



**Canal &
River Trust**

Keeping people, nature & history connected

Richard Parry
Chief Executive

10 June 2014

Murad Qureshi AM
Chair, Environment Committee
London Assembly
City Hall
London SE1

Our Ref GLA/RP/100614
Your Ref

Dear Murad,

Canal & River Trust Response to 'Moor or Less': Moorings on London's Waterways

Thank you for giving the Trust the opportunity to respond to the Committee's report on London moorings, undertaken under the rapporteurship of Baroness Jenny Jones AM.

We are pleased that the report has highlighted the increasing popularity of London's Waterways, and the social, environmental and economic contribution that they make to the city. Although the capital's waterways are busier and more popular than ever, they are a finite resource and are affected by similar issues of excess demand, conflicts over different uses, and issues of congestion as other parts of the city.

The Trust manages approximately 100 miles of waterways within London which, as the report highlights pass through 15 London boroughs, providing 270 hectares of open space and making a vital contribution to London life.

The Trust has a central role in managing this resource for the benefit of the public. However, we cannot manage the growth in the waterways' popularity alone. As this is a resource that benefits the whole of London, the Trust needs the support of the Greater London Authority, the fifteen local authorities, and other partners such as the Lee Valley Regional Park Authority, to ensure that the potential of the waterways can be fully realised.

It is crucial that the waterways are managed for the benefit of all Londoners and not for one part of the community at the expense of another. We already work in partnership extensively, and welcome the opportunity to develop these partnerships to find solutions for the effective use and management of waterways and their many users.

While the report focuses mainly on the Trust's role, it has highlighted the part that others can play in delivering the outcomes sought by the report. In particular, local authorities have a key role in planning for waterside development and supporting the provision of new moorings, as well as

Canal & River Trust First Floor North Station House 500 Elder Gate Milton Keynes MK9 1BB

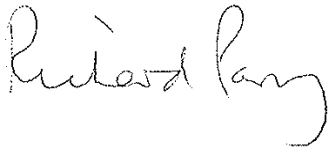
T 0303 040 4040 **E** customer.services@canalrivertrust.org.uk www.canalrivertrust.org.uk

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helping to address waste management and community safety issues arising from greater public use of the waterways. The private sector – and potentially social enterprise - also has a key role in the development of new moorings especially to help meet the growing demand for residential moorings.

We have considered the report's findings and are pleased to note that the Trust is already delivering on a number of its recommendations. We set out below our detailed response to the report and its recommendations, and would be pleased to discuss these further with the Committee.

Yours sincerely,

A handwritten signature in black ink that reads "Richard Parry". The signature is written in a cursive style with a large, looping 'R' and a long, sweeping tail on the 'y'.

Richard Parry
Chief Executive

1. Overall response

- i. We welcome the report, and its acknowledgement of the contribution that the inland waterways make to the life of London¹.
- ii. The report highlights the massive growth in demand for mooring over the last 3 years², which has been driven predominantly by the housing shortage.
- iii. This has put significant pressure on the waterways infrastructure, on mooring supply, on existing facilities for boaters and on the Trust's management resources, as well as resulting in conflicts between those who use the waterways in different ways.
- iv. The Trust has limited powers to address some of the environmental pollution, community safety and neighbour conflict issues that arise, and therefore depends on partnership with other agencies.
- v. While the Trust has a key role in managing this growth, we welcome the report's acknowledgement³ that different groups and organisations will need to work in partnership to plan properly to meet mooring needs and address the impacts arising from greater use of the capital's waterways.
- vi. The Mayor and local planning authorities should ensure that planning policy recognises the need for waterside developments that enhance the waterside environment, provide opportunities for new moorings, and protect wharves for waterway operations.
- vii. The private sector, community enterprises and social housing providers should work with the Trust to meet the demand for new moorings⁴, as the Trust is not the only provider of permanent or residential moorings and does not generally own or control access to the land required to provide new moorings.
- viii. Local authorities and the Metropolitan Police should work with the Trust to develop local arrangements to ensure community safety along the waterways⁵, to encourage mooring in areas that are currently considered unsafe and to protect waterways facilities⁶.
- ix. Local authorities should work with the Trust to provide adequate facilities for waste management in close proximity to the waterways to help meet the needs of live-aboard boaters⁷, as the Trust's land ownership is generally limited to the narrow towpath.
- x. The Trust is developing a number of initiatives to address the moorings supply and management issues highlighted in the report. These include:
 - provision of new towpath moorings
 - practical guidance on creating affordable residential moorings
 - provision of boater facilities at new Trust moorings
 - enhanced security measures at boater facilities

¹ P.6, para.2, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

² P.10, para.3, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

³ P.7, para.5, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

⁴ P.13, para.4, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

⁵ P.16, para.4, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

⁶ P.15, para.5, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

⁷ P.15, para.3, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

- partnership working with the Police and local authorities to enhance community safety
- working with developers and local planning authorities to incorporate moorings
- working with LLDC to return boating access to the Queen Elizabeth Olympic Park
- assessing opportunities to provide new moorings on Trust waterways in Docklands.

The Trust is a charitable body which cares for part of London's available waterspace. There are other private and public sector operators who manage the remaining waterspace, such as the River Thames (Port of London Authority and Environment Agency), the Royal Docks and many other private moorings and marinas. Any changes in mooring policy and practice that are proposed by the GLA should be sought consistently across all London's waterways.

2. 'Mooring supply and demand'

Mooring Demand

2.1 The report acknowledges⁸ that record levels of house prices and rents are leading many people to live on a boat, which is seen as a more affordable option. While there are hidden costs and practical challenges to living on a boat (e.g. emptying toilets and filling water tanks regularly, waste disposal and recycling, securing diesel and heating fuel), the numbers of new boaters entering the market is growing.

2.2 The results from the 2014 Trust national boat check indicates that since 2007, an extra 1,000 boats are now on the Trust's waterways in London (either with or without a home mooring), representing a 50% increase in just seven years. We are concerned that this level of growth places significant pressure on waterways infrastructure and may result in conflicts with other waterways users and canal-side neighbours. Furthermore, vacancies at long-term moorings in London are scarce, especially for residential use. Of the 578 long-term moorings that the Trust operates in London, we currently have only 4 vacancies, and these are well outside the Central London area.

2.3 In this context, it is challenging for us to meet the demand for moorings in London on our own. We need support from planning authorities, and investment from the private sector and social enterprises, to make further progress in increasing supply to meet the demand for moorings.

Mooring supply

2.4 We have invested in a three year project to review the management of towpath moorings across England, known as the Towpath Mooring Management project, which commenced in April 2013. One of the objectives of this project is to increase mooring supply through better management of existing moorings as well as identifying the capacity for new mooring sites (both casual mooring and permanent mooring) and new models of 'affordable' moorings provided by social enterprises and the community sector.

2.5 This project has already led to the installation of new mooring rings in three locations (Grand Union Paddington Arm between Little Venice and Harrow Road; and on the Regent's Canal at Broadway Market, Hackney, and at Victoria Park, Bow) and has identified two other initial locations where new moorings could be located, providing approximately 40 new casual towpath moorings. We will be working with the London Waterways Partnership (a volunteer advisory group set up to steer our work in the capital) to explore capacity more systematically

⁸ P.9, para 1, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

and develop proposals for increasing mooring sites. We are also developing guidance and support for those wishing to develop low-cost moorings in 'on-line' locations along the waterways, subject to navigation and policy constraints.

Towpath quality and grass verges

GLA Recommendation 1:

To increase mooring supply on London's canals, the Canal and River Trust should ensure as far as possible that towpaths have soft verges, mooring rings or bollards, are free of debris or silting up in the waterway and, where possible, are accessible to boaters with disabilities.

2.6 We recognise the need to retain mooring capacity, as well as the environmental value of grass verges. If there is a need to reduce or remove grass verges for towpath capacity reasons, our approach is to retain planting along the back verge of the towpath and to provide facilities for mooring in the towpath.

Planning and partnership working

GLA Recommendation 2:

Planning authorities should use the development control process to apply the London Plan Blue Ribbon Network policies more strongly, to ensure that waterside developments enhance and do not detract from the waterways and their uses, including residential mooring use.

The Mayor should, in the next set of amendments to the London Plan, more fully reflect the residential value of London's waterways, and include a policy to increase the number of moorings.

2.7 The report acknowledges that navigation authorities, planning authorities and waterside landowners can all have a role in creating more 'off-line' mooring places in suitable locations off the main waterway route⁹. While this is desirable for keeping the navigation clear, and potentially provides a greater level of services at moorings, the opportunities for delivering more off-line moorings are restricted by the limited suitable site availability and development viability.

2.8 We facilitate the provision of new moorings through two principal routes: encouraging third party land owners to deliver new mooring sites; and developing new moorings ourselves on land/ waterspace that we own. In the next two years, we expect to develop approximately 20 new long-term moorings on our own land/waterspace. We are also investigating the opportunities for developing new moorings in the docks owned and managed by the Trust in London's Docklands.

⁹ P.11, para 3, Moor or Less: Moorings on London's Waterways, London Assembly, 2013

- 2.9 In respect of third party development proposals, we do work with landowners and planning authorities to seek new moorings in development proposals alongside our waterways. We also seek provision of new boater facilities in such schemes (e.g. water points, electricity bollards and pump out facilities) where appropriate.
- 2.10 We support the report's call for local planning authorities to implement the Blue Ribbon Network policies more strongly to ensure that waterside developments enhance and do not detract from the waterways and their uses, including residential moorings, through the development management process, as well as ensuring that the planning and other policies of local authorities and the Lee Valley Regional Park Authority (LVRPA) support the provision of new moorings in waterside developments.
- 2.11 We also support the report's recommendation that the Mayor should include a policy to recognise the residential value of London's waterways and increase the number of moorings. We welcome the Mayor's proposed changes to Policy 7.27 and paragraph 7.80 in the Draft Further Alterations to the London Plan and will continue to work with the GLA to ensure that there is a supportive spatial policy context to aid the delivery of new moorings on London's waterways. We welcome the report's acknowledgement¹⁰ that an enumeration or mapping of moorings could help inform the London Plan. We believe the Mayor could play an important part in facilitating such research work, and would welcome his support to enable this.

Affordability and mooring auctions

GLA Recommendation 3:

The CRT should review its system of auctioning moorings, and seek a system that is fairer to those using and contributing to the waterway network.

- 2.12 We are not London's only moorings provider, even on our own directly managed waterways, and a commercial market exists for long-term moorings. As the navigation authority (network operator) as well as a commercial provider of moorings, we have a duty under competition law not to undercut the market rate for moorings. In high demand areas, auctions are the most effective and fairest way of establishing the market rate for a mooring. The auction system is under review, but its use is likely to continue in areas of high demand.

Community moorings

GLA Recommendation 4:

The CRT should encourage a trial of community moorings. The costs of community moorings, and the process for setting them, should be transparent.

- 2.13 The Trust supports the principle of community groups or social enterprises developing sites to provide sub-market price residential moorings. Such proposals will face similar development challenges to commercial moorings, such as compliance with existing mooring policies, site availability, planning restrictions, or viability. We encourage proposals of this nature, but our

¹⁰ P.11, para 1

support has to be subject to us achieving best value for access to the waterspace. Such proposals will, therefore, need to compete with other potential uses. Nevertheless, social enterprises should, by their nature, be able to offer lower priced moorings as a result of lower management costs, though the Trust will retain a commercially competitive price for the waterspace.

2.14 We are developing a support programme for those wishing to develop community moorings schemes, which will include a 'how to' guide with step by step guidance on the issues that need to be addressed when developing a mooring scheme (including assessing planning policy, making landowner contact, considering access and services/waste management issues etc.), as well as an application process for lodging proposals with us.

Boater facilities

GLA Recommendation 5:

The Canal and River Trust should review the provision of facilities and lighting, and lead the production and implementation of a facilities strategy for London waterways. It should aim to ensure that facilities are:

- sufficient to cope with increasing boater numbers and encourage less concentrated mooring***
- readily-available and well-signposted for cruisers and accessible to all boaters including those with disabilities***
- available when needed, with prompt maintenance seven days a week***

The facilities strategy should also seek to support the operation of service boats and the wharves they need.

The Canal and River Trust should also publicise a map of transport links for different London mooring locations, including those not currently overcrowded.

The Canal and River Trust should work with the London Legacy Development Corporation to seek boater facilities and sufficient moorings at the Queen Elizabeth Olympic Park, and the London Legacy Development Corporation should support this aim.

2.15 The rapid growth in boat numbers has put considerable pressure on existing services (e.g. water points and pump out facilities), which is exacerbated by regular criminal damage which often renders such facilities unusable. These incidents often involve wilful and targeted actions aimed at sabotaging the facility, rather than constituting general vandalism. We are therefore working with the Metropolitan Police's Safer Neighbourhood Teams and the Marine Policing Unit to address these issues.

2.16 We are already reviewing the adequacy of facilities provision across the London waterways, and are taking steps to ensure that new moorings developed by the Trust include facilities that are accessible to all boaters, to ensure that gaps in provision can be filled. In some locations, there are already third party facilities which boaters may use, although the awareness of these sites may be limited. We have therefore developed new pages on our website that provide interactive maps on local information across the Trust's national network of waterways. This includes details of boater facilities, designated visitor moorings, local

services etc. We are developing maps of public transport accessibility which will assist in raising awareness of alternative mooring locations and the distribution of boater facilities as well as other local services.

- 2.17 We are also exploring ways of working in partnership with third parties, e.g. waterside businesses, third sector organisations, local authorities and other bodies to provide boater facilities where there are gaps in provision. This includes exploring different approaches to the provision of boater facilities, e.g. community businesses providing mobile, barge-based refuse/recycling and sanitary services; or use of third party assets and services such as car parking, buildings or waste management. We would welcome innovative proposals to address facilities issues, and would be keen to work in partnership with potential operators.
- 2.18 In relation to lighting towpaths, we are not in a position to fund lighting along the waterways on our own. We must also account for heritage and environmental considerations when considering lighting. Whilst we recognise the need to promote community safety, the Police and local authorities need to accept that they have a responsibility to address community safety. A good example of partnership working is in east London, where the London Legacy Development Corporation and Tower Hamlets Council are working together with us to provide lighting along the canal corridor at the junction of the Hertford Union and Lee Navigation.
- 2.19 In relation to mooring in the Queen Elizabeth Olympic Park, it should be noted that the Trust's predecessor, British Waterways, played an active and leading role in getting the Bow Back Rivers restored for navigation and mooring, and the Trust continues to support this approach. There are a variety of physical constraints within the Bow Back Rivers which preclude the ability to create safe moorings without significant investment in new infrastructure. For example, there is a 2 to 3 metre level difference between the water and the top of the bank in most places, so pontoons and ramped access is required to create safe embarkation areas. However, we have been working with LLDC for a number of years to identify ways to jointly create new boating facilities in and around the Queen Elizabeth Olympic Park. This includes establishing new trade moorings and a new pump-out facility on the River Lee Navigation.
- 2.20 In addition, we are in discussions with the London Legacy Development Corporation regarding boater access to the Park now that is fully open to the general public. The restrictions to navigation resulting from Crossrail works and the non-navigable Carpenter's Road Lock mean there will be limited boating access in the short-medium term. However, we will continue to work in partnership with other agencies to seek the funding required to fully open up these waterways for the first time in over 50 years.

3 Communication

GLA Recommendation 6:

Relevant authorities, particularly the Canal and River Trust, the Mayor and London Waterways Commission, Transport for London and the police, should support work to engage boating and waterside communities, particularly the Better Relationships on the Waterways project and boater wardens. Support could include attending meetings, taking forward conclusions and agreements, and potentially some small financial or organisational resources.

- 3.1 We welcome the report's recommendation for greater engagement between boating and waterside communities, with potential financial support from the Mayor and London Waterways Commission. The growing popularity of the waterways sometimes leads to conflict, often

through a lack of awareness of differing needs, pressure on scarce resources, or simply inconsiderate or intolerant behaviour by different waterways users. Greater engagement between different communities helps to reduce such conflicts, and prepare the ground for understanding of mutual needs. The Trust's introduction of a volunteer 'Caretaker Boater' scheme in Islington (formerly referred to as a 'warden scheme'), in partnership with London Boaters, demonstrates the potential of such engagement.

- 3.2 We welcome the report's recognition of the Better Relationships Group, and our investment in a boater liaison manager post, as excellent examples of engagement and communication. The Trust set up the Better Relationships Group in conjunction with boating groups to help us improve communications and engage boaters, in particular, in mediating different needs and developing local policy with us. The Group is now actively engaged in policy discussions and has come forward with specific proposals for improving boating in London.
- 3.3 In particular, the Group has helped us develop the management plan for the Islington Visitor Moorings, the Caretaker Boater scheme, winter moorings proposals for London, and new management proposals for visitor moorings. It also has the potential to help provide information and support to boaters on a range of issues, from living aboard in London to living more sustainably on the waterways.
- 3.4 We welcome the GLA's commitment to the engagement of partners, and would welcome the GLA's support to help fund and service these engagement structures.
- 3.5 We are actively improving the ways we communicate with our users to widen engagement, including providing channels for boaters to feed ideas back to us. This includes appointing two part-time mooring rangers to engage with boaters on the towpath, new 'boating community communications volunteers' to help us disseminate information via social media and engage with boating groups directly, active Twitter accounts and a London boating bulletin covering news about the waterways in London. As a result, we have funded community-led initiatives such as the Operation Whistle Blower 'boating community watch' scheme.
- 3.6 Our towpath ranger and mooring rangers are increasingly engaging with communities along the waterways and attending partnership meetings with local interest groups, the Police and local authorities. This is helping to bring forward ideas and proposals for implementation such as towpath clearances and community gardens, and has been the catalyst to the proposals for the two new mooring sites referred to in para.2.5. This has also led to new procedures for addressing the issue of rough sleepers on the towpath, with two rough sleepers recently having been placed into accommodation as a result.
- 3.7 We would welcome continued support from the Police, local authorities and other partners, and would encourage their participation in local or theme based activities to address the needs identified in this report.

4 Mooring regulation

GLA Recommendation 7:

The CRT should ensure that its action to regulate restricted moorings (including visitor moorings, lock landings, bends and narrow waterways) is effective. It should be:

- ***Consistent over time and between areas***
- ***Well-understood by boaters, and communicated locally such as by clear consistent signage and local wardens***
- ***Timely and efficacious, particularly where navigation is obstructed.***

- 4.1 The Trust acknowledges the important role of mooring regulation and enforcement in maintaining effective navigation and mooring availability. We are developing a national framework for consistent provision and management of visitor moorings, and have had discussions at the Better Relationships Group about how best these could be applied in London. We have also recently consulted on a trial of new mooring arrangements for Paddington Basin and Browning's Pool in Little Venice, to address the needs of different mooring users over the summer cruising season. These discussions have fed into the development of policies for short-term moorings in London.
- 4.2 Our approach to regulating moorings is being reviewed to ensure that more effective information, guidance and enforcement can be delivered. This aims to ensure that all boaters are aware of mooring rules and boating protocols, whether they are new to boating or old hands, and whether they habitually abide by the rules or are less respectful of them. The Trust intends to make sure that timely and clear action is taken so that all boaters are clear about our commitment to effective mooring regulation. Our enforcement team and mooring rangers have adopted procedures for immediately contacting those boaters mooring inappropriately on lock landing and water points, and this approach is starting to have some success. We have also introduced an initiative to colour-code lock landing bollards and water points, backed up with an information campaign, to highlight their temporary nature and improve awareness of mooring rules.
- 4.3 We have now introduced procedures which provide a range of supporting information for boaters taking new licences, to help new boaters understand what they need to do to comply with mooring rules. Boat movements and breaches of licence conditions are monitored closely, and may affect boaters' future licence applications.

5 Environmental issues

- 5.1 We recognise that air and noise pollution are important concerns for canal-side residents and boaters alike. The operation of boats on the waterways will inevitably lead to some noise and smoke being generated, but the Trust's terms and conditions require that boaters avoid causing a nuisance through their boating operations or activities. Where boating activities outside the Trust's terms and conditions results in nuisance, the Trust takes action to warn offenders and pursues stronger action through licence revocation procedures where persistent breaches occur, though this is a long process. However, the relevant powers to act on environmental pollution and statutory nuisance sit with local authorities.

- 5.2 We are developing partnerships with local authorities to ensure effective systems are in place to monitor, record and assess the impact of noise and smoke pollution from use of waterways. Our own monitoring indicates that, in many cases where there has been concern about pollution, boats have actually been operating within established terms and conditions and accepted boating protocols. While there are cases where some boats have been responsible for excessive pollution, the number of cases that have been actionable under statutory nuisance powers is limited. We have nevertheless worked with the boating community to highlight environmental issues and encourage behaviour change, and this is starting to have some success. We welcome the report's suggestion¹¹ that support should be provided to help boats replace older, more polluting energy sources.
- 5.3 In Islington, we are partners with the local authority on an environmental project to improve air quality through engagement with the boating community and provision of advice and guidance on higher environmental performance. London Borough of Islington has provided Trust staff with a training session on environmental protection legislation and procedures, while the Trust has enabled Council staff to explore boating operations.
- 5.4 We will continue to work with local authorities and the boating community to explore the effective management of environmental pollution issues.

Canal & River Trust
May 2014

¹¹ P.27, para.3, Moor or Less: Moorings on London's Waterways, London Assembly, 2013