
**CONSULTATION RESPONSE TO THE
CONSULTATION ON THE DRAFT LONDON PLAN
BY THE NATIONAL BARGEE TRAVELLERS ASSOCIATION
2nd MARCH 2018**

1 INTRODUCTION

- 1.1 This consultation response is from the National Barge Travellers Association (“NBTA”).
- 1.2 The NBTA is a volunteer organisation formed in 2009 that campaigns and provides advice for itinerant boat dwellers on Britain's inland and coastal waterways.
- 1.3 The term “Bargee Traveller” includes anyone whose home is a boat and who does not have exclusive use of a permanent mooring for their boat with planning permission for residential use.
- 1.4 The description of the demographic includes a wide spectrum ranging from
- (a) boaters who are totally itinerant and move from place to place on a continuous basis; to
 - (b) those who keep to a clearly definable region so as to remain in contact with their place of work, a person for whom they are carer (including children who attend school); to
 - (c) those who navigate little because they have to remain close to a specific source of medical treatment; to
 - (d) those who do not navigate for reasons of infirmity; to
 - (e) those with a permanent mooring that they leave intermittently because they have a need to “move” (such a mooring may or may not have residential planning consent); to
 - (f) those with a permanent mooring that they never leave (save for, for example, annual maintenance) because the boat is provisioned with land-side services that are non-trivial to disconnect or the boat is not otherwise equipped; to
 - (g) those with a permanent mooring to which a houseboat (a floating box without an engine) is permanently moored, land-side services are permanently connected and there is no intention to navigate save for delivery in the first instance and removal at the time of destruction.
- 1.5 There are clearly scenarios that fall within these simply defined categories. For the purposes of clarity in this document the term “Bargee Traveller” is used to describe anyone who fits into scenarios (a) - (d) above and full membership of the NBTA is available to anyone who fits into these scenarios. The term “boat-dweller” is used to describe anyone who is not a Bargee Traveller, in other words who fits into scenarios (e) and (f) above and these people are eligible to be Associate Members of the NBTA. This document and the NBTA does not engage scenario (g) above.
- 1.6 The NBTA represents individuals who live on boats on UK waterways and who do so without having a permanent residential mooring. Such boaters live in an itinerant fashion, moving regularly from place to place as is either permitted or required under a number of pieces of legislation.

- 1.7 The NBTA is the only national organisation in Britain dedicated to upholding and defending the rights of itinerant boat dwellers. The NBTA has over 800 members on all the major navigation authorities' waterways and beyond. The NBTA has a number of local branches including its London branch, NBTA London.
- 1.8 The inland waterways in London are managed by three different navigation authorities: Canal & River Trust ("CRT"); the Port of London Authority ("PLA") and the Environment Agency ("EA").
- 1.9 According to the CRT annual boat count, in 2017 there were 4,786 boats on the canals and rivers which CRT manages in London. Some 1880 of these were licensed without a permanent mooring and some 2007 were licensed with a permanent mooring. The remainder were in areas (marinas and docks) where a licence is not required; trailerable boats; unlicensed boats or boats with a permanent mooring on another navigation authority's waterways.
- 1.10 The NBTA does not have any accurate statistics for the numbers of boats on waterways under the jurisdiction of the PLA or the EA in London but the overall number of boats may well be similar.
- 1.11 On CRT waterways, boats without a permanent mooring are required by Section 17(3)(c)(ii) of the British Waterways Act 1995 to travel to a different place every 14 days and by a recent CRT enforcement policy imposed in 2015 to travel in a range of at least 20 miles during their licence period, which is normally one year but may have been restricted to 6 months by CRT as a sanction for not travelling far enough.
- 1.12 The NBTA believes, based on extensive research into the British Waterways Act 1995, that this additional policy of requiring a 20 mile range is unlawful. The sanction for boats that do not comply with the law and/or with CRT's policy on movement is seizure, removal and either sale or destruction of their homes under Section 8 of the British Waterways Act 1983.
- 1.13 According to the CRT Boat Owners Survey 2017, 49% of boats on CRT waterways in London are used as a permanent home. Many of these boats will be used as homes by boaters without a permanent mooring (the term used by CRT is "home mooring" whether or not a boat is lived on). While there are many reasons for living on a boat, many do so as an affordable way to live in the capital. This includes key workers such as teachers and doctors, as well as people who would otherwise be homeless whose boat is a vital source of stability.
- 1.14 According to the 2016 CRT survey "Who's who on London's boats", 43% of those living on boats live alone; 42% of those living on boats live as part of a cohabiting couple and 12% of those living on boats live as part of a wider family group.
- 1.15 Extrapolating these figures, the London Plan will affect at least 7,600 adults and children living on boats on CRT, PLA and EA waterways in London.

1.16 Since 2009, the NBTA has campaigned for the inclusion of Bargee Travellers in the statutory duty of local authorities to assess the accommodation needs of Gypsies and Travellers, and has highlighted the policy vacuum regarding itinerant boat dwellers within both central and local government.

1.17 The Housing and Planning Act 2016 addresses this policy vacuum for the first time in Section 124. This states that local housing authorities in England must, in their periodical reviews of housing need, consider the needs of people “residing in or resorting to their district with respect to the provision of... places on inland waterways where houseboats can be moored”.

2 KEY THEMES

2.1 The NBTA proposes that the following Key Themes relate to the needs of Bargee Travellers, intersect with specific policies embodied in the Draft Plan and are addressed in this document:

ITEM	KEY THEME	POLICIES IMPACTED
2.1.1	Recognition and protection of the significant population of people using boats as homes in London without permanent moorings	D4, D8, SI14, SI15, SI16, SI17, G4, G6 H16
2.1.2	Inclusion of the community of boat dwellers within any consultation on developments affecting London’s waterways	D4, D8, SI14, SI15, SI16, SI17
2.1.3	Developments should not lead to any decrease in existing moorings and, where possible, should provide new facilities to London’s live-aboard boating community	D4, D8, SI14, SI15, SI16, SI17, G4, G6
2.1.4	Overshadowing of the waterways, which stops boats generating clean solar electricity, to be avoided	D4, D8
2.1.5	Gypsy and Traveller Accommodation requirements	H16

3 POLICY D4: HOUSING QUALITY AND STANDARDS

3.1 Policy D4 refers to bricks and mortar houses being designed, and site layout provisioned, so that each house enjoys a high level of natural sunlight. This has direct bearing on health and solar gain (in turn decreasing the energy consumption of the dwelling).

3.2 It is impractical to impose equivalent specifications onto boat construction specifications although boats are now routinely built with large but double-glazed windows and 50-100mm of polyurethane foam insulation.

3.3 In addition a large proportion (approximately 81% ^[1]) of boats use roof-mounted solar panels for electricity generation. The siting of moorings must ensure that for as much of the year as possible sunlight will not be obscured from falling on the panels because of adjacent waterside developments.

3.4 It follows that Policy D4 must include reference to and encompass mooring provision.

[1] "Sustainable cities: an environmental sustainability study on canal-boat housing in London", Grala, 19-12-2017

4 POLICY D8: TALL BUILDINGS

4.1 This policy highlights the 'visual, functional, environmental and cumulative impact of tall buildings' on their surroundings/environs. The NBTA supports the objectives of this Policy as tall buildings are becoming a feature of canal and waterside developments and can have negative impacts on boats used as homes on the waterways.

4.2 Two impacts in particular are worth making explicit within the Plan:

- 1 Buildings along waterways can contribute to a "canyon" effect which leads to strong winds forming along the waterways. This can impede navigation (including mooring of boats) on the waterways and is particularly pronounced on relatively narrow canals.
- 2 Tall buildings can lead to overshadowing and reduce the amount of direct sunlight which can reach the waterways. As stated in paragraph 3.3 above many boats which are used as homes have solar panels which can generate most or all of the power for residential needs. Efficient solar generation requires direct sunlight and without this boats need to run diesel engines to create power leading to otherwise unnecessary noise and air pollution.

4.3 The NBTA suggests that Policy D8 is amended to address these two points. In particular, the NBTA recommends that D8(1)(f), which requires buildings by the Thames to "not contribute to a canyon effect along the river" to be extended to all navigable waterways.

4.4 Regarding overshadowing, the NBTA suggests that D8(2)(g) which requires buildings to "avoid a significant detrimental effect on solar energy generation on adjoining buildings" to be widened to explicitly take into account solar generation on boats. This would align with the objectives of the London Environment Strategy.

5 **POLICY SI 14: WATERWAYS- STRATEGIC ROLE**
POLICY SI 15: WATER TRANSPORT
POLICY SI 16: WATER USE AND ENJOYMENT
POLICY SI 17: PROTECTING LONDON'S WATERWAYS

5.1 The community of boat-dwellers and Bargee Travellers is diverse, adding to the character and safety of the waterways. It should be recognised and protected as an asset of London's waterways. This can be achieved in the London Plan in four ways:

- 1 The Plan should explicitly recognise that London's waterways themselves have a residential function which must be considered and protected within this Plan and local Development Plans.
- 2 The Plan should acknowledge that Article 8 of the Human Rights Act (the right to respect for one's home) means that the needs of residential users of the waterways take precedence over the needs of recreational waterway users: there is no corresponding right to respect for one's recreational activities. Therefore where policies relating to housing are in contention with policies relating to recreation or policies relating to river transport, the policy relation to housing must carry precedence. This contention rarely arises in the case of bricks-and-mortar dwellings.
- 3 The Plan should require that the community of boat-dwellers and Bargee Travellers are consulted as part of any development affecting navigable waterways. Consultation with bodies such as CRT is not sufficient. In fact it is regularly the case that CRT would be conflicted in such a consultation as CRT is routinely an interested party in riverside development, being the seller of the land. This has caused many difficulties including for example the development at Kings Cross and the development to the east of Kings Cross.
- 4 Waterside developments should enhance the use of the waterways for boats without home moorings, in particular through the provision of simple facilities including bins, toilets, chemical toilet emptying facilities, potable water taps, showers and other waste disposal/recycling.

5.2 Currently paragraph 9.14.2, which sets out the various functions of London's waterways, does not make any reference to the waterways being used for residential purposes. This is a significant omission and the NBTA recommends that this paragraph be amended to reflect this important function of the waterways.

- 5.3 The NBTA supports the inclusion in Policy SI16 of drafting which requires development proposals to not 'negatively impact on navigation' (SI16.B and SI16D). These points should remain in the final version of the London Plan. "Navigation" is often thought of only in terms of the movement of boats. This view is too narrow. In fact "navigation" also includes the act of mooring and therefore "navigation" should also include the availability of mooring space and facilities in the same way as bricks-and-mortar dwellings require land itself, access to roads and footpaths and utilities connections.
- 5.4 Waterside developments can lead to a reduction in the provision of mooring space for boats. The NBTA considers this on the same level as impacting navigation. The NBTA therefore recommends that SI16B and SI16D be amended to include the safeguarding of existing mooring space, for example by redrafting as: "negatively impact on navigation, including existing mooring space".
- 5.5 Similarly, the NBTA would ask that SI16E be amended to also require major developments to consider the provision of new moorings and facilities for the use of all boaters.
- 5.6 There is an acute and chronic lack of basic facilities on London's waterways such as potable water taps, waste disposal facilities (for domestic waste, recycling, chemical toilets and motor oil), land-side toilets and land-side showers. For example there are only 17 water taps, 10 chemical toilet disposal facilities and 10 rubbish bins in the CRT Greater London region.
- 5.7 The deficit in facilities is noted in the briefing document issued by CRT at the commencement of the CRT London Mooring Strategy in Q4 2016. However it should not be left to CRT alone to provide facilities and developers and boroughs should also play their respective roles.
- 5.8 If included as part of the plans for developments (i.e. provisioned as a product of a "s.106 agreement") these facilities could be cost effective and simple to provide and would make a big difference to the community.
- 5.9 These provisions would also align with requirements of s.124 of the Housing and Planning Act 2016.
- 5.10 Paragraph 9.16.2 should also be amended to reflect the lack of facilities available for boaters (currently it only discusses a deficit in moorings).
- 5.11 London's community of boat dwellers and Bargee Travellers is diverse and engaged and can play a positive cooperative role in the planning process. The inclusion of boat dweller groups, such as the NBTA, as a required part of the consultation process would help to ensure that the London Plan is HRA compliant as well as enabling the community to help identify opportunities to enhance the waterways and maintain their current essential residential function.

5.12 The NBTA will welcome any amendments to the Draft Plan which would ensure the inclusion of the boating community within consultations on development, perhaps as part of Policy SI17D.

5.13 The NBTA would not see consultation with authorities such as the EA, PLA or CRT as a substitute for including boating groups. In particular, CRT frequently acts as a waterside developer and so there is an inherent conflict of interest.

6 POLICY T5 CYCLING

6.1 Any development, use or advertisement of waterway towpaths as cycle routes must protect and safeguard boat dwellers and Bargee Travellers whose homes are moored on the towpaths all year round. Boaters need to use the towpath for pedestrian access to their homes and for navigational purposes such as working locks and bridges, mooring and casting off.

6.2 Boaters also use the towpath for ordinary domestic activities such as cleaning their boat windows or simply sitting in the open air with a cup of tea.

6.3 Case law has established that the protection afforded to one's home by Art 8 of the Human Rights Act includes the immediate environs of the home and thus (to an extent) the towpath.

6.4 The progressive development and hard surfacing of waterway towpaths (as a product of laying utility ducts) for cycling and the inclusion of towpaths in cycle routes over the past 11 years or so has led to excessive cycling speeds and regular injuries to pedestrians, especially elderly people and children, and to animals such as dogs, cats and swans, caused by inconsiderate speeding cyclists who are travelling too fast to give way to these vulnerable towpath users.

6.5 The towpaths are increasingly being used for cycling time trials via the Strava web site with highly dangerous speeds being recorded. Some cyclists are deliberately aggressive towards other towpath users and believe that the towpath is a dedicated cycle route when in fact it is a shared space.

6.6 Some towpaths have become "no go" zones for pedestrians at certain times of day or in certain places. It is imperative that any development of cycling routes on waterway towpaths must protect pedestrians, boaters and animals from injury; must give priority to pedestrians; must have a safe speed limit for cycling and must compel cyclists to give way to pedestrians. The CRT campaign "More Tortoise, Less Hare" was a feeble attempt to reduce towpath speeds. Conversely railing "chicanes" have proved useful in some cities and some rural locations.

7 H16 GYPSY AND TRAVELLER ACCOMMODATION

- 7.1 Policy H16 is non-compliant as it fails to address the needs of boat dwellers as required by s.124 of the Housing and Planning Act 2016.
- 7.2 The NBTA therefore requires amendments to H16 and lays out a revised form of H16 below that the NBTA considers to be compliant. While there is no obligation on the GLC to adopt these changes, should the GLC decline to accept these (or changes materially the same as these) then the GLC will be vulnerable to judicial review for (a) promulgating non-compliant policy and (b) failing to take correcting steps when these are identified and requested.
- 7.3 The NBTA draws the attention of the GLC to the requirement laid down in the statutory guidance of Communities relating to the execution of BTAAAs ^[2]. The textual-change recommendations laid out below amount to a consultation response by the NBTA within this scope.

[2] <https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance>

Policy H16: Gypsy, ~~and Traveller~~ Boat Dweller and Bargee Traveller Accommodation

H16

- A Boroughs should plan to meet the identified need for:
- (i) permanent Gypsy and Traveller pitches;
 - (ii) permanent boat-dweller moorings;
 - (iii) Bargee Traveller transit moorings; and
 - (iv) certain Bargee Traveller facilities.
- B As of the start of this Plan period, boroughs should use the following definition of ‘Gypsies, ~~and Travellers,~~ boat-dwellers and Bargee Travellers’ as a basis for assessing need: People with a cultural tradition of nomadism, or living in a caravan or on a boat, whatever their race or origin, including:
- 1 those who are currently travelling or living in a caravan or on a boat
 - 2 those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural or habitual preference not to live in bricks and mortar accommodation
 - 3 those who, on grounds of their own or their family’s or close relative’s or dependant’s educational or health needs or old age or other Protected Characteristic, have ceased to travel temporarily or permanently.
- C Boroughs that have not since 2008 undertaken:-
- (i) a ~~needs Gypsy and Traveller Accommodation~~ Assessment in accordance with with s.225 Housing Act 2004 (“GTAA”); or

- (ii) a Gypsy and Traveller Accommodation Assessment in accordance with with s.124 Housing and Planning Act 2016 (“n-GTAA”); or
(iii) a Bargee Traveller Accommodation Assessment in accordance with with s.124 Housing and Planning Act 2016 (“BTAA”)
~~since 2008 should shall~~ either:

1 undertake:-

- (i) (based on the definitions set out above) a Gypsy and Traveller accommodation needs assessment n-GTAA; and within the first two years of this Plan period
(ii) a BTAA (based on the definition set out above) within one year of this Plan period; or

- 2 (i) in relation to caravan dwellers use the midpoint figure of need in Table 10 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment n-GTAA is undertaken as part of their Development Plan review process; and
(ii) in relation to Bargee Travellers and boat-dwellers plan for the conducting of a BTAA to be executed within one year of this Plan period.

D Boroughs that have undertaken a needs assessment GTAA, a n-GTAA or a BTAA since 2008 should update ~~this these~~ (based on the definitions set out above) as part of their Development Plan review process.

E Boroughs should undertake an audit of existing pitches, ~~and~~ sites, transit moorings, permanent moorings and facilities (whether provided by a navigation authority or the Borough) identifying:

- 1 areas of overcrowding, areas of potential extra capacity within existing sites, pitches in need of refurbishment, areas of potential extra transit mooring capacity, areas of potential extra permanent mooring capacity, moorings in need of refurbishment and Borough-provided facilities in need of refurbishment.
- 2 Boroughs should plan to address issues identified in the audits.

E1 Boroughs should undertake periodic audits of off-side (non-towpath side) land that could be used for creation of transit moorings and permanent moorings. The work product of these audits should inform the development of strategies to meet the outcomes of BTAA's.

F Boroughs should actively plan to protect existing Gypsies, ~~y and~~ Travellers, boat-dwellers and Bargee Travellers accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created. In particular where waterside developments are considered these must specifically:
(i) not curtail mooring by boat-dwellers or Bargee Travellers; and
(ii) ensure that, if not already in existence, moorings are made available for use by boat-dwellers or Bargee Travellers; and

including specifically developer

- (iii) not seek to subvert the public right of navigation (including the right to moor for a reasonable time) where this exists (specifically on natural rivers); and
- (iv) have these obligations established by means of an agreement with the developer and freeholder under s.106 of the Planning Acts (as amended).

G Boroughs should undertake BTAs in all cases where navigable water exists or is believed to exist within their boundary, even if this navigable water is not connected to the main inland waterway network.

4.16.1 Estimates show there are around 30,000 Gypsies and Travellers in London ^[59] and 7,600 boat-dwellers and Bargee Travellers ^[59a]. –Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers try to maintain this, the lack of pitches on local authority sites or mooring space (including towpath) on the waterways often presents a barrier to this.

Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches.

The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer.

A smaller number of boat-dwellers and Bargee Travellers in London have been forced to navigate in a pattern that negatively impacts upon employment, access of school children to education, ability to care of aged or disabled family members or in some cases caused the boat-dweller or Bargee Traveller to give up their home entirely.

Although no analytical research has been executed, extensive ad-hoc evidence through NBTAs casework has clarified that significant persecution of boat-dwellers and Bargee Travellers by both Boroughs and navigation authorities takes place leading to extensive physical and mental health deterioration.

[59] <http://www.londongypsiesandtravellers.org.uk/why-were-needed/>

[59a] [NBTAs Response to Chapter 4 \(Air Quality\) of Mayor’s Draft London Environment Strategy](#)

4.16.2 In this Plan, the Mayor has adopted a new definition for Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers. This is due to (a) the inclusion of boat dwellers in Section 124 of the Housing and Planning Act 2016 and (b) concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:

- Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers who have ceased to travel permanently due to some or all of:

- (i) a lack of available permanent pitches, transit sites ~~or~~ stopping places, permanent moorings or transit moorings;
- (ii) frequent enforcement action (evictions) leading to homelessness;
- (iii) imposition of onerous (and ultra vires) navigation pattern, persecution for non-compliance;
- (iv) failure to recognise a Protected Characteristic, subsequent failure to make allowance for the Protected Characteristic and subsequent enforcement action including eviction leading to homelessness;
- (v) failure to ensure that children are able to attend school;
- (vi) lack of opportunities and barriers to work

- Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers who live in (bricks and mortar) housing due to the lack of sufficient, affordable and good quality caravan site, transit mooring or permanent mooring provision; ~~or~~
- Gypsies, Travellers, boat-dwellers and Bargee Travellers who live in (bricks and mortar) housing due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect Gypsies and Travellers families who face multiple and intersecting inequalities (for example older people, people with disabilities, led Gypsies and Travellers, women and single mothers); or
- The existing Government planning definition does not include Bargee Travellers who do not travel for work but because they are required by Section 17 (3) (c) (ii) of the British Waterways Act 1995 to travel to a different place every 14 days or who travel because they do not have a permanent mooring or who travel through choice.

4.16.3 For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current Government planning definition although this is the subject of legal challenge) because

- (i) there are no viable options; or
- (ii) because doing so would have a significant impact on their health, well-being and security of income.

4.16.4 This often results in Gypsies and Travellers not being recognised or counted in needs assessments, with many needs assessments identifying zero need. This has a direct impact on the housing options available to Gypsies and Travellers, their ability to retain their cultural status and identity, and can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education. In spite of the fact that boat-dwellers and Bargee Travellers fell within scope of s.225 Housing Act 2004 no accommodation assessments of boat dwellers or Bargee Travellers were conducted and consequently the adverse effects listed above have never been assessed.

- 4.16.5 Insufficient pitch provision can also lead to a rise in unauthorised encampments, with implications for the health and well-being of Gypsies and Travellers, community cohesion and costs for boroughs. [The lack of readily available permanent moorings, the absence of Transit Moorings on the Thames and the persecution of Bargee Travellers by the navigation authority on the canal system has led to grave difficulty for this](#) demographic.
- 4.16.6 The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches. [temporary moorings space on waterways and permanent moorings on waterways.](#)
- 4.16.7 Boroughs should actively plan for [the outcomes of n-GTAAs and BTAAAs Gypsies and Travellers' accommodation needs](#), and should ensure that new sites, [new transit moorings and permanent moorings](#), are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.
- 4.16.8 To assist boroughs in meeting identified need, Mayoral funding will be available through the Homes for Londoners 2016-21 Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches. [Boroughs should note that the New Homes Bonus applies to new permanent residential boat moorings.](#)
- 4.16.9 If existing pitches, [transit moorings or permanent moorings](#) have to be re-located or re-provided within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. The community should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved.
- 4.16.10 Where new pitches, [transit moorings or permanent moorings](#) are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.
- [4.16.11 Boroughs should not create permanent moorings that replace transit moorings on waterways. Where new provision of both permanent moorings and transit moorings is being planned, boroughs should endeavour to increase the overall mooring space available for boat dwellers and Bargee Travellers by utilising sites on the off-side of the waterway \(i.e. the non-towpath side\) and should investigate the availability of such sites. Boroughs should avoid replacing 14 day temporary mooring space, which is needed by Bargee Travellers, with short-stay visitor mooring space of less than 14 days.](#)
- [4.16.12 In relation to the facilities needs of boat dwellers and Bargee Travellers, Boroughs should:](#)

- (i) inform themselves of the facilities needs (in the abstract) of boat dwellers and Bargee Travellers (for example potable water taps, chemical toilet disposal, compost toilet disposal, "pump-out" toilet holding tank provision, rubbish disposal, recycling and bulky/hazardous waste disposal; and
- (ii) identify metrics for the ratio between (a) the numbers of boat dwellers and Bargee Travellers resident in or who resort to the borough and (b) the numbers of each type of facility necessary; and
- (iii) identify the number of each type of facility provisioned (irrespective of who performs the provision; and
- (iv) where facilities are considered necessary but absent any provision, provide them.

4.16.13 Boroughs should assess the needs of boat dwellers, who have permanent moorings, for residential planning consent for the use of existing leisure (i.e. non-residential) moorings as their homes. Boroughs should develop a strategy for seeking and securing, from the LPA, residential planning consent for existing leisure moorings currently used by boat dwellers, where there is an identified need.

2nd March 2018
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