evidently the same for a boat (inseparable from its mooring in the context of value) as it is for public sector housing that is leased to a family wherein the children of that family are not evicted upon the passing of their parent(s).

Thank you for considering my views.

[REDACTED]

11th Oct 2023



CEREDIGION COUNTY COUNCIL,
HARBOURS MANAGEMENT,
PENLORFA
ABERBERON
CEREDIGION SAH6 0PA.

Dear Sirs

Re: CEREDIGION HARBOURS MANAGEMENT
POLICY - DRAFT DISCUSSION

I have before me the existing and proposed draft documents for the above and in the first instance my initial reaction is "if it's not broken why fix it". In my opinion the wording abbreviations etc are generally similar without any major concerns. However the one major point in my book is 'INHERITANCE' and would comment as follows. I am now 76 years old and for the last 60 years or so New Quay has been my holiday destination even spiritual home.

So it has been for my 5 grown up children and grandchildren who have all loved holidays, weekends etc and are part of the local community. We have a house in [redacted] which we have owned since 1983 and since retirement have spent more and more time there.

I have been allocated a nearby flat

P.T.O

over 45 years and in those years the whole family has enjoyed the gifts of boating, its skills etc and have indulged in the Regattas and dined with the volunteering.

It would be totally unfair if when I pass these benefits could not continue to be enjoyed by my children and grandchildren and indeed would disenfranchise my family.

Even at my age I understand the need for change but only where necessary. I don't think this is. In recent years New-Quay has suffered the deaths of some relatively young people with families and to think that they would be deprived part of their parents legacy would be a tragedy.

In my opinion, MR DENIS LENCORPIL was a very able boatmaster and since then little seems to have been done with the management of the club. I met with OWEN ROBERTS at New-Quay shortly after he took over his post and we discussed the like meetings of the PIER and he stated his proposal for solving the problem etc. To date nothing.

So perhaps all energies should be put into the management of the club and not spend unnecessary time on a new document where the original is still true.

Kind regards



Ceredigion Harbours Management Policy



Author and service: Owen Morgan –
Highways & Environmental Services.
Date approved by Cabinet: **TBC**
Integrated Impact Assessment (Yes/No): **TBC**
Publication date: **TBC**
Review date: **TBC**

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Ceredigion Harbours Management Policy

Introduction

1.1 This is a Policy for managing the facilities and moorings of different vessels in the Council managed Harbours of Ceredigion, namely Aberystwyth, Aberaeron and New Quay.

1.2 Whilst the current scope of the Policy is the Harbours at Aberystwyth, Aberaeron and New Quay, in the event that any other Harbours or related facilities become Council managed facilities in the future, this Policy will automatically extend to cover those facilities.

1.3 All moorings and other facilities form part of a discretionary service provided by the Harbour Authority. Each mooring and associated facility is allocated subject to application on a seasonal (Summer 1st April – 31st October, Winter 1st November – 31st March) basis only and is covered by a Mooring or Facility Form Agreement Form with associated terms and conditions of use.

1.4 The purpose of this Policy is to ensure that a consistent, fair, and equitable approach is applied to new, existing and potential mooring holders and harbour users at the Ceredigion Harbours. It aims to ensure that the operational Policy and associated conditions are fully understood and recognised as fair, reasonable and equitable to all in what are shared use facilities.

1.5 This operational Policy statement supplements the Aberystwyth Harbour Act 1987, the Aberaeron Harbour Act 1807, and the New Quay Harbour Act 1835, Harbours, Docks and Piers Clauses Act 1847, (and all other relevant legislation including any subsequent supplementing and amending Orders and legislation), the associated Harbour Bye- laws, and the Terms and Conditions for the use of Ceredigion County Council Harbours. Where Ceredigion County Council is the Statutory Harbour Authority this Policy applies.

1.6 The term 'Harbour Master' as defined in national legislation shall be used to describe the term 'Harbour Manager' within this policy.

1.7 This Policy is a management tool, nothing within it shall interfere with the Harbour Manager's overall ability to allocate or regulate the number, location, size and type of moorings and facilities being used at any time within the three Ceredigion Harbours.

Objectives of the Policy

2.1 The main objectives of the Policy are as follows:

- (i) To clearly define criteria for the operation and management of harbour moorings and related quayside uses, having due regard to local needs and desires as well as encouraging public use and enjoyment of the harbour quays.
- (ii) To continue promoting the harbours as some of the County's main locations as working harbours and for water-based recreation and leisure, taking into account the need for safe and easy access for all members of public.
- (iii) To contribute positively to the management of the natural and built environment of the harbours, which includes adherence with all relevant Environmental Legislation.
- (iv) To give a general overview of the responsibilities and obligations of mooring/facility holders and provide an outline of some of the key terms upon which the mooring/facility is allocated.

2.2 A copy of the Policy will be provided to applicants, potential applicants, members of the public and other interested persons or bodies on request. A copy will also be published on the Council's web page.

Functions of the Ceredigion Harbours

3.1 The following paragraphs confirm the complex range of roles which the harbours perform and underlines the need for a clear mooring policy as a foundation for their proper management.

(a) Commercial Activity

3.2 The port-related commercial operations in the harbours include charter companies who run scheduled tours around Cardigan Bay, a number of commercial fishing boat operations, and water-based activity providers.

(b) Leisure Activity

3.3 The use of the harbours continues to predominantly be by leisure mooring holders which currently range from sailing yachts to power boats. Access is facilitated for visiting vessels in addition to mooring holders.

3.4 The use of the harbours for water-based recreation has increased, in particular but not limited to windsurfing and dinghy sailing, canoeing, kayaking, rowing, paddleboarding and angling. Slipways and facilities for water activities are located in all harbours.

(c) Visitor Attractions

3.5 In addition to annual water-based events such as regattas, the harbour areas make a considerable contribution to the county's tourist economy as well as being a valuable recreational resource for local people. The Harbours give access to visitors and local people to the two Marine Special Areas of Conservation (SACs), home to the famous Cardigan Bay dolphins and other wildlife of international significance.

The Types of Moorings and Facilities.

4.1 The classification for moorings and facilities in Ceredigion County Council managed harbours are as follows:

- (a) Leisure moorings
- (b) Commercial moorings
- (c) Deep water moorings
- (d) Short term visitor moorings
- (e) Facilities
- (f) Sizes and particulars of vessels, watercraft and other equipment

4.2 Other than the specific arrangements referred to relating to the limited quayside parking at New Quay Harbour there is no parking provision made or season tickets afforded to Harbour users in the Council's Pay and Display car parks.

(a) Leisure Moorings

4.3 The provision of moorings for leisure craft (mostly smaller craft used by private individuals for their own recreation) is a vital part of the recreational use of all three harbours. Leisure moorings are provided in a variety of locations in order to allow operational and managerial flexibility. This allows the ability to cater for varying demand for such moorings during the year.

4.4 These are agreed moorings for periods of stay greater than two weeks. Long-term does not imply that these moorings are permanent or tied to a particular location or mooring holder. This type of mooring is used by owners of leisure craft who wish to moor them in the harbours for long periods based on a seasonal agreement. The vessel owners do not own the rights to the mooring, nor are they allowed to transfer the rights of the use of the mooring if selling the vessel which is presently on the mooring. As Ceredigion County Council actively promotes the harbours for use by leisure craft, the provision of additional service facilities continues to be a priority. These may be provided by the Council or in partnership with others.

(b) Commercial Moorings

4.5 There are a finite number of moorings for passenger carrying pleasure boats, commercial water sports and commercial fishing boats agreed at each harbour. It is recognised that further moorings could be provided as part of any future development opportunities or where future capacity becomes available.

4.6 Commercial moorings are subject to the following controls:

(i) Commercial moorings can be categorised as follows:

Passenger Carrying Pleasure Boat Moorings

Certain moorings can be used for passenger carrying pleasure boats to offer wildlife tours, fishing trips and water activities in and around Cardigan Bay.

Commercial Fishing Boat Moorings

Certain moorings can be used by commercial fishing boats to fish in Cardigan Bay.

(ii) All vessels seeking a dedicated commercial mooring will require the necessary commercial licences, coding and certification together with a mooring agreement.

(iii) Any commercial vessel trading in strategic locations of the Harbour affected by events will need to be able to move to allow for occasional relocation.

(iv) All waste generated by the user will wherever possible be stored on board the vessel. Bins must be kept aboard and stored in a satisfactory way so as not to prejudice the appearance of the vessel. Vessels will be expected to comply with requirements of the Harbour Manager in respect of waste disposal, which may vary from time to time depending on the disposal regime in operation. All commercial users must dispose of waste in accordance with the most current Port Waste Management Plan.

(vi) There is a quota for commercial moorings which is currently.

Aberystwyth:

Commercial Passenger: 3.

Commercial Fishing: 9.

Aberaeron:

Commercial Passenger: 6.

Commercial Fishing: 1.

New Quay:

Commercial Passenger: 11.

Commercial Fishing: 6.

Commercial Deep-Water Moorings: 12.

Quotas could be subject to change depending on future development opportunities or where future capacity becomes available.

(c) Deep Water Moorings

4.7 There are currently 18 deep water moorings situated off the coast in New Quay. Specific moorings have been assigned to a mixture of commercial and leisure vessels. The number of deep-water moorings has reached maximum capacity.

(d) Short Term Visitor Moorings

4.8 Short-Term Visitor Leisure Moorings

Short stay/overnight visitor moorings are available in harbours where capacity allows. There is a set daily and weekly fee for these moorings (please see current 'Fees and Charges'). The maximum stay on these moorings is two weeks and are allocated on a first come first served basis, at the Harbour Manager's discretion. Length of stay may be extended during the winter season, at the discretion of the Harbour Manager.

4.9 Short-Term Visiting Commercial Moorings

Short stay/overnight commercial visitor moorings are available in harbours where capacity allows. There is a set daily and weekly fee for these moorings (please see current 'Fees and Charges'). The maximum stay on these moorings is two weeks and are allocated on a first come first served basis, at the discretion of the Harbour Manager. Length of stay may be extended during the winter season at the discretion of the Harbour Manager.

(e) Other Facilities

4.10 Any leisure vessels, tenders, boats, cars and fishing gear etc. on harbours, piers, docks and slipways in strategic locations or any other location of the Harbour affected by events will need to be able to move to allow for occasional relocation and operational needs at the Harbour Managers discretion.

4.11 There is Water Activity Equipment Stand available for long term use at New Quay Harbour. The stand can be used for storage of water activity equipment such as but not limited to kayaks, paddleboards, windsurf boards and surfboards at Harbour Managers discretion. Long- term does not imply that the stand/facility spaces are permanent or tied to a particular location.

The facility is used by owners of water activity equipment who wish to store them in the harbour for long periods subject to an annual agreement. The users do not own

the rights to the space, nor do they have the right to transfer the use of the space if selling the equipment allocated to the space.

(f) Sizes and Particulars of Vessels, Watercraft and Other Equipment

4.12 No vessel/watercraft/ equipment shall be placed on a mooring other than the vessel/watercraft/equipment applied for. The mooring/facility is allocated according to the particulars of the vessel and the mooring/facility holder must not increase the size of the vessel/watercraft/equipment without ascertaining whether or not there is a suitable alternative mooring/facility available and without prior agreement with the Harbour Manager. The mooring/facility holder may lose the mooring/facility without being offered a replacement.

Leisure Mooring, Dinghy and Water Activity Equipment Stand Waiting Lists

5.1 A mooring or storage space can only be offered and allocated to the person whose name is next on the appropriate waiting list for a specific harbour/facility subject to the suitability of the vessel/equipment being applied for, priority definitions below and at the Harbour Manager's discretion. A non-refundable fee (please see current 'Fees and Charges') is required to join the appropriate waiting list. A procedure covering the waiting list can be found in Appendix 1 below.

5.2 Moorings, once allocated, are not transferable.

5.3 The waiting list is segregated into the following categories/order of priority:

1st: Council taxpayers whose permanent residence is within Ceredigion and who pay full Council tax to Ceredigion County Council. Proof of Council Tax arrangements will need to be sent to the Harbour Authority on application.

2nd: Council taxpayers whose main residence is outside of Ceredigion, but they own a property within the county. i.e., second homeowners. Proof of Council Tax arrangements will need to be sent to the Harbour Authority on application.

3rd: All others.

5.4 Other than those persons already on the mooring waiting list on 1st January 2011, berths will then be allocated according to the priorities above.

5.5 Only one entry per person will be accepted onto any individual waiting list.

Commercial Moorings - Waiting Lists

6.1 A commercial mooring can only be offered and allocated to a commercial operation that is next on the appropriate commercial mooring waiting list (one for passenger carrying pleasure boats, and one for commercial fishing boats in each harbour) and subject to the suitability of the vessel being applied for at the Harbour Manager's discretion. A non-refundable fee, please see current 'Ceredigion Fees

and Charges', is required to join the waiting list. A procedure covering the waiting list can be found in Appendix 1 of this Policy.

6.2 Both types of commercial moorings, once allocated, are not transferable.

6.3 Given the obvious demand for these types of mooring and the significant contribution made by passenger carrying pleasure boats, and commercial fishing boats to Ceredigion's economy and tourism portfolio, the Harbour Authority will operate a "use it or lose it" policy. If a commercial boat owner does not put a vessel on the allocated mooring facility by the 31st of May and / or does not operate a vessel commercially, then as of the 1st of June the mooring facility will be allocated to the next appropriate applicant on the waiting list at the Harbour Manager's discretion.

6.4 Only one entry per person will be accepted onto any individual waiting list.

6.5 A car parking space at New Quay Harbour slipway can only be offered and allocated to a commercial operation that is next on the New Quay commercial car park space waiting list and subject to the suitability of the vehicle and operation being applied for at the Harbour Manager's discretion. A non-refundable fee (please see current 'Fees and Charges') is required to join the waiting list. A procedure covering the waiting list can be found in Appendix 1 of this Policy.

Car parking spaces are not transferable and cannot be used by any other vehicles other than the vehicle allocated to the space.

Deep-Water Mooring Waiting List

7.1 Other than those leisure boats that have previously been allocated a deep-water mooring and choose to continue using it following the introduction of the charge, all future deep-water moorings that become available will only be allocated to commercial vessels.

7.2 A deep water mooring can only be offered and allocated to a commercial operation that is next on the appropriate deep water mooring waiting list. A non-refundable fee (please see current 'Fees and Charges') is required to join the waiting list. A procedure covering the waiting list can be found in Appendix 1 below.

7.3 Only one entry per person will be accepted onto any individual waiting list.

Duration of Mooring, Launching and Facility Agreements

Long Term Moorings

8.1 The duration of the mooring agreement is dependent on the season applied for.

The duration of the summer season is 1st April – 31st October each year.

The duration of the winter season is 1st November – 31st March the following year.

Any vessel owned by a long-term mooring holder found on a mooring or on a hardstanding on harbour/Council premises after the 1st of November will be charged Winter Mooring Fees.

Short-Term Visiting Leisure Moorings

8.2 The maximum duration of a short-term visiting leisure mooring agreement is two weeks commencing on the first date of stay. This may be extended during the winter season at the Harbour Manager's discretion.

Short-Term Visiting Commercial Moorings

8.3 The maximum duration of a short-term visiting commercial mooring agreement is two weeks commencing on the first date of stay. This may be extended during the winter season at the Harbour Manager's discretion.

Long-Term Launching

8.4 The duration of the annual launching agreement commences with each financial year on 1st of April and expires on the 31st of March of the following year.

Annual Launching Agreements are not offered on a pro rata basis, full fees are applicable regardless of date of launching.

No car parking rights are associated with the Annual Launching Agreement.

The Annual Launching Agreement is not Harbour specific and is valid for launching at any of the Ceredigion Harbours covered by this Policy.

Short-Term Launching

8.5 The duration of the short-term launching agreement is dependent on the needs of the user and at the discretion of the Harbour Manager.

No car parking rights are associated with the Short-Term Launching Agreement.

The Short-Term Launching Agreement is not Harbour Specific and is valid for launching at any of the Ceredigion Harbours covered by this Policy.

Facility Agreements

8.6 The duration of the Facility Agreement is 11 months commencing on 1st of May and expiring on the 31st of March of the following year. Every item/ equipment must **be removed** from the rack for the month of April to allow for any required maintenance/renumbering. Any equipment/ item remaining on a facility during the month of April can be removed by the Council without notice.

Mooring, Facility and Launching Charges and Rules

9.1 All matters related to the application of charges for leisure moorings, commercial moorings, launching, visiting, kayak windsurf board stand, boat park spaces and other facilities can be found in the current financial years 'Fees and Charges'.

9.2 If a mooring/facility holder has not paid the required fee in full by the 31st of May, then as of the 1st of June that mooring / facility will be reallocated to the next appropriate applicant on the waiting list at the Harbour Manager's discretion.

9.3 If a mooring/facility holder does not put a vessel on the allocated mooring facility by the 31st May then as of 1st June the mooring will be reallocated to the next appropriate applicant on the waiting list at the Harbour Manager's discretion.

9.4 Moorings are not offered on a pro rata basis, full fees are applicable each season regardless of when the mooring was allocated or occupied.

9.5 A vessel will be charged based on length overall measured in metres (rounded up to the nearest metre), which shall include any bowsprit, push-pit, stern davit, bathing platform.

9.6 If the mooring/facility holder does not have his/her own vessel/watercraft/equipment on the authorised mooring for a period of one year then the facility will be forfeit and reallocated from the appropriate waiting list.

Renewal of Allocated Mooring/Facility

10.1 The Council will endeavour to send each existing mooring/facility holder an application form requesting a Mooring/Facility Form Agreement to be completed and returned before the start of each season. If the mooring/facility holder returns the form indicating that he/she does not wish to renew the Mooring/facility Form Agreement, it will be allocated to the next person on the appropriate waiting list and the Council will send an application form and invoice as above. On receipt of the Mooring/Facility Form Agreement the Council will send an invoice to the mooring/facility holder.

10.2 In the event that the Council does not receive a completed mooring application form by 30th April, it will be considered that the mooring holder does not want to renew their mooring agreement and it will be allocated to the next person on the appropriate waiting list.

10.3 The Council will, upon receipt of payment, allocate a mooring/facility to the applicant in a location within the specific harbour applied for, the exact location is determined at the discretion of the Harbour Manager.

Cancellation of Mooring Form Agreements and Rejection of Waiting List Applications

11.1 The mooring holder can cancel the Mooring/Facility Form Agreement at any time by giving 14 days' notice in writing to the Council. However, the fee already paid shall be retained by the Council.

11.2 The Council can cancel the Mooring/Facility Form Agreement at any time by giving 1 month notice in writing to the mooring holder's last known contact details held by the Authority. A mooring/facility may be cancelled for a number of reasons, and these may include but are not limited to; bad debt, failure to comply with harbour Policy, regulations, directions, reckless conduct, disorderly behaviour and abuse towards harbour staff.

11.3 Full or pro rata refunds will not be due if the reason for cancellation is due to the conduct of the mooring/facility holder to comply with this Policy and / or any other Council directives or legal requirements. The Council will pursue any unpaid debt, irrespective if the mooring/ facility holder has vacated or been removed from the mooring/facility.

11.4 Waiting list applications will be rejected as a result of any abuse towards harbour staff.

Risk, Liability, Insurance Requirements and Recommendations

12.1 All vessels/watercraft are berthed, moored, launched, moved and hauled out at the applicant's own risk and is not the responsibility of the Council. The applicant is therefore required to make sure that their vessel/watercraft and property are adequately insured against all risks. The Council accepts no liability for any loss or damage to property howsoever caused.

12.2 Any vessels/watercraft/equipment deemed injurious to the amenity of the harbour as defined below will have to be recovered and removed from the harbour by the vessel/watercraft/equipment owner. Failure to remove such a property from the harbour in such a period as shall be specified by the Harbour Manager in his absolute discretion (including immediate notice) will result in the Council recovering and removing the property and the appropriate charges being made. Such charges shall be a debt due from the Mooring/facility Form Agreement holder to the Authority. It is therefore strongly recommended that any insurance policy includes a wreck removal cover.

12.3 The mooring/facility holder shall indemnify the Council, their servants and agents against all actions, claims, costs and demands in respect of any injury or death of any person and any damage to any property which may arise out of the applicant's occupation and use of the harbour facilities including slipways, steps, jetties and staging and for this purpose shall maintain a Public Liability policy against such risks. Failure to maintain the appropriate insurance cover will result in the withdrawal of the mooring, launching and other facilities.

12.4 All mooring/facility holders using any part of the harbour facilities including slipways, steps, jetties and staging, for whatever purpose in connection with this application and whether by the Council's invitation or not, are expected to have due regard for their own safety and do so at their own risk.

12.5 The mooring/facility holder shall at all times be responsible for the safety of his/her vessel/watercraft/equipment and shall be liable for any damage accessioned to the Council's property, howsoever caused, during the navigation of any vessel/watercraft by the applicant or his servant or agents, or whilst the applicant's vessel/watercraft is berthed, moored, or launched, or by the vessel/watercraft slipping her berth, mooring or being cast adrift and will pay to the Council on demand any claim for compensation in respect of such damage.

12.6 The Council's Harbour Manager and other authorised Officers and servants, whilst acting in the course of their duty, shall not be responsible for any loss or damage which may occur as a result of compliance, or attempted compliance, with any lawful order or directions given by the Harbour Manager, or such other Officers or servants, nor shall the Council be liable for any loss or damage arising out of compliance, or attempted compliance, with the Officers' lawful orders. The Council, its servants, agents or employees shall not be liable for injury to any person, except where such injury arises through the negligence of the Council.

12.7 Any mooring holder wanting to over-winter or visit another Ceredigion Harbour other than that applied/allocated to, must make an application for that harbour. The mooring holder must ensure that his/her vessel is adequately insured for that harbour.

12.8 The mooring/facility holder is responsible and liable for any personal chain, ropes, bridles, shackles, tackle or any other mooring devices used to moor their vessel/watercraft/equipment to any point of the Harbour Estate or Council Property.

Vessels and Other Watercraft or Equipment Injurious to the Amenity of the Harbour

13.1 If at any time the Harbour Authority are satisfied that a derelict vessel or structure or equipment moored in or lying in the water, on the foreshore of the harbour or other Council property is in such a condition as to be seriously injurious to the amenity of that part of the harbour or Council property in which it is moored lying or standing, the Harbour Authority may by notice require the owner thereof within such time as may be specified in the notice to take such steps as may be necessary to abate the injury to amenity. A vessel or other any other type of watercraft or equipment may be considered to be injurious to the amenity of the harbour or other Council property, by the Authority for reasons including but not limited to being badly dilapidated, unsightly due to neglect, seriously unkempt, unseaworthy and/or in danger of sinking, etc.

13.2 Failure to comply with such a notice issued by the Harbour Authority may result in the necessary action being taken directly by the Harbour Authority and the appropriate charges being made. Such charges shall be a debt due from the Mooring/facility Form Agreement holder to the Authority.

13.3 Tenders and trailers not marked with parent vessel's name may be removed without notice.

13.4 Other watercraft shall include but not be limited to kayaks, canoes, windsurf boards, paddle boards, dinghies or any other description of watercraft. Equipment shall include but not limited to trailers, vehicles, fishing equipment or any other property or items owned or used by the user.

Prohibition on Assignment/Sub Letting of Moorings/Facilities

14.1 The mooring/facility is allocated to the mooring/facility holder and may not be shared, assigned, transferred, sub-let or otherwise used or made available to anyone other than the mooring holder. In the event that it is discovered that a mooring/facility holder is subletting or allowing the use of the mooring by another party, the mooring/facility will be withdrawn with immediate effect.

Inheritance

15.1 Commercial Moorings

Where a member or members of a family wishes to continue using the named vessel on the allocated mooring after the death or incapacity of the existing holder(s), they must gain written consent from the Council to do so.

15.2 Leisure Moorings

There are no inheritance rights in relation to leisure moorings or leisure facilities within Ceredigion managed Harbours.

Identification

16.1 All vessels/watercraft and equipment including but not limited to, trailers and tenders used within the harbours and Council property must have their names displayed conspicuously to the satisfaction of the Harbour Manager. The mooring holder should also ensure that the name of the vessel or mooring number is clearly displayed on any mooring buoy. Tenders must be marked with the name of the parent vessel. Kayaks/wind surfboards and other equipment as defined above must be numbered/named conspicuously to the satisfaction of the Harbour Manager.

Change of Vessel, Watercraft or Other Equipment

17.1 In the event of the mooring/facility holder selling or otherwise disposing of the vessel/watercraft authorised to use the mooring/facility, the parties to the change shall ensure that immediate written notification prior to the sale or disposal is given to the Harbour Manager.

17.2 When an existing owner wishes to change their vessel/watercraft/equipment then a fresh application must be made for the intended new vessel/watercraft/equipment. The Council reserves the right to determine where a

mooring/facility holder replaces a vessel upon a mooring/facility with another vessel/watercraft/equipment which is not suitable for the mooring/facility allocation, having regard to the size and particulars of the vessel/watercraft/equipment, to refuse that application. Where applications are not approved, applicants will be able to re-join the relevant waiting list at the next available opportunity (subject to sections 5 & 6 and Appendix 1) or keep the existing vessel/watercraft/equipment on that mooring/facility.

Mooring and Facility Transfers

18.1 There are no transfer rights in relation to moorings or facilities within Ceredigion managed Harbours.

Partnerships

19.1 Partnerships must have been registered with the Harbour Authority when the mooring was/is first allocated. Any subsequent changes of ownership or partnership buy out will not be recognised or count towards mooring allocation.

Use of Moorings

20.1 Moorings must only be used for the purposes stated in the original application (i.e., leisure, commercial or deep water).

20.2 Vessels using moorings must not be used for residential purposes. i.e., no living on board is permitted and boats must not serve as the sole or main residence of any individual or group. Customers are not expected to sleep on board their craft unless that vessel has a suitable manufacturer holding tank for grey water and sewage. Moorings will be withdrawn from those harbour users who breach this expectation.

Fuel and Refuelling

21.1 No fuel or combustible material is permitted to be kept on or within the allocated mooring save in authorised storage tanks and containers. No petrol refuelling from cans or containers is permitted on the harbour side, pontoons, steps, slipways, or moorings. The only exception being by way of an approved siphoning/pumping device agreed specifically with the Harbour Manager. Any fuel spillage must be reported to the Harbour Manager, MCA and Natural Resources Wales immediately.

Pollution and Waste

22.1 Mooring/facility holders must not pollute the harbour by spillage, dumping of waste, effluent, human waste, detergent and/or fuel or otherwise deposit refuse or

scrap on the harbour estate, in the waters of the harbour or on the harbour bed. All harbour users must abide by the most current Port Waste Management Plan.

Reckless Conduct and Disorderly Behaviour

23.1 The mooring/facility holder shall not use the mooring or facility in a reckless manner so as to cause danger to other users of the Harbour or damage to their property. The mooring/facility holder (including any persons on board a vessel/watercraft on the harbour within harbour limits) shall not cause unreasonable noise, nuisance or annoyance to other users of the Harbour. Harbour users must follow the current Code of Conduct and other Council Directives at all times. Any such behaviour may result in the Council terminating the Mooring/Facility Form Agreement.

Compliance with Statute, Byelaws and Directions of the Harbour Manager.

24.1 The harbour user and all persons having control or having charge of or being aboard their vessel/watercraft/equipment shall observe and perform all statutory and other obligations relating to the harbour including all Byelaws and Regulations made by the Council and directions given by the Harbour Officers.

24.2 In the event of the holder of the Mooring/Facility Form Agreement failing to comply with the conditions of the Mooring/Facility Form Agreement, Policy or any other Council Directive, the Council may give notice to remove the vessel/watercraft/equipment. Should this notice not be complied with or the conditions not met within fourteen days (or within the time period specified by the notice) of the date of the notice sent to the last known address of the harbour user, the Authority may remove the vessel to any place wheresoever and after a period of 14 days may dispose of it if it is not retrieved by the harbour user. The harbour user shall be liable to pay the cost of such removal, storage, mooring, berthing or disposal where applicable. Such charges shall be a debt due from the harbour user to the Authority.

24.3 No person shall within any enclosed harbour use buoyant pick-up ropes on moorings.

24.4 The master of a vessel shall not cause or permit the vessel to manoeuvre, come to anchor or be moored or placed so as to intentionally obstruct in any manner whatsoever the passage of vessels in and out of the harbour.

24.5 No person shall allow any vessel to obstruct any pontoons steps or slipways without the permission of the Harbour Manager.

Contractors

25.1 Any business contracted by a harbour user to carry out any work on the harbour estate must apply for and be granted a valid Estates License for any work that may impact on the harbour such as but not limited to lifting operations, vessel repairs/maintenance, property works or any other events which may affect public highways and or publicly or privately owned property.

Any business contracted by a harbour user for any minor repairs on vessels watercraft, moorings or other equipment that does not affect arrangements relating to the above shall ensure that:

- Adequate third-party liability insurance and public indemnity cover is in place.
- An appropriate method statement and risk assessment is in place.
- The work does not breach the Policy, and or any other Council Directive or legislation.
- The contractor indemnifies the Council, their servants and agents against all actions, claims, costs and demands in respect of any injury or death of any person and any damage to any property howsoever caused during any works on the Harbour Estate.

Passenger Landing

26.1 At the discretion of the Harbour Manager, visiting vessels coming from outside the County of Ceredigion are able to embark and disembark passengers from any of the three Ceredigion harbours, subject to application, payment of the applicable charge (see current 'Fees and Charges' and proof of insurance. Such vessels are required to give ample notice to the Authority where possible greater than two weeks.

Landing of Goods

27.1 At the discretion of the Harbour Manager, visiting Commercial Vessels are able to land passengers or goods from any of the three Ceredigion Harbours subject to, application, payment of the applicable charge (see current 'Fees and Charges') and proof of insurance and applicable certification.. Such vessels are required to give ample notice to the Authority where possible greater than two weeks.

Documents

27.1 The following associated documents can be found on the Council's website or by contacting the Authority at clic@ceredigion.gov.uk or on 01545 570881.

- Fees and Charges.
- Port Waste Management Plan.
- Port Marine Safety Code.
- Harbour Mooring Plans.
- Byelaws and Harbour Acts.
- The Harbours Constitution.

- Minutes of the Harbour Users Consultative Meetings.
- Live Public Consultations.
- Any other publicly available harbour associated documents.

Contact Details

28.1 Should you wish to contract the Council in relation to any Harbour related matters you may do so via the following means:

Email: clic@ceredigion.gov.uk

Telephone: 01545 570881

Neuadd Cyngor Ceredigion

Penmorfa

Aberaeron

Ceredigion

SA46 0PA

Appendix 1

Leisure, Commercial, Deep Water and Facilities Waiting List Procedure.

1) The waiting list fee is detailed in the current financial years' 'Fees and Charges'. On receipt of the appropriate fee and application form, the applicant's details will be placed on the relevant waiting list. Payment is as per instruction on application.

2) The waiting list entry will be dated the same day the fee is received.

3) The fee is NOT REFUNDABLE OR TRANSFERABLE.

- 4) Only one entry per person will be accepted onto any individual waiting list.
- 5) Under normal circumstances the applicant will only be given one offer of a mooring/facility.
- 6) When a mooring/facility is offered and accepted, it can only be allocated to the person/operation whose name is on the appropriate waiting list, and subject to the suitability of the vessel/equipment being applied for at the Harbour Managers discretion.
- 7) When a mooring/facility is offered and accepted and no vessel/equipment is immediately available, the applicant must pay the full fee for the size of vessel/equipment applied for, and then has three months to place their vessel/equipment on the mooring/facility. If the mooring/facility is offered during the winter season, then the vessel / equipment may be placed by the commencement of the following summer season if this period is greater.
- 8) Often a waiting list will be banded dependent on the size of the mooring/facility. It is therefore important that applicants are certain about the size of the vessel/equipment. The length entered on the waiting list form will may be amended prior to the offer of a mooring being made however, this may result in a transfer to a new banding with a new entry date.
- 9) From time-to-time applicants will be asked to provide written confirmation of their wish to remain on a particular waiting list. The applicant's place on the waiting list will be forfeited and their details deleted from the waiting list records if written confirmation is not provided within 28 days of the request for confirmation being sent to the applicants last known contact details.
- 10) It is the applicant's responsibility to keep the Harbour Authority advised of any change in the applicant's details, especially any change of contact details.



Cyngor Sir
CEREDIGION
County Council



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Cyngor Sir Ceredigion County Council - Integrated Impact Assessment (IIA)

An integrated tool to inform effective decision making



This **Integrated Impact Assessment tool** incorporates the principles of the Well-being of Future Generations (Wales) Act 2015 and the Sustainable Development Principles, the Equality Act 2010 and the Welsh Language Measure 2011 (Welsh Language Standards requirements) and Risk Management in order to inform effective decision making and ensuring compliance with respective legislation.

1. PROPOSAL DETAILS: (Policy/Change Objective/Budget saving)

Proposal Title	Ceredigion Harbours Management Policy Consultation				
Service Area	Harbour Services	Corporate Lead Officer	Rhodri Llwyd	Strategic Director	Barry Rees
Name of Officer completing the IIA	Chay Sanders	E-mail	clic@ceredigion.gov.uk		Phone no 01545570881

Please give a brief description of the purpose of the proposal

The Ceredigion Harbour Management Policy provides the strategic framework that underpins and informs how we fulfil our obligations as a Statutory Harbour Authority and how we deliver the Service. The current Policy was approved and adopted by the Council on the 19th of October 2010 and it is the view of the Service that a review is timely and appropriate.

Who will be directly affected by this proposal? (e.g. The general public, specific sections of the public such as youth groups, carers, road users, people using country parks, people on benefits, staff members or those who fall under the protected characteristics groups as defined by the Equality Act and for whom the authority must have due regard).

Current and future mooring holders, both leisure and commercial. Users of vessels visiting or launching from Council managed facilities. Members of the public using the harbours. Contractors carrying out work in the harbours. The Policy applies to Aberystwyth, Aberaeron and New Quay harbours and also makes provision that it will cover any other facility which the Harbour Service may manage in future.

VERSION CONTROL: The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development, Welsh language and equality considerations wherever possible.

Author	Decision making stage	Version number	Date considered	Brief description of any amendments made following consideration
Chay Sanders	Overview and Scrutiny Committee.	1	30/11/23	

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COUNCIL STRATEGIC OBJECTIVES: Which of the Council's Strategic Objectives does the proposal address and how?	
Boosting the Economy, supporting Business and enabling employment.	<p>The harbours are much loved and valued assets, providing a setting for a range of commercial and leisure activities which have an important role in contributing towards Boosting the Economy, supporting Business and enabling employment.</p> <p>The management policy aims to promote the harbours as working harbours and for water-based recreation and leisure, taking into account the need for safe and easy access for all members of public. Through management of the harbours in a consistent, fair, and equitable way they will continue to be attractive for existing and potential mooring holders and other harbour users.</p>
Creating caring and healthy communities	N/A
Providing the best start in life and enabling Learning at all ages	N/A
Creating sustainable, greener and well-connected communities	To contribute positively to the management of the natural and built environment of the harbours, which includes adherence with all relevant Environmental Rules and Legislation.

NOTE: As you complete this tool you will be asked for **evidence to support your views**. These need to include your baseline position, measures and studies that have informed your thinking and the judgement you are making. It should allow you to identify whether any changes resulting from the implementation of the recommendation will have a positive or negative effect. Data sources include for example:

- *Quantitative data - data that provides numerical information, e.g. population figures, number of users/non-users*
- *Qualitative data – data that furnishes evidence of people's perception/views of the service/policy, e.g. analysis of complaints, outcomes of focus groups, surveys*
- *Local population data from the census figures (such as Ceredigion Welsh language Profile and Ceredigion Demographic Equality data)*
- *National Household survey data*
- *Service User data*
- *Feedback from consultation and engagement campaigns*
- *Recommendations from Scrutiny*
- *Comparisons with similar policies in other authorities*
- *Academic publications, research reports, consultants' reports, and reports on any consultation with e.g. trade unions or the voluntary and community sectors, 'Is Wales Fairer' document.*
- *Welsh Language skills data for Council staff*



2. SUSTAINABLE DEVELOPMENT PRINCIPLES: How has your proposal embedded and prioritised the five sustainable development principles, as outlined in the Well-being of Future Generations (Wales) Act 2015, in its development?			
Sustainable Development Principle	Does the proposal demonstrate you have met this principle? If yes, describe how. If not, explain why.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the principle?
Long Term Balancing short term need with long term and planning for the future.	The previous management Policy was written in 2010 and the vast majority of the Policy has been retained as it is believed to be fit for purpose for the long term. One change in the facility is the addition of the paragraph: in the event that any other Harbours or related facilities become Council managed facilities in the future, this Policy will automatically extend to cover those facilities.	The harbours continue to be popular with mooring holders (evidence being waiting lists for moorings / facilities) and visitors. Providing a management framework that ensures that the facilities are managed and maintained in a safe, fair way should mean that they continue to thrive.	In the event of any major changes to the harbours or associated legislation, rules or guidance, the Policy can be reviewed as necessary as and when deemed appropriate. A review of the Policy could be considered to be undertaken on a structured schedule to establish if it's still fit for purpose.
Collaboration Working together with other partners to deliver.	In addition to the Harbours directly managed by Ceredigion County Council, collaboration / 3 rd party arrangements are in place in relation to the Teifi Estuary (ATFL) and Aberystwyth Marina. Over and above the normal correspondence / contact arrangements, stakeholders can engage in the monthly surgeries at each Harbour and also via the Consultative Committee meetings which take place biannually.	Ongoing correspondence and arrangements and minutes of consultative committee meetings. Collaboration has taken place in relation to specific projects with stakeholders and the Council, including the recent arrangements for the mobile platform in New Quay.	None identified in the context of the changes proposed.



<p>Involvement Involving those with an interest and seeking their views.</p>	<p>A consultation exercise was carried out between 20th September until the 20th October 2023 asking for feedback from current harbour users and other interested parties.</p> <p>The arrangements have been consistent with those applied in other similar policy development processes and benefitted from the input of a Corporate Service who specialise in consultation and engagement activities.</p> <p>Other representations were also received outside of the prescribed process. With a view of being as open and inclusive as possible these have been collated and included.</p> <p>As well as the consultation on this draft policy the Harbour Service also engages with users in a number of other ways.</p> <p>There were a high number of responses which showed engagement and involvement.</p>	<p>Following receipt of the consultation responses changes to some elements of the draft policy have been put forward in relation to inheritance for commercial moorings and also waiting list arrangements.</p> <p>This consultation was sent out to harbour users, made available in the harbour offices and libraries and could be accessed online. Promotion was carried out by Ceredigion Council's comms team.</p> <p>Feedback from the responses gained will be analysed and presented within documents used to form the final policy.</p> <p>Although we will not respond to everyone individually, this information will be shared with those who indicated, as part of the consultation process, that they would like to receive feedback.</p>	<p>Possibility of structured review and survey perhaps a survey every 5-10 years.</p>
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		<p>The Harbour Service also engages with it's users through:</p> <p>Harbour Users Consultative Committees (twice a year)</p> <p>Harbour Surgeries (monthly)</p> <p>Regular presence by Harbours Team at the Harbours (regular and ongoing) with an open-door approach/policy</p> <p>Calm Waters (twice a year)</p> <p>Contact via Clic (letters, e-mail, phone, feedback forms)</p> <p>Notices to Mariners</p> <p>Group e-mails to Mooring Holders</p> <p>Dedicated pages on the Council website which includes access to the Harbour Management Policy.</p>	
<p>Prevention Putting resources into preventing problems occurring or getting worse.</p>	<p>In order to prevent ongoing issues with the slow turnover of the waiting list and to provide greater access to moorings</p>	<p>The waiting lists, especially in New Quay, ,have, in general, seen very little movement /</p>	<p>It has been recognised from the consultation process that there is a difference between the commercial and leisure moorings in that, in some cases,</p>



	<p>the following proposed changes to the policy have been put forward:</p> <ul style="list-style-type: none"> • Removing the ability to transfer moorings to another party. • Removing inheritance rights for leisure mooring holders. • Removing the free Car Parking for mooring holders. • Removing the cap on all waiting lists. • Allowing only one entry per person onto any individual waiting list from the implementation date. <p>The arrangements currently in place for the transfer of vessels is now deemed not to be appropriate and as such it is proposed to remove it. This arrangement undermines the waiting list arrangements and could result in substantial premiums being paid for vessels on a mooring. The retention of the transfer of moorings arrangements is also deemed to support the perception that opportunities to access the harbour services and moorings, especially, is something of a closed shop and / or limiting access to those who are able to pay the premiums.</p>	<p>allocation of moorings becoming available to people on the list, with some people having been on the list for over 10 years.</p> <p>There is a level of mooring transfers each year which take place and, if transfers are prevented, moorings should then become available to those on the waiting list (which is not taking place currently).</p> <p>Allowing only one entry per individual per waiting list at any given time will prevent an individual blocking out a waiting list / being allocated a number of moorings in advance of others on the waiting list. This will improve access and reduce the time on the waiting list for individuals to secure a mooring.</p> <p>The current provision of a parking permit can in some cases mean that the value of the permit afforded is the same or</p>	<p>over an extended period, businesses have built up capital having been afforded ongoing use and access to those moorings. With this in mind, it is intended to retain the inheritance arrangements for commercial moorings but remove them from the leisure moorings.</p> <p>The Council will, as part of the Fees and Charges setting process, be reviewing whether the charging mechanism and structure for the commercial operations in the Harbour remain relevant, valid and are in the overall best interest of the Council.</p> <p>When a bereavement occurs relating to a leisure mooring this will be dealt with sensitively by the Harbour Service. A period of three months will be allowed for arrangements to be completed.</p>
--	---	--	--



	<p>The proposal to remove the inheritance arrangements for leisure users is made with a view of improving opportunities for the general public to have a reasonable chance to gain access to a leisure mooring at the CCC managed harbours.</p> <p>It is no longer deemed appropriate to provide the benefit of free parking permits at CCC managed car parks to harbours users as part of the seasonal mooring arrangements. This is partly because the free parking provision has a significant value in its own right.</p> <p>The proposal to remove the cap on each waiting list has been deemed appropriate to improve accessibility of waiting lists.</p> <p>The proposed insertion of only one entry per person will increase the opportunities for someone to get a mooring when one becomes available, thereby making the harbours more accessible to a wider range of people.</p>	<p>exceeds the cost of the mooring e.g. A permit affords free parking for a period of 8 months when the car parks are chargeable whilst a 6 month car parking season ticket for Church Street New Quay and South Beach Aberaeron cost £267, which is the same as a leisure mooring for a 4m vessel.</p>	
<p>Integration Positively impacting on people, economy, environment and culture and trying to benefit all three.</p>	<p>The overall aim of the policy is to manage the Harbours in a way that contributes positively to the overall economy, environment and culture, while taking into consideration that</p>	<p>The policy in general has been seen to positively support the arrangements at the Harbours, however it is deemed appropriate at</p>	<p>None identified in the context of the changes proposed.</p>



	<p>there are varying views, wants and needs of stakeholders, along with the awareness that the provision of moorings is a discretionary service.</p> <p>Changes to the policy intend to increase the availability and turnover of moorings which in turn will positively impact those people trying to secure a mooring.</p>	<p>this time to make amendments to the policy to further positively impact those wishing to access moorings at the harbours. This is in light of operational experience through issues which have arisen and feedback received generally and / or as part of the consultation process.</p>	
--	--	--	--



3. WELL-BEING GOALS: Does your proposal deliver any of the seven National Well-being Goals for Wales as outlined on the Well-being of Future Generations (Wales) Act 2015? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. We need to ensure that the steps we take to meet one of the goals aren't detrimental to meeting another.			
Well-being Goal	Does the proposal contribute to this goal? Describe the positive or negative impacts-	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the goal?
3.1. A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs.	The Policy's aim is to continue to promote commercial activity in the harbours as well as the wider tourism related economy which benefits in part from the attraction provided by the Harbours.	<p>A large part of the policy is dedicated to the management of commercial moorings, it is recognised that further moorings could be provided as part of any future development opportunities or where future capacity becomes available.</p> <p>As there is significant demand for these moorings the Council operates a use or lose it policy, ensuring that if moorings are not being used then another venture gets an opportunity.</p>	The draft policy was amended following the consultation feedback in relation to inheritance arrangements for Commercial moorings to continue to support their ongoing operation in the case of death or incapacity of the mooring holder.
3.2. A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change).	There are no changes in the policy related to biodiversity and ecosystems however, environmental issues including the issue of pollution and waste generated by harbour users already formed part of the policy.	Harbour users must adhere to the Port Waste Management Plan and report any fuel spills.	None identified in the context of the changes proposed.



	<p>The Policy already includes that harbour users must follow the Cardigan Bay Code of Conduct and other Council directives at all times.</p>	<p>Code of Conduct includes regulations on interaction with wildlife, taking litter home and abiding with byelaws.</p> <p>Information on the PWMP and Special Area of Conservation is and will be available on various platforms such as the Council's website, in the Harbour newsletter Calm Waters, at strategic points in the Harbours and at each Harbour Office.</p> <p>Initiatives related to availability of spill kits have been taken forward via grant funding at each of the harbours by the Council.</p>	
<p>3.3. A healthier Wales People's physical and mental wellbeing is maximised and health impacts are understood.</p>	<p>The Policy's aim is to continue to facilitate the use of the Harbours for water based recreational activities which help support health and wellbeing in addition to being areas that people use for leisure walks. They are also attractive settings which contribute to the overall environment and have an positive impact on lhealth and wellbeing.</p>	<p>The leisure moorings at each harbour are well used and valued. The areas are busy and vibrant especially during the peak tourist seasons with a number of visitors to the areas.</p>	<p>None identified in the context of the changes proposed.</p>



<p>3.4. A Wales of cohesive communities Communities are attractive, viable, safe and well connected.</p>	<p>The Policy's aim is to continue to manage the Harbours in a way that supports the wider community taking into account the varying stakeholder wants and needs which can often be conflicting.</p>		<p>None identified in the context of the changes proposed.</p>
<p>3.5. A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental well-being.</p>	<p>The Policy's aim is to continue to facilitate the use of Harbours in a way that is responsible and sustainable in the long term.</p>		<p>None identified in the context of the changes proposed.</p>



<p>3.6. A more equal Wales People can fulfil their potential no matter what their background or circumstances.</p> <p><i>In this section you need to consider the impact on equality groups, the evidence and any action you are taking for improvement.</i></p> <p><i>You need to consider how might the proposal impact on equality protected groups in accordance with the Equality Act 2010?</i></p> <p><i>These include the protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or beliefs, gender, sexual orientation.</i></p> <p>Please also consider the following guide:: Equality Human Rights - Assessing Impact & Equality Duty</p>	<p>Describe why it will have a positive/negative or negligible impact.</p> <p><i>Using your evidence consider the impact for each of the protected groups. You will need to consider do these groups have equal access to the service, or do they need to receive the service in a different way from other people because of their protected characteristics. It is not acceptable to state simply that a proposal will universally benefit/disadvantage everyone. You should demonstrate that you have considered all the available evidence and address any gaps or disparities revealed.</i></p>	<p>What evidence do you have to support this view?</p> <p><i>Gathering Equality data and evidence is vital for an IIA. You should consider who uses or is likely to use the service. Failure to use <u>data</u> or <u>engage</u> where change is planned can leave decisions open to legal challenge. Please link to involvement box within this template. Please also consider the general guidance.</i></p>	<p>What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?</p> <p><i>These actions can include a range of positive actions which allows the organisation to treat individuals according to their needs, even when that might mean treating some more favourably than others, in order for them to have a good outcome. You may also have actions to identify any gaps in data or an action to engage with those who will/likely to be effected by the proposal. These actions need to link to Section 4 of this template.</i></p>																						
<p>Age Do you think this proposal will have a positive or a negative impact on people because of their age? (Please tick ✓)</p> <table border="1" data-bbox="71 989 788 1433"> <thead> <tr> <th></th> <th>Positive</th> <th>Negative</th> <th>None/ Negligible</th> </tr> </thead> <tbody> <tr> <td>Children and Young People up to 18</td> <td></td> <td></td> <td style="text-align: center;">✓</td> </tr> <tr> <td rowspan="2">People 18-50</td> <td>Positive</td> <td>Negative</td> <td>None/ Negligible</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">✓</td> </tr> <tr> <td rowspan="2">Older People 50+</td> <td>Positive</td> <td>Negative</td> <td>None/ Negligible</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">✓</td> </tr> </tbody> </table>		Positive	Negative	None/ Negligible	Children and Young People up to 18			✓	People 18-50	Positive	Negative	None/ Negligible			✓	Older People 50+	Positive	Negative	None/ Negligible			✓	<p>The Policy will not have any impacts specific to this protected characteristic.</p>		
	Positive	Negative	None/ Negligible																						
Children and Young People up to 18			✓																						
People 18-50	Positive	Negative	None/ Negligible																						
			✓																						
Older People 50+	Positive	Negative	None/ Negligible																						
			✓																						

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Disability Do you think this proposal will have a positive or a negative impact on people because of their disability? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic. However, a few responses mention the lack of disabled friendly facilities for accessing the harbour and its facilities. This however is not a matter for the Policy.	The Ceredigion Harbours are historic working harbours and in some cases listed infrastructure.	While we look at pragmatic and affordable ways of improving access the scope to do this may be limited. We will continue to look for, consider and progress opportunities in this respect.
Hearing Impairment	Positive	Negative	None/ Negligible			
			✓			
Physical Impairment	Positive	Negative	None/ Negligible			
			✓			
Visual Impairment	Positive	Negative	None/ Negligible			
			✓			
Learning Disability	Positive	Negative	None/ Negligible			
			✓			
Long Standing Illness	Positive	Negative	None/ Negligible			
			✓			
Mental Health	Positive	Negative	None/ Negligible			
			✓			
Other	Positive	Negative	None/ Negligible			
			✓			

Transgender Do you think this proposal will have a positive or a negative impact on transgender people? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Transgender	Positive	Negative	None/ Negligible			
			✓			

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Marriage or Civil Partnership Do you think this proposal will have a positive or a negative impact on marriage or Civil partnership? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Marriage	Positive	Negative	None/ Negligible			
			✓			
Civil partnership	Positive	Negative	None/ Negligible			
			✓			

Pregnancy or Maternity Do you think this proposal will have a positive or a negative impact on pregnancy or maternity? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Pregnancy	Positive	Negative	None/ Negligible			
			✓			
Maternity	Positive	Negative	None/ Negligible			
			✓			

Race Do you think this proposal will have a positive or a negative impact on race? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
White	Positive	Negative	None/ Negligible			
			✓			
Mixed/Multiple Ethnic Groups	Positive	Negative	None/ Negligible			
			✓			
Asian / Asian British	Positive	Negative	None/ Negligible			

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			✓			
Black / African / Caribbean / Black British	Positive	Negative	None/ Negligible			
			✓			
Other Ethnic Groups	Positive	Negative	None/ Negligible			
			✓			

Religion or non-beliefs Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs or non-beliefs? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Christian	Positive	Negative	None/ Negligible			
			✓			
Buddhist	Positive	Negative	None/ Negligible			
			✓			
Hindu	Positive	Negative	None/ Negligible			
			✓			
Humanist	Positive	Negative	None/ Negligible			
			✓			
Jewish	Positive	Negative	None/ Negligible			
			✓			
Muslim	Positive	Negative	None/ Negligible			
			✓			
Sikh	Positive	Negative	None/ Negligible			
			✓			
Non-belief	Positive	Negative	None/			

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			Negligible			
			✓			
Other	Positive	Negative	None/ Negligible			
			✓			

Sex Do you think this proposal will have a positive or a negative impact on men and/or women? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Men	Positive	Negative	None/ Negligible			
			✓			
Women	Positive	Negative	None/ Negligible			
			✓			

Sexual Orientation Do you think this proposal will have a positive or a negative impact on people with different sexual orientation? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Bisexual	Positive	Negative	None/ Negligible			
			✓			
Gay Men	Positive	Negative	None/ Negligible			
			✓			
Gay Women / Lesbian	Positive	Negative	None/ Negligible			
			✓			
Heterosexual / Straight	Positive	Negative	None/ Negligible			
			✓			



Having due regards in relation to the three aims of the Equality Duty - determine whether the proposal will assist or inhibit your ability to eliminate discrimination; advance equality and foster good relations.

3.6.2. How could/does the proposal help advance/promote equality of opportunity?

You should consider whether the proposal will help you to: ● Remove or minimise disadvantage ● To meet the needs of people with certain characteristics ● Encourage increased participation of people with particular characteristics

- By removing the transfer of mooring arrangements it will increase transparency, fairness and improve opportunities to access a mooring.
- By removing the inheritance of leisure mooring arrangements it will increase opportunities to access a leisure mooring.
- By removing the waiting list cap it will increase opportunities for people to enter the waiting lists where these have previously been oversubscribed.
- By limiting it to one entry per person on any individual waiting list it will increase opportunities once people are on the waiting list to be allocated a mooring.

3.6.3. How could/does the proposal/decision help to eliminate unlawful discrimination, harassment, or victimisation?

You should consider whether there is evidence to indicate that: ● The proposal may result in less favourable treatment for people with certain characteristics ● The proposal may give rise to indirect discrimination ● The proposal is more likely to assist or impeded you in making reasonable adjustments

N/A – it is not considered that the changes to the policy will result in anyone with any particular characteristic being specifically affected.

3.6.4. How could/does the proposal impact on advancing/promoting good relations and wider community cohesion?

You should consider whether the proposal will help you to: ● Tackle prejudice ● Promote understanding

By increasing opportunities to access moorings it should enable a wider group of people to gain a mooring and consequently reduce tensions / perceptions that arise related to feelings of unfairness and that opportunities to access moorings are currently being based on the ability to pay a premium for a vessel to gain a mooring.

Having due regard of the Socio-Economic Duty of the Equality Act 2010.

Socio-Economic Disadvantage is living in less favourable social and economic circumstances than others in the same society.

As a listed public body, Ceredigion County Council is required to have due regard to the Socio-Economic Duty of the Equality Act 2010. Effectively this means carrying out a poverty impact assessment. The duty covers all people who suffer socio-economic disadvantage, including people with protected characteristics.

3.6.5 What evidence do you have about socio-economic disadvantage and inequalities of outcome in relation to the proposal?

Describe why it will have a positive/negative or negligible impact.



N/A – it is not deemed that there are any proposed changes which will result in a people living in a less favourable social or economic circumstance.

What evidence do you have to support this view?

The changes proposed are related to a discretionary provision and the proposed changes do not have any specific impact on any particular social or economic group.

What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?

None identified in the context of the changes proposed.

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3.7. A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh Language are promoted and protected. <i>In this section you need to consider the impact, the evidence and any action you are taking for improvement. This in order to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language Measure 2011.</i>				Describe why it will have a positive/negative or negligible impact.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?
Will the proposal be delivered bilingually (Welsh & English)?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
			✓			
Will the proposal have an effect on opportunities for persons to use the Welsh language?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
			✓			
Will the proposal increase or reduce the opportunity for persons to access services through the medium of Welsh?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
			✓			
How will the proposal treat the Welsh language no less favourably than the English language?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines.	
			✓			

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					Users can access services bilingually.	
Will it preserve promote and enhance local culture and heritage?	Positive	Negative	None/ Negligible ✓	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	



4. STRENGTHENING THE PROPOSAL: If the proposal is likely to have a negative impact on any of the above (including any of the protected characteristics), what practical changes/actions could help reduce or remove any negative impacts as identified in sections 2 and 3?

4.1 Actions.

What are you going to do?	When are you going to do it?	Who is responsible?	Progress
Changes to the proposal as outlined have already been made to the draft policy in light of feedback received as part of the consultation process including in relation to inheritance and the waiting list.	Draft policy already amended for consideration	Harbour Service	Draft policy already amended for consideration and will be presented to the Thiving Communities Overview and Scrutiny Committee for their consideration.

4.2. If no action is to be taken to remove or mitigate negative impacts please justify why.

(Please remember that if you have identified unlawful discrimination, immediate and potential, as a result of this proposal, the proposal must be changed or revised).

NA

4.3. Monitoring, evaluating and reviewing.

How will you monitor the impact and effectiveness of the proposal?

It will be monitored subject to approval in terms of turnover of the waiting lists, experience following implementation and ongoing feedback and communications from stakeholders.

5. RISK: What is the risk associated with this proposal?

Impact Criteria	1 - Very low	2 - Low	3 - Medium	4 - High	5 - Very High
Likelihood Criteria	1 - Unlikely to occur	2 - Lower than average chance of occurrence	3 - Even chance of occurrence	4 - Higher than average chance of occurrence	5 - Expected to occur

Risk Description	Impact (severity)	Probability (deliverability)	Risk Score
None identified.			

Does your proposal have a potential impact on another Service area?

N/A

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6. SIGN OFF			
Position	Name	Signature	Date
Service Manager	Owen Morgan		
Corporate Lead Officer	Rhodri Llwyd		
Strategic Director	Barry Rees		
Portfolio Holder	Cllr Keith Henson		

Ceredigion Harbours Management Policy

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Author and service: Owen Morgan –
Highways & Environmental Services.
Date approved by Cabinet: **TBC**
Integrated Impact Assessment (Yes/No): **TBC**
Publication date: **TBC**
Review date: **TBC**

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Ceredigion Harbours Management Policy

Introduction

1.1 This is a Policy for managing the facilities and moorings of different vessels in the Council managed Harbours of Ceredigion, namely Aberystwyth, Aberaeron and New Quay.

1.2 Whilst the current scope of the Policy is the Harbours at Aberystwyth, Aberaeron and New Quay, in the event that any other Harbours or related facilities become Council managed facilities in the future, this Policy will automatically extend to cover those facilities.

1.3 All moorings and other facilities form part of a discretionary service provided by the Harbour Authority. Each mooring and associated facility is allocated subject to application on a seasonal (Summer 1st April – 31st October, Winter 1st November – 31st March) basis only and is covered by a Mooring or Facility Form Agreement Form with associated terms and conditions of use.

1.4 The purpose of this Policy is to ensure that a consistent, fair, and equitable approach is applied to new, existing and potential mooring holders and harbour users at the Ceredigion Harbours. It aims to ensure that the operational Policy and associated conditions are fully understood and recognised as fair, reasonable and equitable to all in what are shared use facilities.

1.5 This operational Policy statement supplements the Aberystwyth Harbour Act 1987, the Aberaeron Harbour Act 1807, and the New Quay Harbour Act 1835, Harbours, Docks and Piers Clauses Act 1847, (and all other relevant legislation including any subsequent supplementing and amending Orders and legislation), the associated Harbour Bye- laws, and the Terms and Conditions for the use of Ceredigion County Council Harbours. Where Ceredigion County Council is the Statutory Harbour Authority this Policy applies.

1.6 The term 'Harbour Master' as defined in national legislation shall be used to describe the term 'Harbour Manager' within this policy.

1.7 This Policy is a management tool, nothing within it shall interfere with the Harbour Manager's overall ability to allocate or regulate the number, location, size and type of moorings and facilities being used at any time within the three Ceredigion Harbours.

Objectives of the Policy

2.1 The main objectives of the Policy are as follows:

- (i) To clearly define criteria for the operation and management of harbour moorings and related quayside uses, having due regard to local needs and desires as well as encouraging public use and enjoyment of the harbour quays.
- (ii) To continue promoting the harbours as some of the County's main locations as working harbours and for water-based recreation and leisure, taking into account the need for safe and easy access for all members of public.
- (iii) To contribute positively to the management of the natural and built environment of the harbours, which includes adherence with all relevant Environmental Legislation.
- (iv) To give a general overview of the responsibilities and obligations of mooring/facility holders and provide an outline of some of the key terms upon which the mooring/facility is allocated.

2.2 A copy of the Policy will be provided to applicants, potential applicants, members of the public and other interested persons or bodies on request. A copy will also be published on the Council's web page.

Functions of the Ceredigion Harbours

3.1 The following paragraphs confirm the complex range of roles which the harbours perform and underlines the need for a clear mooring policy as a foundation for their proper management.

(a) Commercial Activity

3.2 The port-related commercial operations in the harbours include charter companies who run scheduled tours around Cardigan Bay, a number of commercial fishing boat operations, and water-based activity providers.

(b) Leisure Activity

3.3 The use of the harbours continues to predominantly be by leisure mooring holders which currently range from sailing yachts to power boats. Access is facilitated for visiting vessels in addition to mooring holders.

3.4 The use of the harbours for water-based recreation has increased, in particular but not limited to windsurfing and dinghy sailing, canoeing, kayaking, rowing,

paddleboarding and angling. Slipways and facilities for water activities are located in all harbours.

(c) Visitor Attractions

3.5 In addition to annual water-based events such as regattas, the harbour areas make a considerable contribution to the county's tourist economy as well as being a valuable recreational resource for local people. The Harbours give access to visitors and local people to the two Marine Special Areas of Conservation (SACs), home to the famous Cardigan Bay dolphins and other wildlife of international significance.

The Types of Moorings and Facilities.

4.1 The classification for moorings and facilities in Ceredigion County Council managed harbours are as follows:

- (a) Leisure moorings
- (b) Commercial moorings
- (c) Deep water moorings
- (d) Short term visitor moorings
- (e) Facilities
- (f) Sizes and particulars of vessels, watercraft and other equipment

4.2 Other than the specific arrangements referred to relating to the limited quayside parking at New Quay Harbour there is no parking provision made or season tickets afforded to Harbour users in the Council's Pay and Display car parks.

(a) Leisure Moorings

4.3 The provision of moorings for leisure craft (mostly smaller craft used by private individuals for their own recreation) is a vital part of the recreational use of all three harbours. Leisure moorings are provided in a variety of locations in order to allow operational and managerial flexibility. This allows the ability to cater for varying demand for such moorings during the year.

4.4 These are agreed moorings for periods of stay greater than two weeks. Long-term does not imply that these moorings are permanent or tied to a particular location or mooring holder. This type of mooring is used by owners of leisure craft who wish to moor them in the harbours for long periods based on a seasonal agreement. The vessel owners do not own the rights to the mooring, nor are they allowed to transfer the rights of the use of the mooring if selling the vessel which is

presently on the mooring. As Ceredigion County Council actively promotes the harbours for use by leisure craft, the provision of additional service facilities continues to be a priority. These may be provided by the Council or in partnership with others.

(b) Commercial Moorings

4.5 There are a finite number of moorings for passenger carrying pleasure boats, commercial water sports and commercial fishing boats agreed at each harbour. It is recognised that further moorings could be provided as part of any future development opportunities or where future capacity becomes available.

4.6 Commercial moorings are subject to the following controls:

(i) Commercial moorings can be categorised as follows:

Passenger Carrying Pleasure Boat Moorings

Certain moorings can be used for passenger carrying pleasure boats to offer wildlife tours, fishing trips and water activities in and around Cardigan Bay.

Commercial Fishing Boat Moorings

Certain moorings can be used by commercial fishing boats to fish in Cardigan Bay.

(ii) All vessels seeking a dedicated commercial mooring will require the necessary commercial licences, coding and certification together with a mooring agreement.

(iii) Any commercial vessel trading in strategic locations of the Harbour affected by events will need to be able to move to allow for occasional relocation.

(iv) All waste generated by the user will wherever possible be stored on board the vessel. Bins must be kept aboard and stored in a satisfactory way so as not to prejudice the appearance of the vessel. Vessels will be expected to comply with requirements of the Harbour Manager in respect of waste disposal, which may vary from time to time depending on the disposal regime in operation. All commercial users must dispose of waste in accordance with the most current Port Waste Management Plan.

(vi) There is a quota for commercial moorings which is currently.

Aberystwyth:

Commercial Passenger: 3.

Commercial Fishing: 9.

Aberaeron:

Commercial Passenger: 6.

Commercial Fishing: 1.

New Quay:

Commercial Passenger: 11.

Commercial Fishing: 6.

Commercial Deep-Water Moorings: 12.

Quotas could be subject to change depending on future development opportunities or where future capacity becomes available.

(c) Deep Water Moorings

4.7 There are currently 18 deep water moorings situated off the coast in New Quay. Specific moorings have been assigned to a mixture of commercial and leisure vessels. The number of deep-water moorings has reached maximum capacity.

(d) Short Term Visitor Moorings

4.8 Short-Term Visitor Leisure Moorings

Short stay/overnight visitor moorings are available in harbours where capacity allows. There is a set daily and weekly fee for these moorings (please see current 'Fees and Charges'). The maximum stay on these moorings is two weeks and are allocated on a first come first served basis, at the Harbour Manager's discretion. Length of stay may be extended during the winter season, at the discretion of the Harbour Manager.

4.9 Short-Term Visiting Commercial Moorings

Short stay/overnight commercial visitor moorings are available in harbours where capacity allows. There is a set daily and weekly fee for these moorings (please see current 'Fees and Charges'). The maximum stay on these moorings is two weeks and are allocated on a first come first served basis, at the discretion of the Harbour Manager. Length of stay may be extended during the winter season at the discretion of the Harbour Manager.

(e) Other Facilities

4.10 Any leisure vessels, tenders, boats, cars and fishing gear etc. on harbours, piers, docks and slipways in strategic locations or any other location of the Harbour affected by events will need to be able to move to allow for occasional relocation and operational needs at the Harbour Managers discretion.

4.11 There is Water Activity Equipment Stand available for long term use at New Quay Harbour. The stand can be used for storage of water activity equipment such as but not limited to kayaks, paddleboards, windsurf boards and surfboards at Harbour Managers discretion. Long- term does not imply that the stand/facility spaces are permanent or tied to a particular location.

The facility is used by owners of water activity equipment who wish to store them in the harbour for long periods subject to an annual agreement. The users do not own the rights to the space, nor do they have the right to transfer the use of the space if selling the equipment allocated to the space.

(f) Sizes and Particulars of Vessels, Watercraft and Other Equipment

4.12 No vessel/watercraft/ equipment shall be placed on a mooring other than the vessel/watercraft/equipment applied for. The mooring/facility is allocated according to the particulars of the vessel and the mooring/facility holder must not increase the size of ~~his-the~~ vessel/watercraft/equipment without ascertaining whether or not there is a suitable alternative mooring/facility available and without prior agreement with the Harbour Manager. The mooring/facility holder may lose the mooring/facility without being offered a replacement.

Leisure Mooring, Dinghy and Water Activity Equipment Stand Waiting Lists

5.1 A mooring or storage space can only be offered and allocated to the person whose name is next on the appropriate waiting list for a specific harbour/facility subject to the suitability of the vessel/equipment being applied for, priority definitions below and at the Harbour Manager's discretion. A [non-refundable fee deposit](#) (please see current 'Fees and Charges') is required to join the appropriate waiting list, ~~and lists will be closed once thirty names have been placed on the list as it will then be considered to be oversubscribed.~~ A procedure covering the waiting list ~~and the application of deposits~~ can be found in Appendix 1 below.

5.2 Moorings, once allocated, are not transferable.

5.3 The waiting list is segregated into the following categories/order of priority:

1st: Council taxpayers whose permanent residence is within Ceredigion and who pay full Council tax to Ceredigion County Council. Proof of Council Tax arrangements will need to be sent to the Harbour Authority on application.

2nd: Council taxpayers whose main residence is outside of Ceredigion, but they own a property within the county. i.e., second homeowners. Proof of Council Tax arrangements will need to be sent to the Harbour Authority on application.

3rd: All others.

5.4 Other than those persons already on the mooring waiting list on 1st January 2011, berths will then be allocated according to the priorities above.

[5.5 Only one entry per person will be accepted onto any individual waiting list.](#)

Commercial Moorings - Waiting Lists

6.1 A commercial mooring can only be offered and allocated to a commercial operation that is next on the appropriate commercial mooring waiting list (one for passenger carrying pleasure boats, and one for commercial fishing boats in each harbour) and subject to the suitability of the vessel being applied for at the Harbour Manager's discretion. A ~~deposit~~[non-refundable fee](#), please see current 'Ceredigion Fees and Charges', is required to join the waiting list, ~~and lists will be closed once fifteen operations have been placed on the list as it will then be considered to be oversubscribed.~~ A procedure covering the waiting list ~~and the application of deposits~~ can be found in Appendix 1 of this Policy.

6.2 Both types of commercial moorings, once allocated, are not transferable.

6.3 Given the obvious demand for these types of mooring and the significant contribution made by passenger carrying pleasure boats, and commercial fishing boats to Ceredigion's economy and tourism portfolio, the Harbour Authority will operate a "use it or lose it" policy. If a commercial boat owner does not put a vessel on the allocated mooring facility by the 31st of May and / or does not operate a vessel commercially, then as of the 1st of June the mooring facility will be allocated to the next appropriate applicant on the waiting list at the Harbour Manager's discretion.

[6.4 Only one entry per person will be accepted onto any individual waiting list.](#)

~~6.5~~ A car parking space at New Quay Harbour slipway can only be offered and allocated to a commercial operation that is next on the New Quay commercial car park space waiting list and subject to the suitability of the vehicle and operation being applied for at the Harbour Manager's discretion. A ~~deposit~~[non-refundable fee](#); (please see current 'Fees and Charges') is required to join the waiting list, ~~and lists will be closed once five operations have been placed on the list as it will then be considered to be oversubscribed.~~ A procedure covering the waiting list can be found in Appendix 1 of this Policy.

Car parking spaces are not transferable and cannot be used by any other vehicles other than the vehicle allocated to the space.

Deep-Water Mooring Waiting List

7.1 Other than those leisure boats that have previously been allocated a deep-water mooring and choose to continue using it following the introduction of the charge, all future deep-water moorings that become available will only be allocated to commercial vessels.

7.2 A deep water mooring can only be offered and allocated to a commercial operation that is next on the appropriate deep water mooring waiting list. A [non-refundable fee](#) ~~deposit~~ (please see current 'Fees and Charges') is required to join the

waiting list ~~and the list will be closed once ten operations have been placed on the list as it will then be considered to be oversubscribed~~. A procedure covering the waiting list ~~and the application of deposits~~ can be found in Appendix 1 below.

[7.3 Only one entry per person will be accepted onto any individual waiting list.](#)

Duration of Mooring, Launching and Facility Agreements

Long Term Moorings

8.1 The duration of the mooring agreement is dependent on the season applied for.

The duration of the summer season is 1st April – 31st October each year.

The duration of the winter season is 1st November – 31st March the following year.

Any vessel owned by a long-term mooring holder found on a mooring or on a hardstanding on harbour/Council premises after the 1st of November will be charged Winter Mooring Fees.

Short-Term Visiting Leisure Moorings

8.2 The maximum duration of a short-term visiting leisure mooring agreement is two weeks commencing on the first date of stay. This may be extended during the winter season at the Harbour Manager's discretion.

Short-Term Visiting Commercial Moorings

8.3 The maximum duration of a short-term visiting commercial mooring agreement is two weeks commencing on the first date of stay. This may be extended during the winter season at the Harbour Manager's discretion.

Long-Term Launching

8.4 The duration of the annual launching agreement commences with each financial year on 1st of April and expires on the 31st of March of the following year.

Annual Launching Agreements are not offered on a pro rata basis, full fees are applicable regardless of date of launching.

No car parking rights are associated with the Annual Launching Agreement.

The Annual Launching Agreement is not Harbour specific and is valid for launching at any of the Ceredigion Harbours covered by this Policy.

Short-Term Launching

8.5 The duration of the short-term launching agreement is dependent on the needs of the user and at the discretion of the Harbour Manager.

No car parking rights are associated with the Short-Term Launching Agreement.

The Short-Term Launching Agreement is not Harbour Specific and is valid for launching at any of the Ceredigion Harbours covered by this Policy.

Facility Agreements

8.6 The duration of the Facility Agreement is 11 months commencing on 1st of May and expiring on the 31st of March of the following year. Every item/ equipment must **be removed** from the rack for the month of April to allow for any required maintenance/renumbering. Any equipment/ item remaining on a facility during the month of April can be removed by the Council without notice.

Mooring, Facility and Launching Charges and Rules

9.1 All matters related to the application of charges for leisure moorings, commercial moorings, launching, visiting, kayak windsurf board stand, boat park spaces and other facilities can be found in the current financial years 'Fees and Charges'.

9.2 If a mooring/facility holder has not paid the required fee in full by the 31st of May, then as of the 1st of June that mooring / facility will be reallocated to the next appropriate applicant on the waiting list at the Harbour Manager's discretion.

9.3 If a mooring/facility holder does not put a vessel on the allocated mooring facility by the 31st May then as of 1st June the mooring will be reallocated to the next appropriate applicant on the waiting list at the Harbour Manager's discretion.

9.4 Moorings are not offered on a pro rata basis, full fees are applicable each season regardless of when the mooring was allocated or occupied.

9.5 A vessel will be charged based on length overall measured in metres (rounded up to the nearest metre), which shall include any bowsprit, push-pit, stern davit, bathing platform.

9.6 If the mooring/facility holder does not have his/her own vessel/watercraft/equipment on the authorised mooring for a period of one year then the facility will be forfeit and reallocated from the appropriate waiting list.

Renewal of Allocated Mooring/Facility

10.1 The Council will endeavour to send each existing mooring/facility holder an application form requesting a Mooring/Facility Form Agreement to be completed and returned before the start of each season. If the mooring/facility holder returns the form indicating that he/she does not wish to renew the Mooring/facility Form Agreement, it will be allocated to the next person on the appropriate waiting list and the Council will send an application form and invoice as above. On receipt of the Mooring/Facility Form Agreement the Council will send an invoice to the mooring/facility holder.

10.2 In the event that the Council does not receive a completed mooring application form by 30th April, it will be considered that the mooring holder does not want to

renew their mooring agreement and it will be allocated to the next person on the appropriate waiting list.

10.3 The Council will, upon receipt of payment, allocate a mooring/facility to the applicant in a location within the specific harbour applied for, the exact location is determined at the discretion of the Harbour Manager.

Cancellation of Mooring Form Agreements and Rejection of Waiting List Applications

11.1 The mooring holder can cancel the Mooring/Facility Form Agreement at any time by giving 14 days' notice in writing to the Council. However, the fee ~~and of deposit~~ already paid shall be retained by the Council.

11.2 The Council can cancel the Mooring/Facility Form Agreement at any time by giving 1 month notice in writing to the mooring holder's last known contact details held by the Authority. A mooring/facility may be cancelled for a number of reasons, and these may include but are not limited to; bad debt, failure to comply with harbour Policy, regulations, directions, reckless conduct, disorderly behaviour and abuse towards harbour staff.

11.3 Full or pro rata refunds will not be due if the reason for cancellation is due to the conduct of the mooring/facility holder to comply with this Policy and / or any other Council directives or legal requirements. The Council will pursue any unpaid debt, irrespective if the mooring/ facility holder has vacated or been removed from the mooring/facility.

11.4 Waiting list applications will be rejected as a result of any abuse towards harbour staff.

Risk, Liability, Insurance Requirements and Recommendations

12.1 All vessels/watercraft are berthed, moored, launched, moved and hauled out at the applicant's own risk and is not the responsibility of the Council. The applicant is therefore required to make sure that their vessel/watercraft and property are adequately insured against all risks. The Council accepts no liability for any loss or damage to property howsoever caused.

12.2 Any vessels/watercraft/equipment deemed injurious to the amenity of the harbour as defined below will have to be recovered and removed from the harbour by the vessel/watercraft/equipment owner. Failure to remove such a property from the harbour in such a period as shall be specified by the Harbour Manager in his absolute discretion (including immediate notice) will result in the Council recovering and removing the property and the appropriate charges being made. Such charges

shall be a debt due from the Mooring/facility Form Agreement holder to the Authority. It is therefore strongly recommended that any insurance policy includes a wreck removal cover.

12.3 The mooring/facility holder shall indemnify the Council, their servants and agents against all actions, claims, costs and demands in respect of any injury or death of any person and any damage to any property which may arise out of the applicant's occupation and use of the harbour facilities including slipways, steps, jetties and staging and for this purpose shall maintain a Public Liability policy against such risks. Failure to maintain the appropriate insurance cover will result in the withdrawal of the mooring, launching and other facilities.

12.4 All mooring/facility holders using any part of the harbour facilities including slipways, steps, jetties and staging, for whatever purpose in connection with this application and whether by the Council's invitation or not, are expected to have due regard for their own safety and do so at their own risk.

12.5 The mooring/facility holder shall at all times be responsible for the safety of his/her vessel/watercraft/equipment and shall be liable for any damage accessioned to the Council's property, howsoever caused, during the navigation of any vessel/watercraft by the applicant or his servant or agents, or whilst the applicant's vessel/watercraft is berthed, moored, or launched, or by the vessel/watercraft slipping her berth, mooring or being cast adrift and will pay to the Council on demand any claim for compensation in respect of such damage.

12.6 The Council's Harbour Manager and other authorised Officers and servants, whilst acting in the course of their duty, shall not be responsible for any loss or damage which may occur as a result of compliance, or attempted compliance, with any lawful order or directions given by the Harbour Manager, or such other Officers or servants, nor shall the Council be liable for any loss or damage arising out of compliance, or attempted compliance, with the Officers' lawful orders. The Council, its servants, agents or employees shall not be liable for injury to any person, except where such injury arises through the negligence of the Council.

12.7 Any mooring holder wanting to over-winter or visit another Ceredigion Harbour other than that applied/allocated to, must make an application for that harbour. The mooring holder must ensure that his/her vessel is adequately insured for that harbour.

12.8 The mooring/facility holder is responsible and liable for any personal chain, ropes, [bridles/bridals](#), shackles, tackle or any other mooring devices used to moor their vessel/watercraft/equipment to any point of the Harbour Estate or Council Property.

Vessels and Other Watercraft or Equipment Injurious to the Amenity of the Harbour

13.1 If at any time the Harbour Authority are satisfied that a derelict vessel or structure or equipment moored in or lying in the water, on the foreshore of the harbour or other Council property is in such a condition as to be seriously injurious to the amenity of that part of the harbour or Council property in which it is moored lying or standing, the Harbour Authority may by notice require the owner thereof within such time as may be specified in the notice to take such steps as may be necessary to abate the injury to amenity. A vessel or other any other type of watercraft or equipment may be considered to be injurious to the amenity of the harbour or other Council property, by the Authority for reasons including but not limited to being badly dilapidated, unsightly due to neglect, seriously unkempt, unseaworthy and/or in danger of sinking, etc.

13.2 Failure to comply with such a notice issued by the Harbour Authority may result in the necessary action being taken directly by the Harbour Authority and the appropriate charges being made. Such charges shall be a debt due from the Mooring/facility Form Agreement holder to the Authority.

13.3 Tenders and trailers not marked with parent vessel's name may be removed without notice.

13.4 Other watercraft shall include but not be limited to kayaks, canoes, windsurf boards, paddle boards, dinghies or any other description of watercraft. Equipment shall include but not limited to trailers, vehicles, fishing equipment or any other property or items owned or used by the user.

Prohibition on Assignment/Sub Letting of Moorings/Facilities

14.1 The mooring/facility is allocated to the mooring/facility holder and may not be shared, assigned, transferred, sub-let or otherwise used or made available to anyone other than the mooring holder. In the event that it is discovered that a mooring/facility holder is subletting or allowing the use of the mooring by another party, the mooring/facility will be withdrawn with immediate effect.

Inheritance

15.1 [Commercial Moorings](#)

[Where a member or members of a family wishes to continue using the named vessel on the allocated mooring after the death or incapacity of the existing holder\(s\), they must gain written consent from the Council to do so.](#)

15.2 [Leisure Moorings](#)

There are no inheritance rights in relation to [leisure](#) moorings or [leisure](#) facilities within Ceredigion managed Harbours.

Identification

16.1 All vessels/watercraft and equipment including but not limited to, trailers and tenders used within the harbours and Council property must have their names displayed conspicuously to the satisfaction of the Harbour Manager. The mooring holder should also ensure that the name of the vessel or mooring number is clearly displayed on any mooring buoy. Tenders must be marked with the name of the parent vessel. Kayaks/wind surfboards and other equipment as defined above must be numbered/named conspicuously to the satisfaction of the Harbour Manager.

Change of Vessel, Watercraft or Other Equipment

17.1 In the event of the mooring/facility holder selling or otherwise disposing of the vessel/watercraft authorised to use the mooring/facility, the parties to the change shall ensure that immediate written notification prior to the sale or disposal is given to the Harbour Manager.

17.2 When an existing owner wishes to change their vessel/watercraft/equipment then a fresh application must be made for the intended new vessel/watercraft/equipment. The Council reserves the right to determine where a mooring/facility holder replaces a vessel upon a mooring/facility with another vessel/watercraft/equipment which is not suitable for the mooring/facility allocation, having regard to the size and particulars of the vessel/watercraft/equipment, to refuse that application. Where applications are not approved, applicants will be able to re-join the relevant waiting list at the next available opportunity (subject to sections 5 & 6 and Appendix 1) or keep the existing vessel/watercraft/equipment on that mooring/facility.

Mooring and Facility Transfers

18.1 There are no transfer rights in relation to moorings or facilities within Ceredigion managed Harbours.

Partnerships

19.1 Partnerships must have been registered with the Harbour Authority when the mooring was/is first allocated. Any subsequent changes of ownership or partnership buy out will not be recognised or count towards mooring allocation.

Use of Moorings

20.1 Moorings must only be used for the purposes stated in the original application (i.e., leisure, commercial or deep water).

20.2 Vessels using moorings must not be used for residential purposes. i.e., no living on board is permitted and boats must not serve as the sole or main residence of any individual or group. Customers are not expected to sleep on board their craft unless

that vessel has a suitable manufacturer holding tank for grey water and sewage. Moorings will be withdrawn from those harbour users who breach this expectation.

Fuel and Re-fuelling

21.1 No fuel or combustible material is permitted to be kept on or within the allocated mooring save in authorised storage tanks and containers. No petrol refuelling from cans or containers is permitted on the harbour side, pontoons, steps, slipways, or moorings. The only exception being by way of an approved siphoning/pumping device agreed specifically with the Harbour Manager. Any fuel spillage must be reported to the Harbour Manager, MCA and Natural Resources Wales immediately.

Pollution and Waste

22.1 Mooring/facility holders must not pollute the harbour by spillage, dumping of waste, effluent, human waste, detergent and/or fuel or otherwise deposit refuse or scrap on the harbour estate, in the waters of the harbour or on the harbour bed. All harbour users must abide by the most current Port Waste Management Plan.

Reckless Conduct and Disorderly Behaviour

23.1 The mooring/facility holder shall not use the mooring or facility in a reckless manner so as to cause danger to other users of the Harbour or damage to their property. The mooring/facility holder (including any persons on board a vessel/watercraft on the harbour within harbour limits) shall not cause unreasonable noise, nuisance or annoyance to other users of the Harbour. Harbour ~~Users~~-users must follow the current Code of Conduct and other Council Directives at all times. Any such behaviour may result in the Council terminating the Mooring/Facility Form Agreement.

Compliance with Statute, Byelaws and Directions of the Harbour Manager.

24.1 The harbour user and all persons having control or having charge of or being aboard their vessel/watercraft/equipment shall observe and perform all statutory and other obligations relating to the harbour including all Byelaws and Regulations made by the Council and directions given by the Harbour Officers.

24.2 In the event of the holder of the Mooring/Facility Form Agreement failing to comply with the conditions of the Mooring/Facility Form Agreement, Policy or any other Council Directive, the Council may give notice to remove the vessel/watercraft/equipment. Should this notice not be complied with or the conditions not met within fourteen days (or within the time period specified by the notice) of the date of the notice sent to the last known address of the harbour user, the Authority may remove the vessel to any place wheresoever and after a period of

14 days may dispose of it if it is not retrieved by the harbour user. The harbour user shall be liable to pay the cost of such removal, storage, mooring, berthing or disposal where applicable. Such charges shall be a debt due from the harbour user to the Authority.

24.3 No person shall within any enclosed harbour use buoyant pick-up ropes on moorings.

24.4 The master of a vessel shall not cause or permit the vessel to manoeuvre, come to anchor or be moored or placed so as to intentionally obstruct in any manner whatsoever the passage of vessels in and out of the harbour.

24.5 No person shall allow any vessel to obstruct any pontoons steps or slipways without the permission of the Harbour Manager.

Contractors

25.1 Any business contracted by a harbour user to carry out any work on the harbour estate must apply for and be granted a valid Estates License for any work that may impact on the harbour such as but not limited to lifting operations, vessel repairs/maintenance, property works or any other events which may affect public highways and or publicly or privately owned property.

Any business contracted by a harbour user for any minor repairs on vessels watercraft, moorings or other equipment that does not affect arrangements relating to the above shall ensure that:

- Adequate third-party liability insurance and public indemnity cover is in place.
- An appropriate method statement and risk assessment is in place.
- The work does not breach the Policy, and or any other Council Directive or legislation.
- The contractor indemnifies the Council, their servants and agents against all actions, claims, costs and demands in respect of any injury or death of any person and any damage to any property howsoever caused during any works on the Harbour Estate.

Passenger Landing

26.1 At the discretion of the Harbour Manager, visiting vessels coming from outside the County of Ceredigion are able to embark and disembark passengers from any of the three Ceredigion harbours, subject to application, payment of the applicable charge (see current 'Fees and Charges' and proof of insurance. Such vessels are required to give ample notice to the Authority where possible greater than two weeks.

Landing of Goods

27.1 At the discretion of the Harbour Manager, visiting Commercial Vessels are able to land passengers or goods from any of the three Ceredigion Harbours subject to, application, payment of the applicable charge (see current 'Fees and Charges') and proof of insurance and applicable certification. ~~This charge can be found in the current 'Fees and Charges'~~. Such vessels are required to give ample notice to the Authority where possible greater than two weeks.

Documents

27.1 The following associated documents can be found on the Council's website or by contacting the Authority at clic@ceredigion.gov.uk or on 01545 570881.

- Fees and Charges.
- Port Waste Management Plan.
- Port Marine Safety Code.
- Harbour Mooring Plans.
- Byelaws and Harbour Acts.
- The Harbours Constitution.
- Minutes of the Harbour Users Consultative Meetings.
- Live Public Consultations.
- Any other publicly available harbour associated documents.

Contact Details

28.1 Should you wish to contract the Council in relation to any Harbour related matters you may do so via the following means:

Email: clic@ceredigion.gov.uk

Telephone: 01545 570881

Neuadd Cyngor Ceredigion

Penmorfa

Aberaeron

Ceredigion

SA46 0PA

Appendix 1

Leisure, Commercial, Deep Water and Facilities Waiting List Procedure.

1) The waiting list fee is detailed in the current financial years' 'Fees and Charges'. On receipt of the appropriate fee and application form, the applicant's details will be placed on the relevant waiting list. Payment is as per instruction on application.

2) The waiting list entry will be dated the same day the [deposit-fee](#) is received.

3) The [deposit-fee](#) is NOT REFUNDABLE OR TRANSFERABLE ~~but will be credited to the mooring/facility charge if, and when, a suitable mooring/facility is allocated.~~

[4\) Only one entry per person will be accepted onto any individual waiting list.](#)

[54\)](#) Under normal circumstances the applicant will only be given one offer of a mooring/facility.

[65\)](#) When a mooring/facility is offered and accepted, it can only be allocated to the person/operation whose name is on the appropriate waiting list, and subject to the suitability of the vessel/equipment being applied for at the Harbour Managers discretion.

[67\)](#) When a mooring/facility is offered and accepted and no vessel/equipment is immediately available, the applicant must pay the full fee for the size of vessel/equipment applied for, and then has three months to place their vessel/equipment on the mooring/facility. If the mooring/facility is offered during the winter season, then the vessel / equipment may be placed by the commencement of the following summer season if this period is greater.

[78\)](#) Often a waiting list will be banded dependent on the size of the mooring/facility. It is therefore important that applicants are certain about the size of the vessel/equipment. The length entered on the waiting list form will may be amended prior to the offer of a mooring being made however, this may result in a transfer to a new banding with a new entry date.

[98\)](#) From time-to-time applicants will be asked to provide written confirmation of their wish to remain on a particular waiting list. The applicant's place on the waiting list will be forfeited and their details deleted from the waiting list records if written confirmation is not provided within 28 days of the request for confirmation being sent to the applicants last known contact details.

[910\)](#) It is the applicant's responsibility to keep the Harbour Authority advised of any change in the applicant's details, especially any change of contact details.



DRAFT



Cyngor Sir Ceredigion County Council - Integrated Impact Assessment (IIA)

An integrated tool to inform effective decision making

This **Integrated Impact Assessment tool** incorporates the principles of the Well-being of Future Generations (Wales) Act 2015 and the Sustainable Development Principles, the Equality Act 2010 and the Welsh Language Measure 2011 (Welsh Language Standards requirements) and Risk Management in order to inform effective decision making and ensuring compliance with respective legislation.

1. PROPOSAL DETAILS: (Policy/Change Objective/Budget saving)

Proposal Title	Ceredigion Harbours Management Policy Consultation				
Service Area	Harbour Services	Corporate Lead Officer	Rhodri Llwyd	Strategic Director	Barry Rees
Name of Officer completing the IIA	Chay Sanders	E-mail	clic@ceredigion.gov.uk		Phone no 01545570881

Please give a brief description of the purpose of the proposal

The Ceredigion Harbour Management Policy provides the strategic framework that underpins and informs how we fulfil our obligations as a Statutory Harbour Authority and how we deliver the Service. The current Policy was approved and adopted by the Council on the 19th of October 2010 and it is the view of the Service that a review is timely and appropriate.

Who will be directly affected by this proposal? (e.g. The general public, specific sections of the public such as youth groups, carers, road users, people using country parks, people on benefits, staff members or those who fall under the protected characteristics groups as defined by the Equality Act and for whom the authority must have due regard).

Current and future mooring holders, both leisure and commercial. Users of vessels visiting or launching from Council managed facilities. Members of the public using the harbours. Contractors carrying out work in the harbours. The Policy applies to Aberystwyth, Aberaeron and New Quay harbours and also makes provision that it will cover any other facility which the Harbour Service may manage in future.

VERSION CONTROL: The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development, Welsh language and equality considerations wherever possible.

Author	Decision making stage	Version number	Date considered	Brief description of any amendments made following consideration
Chay Sanders	Overview and Scrutiny Committee.	1	30/11/23	

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COUNCIL STRATEGIC OBJECTIVES: Which of the Council's Strategic Objectives does the proposal address and how?	
Boosting the Economy, supporting Business and enabling employment.	<p>The harbours are much loved and valued assets, providing a setting for a range of commercial and leisure activities which have an important role in contributing towards Boosting the Economy, supporting Business and enabling employment.</p> <p>The management policy aims to promote the harbours as working harbours and for water-based recreation and leisure, taking into account the need for safe and easy access for all members of public. Through management of the harbours in a consistent, fair, and equitable way they will continue to be attractive for existing and potential mooring holders and other harbour users.</p>
Creating caring and healthy communities	N/A
Providing the best start in life and enabling Learning at all ages	N/A
Creating sustainable, greener and well-connected communities	To contribute positively to the management of the natural and built environment of the harbours, which includes adherence with all relevant Environmental Rules and Legislation.

NOTE: As you complete this tool you will be asked for **evidence to support your views**. These need to include your baseline position, measures and studies that have informed your thinking and the judgement you are making. It should allow you to identify whether any changes resulting from the implementation of the recommendation will have a positive or negative effect. Data sources include for example:

- *Quantitative data - data that provides numerical information, e.g. population figures, number of users/non-users*
- *Qualitative data – data that furnishes evidence of people's perception/views of the service/policy, e.g. analysis of complaints, outcomes of focus groups, surveys*
- *Local population data from the census figures (such as Ceredigion Welsh language Profile and Ceredigion Demographic Equality data)*
- *National Household survey data*
- *Service User data*
- *Feedback from consultation and engagement campaigns*
- *Recommendations from Scrutiny*
- *Comparisons with similar policies in other authorities*
- *Academic publications, research reports, consultants' reports, and reports on any consultation with e.g. trade unions or the voluntary and community sectors, 'Is Wales Fairer' document.*
- *Welsh Language skills data for Council staff*



2. SUSTAINABLE DEVELOPMENT PRINCIPLES: How has your proposal embedded and prioritised the five sustainable development principles, as outlined in the Well-being of Future Generations (Wales) Act 2015, in its development?			
Sustainable Development Principle	Does the proposal demonstrate you have met this principle? If yes, describe how. If not, explain why.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the principle?
<p>Long Term Balancing short term need with long term and planning for the future.</p>	<p>The previous management Policy was written in 2010 and the vast majority of the Policy has been retained as it is believed to be fit for purpose for the long term.</p> <p>One change in the facility is the addition of the paragraph: in the event that any other Harbours or related facilities become Council managed facilities in the future, this Policy will automatically extend to cover those facilities.</p>	<p>The harbours continue to be popular with mooring holders (evidence being waiting lists for moorings / facilities) and visitors. Providing a management framework that ensures that the facilities are managed and maintained in a safe, fair way should mean that they continue to thrive.</p>	<p>In the event of any major changes to the harbours or associated legislation, rules or guidance, the Policy can be reviewed as necessary as and when deemed appropriate. A review of the Policy could be considered to be undertaken on a structured schedule to establish if it's still fit for purpose.</p>
<p>Collaboration Working together with other partners to deliver.</p>	<p>In addition to the Harbours directly managed by Ceredigion County Council, collaboration / 3rd party arrangements are in place in relation to the Teifi Estuary (ATFL) and Aberystwyth Marina.</p> <p>Over and above the normal correspondence / contact arrangements, stakeholders can engage in the monthly surgeries at each Harbour and also via the Consultative Committee meetings which take place biannually.</p>	<p>Ongoing correspondence and arrangements and minutes of consultative committee meetings.</p> <p>Collaboration has taken place in relation to specific projects with stakeholders and the Council, including the recent arrangements for the mobile platform in New Quay.</p>	<p>None identified in the context of the changes proposed.</p>

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<p>Involvement Involving those with an interest and seeking their views.</p>	<p>A consultation exercise was carried out between 20th September until the 20th October 2023 asking for feedback from current harbour users and other interested parties.</p> <p>The arrangements have been consistent with those applied in other similar policy development processes and benefitted from the input of a Corporate Service who specialise in consultation and engagement activities.</p> <p>Other representations were also received outside of the prescribed process. With a view of being as open and inclusive as possible these have been collated and included.</p> <p>As well as the consultation on this draft policy the Harbour Service also engages with users in a number of other ways.</p> <p>There were a high number of responses which showed engagement and involvement.</p>	<p>Following receipt of the consultation responses changes to some elements of the draft policy have been put forward in relation to inheritance for commercial moorings and also waiting list arrangements.</p> <p>This consultation was sent out to harbour users, made available in the harbour offices and libraries and could be accessed online. Promotion was carried out by Ceredigion Council's comms team.</p> <p>Feedback from the responses gained will be analysed and presented within documents used to form the final policy.</p> <p>Although we will not respond to everyone individually, this information will be shared with those who indicated, as part of the consultation process, that they would like to receive feedback.</p>	<p>Possibility of structured review and survey perhaps a survey every 5-10 years.</p>
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		<p>The Harbour Service also engages with it's users through:</p> <p>Harbour Users Consultative Committees (twice a year)</p> <p>Harbour Surgeries (monthly)</p> <p>Regular presence by Harbours Team at the Harbours (regular and ongoing) with an open-door approach/policy</p> <p>Calm Waters (twice a year)</p> <p>Contact via Clic (letters, e-mail, phone, feedback forms)</p> <p>Notices to Mariners</p> <p>Group e-mails to Mooring Holders</p> <p>Dedicated pages on the Council website which includes access to the Harbour Management Policy.</p>	
<p>Prevention Putting resources into preventing problems occurring or getting worse.</p>	<p>In order to prevent ongoing issues with the slow turnover of the waiting list and to provide greater access to moorings the following proposed changes to the policy have been put forward:</p>	<p>The waiting lists, especially in New Quay, ,have, in general, seen very little movement / allocation of moorings becoming available to</p>	<p>It has been recognised from the consultation process that there is a difference between the commercial and leisure moorings in that, in some cases, overan extended period, businesses have built up capital having been</p>



	<ul style="list-style-type: none"> • Removing the ability to transfer moorings to another party. • Removing inheritance rights for leisure mooring holders. • Removing the free Car Parking for mooring holders. • Removing the cap on all waiting lists. • Allowing only one entry per person onto any individual waiting list from the implementation date. <p>The arrangements currently in place for the transfer of vessels is now deemed not to be appropriate and as such it is proposed to remove it. This arrangement undermines the waiting list arrangements and could result in substantial premiums being paid for vessels on a mooring. The retention of the transfer of moorings arrangements is also deemed to support the perception that opportunities to access the harbour services and moorings, especially, is something of a closed shop and / or limiting access to those who are able to pay the premiums.</p> <p>The proposal to remove the inheritance arrangements for leisure users is made</p>	<p>people on the list, with some people having been on the list for over 10 years.</p> <p>There is a level of mooring transfers each year which take place and, if transfers are prevented, moorings should then become available to those on the waiting list (which is not taking place currently).</p> <p>Allowing only one entry per individual per waiting list at any given time will prevent an individual blocking out a waiting list / being allocated a number of moorings in advance of others on the waiting list. This will improve access and reduce the time on the waiting list for individuals to secure a mooring.</p> <p>The current provision of a parking permit can in some cases mean that the value of the permit afforded is the same or exceeds the cost of the mooring e.g. A permit</p>	<p>afforded ongoing use and access to those moorings. With this in mind, it is intended to retain the inheritance arrangements for commercial moorings but remove them from the leisure moorings.</p> <p>The Council will, as part of the Fees and Charges setting process, be reviewing whether the charging mechanism and structure for the commercial operations in the Harbour remain relevant, valid and are in the overall best interest of the Council.</p> <p>When a bereavement occurs relating to a leisure mooring this will be dealt with sensitively by the Harbour Service. A period of three months will be allowed for arrangements to be completed.</p>
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	<p>with a view of improving opportunities for the general public to have a reasonable chance to gain access to a leisure mooring at the CCC managed harbours.</p> <p>It is no longer deemed appropriate to provide the benefit of free parking permits at CCC managed car parks to harbours users as part of the seasonal mooring arrangements. This is partly because the free parking provision has a significant value in its own right.</p> <p>The proposal to remove the cap on each waiting list has been deemed appropriate to improve accessibility of waiting lists.</p> <p>The proposed insertion of only one entry per person will increase the opportunities for someone to get a mooring when one becomes available, thereby making the harbours more accessible to a wider range of people.</p>	<p>affords free parking for a period of 8 months when the car parks are chargeable whilst a 6 month car parking season ticket for Church Street New Quay and South Beach Aberaeron cost £267, which is the same as a leisure mooring for a 4m vessel.</p>	
<p>Integration Positively impacting on people, economy, environment and culture and trying to benefit all three.</p>	<p>The overall aim of the policy is to manage the Harbours in a way that contributes positively to the overall economy, environment and culture, while taking into consideration that there are varying views, wants and needs of stakeholders, along with the awareness that the provision of moorings is a discretionary service.</p>	<p>The policy in general has been seen to positively support the arrangements at the Harbours, however it is deemed appropriate at this time to make amendments to the policy to further positively impact those wishing to access</p>	<p>None identified in the context of the changes proposed.</p>

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	Changes to the policy intend to increase the availability and turnover of moorings which in turn will positively impact those people trying to secure a mooring.	moorings at the harbours. This is in light of operational experience through issues which have arisen and feedback received generally and / or as part of the consultation process.	
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3. WELL-BEING GOALS: Does your proposal deliver any of the seven National Well-being Goals for Wales as outlined on the Well-being of Future Generations (Wales) Act 2015? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. We need to ensure that the steps we take to meet one of the goals aren't detrimental to meeting another.

Well-being Goal	Does the proposal contribute to this goal? Describe the positive or negative impacts-	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the goal?
3.1. A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs.	The Policy's aim is to continue to promote commercial activity in the harbours as well as the wider tourism related economy which benefits in part from the attraction provided by the Harbours.	A large part of the policy is dedicated to the management of commercial moorings, it is recognised that further moorings could be provided as part of any future development opportunities or where future capacity becomes available. As there is significant demand for these moorings the Council operates a use or lose it policy, ensuring that if	The draft policy was amended following the consultation feedback in relation to inheritance arrangements for Commercial moorings to continue to support their ongoing operation in the case of death or incapacity of the mooring holder.

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		moorings are not being used then another venture gets an opportunity.	
<p>3.2. A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change).</p>	<p>There are no changes in the policy related to biodiversity and ecosystems however, environmental issues including the issue of pollution and waste generated by harbour users already formed part of the policy.</p> <p>The Policy already includes that harbour users must follow the Cardigan Bay Code of Conduct and other Council directives at all times.</p>	<p>Harbour users must adhere to the Port Waste Management Plan and report any fuel spills.</p> <p>Code of Conduct includes regulations on interaction with wildlife, taking litter home and abiding with byelaws.</p> <p>Information on the PWMP and Special Area of Conservation is and will be available on various platforms such as the Council's website, in the Harbour newsletter Calm Waters, at strategic points in the Harbours and at each Harbour Office.</p> <p>Initiatives related to availability of spill kits have been taken forward via grant funding at each of the harbours by the Council.</p>	None identified in the context of the changes proposed.
<p>3.3. A healthier Wales</p>	<p>The Policy's aim is to continue to facilitate the use of the Harbours for</p>	<p>The leisure moorings at each harbour are well used and valued. The</p>	None identified in the context of the changes proposed.

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<p>People's physical and mental wellbeing is maximised and health impacts are understood.</p>	<p>water based recreational activities which help support health and wellbeing in addition to being areas that people use for leisure walks. They are also attractive settings which contribute to the overall environment and have an positive impact on lhealth and wellbeing.</p>	<p>areas are busy and vibrant especially during the peak tourist seasons with a number of visitors to the areas.</p>	
<p>3.4. A Wales of cohesive communities Communities are attractive, viable, safe and well connected.</p>	<p>The Policy's aim is to continue to manage the Harbours in a way that supports the wider community taking into account the varying stakeholder wants and needs which can often be conflicting.</p>		<p>None identified in the context of the changes proposed.</p>
<p>3.5. A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental well-being.</p>	<p>The Policy's aim is to continue to facilitate the use of Harbours in a way that is responsible and sustainable in the long term.</p>		<p>None identified in the context of the changes proposed.</p>

<p>3.6. A more equal Wales People can fulfil their potential no matter what their background or circumstances.</p> <p><i>In this section you need to consider the impact on equality groups, the evidence and any action you are taking for improvement.</i></p> <p><i>You need to consider how might the proposal impact on equality protected groups in accordance with the Equality Act 2010?</i></p> <p><i>These include the protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or beliefs, gender, sexual orientation.</i></p> <p>Please also consider the following guide::</p>	<p>Describe why it will have a positive/negative or negligible impact.</p> <p><i>Using your evidence consider the impact for each of the protected groups. You will need to consider do these groups have equal access to the service, or do they need to receive the service in a different way from other people because of their protected characteristics. It is not acceptable to state simply that a proposal will universally</i></p>	<p>What evidence do you have to support this view?</p> <p><i>Gathering Equality data and evidence is vital for an IIA. You should consider who uses or is likely to use the service. Failure to use data or engage where change is planned can leave decisions open to legal challenge. Please link to involvement box within this template. Please also consider the general guidance.</i></p>	<p>What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?</p> <p><i>These actions can include a range of positive actions which allows the organisation to treat individuals according to their needs, even when that might mean treating some more favourably than others, in order for them to have a good outcome. You may also have</i></p>
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Equality Human Rights - Assessing Impact & Equality Duty				<i>benefit/disadvantage everyone. You should demonstrate that you have considered all the available evidence and address any gaps or disparities revealed.</i>		<i>actions to identify any gaps in data or an action to engage with those who will/likely to be effected by the proposal. These actions need to link to Section 4 of this template.</i>
Age Do you think this proposal will have a positive or a negative impact on people because of their age? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Children and Young People up to 18	Positive	Negative	None/ Negligible			
			✓			
People 18-50	Positive	Negative	None/ Negligible			
			✓			
Older People 50+	Positive	Negative	None/ Negligible			
			✓			
Disability Do you think this proposal will have a positive or a negative impact on people because of their disability? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic. However, a few responses mention the lack of disabled friendly facilities for accessing the harbour and its facilities. This however is not a matter for the Policy.	The Ceredigion Harbours are historic working harbours and in some cases listed infrastructure.	While we look at pragmatic and affordable ways of improving access the scope to do this may be limited. We will continue to look for, consider and progress opportunities in this respect.
Hearing Impairment	Positive	Negative	None/ Negligible			
			✓			
Physical Impairment	Positive	Negative	None/ Negligible			
			✓			
Visual Impairment	Positive	Negative	None/ Negligible			
			✓			

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Learning Disability	Positive	Negative	None/ Negligible			
			✓			
Long Standing Illness	Positive	Negative	None/ Negligible			
			✓			
Mental Health	Positive	Negative	None/ Negligible			
			✓			
Other	Positive	Negative	None/ Negligible			
			✓			
Transgender Do you think this proposal will have a positive or a negative impact on transgender people? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Transgender	Positive	Negative	None/ Negligible			
			✓			
Marriage or Civil Partnership Do you think this proposal will have a positive or a negative impact on marriage or Civil partnership? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Marriage	Positive	Negative	None/ Negligible			
			✓			
Civil partnership	Positive	Negative	None/ Negligible			
			✓			

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Pregnancy or Maternity Do you think this proposal will have a positive or a negative impact on pregnancy or maternity? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Pregnancy	Positive	Negative	None/ Negligible			
			✓			
Maternity	Positive	Negative	None/ Negligible			
			✓			

Race Do you think this proposal will have a positive or a negative impact on race? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
White	Positive	Negative	None/ Negligible			
			✓			
Mixed/Multiple Ethnic Groups	Positive	Negative	None/ Negligible			
			✓			
Asian / Asian British	Positive	Negative	None/ Negligible			
			✓			
Black / African / Caribbean / Black British	Positive	Negative	None/ Negligible			
			✓			
Other Ethnic Groups	Positive	Negative	None/ Negligible			
			✓			

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Religion or non-beliefs Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs or non-beliefs? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Christian	Positive	Negative	None/ Negligible			
			✓			
Buddhist	Positive	Negative	None/ Negligible			
			✓			
Hindu	Positive	Negative	None/ Negligible			
			✓			
Humanist	Positive	Negative	None/ Negligible			
			✓			
Jewish	Positive	Negative	None/ Negligible			
			✓			
Muslim	Positive	Negative	None/ Negligible			
			✓			
Sikh	Positive	Negative	None/ Negligible			
			✓			
Non-belief	Positive	Negative	None/ Negligible			
			✓			
Other	Positive	Negative	None/ Negligible			
			✓			

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Sex Do you think this proposal will have a positive or a negative impact on men and/or women? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Men	Positive	Negative	None/ Negligible			
			✓			
Women	Positive	Negative	None/ Negligible			
			✓			

Sexual Orientation Do you think this proposal will have a positive or a negative impact on people with different sexual orientation? (Please tick ✓)				The Policy will not have any impacts specific to this protected characteristic.		
Bisexual	Positive	Negative	None/ Negligible			
			✓			
Gay Men	Positive	Negative	None/ Negligible			
			✓			
Gay Women / Lesbian	Positive	Negative	None/ Negligible			
			✓			
Heterosexual / Straight	Positive	Negative	None/ Negligible			
			✓			

Having due regards in relation to the three aims of the Equality Duty - determine whether the proposal will assist or inhibit your ability to eliminate discrimination; advance equality and foster good relations.

3.6.2. How could/does the proposal help advance/promote equality of opportunity?

You should consider whether the proposal will help you to:

- Remove or minimise disadvantage
- To meet the needs of people with certain characteristics
- Encourage increased participation of people with particular characteristics

- By removing the transfer of mooring arrangements it will increase transparency, fairness and improve opportunities to access a mooring.



- By removing the inheritance of leisure mooring arrangements it will increase opportunities to access a leisure mooring.
- By removing the waiting list cap it will increase opportunities for people to enter the waiting lists where these have previously been oversubscribed.
- By limiting it to one entry per person on any individual waiting list it will increase opportunities once people are on the waiting list to be allocated a mooring.

3.6.3. How could/does the proposal/decision help to eliminate unlawful discrimination, harassment, or victimisation?

You should consider whether there is evidence to indicate that: ● *The proposal may result in less favourable treatment for people with certain characteristics* ● *The proposal may give rise to indirect discrimination* ● *The proposal is more likely to assist or impede you in making reasonable adjustments*

N/A – it is not considered that the changes to the policy will result in anyone with any particular characteristic being specifically affected.

3.6.4. How could/does the proposal impact on advancing/promoting good relations and wider community cohesion?

You should consider whether the proposal will help you to: ● *Tackle prejudice* ● *Promote understanding*

By increasing opportunities to access moorings it should enable a wider group of people to gain a mooring and consequently reduce tensions / perceptions that arise related to feelings of unfairness and that opportunities to access moorings are currently being based on the ability to pay a premium for a vessel to gain a mooring.

Having due regard of the Socio-Economic Duty of the Equality Act 2010.

Socio-Economic Disadvantage is living in less favourable social and economic circumstances than others in the same society.

As a listed public body, Ceredigion County Council is required to have due regard to the Socio-Economic Duty of the Equality Act 2010. Effectively this means carrying out a poverty impact assessment. The duty covers all people who suffer socio-economic disadvantage, including people with protected characteristics.

3.6.5 What evidence do you have about socio-economic disadvantage and inequalities of outcome in relation to the proposal?

Describe why it will have a positive/negative or negligible impact.

N/A – it is not deemed that there are any proposed changes which will result in a people living in a less favourable social or economic circumstance.

What evidence do you have to support this view?

The changes proposed are related to a discretionary provision and the proposed changes do not have any specific impact on any particular social or economic group.



What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?

None identified in the context of the changes proposed.

3.7. A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh Language are promoted and protected. <i>In this section you need to consider the impact, the evidence and any action you are taking for improvement. This in order to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language Measure 2011.</i>				Describe why it will have a positive/negative or negligible impact.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?
Will the proposal be delivered bilingually (Welsh & English)?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
			✓			
Will the proposal have an effect on opportunities for persons to use the Welsh language?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
			✓			
Will the proposal increase or reduce the opportunity for persons to access services through the medium of Welsh?	Positive	Negative	None/ Negligible	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
			✓			

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How will the proposal treat the Welsh language no less favourably than the English language?	Positive	Negative	None/ Negligible ✓	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	
Will it preserve promote and enhance local culture and heritage?	Positive	Negative	None/ Negligible ✓	The Policy and Service is already provided bilingually.	All documents and communications adhere to the Council's Welsh Language guidelines. Users can access services bilingually.	

4. STRENGTHENING THE PROPOSAL: If the proposal is likely to have a negative impact on any of the above (including any of the protected characteristics), what practical changes/actions could help reduce or remove any negative impacts as identified in sections 2 and 3?

4.1 Actions.

What are you going to do?	When are you going to do it?	Who is responsible?	Progress
Changes to the proposal as outlined have already been made to the draft policy in light of feedback received as part of the consultation process including in relation to inheritance and the waiting list.	Draft policy already amended for consideration	Harbour Service	Draft policy already amended for consideration and will be presented to the Thiving Communities Overview and Scrutiny Committee for their consideration.

4.2. If no action is to be taken to remove or mitigate negative impacts please justify why.

(Please remember that if you have identified unlawful discrimination, immediate and potential, as a result of this proposal, the proposal must be changed or revised).

NA

4.3. Monitoring, evaluating and reviewing.

How will you monitor the impact and effectiveness of the proposal?

It will be monitored subject to approval in terms of turnover of the waiting lists, experience following implementation and ongoing feedback and communications from stakeholders.

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5. RISK: What is the risk associated with this proposal?					
Impact Criteria	1 - Very low	2 - Low	3 - Medium	4 - High	5 - Very High
Likelihood Criteria	1 - Unlikely to occur	2 - Lower than average chance of occurrence	3 - Even chance of occurrence	4 - Higher than average chance of occurrence	5 - Expected to occur
Risk Description	Impact (severity)		Probability (deliverability)		Risk Score
None identified.					
Does your proposal have a potential impact on another Service area?					
N/A					

6. SIGN OFF			
Position	Name	Signature	Date
Service Manager	Owen Morgan		08/02/24
Corporate Lead Officer	Rhodri Llwyd		06/02/24
Corporate Director	Barry Rees		06/02/24
Portfolio Holder	Cllr Keith Henson		08/02/24

CYNGOR SIR CEREDIGION COUNTY COUNCIL

Report to: Cabinet

Date of meeting: 20 February 2024

Title: Recommendation from the Thriving Communities Overview and Scrutiny Committee in relation to the Ceredigion Harbours Management Policy Review: Consultation

Purpose of the report: To provide feedback from the Thriving Communities Overview and Scrutiny Committee held on 18 December 2023

Background:

The Thriving Communities Overview and Scrutiny Committee considered the Ceredigion Harbours Management Policy Review: Consultation at its meeting on 18 December 2023.

Councillor Keith Henson (Cabinet Member for Highways and Environmental Services and Carbon Management) provided Committee Members with an update on the outcome of the Ceredigion Harbours Management Policy Review Consultation process. The current Ceredigion Harbours Management Policy was approved by the Council on 19 October 2010 and provided a clear, useful and appropriate framework for the delivery and management of activities at the Council's Harbours at Aberaeron, Aberystwyth and New Quay. It was, however, now considered appropriate and timely to review and update the policy to reflect relevant changes since the Policy's implementation and, to address any gaps between the Policy and current Harbour related activities which had been identified and/or arisen from experience. The proposed changes built on the current Policy which had served stakeholders well for over a decade. The changes recognised and reflected that the Harbours were multi-use, shared-use facilities and that the Council's overall intention was to strengthen the Policy so they could continue to be managed in a fair, transparent and balanced way for the benefit of all stakeholders.

A draft updated Policy was prepared and, as part of the policy change process, a consultation was undertaken that provided stakeholders with an opportunity to provide their feedback. The consultation was launched on 20 September 2023 and was open until 20 October 2023, with a total of 108 responses received through the prescribed process. Feedback from outside the prescribed process was also received and noted. An overview of the feedback received was provided to the Committee. Further to the feedback received through the consultation process, amendments have been incorporated into the latest draft of the new policy. As with any consultation related to any change in policy, it was not possible to respond positively to all the feedback, suggestions and comments received and there could be a direct conflict between the aims, aspirations and expectations of the different stakeholders.

Councillor Keith Henson and Gerwyn Jones, Corporate Manager- Environmental Services explained that the intention was to have an overarching policy framework that supported and facilitated the fair, consistent and transparent management of the

harbours, that recognised the variety of stakeholders that make use of the facilities. It was accepted that not everyone would approve nor agree with the details and implications, however, these were Council-operated facilities and, ultimately, it was for the Council to determine how they, and the activities undertaken therein, were best managed.

Gerwyn Jones added that there had been a misunderstanding around waiting lists which had been reflected in the feedback, and that if a boat for sale included a mooring, it could create an artificial premium. From the 108 responses, 33 had shared their views on the policy, despite stating that they had not known about its existence, therefore having a balanced approach to changes was key.

Members were provided with the opportunity to ask questions which were answered by Officers present. The main points raised were as follows:

- Members were supportive of the removal of the transfer and inheritance rights of mooring arrangements from leisure holders from the revised policy.
- The policy did not encompass the fees and charges and would be dealt with separately during the annual budget-setting process.
- It was noted that the local authority owned the harbour infrastructure and the Crown Estate owned and held responsibility for the coast.
- The Harbour Service engaged with stakeholders regularly, more so than what other service areas were able to sustain or offer. Engagement included monthly surgeries, a biannual newsletter 'Calm Waters' and The Harbour Users Consultative Committee that met in March and October historically. As the Committee's focus had evolved, a review of the Constitution would be required.
- Historically, dredging was undertaken at Aberaeron and New Quay harbour yearly, and every 3-5 years at Aberystwyth, where the task was much greater. Consideration needed to be given to the financial situation.
- In terms of the 'Gunning Principles', it was noted that there had been a clear explanation of why the changes to the policy had been presented.
- Concerns were raised with the removal of the transfer of commercial moorings from the policy, as it was key to ensure businesses were protected given the county's historic maritime heritage. For succession purposes, having some flexibility around the transfer of commercial moorings was key. It was noted that the transfer of moorings had been removed from the policy given feedback received over the years that there was a sense of 'closed shop' when it came to the waiting list.
- There was a specific number of moorings in each of the 3 harbours and the demand varied, but generally, there was less availability in New Quay from a leisure and commercial perspective. At present, there was a limit to the number on the waiting list for both leisure and commercial moorings, but the limit would be removed in the revised policy.
- Following a query around the admin fee linked to parking fees, it was noted that this would need to be looked into as parking permits had been removed from the mooring offer.
- During the work currently being undertaken at Aberaeron coastal defence scheme, no free-parking provision had been arranged for harbour users.
- Concerns were raised that mooring holders would attempt to change from leisure to commercial for inheritance purposes, however, it was noted that there were steps in place to prevent this.

The Chair explained that a letter had been sent by the Ceredigion Commercial Mooring Association, which Members and Officers had already had sight of. Members noted the letter and acknowledged the concerns raised related to the removal of the transfer of commercial moorings and the impact this could have on businesses and the succession of businesses.

In accordance with the Overview and Scrutiny Public Engagement Protocol, Mr Seal attended the meeting to address the Committee on behalf of the Ceredigion Harbour Users Consultative Committee (CHUCC), a separate group to the Harbour Users Consultative Meetings facilitated by the local authority. Reference was given to the concerns noted in the minutes and the open letter sent by CHUCC to the local authority following their meeting to discuss the Harbour Management Policy.

Gerwyn Jones explained that the Harbour Service was a part of the wider Highways and Environment Service, and it operated under the Council's Constitution, similar to other Council services.

It was requested that the policy included the tracked changes when it was presented to the Cabinet for ease of reference.

Recommendation(s):

The Committee agreed to recommend to Cabinet that the latest version of the draft Ceredigion Harbour Management Policy, incorporating the amendments included following the consultation process, is approved for subsequent implementation and that all commercial boats to include fishing boats and passenger boats are permitted to sell their boats with their moorings should it be necessary and that the right of succession is maintained.

Councillor Gwyn Wigley Evans
Chairman of the Thriving Communities Overview and Scrutiny Committee