

DRAFT MOORING MANAGEMENT PLAN FOR THE RIVER LEE, STORT AND HERTFORD UNION CANAL: List of themes emerging from public consultation with BW's responses.

For a fuller description of the consultation response, including the number of people contributing to each 'theme' see the [independent summary report](#)

This document, together with the summary report and press release dated 30 August 2011 constitute British Waterways closing report on the consultation. All material is published on <http://www.britishwaterways.co.uk/listening-to-you/consultations-and-reviews/completed-consultation-reports>

	Theme	BW response
1	I am opposed to the proposals / The proposals seem unfair	We note this view
2	Boaters make the towpath safer, particularly after dark	We agree
3	Boaters are a colourful and vibrant community	We agree
4	BW should just enforce the existing 14-day rule	We agree. The purpose of the draft plan was to propose a framework for clarifying the rules. Our aspiration is that boaters accept rules as reasonable and comply voluntarily. The more boaters that do this, the more cash we would have to maintain and improve the waterways.
5	The proposals risk damaging a vibrant community and a whole way of life	The proposals are not meant to disrupt those who choose a genuinely continuous cruising lifestyle.
6	Over-crowding on the Lee/Stort navigation is not a problem / It is not difficult to find mooring spots	We agree that the overall density of boats is not excessive. However, the risk of bona fide navigators finding it difficult to tie up at popular locations increases in line with the growth of settlements of residential boats along the towpath, particularly close to transport connections and other facilities.
7	People cannot leave the area where they work or their children attend school, access to services such as healthcare will be more difficult	They were aware of this when adopting a boat as their home without a home mooring. Our licence conditions are clear.
8	Boaters make the canals a more attractive place	We agree, providing that they comply with our reasonable rules
9	There are not enough affordable moorings / I would like to see more affordable moorings	We agree and are working with local authorities to encourage more investment in residential moorings.
10	Concern over environmental impact of increased boat movement, e.g. canal bank erosion, water pollution. Increased wear and tear to canal infrastructure will result from increased boat movement	This could be a risk, and we would like to discuss mitigation measures within the context of revised proposals
11	The proposals seem difficult/expensive to enforce effectively	We don't accept this
12	A limit should be placed on the number of "River Only" or "Continuous Cruising" licenses	We do not have statutory powers to do this
13	I support the proposals / The proposals seem fair	We note this view
14	The proposals should go further / Continuous cruisers should have to navigate a larger area of the network	We note this view
15	Increased wear and tear to canal infrastructure will result from increased boat movement	This could be a risk, and we would like to discuss mitigation measures within the context of revised proposals

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16	Liveaboard boaters have a lower environmental impact/have a sometimes arduous life and this should be encouraged/respected	It may be true that on average the impact of liveaboard boaters on the environment may be less than that of land dwellers, but this is not relevant to the central issue.
17	The proposals are discriminatory, threaten the human rights of continuous cruisers and/or are prejudiced against continuous cruisers	BW welcomes continuous cruisers who bona fide navigate because they are an asset to the waterways. It is nonsense to suggest that proposals to support compliance with lawful conditions are either discriminatory or in breach of human rights. Case law already supports our position.
18	The proposal to introduce 7-day zones is too restrictive / The 7-day zones cover too wide an area / The 7-day zones make weekending virtually impossible	We agree that the metrics of our proposal could be improved and had looked forward to debating the necessary changes as part of the consultation.
19	The abuse of the continuous cruiser system is a problem	We agree
20	Concern that increased boat movement will contribute to over-crowding of the waterway	This could be a risk, and we would like to discuss mitigation measures within the context of revised proposals
21	The proposals do not adequately address the perceived problem / There is not enough data to back up BW's assertions in the proposal document	We disagree. The principle is very obvious: there is not room on the river for unlimited growth in long term residential use of the towpath within particular areas. There was and is no need for resource-hungry research to investigate this point. People wishing to live afloat in a particular area should secure a home mooring before deciding to adopt this particular lifestyle.
22	Unhappy at the way the consultation has been handled / There was not enough notice about the proposals / BW are trying to rush these changes through	We reject this completely. The purpose of public consultation is to examine proposals. We have demonstrated that we are not trying to rush through any changes.
23	Some of the proposed neighbourhoods are too large or take too long to navigate / There should be more neighbourhoods	We agree that the metrics of our proposal could be improved and had looked forward to debating the necessary changes as part of the consultation.
24	BW need to take a more collaborative approach, working with the CC community and not alienating them	Now that the community of towpath-based residential boaters has organised into recognised groups with spokespeople, this is precisely what we would like to do. We offered to start the approach during March but our invitation was rejected.
25	The high density of boats is a benefit, not a problem	We agree that boats are good - this is our business. But we do not agree that anyone who so wishes should be allowed to set up home along the public towpath within a limited area. High density of boats moored for long periods at particularly popular/convenient locations increases the risk that these places are not available for use by visiting boats
26	The £20/£40 charge is too high/unfair, it is unclear how they were arrived at	The figures were based on enforcement costs, but we are prepared to re-consider the level
27	Existing facilities (eg water) along the canal must be improved in order to offer more opportunities for mooring and/or to support a higher level of boat movement	We would like to do this, ideally in partnership with the boating community.
28	Prime public mooring sites, or lock laybys, are often taken up by boats that do not move for long stretches of time	Yes, we accept this and it was one reason for our proposals
29	The proposals are motivated by a desire to clean up the canals / generate extra revenue from visiting canal users during the Olympics	We reject this completely. Our Olympic visitor mooring sites are not concentrated on the Lee and we will not be making any changes to mooring rules before late 2012.
30	The proposals risk eroding centuries of history and tradition	There are not centuries of tradition of people setting up home on the towpaths within a limited area - historically, working boats were perpetually on the move carrying cargoes. The proposals do not impact on those who adhere to the licence terms and conditions.
31	BW do not have the legal authority to impose fines/charges or implement these proposals	This is an uninformed and incorrect statement
32	The canal community is an attraction to London's visitors	This is one view which we have no evidence to support or refute.

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33	People cannot afford a house in London	True, but this does not mean that an under-resourced public body with a different remit should carry this particular responsibility. People buying a boat to live on without a home mooring are aware of the conditions of the licence. Affordable housing is a wider issue beyond the scope of BW's remit.
34	The proposals will place additional pressure on social services and social housing in the area	Potentially, which is why we are in discussions with local authorities on the subject.
35	There is a problem with the tidiness of the waterways / boaters' possessions on the towpath / dirty or abandoned boats	This is our understanding too
36	People cannot afford a permanent mooring	See above
37	Permanent moorers pay for facilities to which continuous cruisers do not have access	True, but what they pay covers much more than facilities. A significant proportion of what they pay is indirectly for the use of the scarce and expensive land.
38	The proposals amount to a gentrification of the waterways	No, they amount to setting fair and clear rules
39	The proposals will marginalise continuous cruisers	No, continuous cruisers who comply with the mooring guidance will not be affected.
40	Overcrowding on the Lee/Stort navigation is a problem	This was one of the informally reported views that was one factor in our decision to undertake public consultation.
41	Increased boat movement will make the canal more dangerous for other users	This could be a risk, and we would like to discuss mitigation measures within the context of revised proposals
42	The existing guidelines are not adequately explained to new boat owners	We accept this and are working on literature to improve communications
43	The proposals will simply shift the problem to another area of the network	This is a pilot project. We accept that measures might also be required in other areas.
44	Some of the proposed neighbourhoods are unsafe for mooring	We accept that there may be less desirable locations within some neighbourhoods, but would not agree that the entirety of some neighbourhoods fit this description.
45	The proposals will restrict boaters' freedom of movement	No, they will encourage boaters to bona fide navigate.
46	I think it is important that there are adequate visitor moorings available for genuine visitors to the area	We agree
47	At times the canal is impassable or boats cannot move (e.g. broken locks, frozen canal, engine breakdown). What is the process for making exceptions to the rules outlined in the proposals?	Our mooring guidance already includes provision for exceptional circumstances
48	The requirement for cruisers not to return to a neighbourhood they have just come from is unfair/impractical	It is not unreasonable in the context of bona fide navigation as explained in the mooring guidance.
49	Concerned about possible financial loss as the proposals could lead to a significant loss in value for their boat	The value of a boat lies in its condition. In purchasing a boat, the owner is not acquiring any wider property rights. Simple research in advance of the boat purchase decision makes this obvious.
50	Those who live on the waterways should be given priority over temporary users	"Temporary users" in the form of holiday and leisure boaters contribute a great deal more to waterway maintenance costs through mooring fees so it would be very unfair to accept this proposition.
51	A key attraction of the waterways is the slow pace of life, encouraging more boat movement will destroy this	The average daily distance to be cruised under our proposals was extremely modest.
52	The neighbourhood boundaries should be different	We agree that the metrics of our proposal could be improved and had looked forward to debating the necessary changes as part of the consultation.