

London Boaters

Response to British Waterways Mooring Proposals for the Rivers Lee and Stort



'HOME' event, Broadway Market: Saturday 30th March 2011

Photo courtesy of Katrin Thomas: www.katrinthomas.com

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1. ABOUT LONDON BOATERS

London Boaters is a community-based organisation initially founded in 2008 to connect boaters. The boating community is diverse and vibrant with a vast range of unique skills and knowledge. Recognising this potential London Boaters initially arranged social events and boat-based training and skill sharing sessions to harness this knowledge and unite the community.

The London Boaters community has been strengthened by a new British Waterways mooring proposal that threatens the community's existence. London Boaters has grown in terms of numbers, dedication and community collaboration since the announcement of the proposal. The group have agreed the following mission statement and membership.

“London Boaters act collectively to protect the homes and way of life of the people who live on London’s waterways. We reach out to all those committed to a sustainable future for our canals and rivers.”

Membership is open to boaters who live on London’s waterways and who wish to have a collective voice in support of the aims set out in our mission statement.

Since the publication of the mooring proposals for the Rivers Lee & Stort London Boaters have formed sub groups to focus on:

- Research
- Strategy
- Legal Issues
- Media and Communications

We have established a website which provides details of current issues, campaigns, events and forums for discussion: www.londonboaters.org

You can follow us on Twitter, @Londonboaters and on Facebook, ‘London Canal Boaters’

2. Summary

After serious consideration, research and consultation with other stakeholders, London Boaters have decided to reject the current mooring proposals.

We believe they are not based on sound evidence and have not been developed or consulted upon using a proper, inclusive and transparent process, or with proper representation.

We believe that the proposals would result in damage to the environment, increased costs to British Waterways, damage the interests of other waterways users, reduce community safety and may ultimately result in the destruction of London's liveaboard community. We believe that if implemented they would be unlawful and would impact upon the human rights of liveaboard boaters to a home, a family life, the right to work, vote and access to health, education and other basic services.

We reject the need for the introduction of neighbourhoods of any size, the imposition of patterns of use or return periods or the introduction of punitive new charges, fees or fines.

Our research indicates that waterways covered by the proposal are not congested. We believe the issues of overstaying and overspill of belongings are limited in nature and result from the failure of British Waterways to undertake effective enforcement over a prolonged period. We note the complete absence of towpath staff, for approaching two years before the publication of the proposals. We believe that a period of routine presence, information, communication and appropriate enforcement should be restored before any attempt is made to identify and quantify problems related to mooring, movement and overstay.

Engagement with other waterways users has identified a range of minor issues which we believe can be resolved through better communication and voluntary action by London Boaters and other stakeholders, including a London Boaters Code.

We believe that British Waterways needs to radically change the way that it engages with liveaboard boaters who do not have a home mooring. It should recognise the multiple benefits they bring to the waterways and the communities they serve and see them as an asset not a problem.

British Waterways should recognise that rather than impose change through the introduction of complex new regulations it must adopt a new approach based on better communication, appropriate enforcement, mediation and facilitation of difficult issues, and positive partnership for a more sustainable inland waterway.

3. BRITISH WATERWAYS PROPOSALS FOR THE MANAGEMENT OF MOORINGS ON THE RIVER'S LEE & STORT, HERTFORD UNION AND REGENT'S CANALS

On and around 17th February 2011 boats moored on the River Lee and River Stort were served with notices outlining the above proposals from British Waterways to implement significant changes to the rules relating to the use of towpath moorings on these waterways.

No notices were served on boats moored on the Regent's Canal.

The notices included an invitation to attend public meetings on the 1st March at Stanstead Abbots and on 2nd March at Springfield.

The original closing date for responses to the consultation was 4th April 2011 – an effective consultation period of only 6 weeks.

No attempt was made to engage liveaboard continuous cruisers in the London area in identifying issues or discussion of the proposals prior to their publication.

The key points of the British Waterways proposals can be summarised as follows.

3.1 Issues identified by British Waterways

3.1.1 There has been an increase in the number of boats in recent years.

BW claim that:

- I that this has led to congestion with many short term mooring sites being continuously occupied

3.1.2 Boats are moving only short distances between a few locations.

BW claim that:

- i These boats are not meeting the requirements of BW's Mooring Guidance for Continuous Cruisers
- ii The best mooring locations are often unavailable to visiting / cruising boats (particularly during the cruising season)

- iii There are amenity issues such as spillover of possessions onto the towpath and fewer spaces for angling
- iv By not paying to moor for long periods an unfair situation is created in comparison with those who pay for long term moorings in the area
- vi There has been an increase in costs for the provision of services such as a sewage disposal, water and waste disposal

3.1.3 There has been an increase in off-side mooring on privately owned land.

BW state that this is a problem because:

- i. Moorings may not have BW or landowner consent and no one is managing the site
- ii. The site has not been assessed by BW for suitability for mooring
- iii. There is no contractual agreement with or payment to BW

3.2 British Waterways proposals

3.2.1 Addressing unauthorised offside moorings by:

Conducting an audit of the River Lee in order to identify unauthorised sites and identify suitability, ownership, consents etc with landowners.

3.2.2 Controlling short term / casual mooring by:

- i. Imposing Neighbourhoods

The proposals define six neighbourhoods throughout the Rivers Lee & Stort – 4 on the Lee and 2 on the Stort. Each neighbourhood being approximately 6-8 miles long.

- Boats will only be allowed in each neighbourhood for 14 days
- Stays of over 14 days will result in a daily charge of £20 - £40

- Boats may not return to a neighbourhood they have just been to unless they have reached a terminus
 - Boats may spend no more than 61 days per year in any one neighbourhood
- ii. Imposing 7 day mooring zones across a substantial part of the Lee and Stort
- Eight 7 day zones are identified which include the whole of the River Stort and the whole of the Hertford Union
 - Stays of over 7 days will result in a daily charge of £20 - £40
- iii. Increasing monitoring and enforcement by:
- Logging boat sightings on a central computer network
 - Employing additional towpath patrols

4. LONDON BOATERS RESPONSE - NATURE AND PROCESS

London Boaters wish to raise a number of objections related to the lack of evidence, representation or process relating to the way in which the current proposals have been developed and consulted upon:

4.1 Lack of Evidence

On Friday 18th March representatives of London Boaters and the Upper Lee and Stort Boaters Association met with British Waterways' staff Sally Ash, Gill Owen and Damian Kemp. The discussions at the meeting (for which a transcript is available) made clear that:

- With the exception of a boat movement survey conducted in one location on the River Lee during 2010 BW have not done *any* formal research in developing the proposal and can't quantify the problems which it is intended to address.
- No evidence could be provided of the number or nature of complaints received about congestion, spillover or overstaying. Sally Ash described the British Waterway's assessment of the situation as 'a picture you build up' following 'informal approaches'

4.2 Lack of Representation

At the same meeting on Friday 18th March it was made clear that:

- The response of the local boating community at the two public meetings held at Stanstead Abbots and Springfield on the 1st and 2nd of March had led BW, for the first time, to realise the extent to which liveaboard continuous cruisers are un(der)represented in existing user groups
- Liveaboard continuous cruisers have therefore not been properly consulted prior to the current proposals being drawn up, or indeed during the consultations that led to the development of the 2009-10 national mooring policy upon which the current proposals are claimed to be based.

- The degree of dependence of liveaboard continuous cruisers on the waterway is much greater than anyone else's. As Sally Ash stated at the meeting, 'Leisure activity is discretionary. Living accommodation is not.'

4.3 Lack of Process

4.3.1 British Waterways have stated throughout the current process that the proposals are based upon the national mooring policies developed during 2009-10. *(We have previously established that liveaboard continuous cruisers were under represented during that consultation - see 3.2 above).*

It is clear that the current process on the Lee and Stort does not comply with the proposals agreed by the national user group meeting for the formulation of local mooring strategies. At that meeting on 28th May 2010 BW, NABO, IWA, RBOA, AWCC, TYHA and APCO agreed that:

- The problems giving rise to the mooring policy consultation result from insufficiently energetic enforcement action by BW
- A consistent national framework should be applied to the development of local mooring strategies
- Strategies should be developed by an inquiry with a panel inviting representations from all stakeholders and then commissioning working parties to develop solutions to the issues identified and finally with the inquiry panel formulating a draft strategy from those solutions – depending on the circumstances it was felt that this could be entirely run by an external and independent consultant or by BW.
- 'Great efforts' need to be made to communicate with and include all stakeholders – 'especially boaters (regardless of type)'

On the Lee & Stort it is clear that no inquiry panel has been appointed, no facilitation of stakeholder views has been undertaken by an independent panel or by BW in drawing up the proposals and no effort was undertaken to consult boaters or other stakeholders in advance of their publication.

4.3.2 A document written by Sally Ash to the Lee Valley Regional Park on 17th November 2010 indicates that the key features of the proposed strategy were known at this point and were being discussed with selected stakeholders such as the Regional Park and the Inland Waterways Association.

In contrast no pre consultation discussions were undertaken or attempted with local boaters who are most likely to be impacted by the proposals.

4.3.3 The initial timetable for the consultation proposed by BW was approximately 6 weeks – responses were requested by 4 April with many boaters only learning of the proposals during the week following the serving of documents on boats from approximately 17th February.

The consultation period was extended to 9th May following a request at the first stakeholder meeting on 1st March that the recommended statutory minimum period of 12 weeks be applied. The consultation was further extended until the 31st May following requests from other stakeholders.

4.3.4 No formal impact assessment has been undertaken despite the wide range of impacts identified by London Boaters (see section 5.2.2 below).

4.3.5 The Equalities Impact Assessment produced by British Waterways during the consultation period is based solely on opinion. No independent research or pre consultation has been undertaken to identify or quantify impacts. It misrepresents both the positive and negative impacts of the proposals and makes claims regarding the definition of bona fide navigation based on specificities of the BW vs Davies case that are not applicable more widely. We refer British Waterways to section 5.2.2 (i) of this report

We believe that the lack of transparency and due process is related to the desire by BW, as stated in the proposal document, to address mooring issues in the area prior to the Olympics when BW is offering high priced reserved berths along the towpaths within the proposal area. It is notable that BW has offered these moorings for sale without entering into any discussion with boaters currently living in the area as to how additional boats will be accommodated or what alternative moorings will be

made available to those displaced as a result of the commercial moorings or security exclusion zone.

London Boaters believes that it is unacceptable to seek to rush through wide ranging and permanent changes without proper evidence, representation or process. The proposals have been described by British Waterways as deliberately 'draconian' and will have a significant and long term impact on all canal users and local communities. They will most significantly impact on the ability of liveaboard boaters without home moorings within the London area to maintain a home and family life.

We believe any attempt to impose the current proposals will be open to legal challenge and judicial review on the basis of the inadequacy of the process undertaken to date.

5. LONDON BOATERS RESPONSE - ISSUES AND PROPOSALS

Over 100 boaters attended both the Stansted Abbotts and Springfield meetings and have attended a series of group and working group meetings since the publication of the proposals.

In contrast with the lack of recorded evidence provided by British Waterways in order to establish the need for, or assess the impact of, the current proposals London Boaters has undertaken a range of qualitative, quantitative and desk research over the past 2 months.

(i) Quantitative Research includes;

- Boaters survey (Appendix A)
 - 138 responses from boaters moored at towpath moorings between Stonebridge and Kensal Green during April 2011

- Towpath users survey (Appendix B)
 - 123 responses from towpath users at Angel, Victoria Park, Broadway Market, Mile End, Springfield, Stonebridge/Tottenham on a number of dates during April 2011

- Residential moorers survey (Appendix C)
 - 54 responses from residential and leisure boaters on moorings at; Battlebridge, Ice Wharf, Kingsland Basin. Ramney Marsh, Springfield, Stonebridge and Wenlock Basin during April 2011

- Congestion survey / mapping (Appendix D)
 - Undertaken on 19th March 2011 and 17th April 2011

(ii) Qualitative research includes the following meetings with stakeholder groups:

- Upper Lee and Stort Stakeholder meeting - 4th April 2011
 - Present: IWA, NABO, RBOA, Stort Boat Club, Lee and Stort Cruising Club, Broxbourne Cruising Club, Ware Anglers, Hertham Common Cycling Club
- Meeting with Lea Rowing Club
- Meeting with Rammey Marsh Cruisers Club
- Communications with:
 - Lea Valley Regional Park Authority
 - Lea Valley Angling Consortium
 - Lea Valley Canoe Club
 - Stonebridge Canoe and Cycle Hire

Findings of these meetings and correspondence are summarised in Appendix E.

In addition the degree of support for liveaboard communities on London's waterways is evidenced by:

- Over 1150 members of the Facebook page: 'Stop The Destruction of London's Boating Communities'. Comments posted on the Facebook page are included in this report (See Appendix F)
- @LondonBoaters communicates with 124 Twitter followers.
- Over 800 signatories of a petition supporting the presence of liveaboard boaters on towpaths on London's waterways

(iii) Desk Research has also been undertaken

- analysis of documents obtained through Freedom of Information Requests

- reviewing publicly available British Waterways research, meetings notes and policies
- reviewing and researching the legal context for these proposals

As a result of discussions within the group, and from our research, we would like to make the following responses to the issues and proposed solutions presented by British Waterways.

The focus of our response, and of our research, relates to the Lower Lee (south of the M25) and the Hertford Union Canal. The Upper Lee and Stort Boaters Association (UL&SBA) has submitted a separate report relating to the area north of the M25. London Boaters fully supports and endorses the work of the UL&SBA).

5.1 Response to Issues Raised by British Waterways

Below we address on a point by point basis the issues (in italics) raised by British Waterways in the proposal document.

5.1.1 *There has been an increase in the number of boats in recent years that has led to congestion with many short term mooring sites being continuously occupied*

London Boaters accept that there has been an increase in the number of boats in the London area over recent years. However we dispute the assertion that this has led to congestion and the 'continuous occupation' of many short term mooring sites.

Most local liveaboard boaters do not report problems of being unable to find moorings when required – with the exception of the visitor moorings at Camden where limited space (only 6-7 boats) and a ban on double mooring mean that the site is persistently full.

The 2009-10 British Waterways national mooring strategy consultation showed that:

- Amongst representative groups; 25% considered that congestion was best measured by average / peak waiting time at locks, 5% felt that congestion was caused by overstayers and 8% felt congestion was 'a matter of perception'.
- Amongst individuals; 22% considered that congestion was best measured by average / peak waiting time at locks, 8% felt that congestion was caused by overstayers and 8% felt congestion was 'a matter of perception'.

British Waterways has provided neither definition nor quantitative evidence of a congestion issue on the Lee & Stort in relation to waiting times at locks, lack of available moorings or any other measure.

London Boaters have conducted two congestion surveys on 19th March 2011 and 17th April between Paddington and the M25 (see Appendix D). These show that:

- On 19th March there were 262 boats in 36 kilometres of waterways
The average boat length of boaters surveyed is 14 m (47 feet).
This would indicate that only approximately 10% of the available towpath length is currently moored.
- There is a clear clustering around the facilities available.
There are only 8 water points within the area surveyed leading to concentrations of boats in those areas and long stretches which are completely empty of moored boats
- Long stretches of the towpath are unavailable for mooring due to lack of mooring rings and concreted verges

A survey of boaters with home moorings in the London area showed that of 54 respondents only 15% agreed with the statement that the waterways are congested with 31% stating that are 'sometimes congested'.

A survey of 123 towpath users undertaken at six locations found that only 7% of towpath users felt the canal was congested (82% felt that it was not whilst 12% did not know).

London Boaters note that in 2005 British Waterways Commercial Director James Froomberg set a target for [12,000 new boats](#) on the waterways system (an increase of 40%) by 2012 in order to provide new income for the organisation. British Waterways state that the increase in the number of boats in London over the same period has been 39%.

We congratulate the organisation on meeting its targets – at least in the London area – and suggest that rather than view the increase as a ‘problem’ British Waterways should work in partnership with local boaters and other stakeholders in order to establish how such an increase can be most effectively managed and how learning from the experience can be applied in order to replicate this success elsewhere.

London Boaters also wish to point out that the increase in the number of boats has coincided with a period where British Waterways have significantly reduced the towpath presence of enforcement staff. In the two years prior to the publication of the proposals enforcement activity and day-to-day communication between BW staff and boaters in the area has been negligible.

According to the survey 138 London Boaters (Appendix A) 53% have had their boat licence for 2 years or less. A majority of boaters in the area have therefore never had regular communication with or information from BW regarding the expectations of liveaboard boaters without a home mooring in the area.

5.1.2 Boats are moving only short distances between a few locations.

In order to support this assertion British Waterways have provided one piece of evidence, a study undertaken between 19 July 2010 to 19 October 2010 from LN001-LN042. This research identifies that:

- 77% (128 licensed boats) made a net progressive journey of less than 5km.
- 13% (22 licensed boats) made a net progressive journey of 10km or more.

- 41% (69 licensed boats) did not make any net progressive journey

These headline figures are grossly misleading. Whilst 328 licensed boats were sighted in the study area during this period the % figures quoted above relate only to the 167 boats where 3 or more sightings are spread over three months. If the figures are recalculated as percentages of the *total* number of boats sighted the figures drop to:

- 39% of boats made a net progressive journey of less than 5km.
- 21% did not make any net progressive journey
- It must therefore be assumed that 40% of boats undertook a net progressive journey of 5km or more

We also believe at the concept of a 'net progressive journey' is flawed. Even if the current proposals were implemented and followed to the letter, with a boat staying in each of the six neighbourhoods for no more than 61 days per year, it would be entirely possible to undertake an annual 'net progressive journey' of 0km if the boat was in the same location at the start and end of the year.

The report states that the average distance travelled over the three months of the study (of the 167 boats with three or more sightings spread over the period) was 12km. This equates to an annual distance travelled of 48km. This seems entirely reasonable given that many boats on the Lee and Stort operate under the terms of a 'river only' licence, effectively confining them to the local river system which is itself approximately 42km in length. (It seems reasonable to assume that if all 328 boats had been tracked the average distance travelled would have been significantly higher).

London Boaters wish to note that as stated in 4.1.1 above this study was undertaken following a prolonged period of negligible enforcement or communication between boaters and BW staff. We would therefore wish to see any future studies undertaken following a reasonable period of more usual towpath presence, communication of expectation, and appropriate enforcement before any general inferences are made regarding the presence of a 'problem' of overstaying or lack of movement.

We also note that the local enforcement officer has stated that out of the 400-450 boats he patrols in London there are only about 10-15 with whom he has persistent issues regarding frequency or distance of movement.

The proposals go on to state that:

- i These boats are not meeting the requirements of BW's Mooring Guidance for Continuous Cruisers*

A survey of liveboard boaters in the London area (Appendix A) found that 43% had never received a patrol notice. Only 12% had received 3 or more patrol notices.

It is our understanding that the Mooring Guidance will be rewritten following the BW vs Davies case and is currently in a draft form making this a difficult question to address. However it is clear that the 'mooring guidance' does not have the force of law and is based on subjective interpretation of a number of key words and phrases such as 'place' and 'bona fide navigation'.

For instance Section 17 (3) (c) ii of the 1995 British Waterways Act requires bona fide navigation '*throughout the period for which the consent is valid without remaining continuously in any one place for more than 14 days or such longer period as is reasonable in the circumstances*'. British Waterways has attempted to extend this definition within the previous Mooring Guidance for Continuous Cruisers to state that it '*therefore requires progression around the network, or at least a significant part of it*'. This interpretation has been challenged during the recent BW vs Davies case and in the current draft guidance is revised to '*a journey of some length*' – this again is a subjective interpretation which extends the legal requirement of the 1995 Act. It depends upon first defining the act of navigation as 'travelling on water' and then defining 'travel' as 'a journey - especially of some length'. The draft guidance then goes on to introduce the concept of a 'cruise' or 'genuine cruise' as synonymous with 'navigation', defined as 'a journey of some length', and states that this is a requirement of the licence. There is no such requirement to 'cruise' in law.

Research undertaken by members of the Kennet and Avon Boating Community demonstrate that this was clearly not the intention of Parliament when passing the

1995 Act. Indeed those drafting the legislation in the relevant House of Commons Select Committee concluded that British Waterways should not be allowed to define return periods (simply to prevent boats ‘remaining continuously in one place for more than 14 days’) and that bona fide navigation is *not* defined by the distance travelled.

London Boaters believe that by moving “*throughout the period for which the consent is valid without remaining continuously in any one place for more than 14 days or such longer period as is reasonable in the circumstances*”, as described by Section 17 (3) (c) ii of the 1995 British Waterways Act, boaters are meeting the legal requirements of their licence.

With regard to what constitutes a ‘bona fide navigation’ It is our understanding that, contrary to the statements made by British Waterways, the judgement in the BW vs Davies case does not set a legal precedent and is of relevance to that case alone. Whilst the draft revised mooring guidance cites the case in order to state that use ‘within a ten mile stretch’ does not constitute bona fide navigation, we note that in our meeting of 18 March Sally Ash stated that it would be entirely possible for boaters to comply with the guidance whilst remaining within a confined stretch of waterway such as the Lee & Stort or Lancaster Canal. The requirements of the guidance therefore remain ambiguous and over above those required by law.

We reject entirely the implication of the BW vs Davies judgement that it is not possible for a boat to be used both as a home *and* for bona fide navigation. We request that British Waterways make a clear statement that they will not attempt to discriminate against those for whom their boat is their primary residence, those who work, those who have families, or on any similar basis, in issuing licences in the future.

- ii *The best mooring locations are often unavailable to visiting / cruising boats (particularly during the cruising season)*

In the research undertaken by BW between 19 July 2010 to 19 October 2010 on movements on the Lee, British Waterways found that: ‘*only 106 (7%) of the sightings were on visitor moorings (VM’s) and nearly half of those were on the VM at*

Cheshunt. The overwhelming majority, 960 (61%), were in casual mooring zones'. This research indicates that visitor moorings on the Lee and Stort are not being overwhelmingly occupied continuously cruising boats.

These findings are supported by comments by members of cruising clubs at the Upper Lee & Stort stakeholder meeting on 4th April. These stakeholders stated that whilst moorings were sometimes unavailable at Stonebridge and Victoria Park they did *not* wish to moor at areas around Springfield, Lea Bridge, Hertford Union, Bow Locks etc (identified as 'hot spots' in the proposal). These areas were seen as unsafe by cruising clubs and were therefore not desirable mooring sites.

Meetings with a range of stakeholders, including rowing clubs and cruising clubs, have identified that mooring by liveaboard continuous cruisers presents only minor problems which can, for the most part, easily be overcome (see Appendix E).

These include:

- Mooring on lock landings
- Mooring on the inside of bends on stretches used by rowers
- Double mooring and butties moored alongside boats present problems for rowers at some locations
- Mooring on a limited number of visitor moorings at specific times when clubs are planning club events and cruises

Anglers and cyclists reported no particular issues related to moored boats. Anglers expressed concern that the current proposals would increase boat movements and do nothing to protect the areas that they consider desirable for angling.

London Boaters have provided a map to Lea Rowing Club in order that they can identify specific locations where moored boats present them with problems. We will communicate these sites to boaters and seek to maintain communication in order to monitor new or existing problems. Such solutions will form part of a future 'London Boaters Code'.

Of the local stakeholder groups contacted by London Boaters only Lee Valley Regional Park Authority identified issues which resemble those outlined in the British

Waterways proposal. Aside from the Inland Waterways Association they are also the only stakeholder group for whom we have been able to find evidence of pre-consultation by British Waterways on the proposal.

A survey of boaters with home moorings in the London area undertaken by London Boaters (Appendix C) showed that, of 54 respondents, 20 (37%) reported difficulties finding a towpath mooring (4 of these reported that they were unwilling to double moor). 13 respondents stated locations where they had been unable to find a mooring. Camden was mentioned most often (6 times) with Islington, Victoria Park and 'London / Central London' each being mentioned 3 times. Of the locations on the Lee & Stort, Springfield, 'Hackney' and Stansted Abbots were each mentioned once.

London Boaters believe that issues relating to hotspots have been overstated and locations misidentified. Minor problems and time limited issues related to specific events can be addressed through better communication between stakeholders in order to identify issues and mutually acceptable solutions on a case by case basis.

An example is the Lea Rowing Club Regatta on Sunday 24th April. Improved communication between Lea Rowing Club and London Boaters led to a reduction in the number of boats travelling at the time of the regatta (the popular Easter weekend) resulting in less disruption to a local waterways event.

London Boaters will explore ways to ensure such communication is established and maintained with key stakeholder groups. Such solutions will form part of a future 'London Boaters Code'. This autonomous, collaborative and consensual approach to resolving problems is key role for London Boaters, one which we hope British Waterways will support and facilitate where required.

Whilst we believe the problem has been overstated we recognise that there are issues with lack of availability at a small number of visitor mooring sites – largely outside the area covered by the current proposals. London Boaters believe that, if this is not resolved by effective communication and appropriate

enforcement of the 1995 Act, an independently facilitated and mediated approach to understanding the true nature and scale of the issue would result in a mutually agreeable solution without the need for additional regulation.

We note that the ‘cruising season’ lasts only 3 months and different approaches may be required (by negotiated agreement) during the summer months when demand on moorings is higher compared to the winter months when the presence of moored boats brings clear security and public safety benefits.

- iii There are amenity issues such as spillover of possessions onto the towpath and fewer spaces for angling*

British Waterways has provided no evidence of issues relating to spillover or reduction of angling spaces.

London Boaters communications with stakeholders have confirmed that Lee Valley Regional Park Authority have some concerns regarding spillover of possessions and activities such as wood cutting and maintenance being undertaken on the towpath. No other stakeholders have reported spillover as an issue.

London Boaters believe that any issues relating to persistent spillover could be easily addressed through the return of a presence of BW towpath staff in the area. Simple communication, information provision and appropriate enforcement, alongside movement according to the legal requirements of the 1995 Act, is likely to address any issues of spillover of possessions.

We believe that activities such as wood cutting and maintenance are legitimate activities which, if undertaken with proper consideration for passers-by and provided they do not result in pollution or nuisance, should not be a matter for enforcement.

London Boaters have communicated with the Lee Valley Anglers Consortium. Anglers expressed concern that the current proposals do nothing to protect the areas that they consider desirable for angling.

London Boaters have provided a map to Lea Valley Angling Consortium in order that they can identify specific locations where moored boats present them with problems. We will communicate these sites to boaters and seek to maintain communication in order to monitor new or existing problems. Such solutions will form part of a future 'London Boaters Code'.

iv By not paying to moor for long periods an unfair situation is created in comparison with those who pay for long term moorings in the area

British Waterways has provided no evidence of substantive grievances from those who pay for long term moorings in the area.

83% of the 54 boaters with home moorings surveyed by London Boaters indicate that they were not consulted prior to the publication of the proposals.

56% of those questioned disagreed with the statement that '*By not paying to moor for long periods an unfair situation is created in comparison with those who pay for long term moorings in the area*' (33% agreed whilst 11% did not know or did not answer).

We also understand that both Springfield Cruising Club and CHUG have written to British Waterways disassociating themselves from these views which they see as seeking to create division between different sections of the boating community.

London Boaters believe that all boaters use the waterways in different ways and that boat owners will have different habits and make different mooring arrangements based on their individual needs, personal preferences and changing circumstances.

Boaters with moorings, provided by British Waterways or by private marinas and clubs, receive a range of services in return for the mooring fee. These vary but may include security, electricity hook ups, accessible water points, waste collection, laundry rooms, club house facilities etc. Fees are not related to waterways management and comparisons are therefore spurious.

Liveaboard boating without a home mooring is not an easy option. Moving continually throughout the year, managing on limited resources, balancing water and toilet usage with availability of facilities are all challenges that are not required of permanently moored boats. In addition such boaters face challenges related to registration for voting, medical care, schooling and a variety of other issues. These issues should all be factored into any considerations of ‘fairness’ with regard to differential charging for boats with and without home moorings.

We also wish to point out that very few moorings are available within the London area. When they do come onto the market inflated reserve prices and the subsequent online bidding process inflates prices beyond the reach of most existing boaters. The current online bidding process has resulted in rogue bids and ‘autobidding’ raising prices to over £15k in some cases.

- vi There has been an increase in costs for the provision of services such as sewage disposal, water and waste disposal

According to Section 107 of the 1968 Transport Act, BW has a statutory duty to provide services and facilities on cruising and commercial waterways.

No evidence has been provided relating to any increase in costs for the provision of facilities.

The most persistent problem relating to canalside facilities for boaters and other towpath users alike is the failure of British Waterways to adequately service the towpath refuse bins. These are not available for the use of boaters but are frequently left unemptied and overflowing. It is particularly noticeable that popular towpath locations such as Angel, Broadway Market and Victoria Park are not emptied at weekends and bank holidays when they are most used. This results in litter on the towpath and in the canal which reflects badly on boaters and on British Waterways. We believe that it contributes to a perception of congestion and overuse by boaters.

London Boaters believe that effective management of waterways facilities designated for use by boaters would mean that ‘the money should follow the boats’. If the increase in boats in the London area is due to previously licensed boats being moved to London from other parts of the system then increased

costs in London should be offset by decreased costs elsewhere. If the increase in boats in London is a result of new boats coming onto the system then the additional licence fees should enable any additional facilities costs to be met.

If British Waterways are unable to effectively manage the existing facilities, or provide new facilities which may be required in order to address the clustering of boats around existing facilities, London Boaters would be interested in discussing options for community ownership or management in order to provide more cost effective use of the relevant assets. We believe local community management would enable us to access new forms of finance such as grants, revenue from diversification of use, renewable feed in tariffs etc.

An application has been made to the Asset Transfer Team at Localities in order to obtain technical assistance in producing a business plan for community management of the facilities (See Appendix G).

We wish to note that following several months during which British Waterways failed to respond to requests to fix the broken water tap at Angel a London Boater took action to restore the facility for use by local and visiting boaters.

5.1.3 Increase in off-side mooring on privately owned land

No evidence of the extent or nature of offside moorings has been provided nor has British Waterways published information relating to its audit of this issue.

5.2 Response to British Waterways Proposals

5.2.1 Proposals to address offside moorings:

British Waterways state that an audit and assessment of current unauthorised sites is already underway and that discussions will be held with site owners. The results of the audit will show which sites are suitable for the provision of moorings.

London Boaters request that the information arising from the audit, identifying suitable mooring sites, is made available to both London Boaters and UL&SBA. We should be involved in such discussions as a key stakeholder

as an underlying issue, recognised by British Waterways and other waterways users, is the lack of available moorings in the area.

Where audit and negotiation relates to offside sites which are already occupied as long term home moorings for boats the residents and boat owners should be included in any discussions relating to these sites.

Where audit and negotiation relate to offside casual moorings which are not occupied as long term home moorings London Boaters would be interested in discussing options for community ownership or management of sites identified as suitable for offside moorings. Such a partnership approach may be of interest to landowners of currently unmanaged sites who have no objection to moorings being provided on their land but little interest in securing the required authorisations, planning permissions etc.

A number of local boaters have applied for, or are in the process of seeking permission for, the establishment of offside moorings on third party land within the London area. At the public stakeholder meetings held at the beginning of March Sally Ash encouraged local boaters to take such proactive steps to obtain moorings in order to address the shortage of residential mooring sites in the London area.

However the current British Waterways guidance on the development of offside moorings states that '*permission will only be granted [where] there is no prospect (short or long term) of new off-line mooring development within a 30 mile radius*'. This stipulation will make it effectively impossible for any new online moorings to be developed within London, and in most other locations, despite the chronic lack of moorings in the area which is universally acknowledged.

London Boaters believe that the 30 mile radius is unreasonable in a densely populated urban area and that unless a more flexible approach is adopted by British Waterways it will be impossible to meet the established need for new residential moorings within London. If no flexibility is shown, if British Waterways are not prepared to work in partnership to identify and obtain permission for new moorings sites, and if new draconian measures such as those outlined in this proposal are implemented it would seem reasonable to assume that the intention of British Waterways is not genuinely seeking to

address any issues arising from the increase in number s of boats in London but actively seeking to make it impossible to maintain a community of liveaboard boaters in the area.

5.2.2 Proposals to address short term / casual mooring:

i. Neighbourhoods

The proposals to establish 'neighbourhoods' is without foundation in the legislation set out in the 1995 Act and is a substantial extension of any definition of 'place' currently in use on the waterways. The proposals seek to establish 'neighbourhoods' of 6-9 miles in length which cross existing London Borough boundaries. In contrast the neighbourhoods in common usage by local authorities and other statutory authorities such as police and fire services, and those which are being considered for neighbourhood planning purposes, are much smaller and recognisable at a functional community level.

If the proposals are implemented in their current form boats will be forced to travel much further distances, with all boats in the area being required to move approximately 10 miles every 7 - 14 days. Whilst shorter movements can currently be undertaken during evenings by those who work during the day, longer movements are likely to be concentrated during weekends when the waterways are also most popular with other users such as those undertaking leisure cruises, anglers, and rowers.

Impacts of increased movement may include:

On British Waterways:

- Increased wear and tear on locks and other facilities
- Increased maintenance costs
- Increased pressure on very limited water and waste facilities on the Upper Lee
- Increased monitoring and enforcement costs - see (v) below

On other users:

- Increased congestion at locks and water points
- Disruption of the enjoyment of the waterways by rowers and anglers
- Increased wash of juvenile fish downstream from spawning grounds through increased flows through locks
- Increased use of water resulting from increased lock usage resulting in drainage of some sections of the rivers and canals during busy periods

On the environment:

- Increased erosion of banks
- Increased disturbance of sediments resulting in increased biological and chemical oxygen demand, reducing the oxygen available to aquatic flora and fauna
- Disturbance of nests and other habitats
- Increased emissions from diesel engines resulting in increased levels of particulates and CO₂ and other greenhouse gases
- Increased use of water in an area of the UK that is already experiencing significant water stress
- Increased turbulence caused by propellers of motor driven craft - this is proven to reduce zooplankton populations, reducing their ability to graze down algal blooms (already a problem on the lower Lee) and impacting on the aquatic food chain
- Increased spread of problematic alien species such a floating pennywort (*Hydrocotyle ranunculoides*) which is already a problem on the lower Lee

On liveaboard boaters:

- Disruption to access to work
72% of boaters surveyed travel to work and 94% said they would be affected by increased time and costs associated with travelling to work
- Disruption to childcare and education
18% of boaters surveyed have children.
Increased travel to school distances can impact on a child's ability to take part in after school activities
- Disruption to healthcare and family commitments
66% of boaters surveyed are registered with a local GP.
Continuity of care and a good doctor-patient relationship are important aspects of personal care especially for those with health problems (11% of those surveyed have a recognised disability). Greater and more frequent movement will result in increased use of walk-in clinics, discontinuity of care, stress and poorer health services.
4% of those surveyed have care responsibilities for a disabled or elderly adult.
- Disruption of home life and increased take up of benefits
66% of boaters surveyed owned their own boat (91 individuals).
Of 109 individuals who responded to the question: 'How would the proposals affect you; 62 said they would have to sell their boats, 52 that they would have to move to rented accommodation. 43 say they would face homelessness.
Currently only 13% of those surveyed claim any benefits – this is a very low figure considering that 57% earn less than £20,000 per annum and 39% less than £10,000 per annum.
Of 109 individuals who responded to the question: 'How would the proposals affect you; 31 stated that they would have to claim benefits or claim more benefits.

London Boaters believe that in proposing any new strategy British Waterways should undertake a proper, professional and independent impact assessment which, at a minimum, seeks to identify and quantify the impacts on the environment and on the stakeholder groups outlined above.

ii. Return Periods / Annual Time Limits

The proposals require licence holders to spend no more than 61 days in one neighbourhood effectively restricting return periods.

There is no provision in the law which enables British Waterways to stipulate return periods or prescribe cruising patterns for boats without moorings or to set restrictions on return to particular places (House of Commons Select Committee on the Waterways Bill, 1993-94).

In addition to the impacts outlined in (i) Neighbourhoods, above, any artificial annual limit within any defined area will result in increased complexity and unwarranted restriction on freedom of movement on liveaboard boaters. Boaters require flexibility for a range of practical reasons including access to a range of essential facilities and services which are not evenly distributed throughout the network such as; water, sewerage, waste, fuel, boatyards, chandlers.

By requiring licensed boaters to split their time evenly between neighbourhoods there is a risk that boaters will be disenfranchised. Individuals without a residential address are required to make a 'statement of personal connection' in order to register to vote. The statement requires the individual to identify the place at which they spend the majority of their time.

London Boaters reject the proposals for the introduction of neighbourhoods of any size. We believe that British Waterways has no powers to stipulate a pattern of use for any boater and that a common sense understanding of 'place' such as has been in use since its introduction is sufficient to enable appropriate enforcement under the 1995 Act.

iii. 7 day mooring zones

British Waterways does not have the legal power to enforce 7 day mooring zones. BW's powers to set mooring restrictions of less than 14 days, and to erect notices or signs designating mooring restrictions of less than 14 days, are limited to the power to set advisory restrictions and erect advisory notices or signs. (House of Commons Select Committee on the Waterways Bill, 1993-94).

The proposals state that the 7 day zones are required to free up spaces at 'hot spots' or popular locations for leisure cruisers. The sites identified on the lower Lee are:

- The entire length of the Hertford Union
- Bow Lock to the A12
- Lea Bridge to the North Circular

Local boaters are well aware that these sites are not popular with visiting boaters who perceive them to be unsafe and who would be unwilling to moor at them, let alone leave their boats unattended for days or weeks, whilst 'cruising'.

This perception was confirmed by cruising clubs present at the stakeholder meeting organised by the Upper Lee and Stort Boaters Association on 4th April 2011 who stated that these were not desirable sites for their members.

Any proposals to increase the frequency of boat movements would have impacts similar to those outlined in (i) Neighbourhoods above.

London Boaters rejects the imposition of 7 days mooring zones on anything other than an advisory basis.

iv. Charges

BW does not have the power to impose fines for contravention of mooring time limits and/ or mooring restrictions (House of Commons Select Committee on the Waterways Bill, 1993-94).

Although the proposals describe excess mooring "charges", the level of the proposed charges are punitive in comparison to the stated average annual mooring fee of £1,500 to £2,000. The excess mooring "charge" incurred after 7 days would amount to £7,160 per annum at £20 per day and £14,320 per annum at £40 per day.

London Boaters also note that Defra have committed the new waterways charity to maintaining free access to towpaths and believe that charging for casual towpath moorings is at odds with this commitment which must include access from the water.

London Boaters rejects the imposition of punitive new fees, charges or fines.

v. Increased monitoring and enforcement

The proposals which include a mixture of 7 and 14 day moorings zones, return period restrictions, two tier charging and annual neighbourhood stay restrictions are extremely complex.

A Freedom of Information request provided the following calculation of costs and income. It appears to assume that charges will only be made to cover the period between the proposed new 7 day limits expiring and the 14 day legal requirement to move. Assumptions about revenue raised are therefore dependent on a 7 day zone being included in the final proposals. We have already stated that we do not believe that British Waterways can implement anything more than advisory limits below 14 days.

Figures provided by British Waterways:

Costs (pa):

£61,000 Data Collectors x 4 (on a pro rata contract)

15% transaction cost (dependent on price of extended stay charge, but based on figures below it would be £11,250)

Total costs = £72,250

Income (pa):

150 boaters paying 15 extended stay charges pa @ £20 = £45,000

150 boaters paying 4 extended stay charges pa @ £40 = £24,000

Total income = £69,000

*This would give us a **nominal deficit of £3,250.***

This does not include any of the management, capital investment, back office, monitoring and oversight or enforcement costs. No estimates were given for these costs, which are likely to be substantial, and no range of scenarios was provided.

If the proposed 7 days mooring areas are not carried forward to the final proposal, or if fewer boater are prepared to pay the fee, then the scheme as it stands will make

even less money. British Waterways do not present any evidence regarding willingness to pay the proposed charges which might have informed the above figures.

Research conducted by London Boaters found that only 13% of boaters with home moorings in London would be prepared to pay a fee for overstaying (Appendix C). 83% of boaters without a home mooring said that they could not afford the proposed charges (Appendix A).

London Boaters conclude that British Waterways have either not disclosed the full information related to the business case for the proposed approach to charging, or are prepared to subsidise a loss making operation at a time when other services are being cut simply in order to make life more difficult for boaters on the Lee & Stort. This goes some way to supporting the proposition that the current proposals are not a genuine attempt to develop a local mooring strategy but is in fact a process intended to drive liveaboard boaters off London's waterways in which British Waterways is prepared to invest a substantial amount of additional resource.

5.3 Wider Impacts of the Proposals

It is important not just to respond to each individual issue and proposal contained within the draft policy but to give proper consideration on the overall impact of the proposals. As stated above the impacts fall not only on liveaboard boaters in the London area but also upon the environment, on other waterways users, on the character of local communities and their engagement with the waterways, and on British Waterways itself.

The proposals have arisen in response to a perceived 'problem' of an increase in the number of liveaboard boats in London, reported to be 39% in the past five years. However it is clear that, whilst the increase has resulted in some minor and localised issues, primarily relating to lack of availability of visitor moorings at some locations and at some times of the year, it has also had many beneficial impacts.

Towpath surveys undertaken by London Boaters at 6 locations show that (of 123 respondents):

- 96% liked the presence of boats on the canal / river
- 84% stated that the presence of boats encouraged them to use the towpath
- 90% felt the presence of boats made them feel safer using the towpath

Leisure boaters can obviously provide some of the colour and movement that attracts non-boaters to the waterways but only the year-round presence provided by a critical mass of liveaboard boaters can ensure that London's towpaths remain safe and welcoming to casual towpath users. London Boaters are only too aware that, where only a few boats are moored, sites that may be considered desirable 'hot spots' quickly become uninhabitable due to violence, theft and vandalism

Likewise the presence of liveaboard boaters with a local connection provides a network of links between boaters and local communities through family, work and social ties. These connections link local canalside communities to the waterways in a manner that passing leisure boaters do not. Liveaboard boaters demonstrate a different way of life – one that is not tied to place, that is off-grid and has a low environmental impact. This can have a profound impact on the local community and contributes to long term sustainable development. The pleasures of liveaboard boating are increasingly being showcased on television and radio programmes and in lifestyle magazines – all of which bring the waterways to a new audience and which British Waterways understandably keen to promote and exploit as the move to charitable status brings a need for new stakeholders, supporters, donors and volunteers.

The vibrancy of the London waterways is becoming internationally renowned, often featured on foreign TV and radio programmes about the city – and will become more so with the prominent place being given to the presence of boats in publicity for the forthcoming Olympic Games.

British Waterways and London are already in effect trading on the image and romance of a vibrant and colourful alternative community which exists on the city's waterways. This is not an image that could be so effectively marketed if the only

boats on the system were limited to passing leisure cruisers present for only a few summer months or parked up in offline marinas.

The proposals set out by British Waterways are based on little publically available evidence and have caused anger and resentment amongst many stakeholder groups who feel that their views have not been sought or who have been misrepresented in the way that the issues have been presented.

Taken together the mixture of 'neighbourhoods', 7 & 14 day zones, annual restrictions on total number of days per neighbourhood and two tier system of punitively high 'charges' combine to create a set of proposals that Sally Ash has described as 'draconian', and which we believe to be overly complex, disproportionate, irrational, discriminatory and unlawful.

They would require a large-scale, timetabled, weekly movement of hundreds of boats across large distances irrespective of personal, professional or family commitments or the practical necessities of fuel, water, waste disposal, boat maintenance and repair. They are either intended to make liveaboard boating in London impossible, or have been designed with no understanding of the practicalities faced by boaters of any type or the impacts of such large scale movements on other waterways users. Either way if implemented they will force many people off the waterways and destroy or radically diminish the vibrant community that has been built up over two centuries and on which British Waterways and London hope to capitalise over the coming 12 months as they launch the new waterways charity and the Olympics respectively.

The loss of London's liveaboard communities would damage both the waterways and the city. We have already outlined the environmental and structural damage to the waterways that would occur if all the boats currently on the system were to follow the new proposals. More likely however is that significant numbers of boaters would leave the waterways either in response to the practical requirements of the proposals or the destruction of the sense of freedom resulting from an over bearing enforcement regime brought in to police them.

The results of such an outcome would be:

- More crime and graffiti on towpaths resulting in reduced visitor numbers, increased costs and reduced support for the new waterways charity
- More abandoned and unlicensed boats which would require costly enforcement and removal operations
- A reduction in the value of boats due to an increase in supply as a large number of boats come onto the market
- More people on low incomes needing to claim income and housing benefits as the liveaboard option of affordable housing is denied to them
- Break up of family and social ties as boaters moved out the area
- The breaking of ties between local communities and their waterway
- Loss of local water based knowledge and expertise which currently saves British Waterways money by ensuring that locks are closed, pounds do not drain, obstructions are cleared and problems are reported

We believe the current proposals present a serious risk of destroying a community that is an asset to London, to the canalside communities we live alongside and to British Waterways.

6. General Issues & Observations

British Waterways has repeatedly stated that it does not have responsibility for 'housing' and yet the Association of Inland Navigation Associations (AINA) stated in its 2010 advisory report 'Residential Use of Inland Waterways' that '*residential use of waterways is a form of housing and residential boaters are recognised by Government as a specific household group*'. British Waterways states that the provision of residential moorings is a matter for local authorities. However by issuing licenses for liveaboard boats without home moorings British Waterways is, de facto, a body with responsibilities for housing – albeit a form of housing that is unconventional and itinerant. It should take its responsibilities seriously, working with those it accommodates to ensure that facilities are adequate, that the rules are known, understood and are fairly enforced. It should also empower those who use the waterways to take more responsibility for facilities, and self regulation.

London Boaters have been dismayed by the attitudes shown to liveaboard boaters by British Waterways both throughout the development of the current proposal, including the current consultation, and in relation to the provision of visitor towpath moorings at commercial rates during the Olympic period.

No attempts have been made to consult with the community prior to the publication of the current proposal, or the decision to allocate large stretches of London towpath moorings for sale for several weeks during the summer of 2012 – both of which have serious potential consequences for the community who pay their licence fees and the vast majority of whom abide by the legal requirements of their license.

Not only have we not been engaged in decisions which impact directly and immediately on us, we have been addressed by British Waterways staff in meetings as 'you people' and 'continuous moorers' and wrongly painted as law breakers and freeloaders by British Waterways in the press. Serious human rights concerns regarding healthcare, loss of voting rights, education and family life have been dismissed as 'lifestyle choices'.

We believe that our treatment is a result of deep seated antipathy towards liveaboard boaters without home moorings within British Waterways. This institutional hostility predates the 1995 Act and results in a dismissive and discriminatory approach to a

legitimate group of boaters who are living within the letter and the spirit of the law, and who are a valuable, but undervalued, stakeholder group.

It is clear that different groups of boaters use the waterways in different ways and have different needs. It is also a fact of history that the use of the canals has changed dramatically over time and that it is continuing to change in response to wider social changes. Conflicts are perhaps inevitable but British Waterways should not simply take sides when different groups come into conflict, reinforcing prejudices and deepening divisions between different users. As a responsible public body it should take an even handed approach, recognising the value and validity of each of its stakeholder groups and facilitating better understanding and accommodation between them. It should also be willing to accommodate change.

In seeing livaboard boaters as a nuisance or a problem to be dealt with, rather than a legitimate stakeholder and an asset to the waterways, British Waterways has developed an approach that is confrontational, discriminatory, antagonistic and enforcement-based rather than flexible and based on respect and consensus. It has galvanised a community to come together which it now has the opportunity to engage with positively to realise a range of mutual benefits.

7. An Alternative Approach

London Boaters has already undertaken an extensive range of engagement with other waterways users and the canalside communities.

These meetings and communications have raised a range of real issues related to where boats moor, and the attitudes and behaviours of some boaters. It has also identified a range of simple solutions and areas of basic misunderstanding and lack of communication.

British Waterways should recognise that rather than impose change through the introduction of complex new regulations it must adopt a new approach based on:

7.1 Better Communication

Most of the issues raised by other stakeholder groups so far have been minor and easily addressed through better and more regular communication both between user groups and boaters and between boaters ourselves. These include:

- mooring on lock landings
- mooring on specific sites of interest to rowers and anglers
- mooring on particular stretches or sites when other user groups are planning events / cruises / regattas etc

We will develop a London Boaters Code to ensure both locally resident and visiting boaters are aware of such local agreements.

7.2 Appropriate Enforcement

The three key issues raised by British Waterways of overstay, congestion at 'hot spots; and overspill of belongings all appear to be over stated and are best addressed by more effective communication, information and enforcement by British Waterways towpath staff.

Enforcement should be based on the current rules and should not seek to extend the existing legislation through regulation.

7.3 Mediation and Facilitation

Some issues may be more difficult to deal with through better communication and appropriate enforcement.

The boating community is as diverse as any, and more diverse than most. It cannot be expected to entirely regulate itself but nor should the only response to difficult issues be to devise new and complex regulation.

Where issues are identified which are evidenced and which are not able to be immediately resolved, British Waterways should seek to ensure that they are independently and respectfully mediated or facilitated until agreement is reached.

The provision of sufficient visitor moorings or the provision of alternative moorings during the Olympics are issues that might fall into this category.

7.4 Positive Partnership

London Boaters are committed to the maintenance of a working accessible waterway that is environmentally sustainable and which meets our needs and the needs of others who live on and alongside it.

The canals and waterways provide a bond between us, the other users of the waterways, the local communities and British Waterways.

We would like to explore the possibilities of working more closely to ensure provision of new facilities and new moorings in order to address some of the perceived issues of congestion raised in the proposals.

LONDON BOATERS
MAY 2011