



# Hounslow Boroughwide Mooring Byelaw; Responses to Consultation Exercise.

## April 2018

### Introduction;

The London Borough of Hounslow undertook extensive public consultation during 2017 with relevant organisations, including the Port of London Authority and London Borough of Richmond on Thames, park users, boaters and other organisations including residents.

The intention to bring in new bye laws was advertised and highlighted on the authority's web site. The proposed bye laws were published widely by the council including meetings and through social media.

A specific web site was set up for feedback on the proposed bye laws which was opened in the Summer 2017 and closed on the 31 December 2017. The site was headed;

### **HOUNSLOW MOORINGS PUBLIC CONSULTATION; HAVE YOUR SAY ON PROPOSALS FOR MOORING BYELAWS IN HOUNSLOW.**

The site received 476 viewings and 23 comments were left on the proposals.

Following the consultation exercise feedback was received via both the consultation web site (Sticky World) and direct contact as follows. In each instance, we have given the comment initially with the Council's response thereafter. As many of the comments are based on similar themes where appropriate we have grouped responses or repeated comments made earlier.

Please note that the web site allowed interested parties to comment on previous posts. In those instances, we have kept the comments under the heading; *Response to above*.

**Comment 1;** *The National Bargee Travellers Association ("NBTA") has been asked to comment on the proposed introduction by the London Borough of Hounslow ("LBH") of byelaws to restrict mooring on the Thames in Hounslow. The NBTA supports itinerant boat-dwellers ("Bargee Travellers", "BTs").*



*The NBTAs opposed such a proposition by LBH on the strongest of terms. The consultation introduction itself is highly offensive as it predicates the consultation with the proposition that mooring in the four zones is illegal: it is not.*

*The opposition of the NBTAs falls under five heads as follows:*

*1 Subverting the right to moor subordinate to the Public Right on Navigation (“PRN”) on the River Thames*

*2 Subverting the right to moor on Canal & River Trust Water*

*3 Failing to address the needs of BTs, in violation of LBHs obligation under s.124 of the Housing and Planning Act 2016;*

*4 Compromising navigational safety; and*

*5 Pursuing a policy that is socially divisive, objectionable in the extreme, amounts to gentrification, falls generally under the description of “social cleansing”, is contrary to Labour Party policy, repugnant to the general law and is not becoming of a public body.*

*The NBTAs notes that LBH is a Labour administration. The NBTAs draws the attention of LBH to page 112 of the Labour Party Manifesto dated 12-05-2017 which states:*

*“We will end racism and discrimination against Gypsy, Roma and Traveller communities, and protect the right to lead a nomadic way of life”*

*The NBTAs also observes that Ruth Cadbury MP (Brentford and Isleworth) has signed a letter to one navigation authority that challenges the institutionalised persecution of BTs. LBH should be engaging in supporting vulnerable boaters instead of persecuting them. This proposed byelaw does the opposite of that and is therefore betraying the obligation of LBH to members of its constituency.*

**Council response;** The byelaws do not affect existing moorings. The byelaws are intended to allow the authority to regulate un- licensed mooring in areas which are not suitable for long term residential occupation. The byelaws will protect any existing rights of navigation.

In terms of interested parties both the PLA and Canals and River Trust have their own regulations which will not be affected by the byelaw proposals.

Careful consideration has been given to the existing rights of river users and how those should be balanced against the needs of the wider community.

The position of a boater displaced by a mooring byelaw in relation to both human rights and residential need was tested in the High Court in Akerman v London Borough of Richmond



(2017). *(It should be noted that the London Borough of Hounslow intends to adopt the same mirror byelaws.)*

In this case a boater sought to argue that making the bye law by LB Richmond was a disproportionate infringement and breach of his rights under Article 8 of the European Convention of Human Right.

The High Court held that the Byelaws were valid since they were a proportionate and necessary step for the council to ensure good rule and government and the suppression of nuisance, in the Borough.

The byelaws will provide a means of regulating the quality/safety of the boats moored on the river in areas under the council's control and set criteria such as the ability of the boats to have pump out facilities for discharge.

The byelaws will also allow the Council to monitor boats polluting its river front and take action against specific boats. In addition, the Council received outline Cabinet approval in September 2014 to create a new marina development next to Waterman's Park. The proposal is to create 26 new moorings in Brentford. This will create job opportunities and provide well-managed, regulated mooring for houseboats.

**Comment 2;** *Council do not have required skill or knowledge to manage any part of the waterways*

*Waterways already over licensed, to pay wages not to improve waterway use, which is there for all not just some*

*Bye law powers will last beyond current council - think on about abuse of powers that could others after this council could do.*

*We should protect our heritage by working with boat owners, not by penalising them in order to social cleanse for developers and those who'll buy their property who are seeking a "perceived lifestyle"*

*Removal of choice of lifestyle, totally anti-Labour ethos? Sounds more like a developers dream, who is the bye-law really protecting?*

*Heard one weak argument that some people on the boats are awkward, so are people on land but we don't create bye-laws for them!*

*The river is already underused due to lack of mooring, believe it or not there is no place to moor between Brentford and I think it's Gravesend or Rochester, many residential moorings are prohibitively expensive ....boats aren't like cars they don't have brakes, you can't just "nip" into a space - when Cathja broke down in central london when the fly wheel on the engine broke mid-stream on our way back from Tower Bridge (two visitor berths on Hermitage Moorings) we drifted over and managed to catch onto Shakespeares Globe mooring platform when we were promptly told to leave as the clippers use it.....errrr doh the engine isn't working, stupidity can be ruled any law and evidence is we are getting less "intelligent" (common sense intellect - innate skills) and more "trained" to be part of a neo-capitalism dream where all and everything is owned, paid for, a funding resource and nothing else, where is the humanity?*



*Creating this bye-law will not only remove some peoples personal lifestyle choice, as it won't just affect the two awkward people, it will make many intentionally homeless, yet the council do not have enough homes to home people!*

*So BIG NO to this from me*

**Council Response;** The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. In addition, the council has legitimate concerns regarding Health and Safety issues arising from using facilities for purposes outside their original intention, this would include scaling/climbing park boundaries and unsafe mooring close to public areas.

Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.

In addition, the council is proposing to create additional spaces in suitable locations in the future.

The council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment.

The byelaws allow for cases of emergency as described above. The bye laws will not penalise legitimate river users.

The byelaws will provide a means of regulating the quality/safety of the boats moored on the river in areas under the council's control and set criteria such as the ability of the boats to have pump out facilities for discharge.

The byelaws will also allow the Council to monitor boats polluting its river front and take action against specific boats.

**Comment 3;** *am against the council taking on these excess powers. 24 hour moorings are also not the right answer. The idea that the council should be able to rule on issues of visual appropriateness is ridiculous - look what they do for planning and what they actually build and have built. Poor legislation which does not provide a proper answer to what frankly is not such a great problem - other than for the councils own nefarious and unwanted plans*

**Council Response;** The council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment.

The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.



In addition, the council is proposing to create additional spaces in suitable locations in the future.

**Comment 4;** *I agree with the council proposal. All the comments on here are clearly only from boat owners that have total disregard for the river and the appearance of their boats. We need a better river and this proposal is going in the right direction!*

**Council Response;** Noted

**Comment 5; This** *is a ludicrous over-reach by Hounslow Council. Their approach to the Thames that runs through areas of the borough has historically been one of neglect. But now that a few greedy councillors and property developers see some private profit in it, they want to grab rights and powers that benefits nobody but themselves and at the expense of the people that actually live here. The council should come clean about why they are so reluctant to work alongside their local communities and boaters. Instead of finding easy solutions that benefit everyone, they seem only to want to exclude, restrict and criminalise. I hope this by-law is rejected by borough residents.*

**Council Response;** The proposed byelaws will seek to ensure that the rules should apply to both river users and park/open space users alike. In addition, the council has legitimate concerns regarding Health and Safety issues arising from using facilities for purposes outside their original intention, this would include scaling/climbing park boundaries and unsafe mooring close to public areas.

Any regulated/approved or legitimate moorings will not be affected by the proposed Byelaws. The council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment.

The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.

In addition, the council is proposing to create additional spaces in suitable locations in the future.



**Comment 6;** *I regularly sail along this stretch of the tidal Thames.*

*Hounslow Council are deluded to think they can impose a 24 mooring restriction along an embankment that is mostly owned by Syon House and offers no mooring facilities at all.*

*The communities of residential boats are well organised and provide an active and positive addition to the river.*

Response to above;

*24hr is too short a time frame for legitimate tourist and visitors. No issue with removing those there illegally but should be a Minimum of 48hours.*

**Council Response;** The byelaws do not affect existing moorings. The byelaws are intended to allow the authority to regulate unlicensed mooring in areas which are not suitable for long term residential occupation.

The byelaws will protect any existing rights of navigation the council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment.

The byelaws allow for cases of emergency as described above. The initial period of 24 hours can be extended on application. The byelaws will not penalise legitimate river users.

**Comment 7;** *I completely oppose this proposal to change a law that has worked to benefit many residents and visitors to the borough.*

*The law as it exists has been in place for many years and is reflected across the country. The council must have greater priorities than extending their dominion over current residents to gentrify the riverbank on behalf of whom exactly.*

*When I visit your riverside, which I walk regularly from Kew south, I enjoy the varied and colourful homes on the water and I would hate to see only the permanent moorings remain.*

AND

**Comment 8;** *Hounslow Council should be doing more to work WITH the existing moorers to develop moorings and facilities that will benefit the wider community - not simply turf folk out to build high cost, premium moorings which will only benefit the privileged few. These communities are part of the reason people come to Brentford and Isleworth etc.*

**Council Response;** The council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment.



The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.

In addition, the council is proposing to create additional spaces in suitable locations in the future.

The byelaw will give the Council further powers to be able to deal more effectively with unlicensed and/or illegally moored vessels. In 1999, the Council together with the Port of London Authority (PLA) obtained possession of the areas alongside the Watermans Park and a total of 47 boats were removed from the area.

Over time however, new boats arrived in the area and this particular stretch of land has become congested as boats displaced from elsewhere have moored on a permanent basis. Licensed boaters on both sides of the Waterman's have complained to the council for a number of years regarding the effect on them due to the activities of the unregulated boaters.

**Comment 9;** *How keeping dirty and rotting boats on the river is "benefiting the wider community"?!? Surely to benefit the wider community you want a nice riverside where families can walk and play, not keeping the status quo for a bunch of boat owners?!?*

**Council response;** Noted .The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike

**Comment 10;** *This Labour Council, under its current leadership, appears Hell bent on reshaping the Borough into a Corporate 'Cleptocracy'.*

*The Council reveals a complete disregard for for the Community and people of Brentford. The people who choose to live on boats are very much part of the heritage of this Borough.and should be supported. This proposed Bye-law is an index of a strategy driven by an impoverished ideology that displays, 'Social cleansing' and Corporate greed at its heart.*

*Thoroughly shameful!*

**Council response;** The Council is keen to encourage the use of authorised moorings throughout the borough and elsewhere. Any legitimate current or future moorings will not be adversely affected by the proposals. The moorings close to Brentford High Street as part of the Ballymore Development will be replaced within the new scheme.



**Comment 11;** *Hounslow Council are not the navigating authority for the Thames*

*Under what Act of Parliament are Hounslow empowered to make such a byelaw?*

*Criminal offences are a matter for the legislature not for a local authority*

*Hounslow are arrogating to itself a power to impose a penalty beyond what it has any authority to assert*

*Hounslow has no power to create an offence of mooring in the ordinary course of navigation which as subjects of the Crown all are entitled to freely exercise (since time out of mind)*

*Are Hounslow asserting that they are entitled to penalise boat owners with a criminal record when those boat owners merely navigate and moor and remain on the Thames?*

*As long as moored boats are out of the run of the navigation then since ancient times owners are entitled to remain*

*It is this right that is enjoyed by boats at the Hollows near Kew Bridge*

*They remain and moor as long as they like as they are out of the run of the Thames interfering with no other in their enjoyment of the river*

**Council response;** The introduction of new Byelaws is subject to the rules and guidance prepared by the Department for Communities and Local Government. The Guidance note was published on 18 September 2012 and updated 23 October 2016. The appropriate penalty for a breach of any bye law is governed by the DCLG. The Byelaws will apply to boundaries/areas in the control of the council and not to public navigation channels administered by third parties (e.g.; PLA).

**Comment 12;** *Shame on you council*

*Just a land grab*

*You have no jurisdiction over the River Thames*

*You have treated the boaters there in a despicable and criminal way*

*I have been offered one of the new "moorings" there by one of your staff in return for a bribe*

AND

**Comment 13;** *24 hour moorings is a joke. 2 week moorings should stay intact for the continual cruisers who are more and more getting pushed out by the very council paid to protect them. Your suggestion that continual cruiser boats attract 'anti social behaviour' is unjustified and I am saddened you as a governing body would stoop so low.*

AND

**Comment 14;** *Yes, and the river*





AND

**Comment 15;** *I think that if there is illegal mooring, and existing legal moorings are full, then, in the first instance, exploring where additional moorings might be possible would be a good first step to combat the problem. If people are refusing to use available legal moorings then that should be addressed.*

AND

**Comment 16;** *I completely oppose this proposal to change a law that has worked to benefit many residents and visitors to the borough.*

*The law as it exists has been in place for many years and is reflected across the country. The council must have greater priorities than extending their dominion over current residents in order to gentrify the riverbank on behalf of whom exactly.*

*When I visit your riverside, which I walk regularly from Kew south, I enjoy the varied and colourful homes on the water and I would hate to see only the permanent moorings remain.*

AND

**Comment 17;** *Hounslow Council should be doing more to work WITH the existing moorers to develop moorings and facilities that will benefit the wider community - not simply turf folk out to build high cost, premium moorings which will only benefit the privileged few. These communities are part of the reason people come to Brentford and Isleworth etc.*

*Response*

*How keeping dirty and rotting boats on the river is "benefiting the wider community"?!? Surely to benefit the wider community you want a nice riverside where families can walk and play, not keeping the status quo for a bunch of boat owners?!?*

**Council Response;** The byelaws are intended to allow the authority to regulate unlicensed mooring in areas which are not suitable for long term residential occupation. The byelaws will not affect any existing approved moorings or legitimate facilities that are constructed in the future. There are significant current issues with unregulated moorings which have no proper facilities for disposing of effluent and rubbish for example. In one instance an electric cable has been run through a public park close to a playground.

The byelaws will protect any existing rights of navigation. The council is eager to encourage use of the existing mooring facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment. The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.

In addition, the council is proposing to create additional spaces in suitable locations in the future.



**Comment 18;** *I am a boat owner and regularly sail along this stretch of the tidal Thames.*

*This area of the river originally comprised of industrial premises and has always been a place for boats to moor.*

*The new influx of expensive residential buildings should not force the boats off the river. This is tantamount to social cleansing.*

*Response*

*So basically you want an area of London, that is desperately trying to improve, to still look miserable and poor so you can continue to sail up and down the river?*

**Council Response;** The Council is keen to encourage the use of authorised moorings throughout the borough and elsewhere. The moorings close to Brentford High Street as part of the Ballymore Development will be replaced within the new scheme.

**Comment 19;** *I am against the new mooring bye laws in Hounslow lots of people live on houseboat and gives people a roof over there heads,i feel it"s an other attack on poor people too and coming from a labour authority as a labour member is against would except this from the tories.in these hard times were poverty and homelessness is rising compassion for others would be nice.*

*Response*

*Because poor people don't deserve decent accommodations and human living standards, right...?*

**Council response;** The council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment.

The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.



**Comment 20;** *I completely agree with council's proposal. I live near the river Brent and I have to witness every day rusty boats overfilled with rubbish and the unsocial behaviour of the occupants that are using the river banks as their private space: building structures, littering the areas surrounding the boats and polluting the river. Not only I think that the appearance and number of the boats in the council should be strictly regulated, but their numbers should be halved. Please go ahead!*

**Council response;** Noted

**Comment 20 (a) ;** *think this is completely unnecessary. Strand on the Green doesn't have an illegal mooring problem...*

*This bylaw is a total waste of everyones time and should be dropped. Do you really have nothing better to focus on?*

AND

**Comment 21;** *Rowing clubs need these areas to be safe for practising and racing*

AND

**Comment 22;** *WATERMANS PARK- I strongly believe that the council have a moral obligation to allow the present people who live on boats there the opportunity to have Moorings there at a reasonable cost. The description of the problem and of the people who live there on this page by the council is unbelievably biased towards the council's aims and slanderous against the people who live there.*

AND

**Comment 23;** *I have cycled and sailed along this stretch of the GU canal. It passes mostly through industrial and semi-industrial areas. The canal comes under the responsibility of the River & Canal Trust so Hounslow Council shouldn't be dictating how the waterway is run.*

AND

**Comment 24;** *Again, if Hounslow Council want to do something positive, this is another area where they could engage with existing boaters to develop community moorings and facilities to the benefit of liveaboard boaters, leisure boaters, and local residents. Hands off Hounslow.*

AND

**Comment 25;** *Brentford is an old industrial working area. This is essential to its character and changing this will mean the area loses something that makes it distinct. Boats should be allowed to come and go.*



**Council Response;** The council is eager to encourage use of the existing facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties, pollution of the environment and may contravene Health and safety guidance.

The proposed byelaws will complement the existing legislation and therefore seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are a number of existing approved mooring locations on the river Thames administered both privately and by relevant authorities.

In addition, the council is proposing to create additional spaces in suitable locations in the future. The position of a boater displaced by a mooring byelaw in relation to both human rights and residential need was tested in the High Court in Akerman v London Borough of Richmond (2017). *(It should be noted that the London Borough of Hounslow intends to adopt the same mirror byelaws.)*

In this case a boater sought to argue that making the bye law by LB Richmond was a disproportionate infringement and breach of his rights under Article 8 of the European Convention of Human Right.

The High Court held that the Byelaws were valid since they were a proportionate and necessary step for the council to ensure good rule and government and the suppression of nuisance, in the Borough. The moorings close to Brentford High Street as part of the Ballymore Development will be replaced within the new scheme.

## Email comments

*From:*

*Email:* [@btinternet.com](mailto:@btinternet.com)

*Subject:* *byelaws to be last resort eg after voluntary schemes failed and proper consultation with all affected*

*Message:*

*Dear xxxxx*

*I would attach House and commons and lords briefing paper on how to make valid byelaws but seems this messaging system does not have that facility.*

*Please confirm that LBH will NOT be using this "survey" as part of their obligation to consult affected members before as A: failed to attempt to contact affected boaters, by even the most simple process of taking advert in thames guardian or getting EA to include proposal in their emails or postage out of 2018 registration forms.*

*not contacting me a boater that paid over £1000 council tax one year in Hounslow (and I didnt even have any facilities or rubbish collected) perefacing what should of been a neutral survey with enough non evidenced anti boater allegations to whip up a vigilante lynch mob.*

*Suggesting mooring is illegal. It is not illegal to moor a boat anywhere in the UK. What respondent is going to back any illegal activity?*



*Thus if you want have a valid pre byelaw survey and consultation you need redraft and reissue AND exclude the same anti boating or anti mooring respondents as now being hopelessly irrevocably biased against "illegal moorers" no matter how the next survey / consultation is drafted.*

*Please confirm you will note their names and take such steps thanks, Please also send through explanation of how boaters mooring to council land is an "expense" to council as you claim.*

*Regards*

*Xxxxxxxxxx*

*PS please add me to your list of houseboat owners wishing a mooring that LBH may provide. Confirm thanks*

**Council Response;** The authority has recently pursued possession proceedings against more than 40 boaters moored without consent on river frontage / river works in the control of the authority or whereby access to moored vessels is over council controlled land. The judgement attained in that case in the later part of 2017 deemed that the use of council owned /controlled property and river works was unlawful.

The necessary court action has proven costly, time consuming and difficult to enforce without revised Byelaws.

prove benefits of limiting time.

**Council response;** The limitation of 24 hours is for cases of emergency only (Proposed Byelaw 5a) and can be extended on application. The approach is based on existing regulations used successfully elsewhere and mirrors the timescales adopted by the adjoining Borough of Richmond upon Thames.

what statistics or evidence do you have that suggest there is a problem with "over crowding" or what ever other problems you have. surely restrictions are a last resort when there is significantly competing boats for mooring space. Please send them xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx like cars in a town. the town has parking limits outside the town is no parking limits.

AND

This is an unnecessary bylaw, Hounslow council should put far more effort into reducing homelessness, build more council houses and stop persecuting boat dwellers who use boats



as homes. The council should offer the boat owners affordable moorings in the Borough and stop wasting council tax payers money persecuting boat owners who are not anti social trouble makers but who are valued members of the local community and themselves council Tax payers.

**Council response:** The byelaws are intended to address unregulated mooring and accessing the riverside through public spaces/parks in the ownership and control of the council. It is not a matter of overcrowding, although that has proven to be an issue, alone rather than unregulated mooring proving a hazard to navigation, dangerous, not compliant with current Health and Safety legislation and in some cases anti-social.

I'm writing to say No I don't agree with by-law being implemented for the following reasons.

Firstly I have a very long connection with boats for over 10 years, having lived on one, I have friends living on them and working at Cathja.

Brentford is being re-modernised and I don't agree with social cleansing mechanisms by a labour council who traditionally are on the side of the "common" man and stand up for the rights of people, nor the removal of choice which doesn't sit comfortably.

I've talked with others and heard the reasoning but after thinking through I still can't agree with a by-law which will affect more than just a couple of awkward types, there's people like that that live on the land too, they're everywhere, but no one tells them to leave their home by law!

There are already 3 specialist river licensing authorities in operation, not including canal & river trust and British waterways board, boats are complex and by law is subject to abuse in order to increase revenue and serve the purpose of penalising the already vilified.

I don't believe a Council possesses the skill and knowledge to determine which boats need moving, for example say I buy a boat which is in a dilapidated state to repair it, it could be perceived as derelict and I could be fined.

I don't believe the councils powers should extend onto any part of the water, as they don't have the skill of knowledge of waterways.

The council state "people are using boats as temporary accommodation" but in the same breath state "we don't have enough homes"??? So why be participant in making people intentionally homeless? See my first comment about social cleansing.

Gypsy mooring has long been around and the council have had many years before now to work collaboratively with boat owners and river authorities if they were really concerned, that's why I believe this is social cleansing as this action is being brought as development in Brentford is progressing - here is an anecdote highlighting how with a by-law it could be used inappropriately for developers.



Cathja is moored for 20 years - about 8 years ago the industrial quarter next to her mooring was razed to the ground and the flat pack "condo" homes called riverside mill house were built, it took 3 years for residents to move in, of the first few one immediately asked us to move the boat, another asked if they could buy the boat, another asked if we could paint the boat etc etc. We have good relations with most but some residents feel we are the interlopers!

Before that Heron Quays was built, BJ Woods 100 year old plus boatyard is opposite these new builds, the first thing that happened? Xxxxxxx xxxxxxx had to stop working on Saturdays and was banned from grit blasting as it was "too noisy" .....we are creating a world which fits a bunch of people who have perceived lifestyle, they aren't "living" but exist in a vacuum of "belief" where only their rights are right and woe-betide anyone who doesn't agree, they'll create a by law!!?

I believe introducing this by-law will be extremely harmful to the character, life and well-being of many. That it will actually create homelessness, and a loss of well-being, including to those who have already lost their homes (2 that I know of but number likely to be higher) as that's why some people are already living on boats as they've lost their homes! So it's not a solution to improving social fabric, social justice it's just creating another problem for struggling individuals in a country and world where society is being torn apart in pursuit of money and only the fortunate and financially secure are thriving.

I think this is a great council, I believe it works hard to bring and stabilise budgets and income in difficult times without financial or well-being harm to Hounslow residents and tries to create equality and fairness for all, this by-law won't achieve that.

A by-law once introduced will exist long beyond this current council think on about who may get control and how they might use it, it's not just a law for now.

Kind regards

**Council response;** The proposed Byelaws relate only to parks/open spaces, play areas and recreation grounds in the council's control and will sit alongside the existing byelaws already in place.

The regulations are intended to ensure that the authority can properly control the river frontages with a view to making the riverside available to all.

The byelaws are intended to allow the authority to regulate un licensed mooring in areas which are not suitable for long term residential occupation. The byelaws will not affect any existing approved moorings or legitimate facilities that are constructed in the future. There are significant current issues with unregulated moorings which have no proper facilities for disposing of effluent and rubbish for example. In one instance an electric cable has been run through a public park close to a playground.

The byelaws will protect any existing rights of navigation. The council is eager to encourage use of the exiting mooring facilities and is seeking only to abate mooring in unlicensed and unregulated locations which has in the past caused social difficulties and pollution of the environment. The proposed byelaws will complement the existing legislation and therefore



seek to ensure that the rules should apply to both river users and park/open space users alike. Currently there are several existing approved mooring locations on the river Thames administered both privately and by relevant authorities.

In addition, the council is proposing to create additional spaces in suitable locations in the future.

I think this is a waste of time and money that can be better spent on more important things. Juts leave them be

AND

I don't think this bylaw is necessary. Anti social behavior on the tow path is not caused by boaters. It affects boaters and residents alike. This is caused by a lack of lighting and security along the tow path. A better cooperation with the boaters would be far more beneficial than eviction. Boaters make the tow path safer. An integrated radio communication system would be an option for example to make the tow path safer for EVERYONE. Do we really want to live in a society that has strict normative rules on how to live...? Apart from the fact that most boats look beautiful and not neglected bear in mind all of you who vote for this bylaw that a council that evicts boaters will tear down council houses next as they are a nuisance to the expensive apartment owners next door.

AND

I think this is a waste of time and money that can be better spent on more important things. Juts leave them be

AND

I oppose this new bylaw.

AND

Please stop trying to remove everything interesting and a little bit different that our city has. Work with the boaters to overcome problems. This way we won't end up with a soul-less sterile place to live. Your job as the council is not to restrict people's way of life, but to find a balanced way to keep as many people happy as possible. I know my kids love seeing the boats every day and I'd hate for that to stop.

AND

Where is the written justification for these restrictions? Where are the provisions for enforcement of these restrictions set out?





**Council response;** The London Borough of Hounslow (LBH) has existing byelaws covering its recreation grounds, parks, play areas and open spaces however it has recognised for some time that these bye laws should be expanded to include areas of riverside with regard to the extensive frontages to the River Thames.

In order to ensure that the authority can properly control the river frontages with a view to making the riverside available to all it is proposed to adopt the new Byelaws relating to mooring.

The bye laws mirror those adopted by the London Borough of Richmond upon Thames and will serve to both improve the amenity of the riverside and ensure that parks and open spaces are maintained for the benefit of all users. In particular, the Council wishes to;

- ) Introduce bye laws that are clear and consistent with modern practice;
- ) Enable the Council to control fly-mooring on riversides;
- ) Reduce pollution;
- ) Ensure that the byelaws are a robust framework for dealing with unfortunate instances of anti-social behaviour;
- ) To ensure that the authority has full control over the important riverside asset to the benefit of the majority.

The council sees byelaws as a basis for ensuring the maximum possible benefit of its open spaces is available to the widest possible range of residents. The London Borough of Hounslow is of the view that the proposed new byelaws do not represent a burden on lawful users of its parks/open spaces and are justifiable in the wider public interest.

Ensure boats comply with licensing and boat safety rules. Otherwise they are a floating health hazard!

AND

Boats should have 24 hours to stay, that's plenty and then move on.

AND

24 hours is plenty for visiting and normal practice on the River Wey (run by National Trust).

AND

I've seen quite a few broken down and abandoned boats which may deter the genuine visiting boater.

AND



The boats should have boat safety certificates, licenses and pay for any moorings. I have seen rats running up ropes and into boats during low tide. This suggests also there may be hygiene problems which would affect any children particularly living aboard.

**Council response; Noted.**

I'm writing to express my opposition to the Council's new borough-wide moorings byelaw.

If the moorings are illegal as the council claims, there should be no need to change the law.

Boaters have lived here for many years. Give them the right to continue mooring here and pay a fair price. Boaters are a part of our community and they look after Watermans park. Don't evict them in favour of millionaire boat owners. Far from being a nuisance, boaters look after the park and the boats are an attraction to visitors and locals walking past.

On top of this, the environmental impacts of the project are appalling. It's the site of the former Brentford gas works and the land is toxic. Building a marina would cause arsenic, mercury and asbestos to run off into the river and harm fish and bird life in the area.

AND

If the moorings are illegal as the council claims, why is there a need for a new byelaw?

Boaters have lived here for many years. Give them the right to continue mooring here and they will pay a fair price. Boaters are a part of our community and they look after the park. Don't evict them in favour of millionaire boat owners.

AND

On top of this, has the Council considered the environmental impact of building on the site? It's the former Brentford gas works and the land is toxic and shouldn't be disturbed as it will harm the abundant bird life in the area.

AND

I feel that the current mooring restrictions are adequate and object to any further restrictions being imposed.

The status quoted should remain, unaltered.

AND

Dear xxxxx

Please oppose this byelaw change.

The unofficial free moorings bring charm and character to the Brentford riverside. Those living there could be assisted by the council too remove old rotten and sunken boats.



Perhaps adding hanging flower baskets like at Richmond riverside would further add to the quaint charm of your river side setting and its floating community.

Tourists to Kew Gardens might wish, if informed of the community, to add a stroll or a bus hop along to this picturesque spot for some photos and a chat with the locals.

Perhaps they would also like to visit The Butts, the Steam Museum, walk the canal path, visit Syon Park, etc.

This would bring more tourism revenue to Hounslow borough.

Yours sincerely,

**Council response;** The London Borough of Hounslow has five miles of riverside. The number of boats using the riverbanks as permanent or semi-permanent moorings has increased significantly over the last few years. The proposed byelaw is designed to restrict and control the mooring of boats on land with a frontage on the River Thames which is owned or managed by the Council.

To enable the council to ensure the enjoyment and safety of those who use parks and open spaces alongside river frontages the council has a duty to ensure it can tackle nuisance and other anti-social behaviours that adversely affect these sites.

The introduction of a new byelaw will:

- ) Enable the Council to move the boats on after mooring on its property
- ) Create safer mooring areas across Hounslow Riverbanks;
- ) Promote a cleaner and greener borough by preventing environmental pollution and discharge of waste into the river;
- ) Provide the Council the ability to control anti-social behaviour on its river frontage;
- ) Increase public enjoyment of parks and open spaces;
- ) Provide managed moorings with appropriate services and drainage connections for waste where appropriate; and
- ) Encourage responsible mooring to protect the river and future maintenance

The byelaws will provide a means of regulating the quality/safety of the boats moored on the river in areas under the council's control and set criteria such as the ability of the boats to have pump out facilities for discharge.

The byelaws will also allow the Council to monitor boats polluting its river front and take action against specific boats. In addition, the Council received outline Cabinet approval in September 2014 to create a new marina development next to Waterman's Park. The proposal is to create 26 new moorings in Brentford. This will create job opportunities and provide well-managed, regulated mooring for houseboats.

Brentford is one of the UK's most important waterway junctions and is one of only two gateways to the canal network in London that link the River Thames with the rest of the country via the Grand Union (which follows the course of the River Brent in its lower reaches).



Boaters displaced elsewhere are now using this important gateway to moor illegally. On the River Brent. Parts of Boston manor and Cletheroe Island, nature reserve, are now being taken over by boaters, with the potential to destroy valuable wildlife habitat. The byelaws will ensure that the council can properly legislate against unlawful occupation and enable the riverside to be managed to the benefit of residents throughout the borough.

Any thought of having social moorings. Similar to social Housing

**Council response;** Various organisations including for example the Canals and Riverside Trust operate moorings to the wider benefit of the boating community.

remove the illegally moored vessels

**Council response;** Noted

I completely agree with the proposal. The boats along the river and the canals in Hounslow are a total disgrace, almost always in incredibly poor condition, full of rubbish and untidy. They are a real eyesore when walking along the beautiful banks of the Thames and the Brent rivers. They pollute the air and the water and represent a real danger for the ecosystem (not to talk about the unsocial behaviors of the owners, using the river banks as their personal space for storing building material and bulky items...). We should not only force the owners to keep them in a decent state but at least halve the total number.

**Council response;** Noted

LONDON BOROUGH HOUNSLOW; APRIL 2015.



London Borough  
of Hounslow