

**FEEDBACK ON THE INFORMAL PUBLIC CONSULTATION ON
Houseboat Mooring Guidance**

	Consultee	Organisation	Summary of Feedback	PLA Response
1.	CHARLIE SKRINE	Qualified Kayak Coach	<p>Thank you for your invitation to comment. I am replying as a qualified kayak coach who takes groups of kayakers onto the tidal Thames between Greenwich and Vauxhall.</p> <p>I have no comment on the vast majority of your advice which looks excellent.</p> <p>My only comment relates to the siting of new houseboats etc. Please would you continue to give a high priority to considering the impact of siting them on recreational small craft users. I can think of several ways they make an impact: a) Where they are positioned in relation to the bank can have the effect of forcing small craft into the fairway. That exposes small craft to greater current, and to the risk of impeding other shipping. The correct distance will obviously depend on the underwater profile at that location. I can get groups of kayaks through safely with a depth of only 20cm and a width of c.5 metres. If such a passage was available at nearly all states of tide then that would keep us out of the way of other shipping more effectively. The boats moored on the North bank when approaching Tower Bridge from the East are a good example of this; those on the South bank are not. b) Where they are positioned in relation to the normal fast flow of current has an impact on the risks faced by small craft. Our greatest risk is of being swept under a fixed object (like a houseboat.) Sometimes moving the proposed site 100m up or down stream, or in or out from the bank by a relatively small amount, would reduce the risk significantly.</p>	<p>Thank you for responding to our consultation.</p> <p>We will put you in touch with our Assistant Harbour Master (Recreational) Darren Knight, who can liaise regarding any further questions on this subject. We recommend clubs to have Risk Assessments and Passage Plans in place to highlight hazards on the river to their members. We also produce a range of safety and navigational guidance documents aimed at recreational boaters.</p> <p>It should be noted that new houseboat moorings go through a River Works Licensing process and the impact on Safety of Navigation is considered by the Harbour Master, to include recreational craft.</p>
2.	ED FAWSETT		<p>Looking at your online document, I see the emphasis seems to be on improving the experience of those living in houseboats. I think it should be said that houseboats are much like caravans in public parks, which is to say visually intrusive, obstructive and polluting. I have seen the contents of chemical lavatories emptied over the side into the river, and understand that conventional water toilets can be pumped out into the river.</p>	<p>Thank you for responding to our consultation.</p> <p>This guidance is focussed on mooring arrangements for houseboats, rather than the design however the discharge of sewage into the Thames is prohibited by PLA Byelaws and would</p>

			<p>Specifically, houseboats impede navigation for human-powered boats and present a real threat to life as Dove Pier, for example, has demonstrated many times. Ideally they would all be removed. At the very least I believe that they should all be fitted with handholds to assist anyone falling into the river. It would also be a commonsense measure for them to be equipped with life rings and throwlines. When human powered boats have become entangled with houseboats and the occupants have appeared, they seldom seem to be of any use in effecting a rescue.</p> <p>Let's remember that the presence of houseboats is what often causes these collisions, and that there are many children and beginners at rowing, canoeing, paddle-boarding and sailing on the river.</p> <p>I understand that houseboat owners are charged for their moorings at the same rate as rowing clubs are charged for pontoons? Could you clarify that?</p>	<p>take appropriate enforcement action where this is not being adhered to.</p> <p>It should be noted that new houseboat moorings go through a River Works Licensing process and the impact on Safety of Navigation is considered by the Harbour Master, to include recreational craft.</p> <p>River Works Licensing fees are considered on a case-by-case basis – through extensive consultation with residential river users a specific charging regime has been established for residential vessels. A houseboat's mooring fees would typically be more than that for a rowing club pontoon.</p>
3.	ANDREW STANWAY		<p>Overall, not unreasonable to have some Guidelines but they must be tailor-made to every individual vessel and location to make any sense. It must also be made clear that these are indeed for guidance and help only and that they will not be followed by draconian measures that would put people's homes at risk. In many locations some vessels are doing nearly as well as they are able, given the local circumstances.</p> <p>Any notion that 'one size fits all' will produce a lack of response and cooperation.</p> <p>The matter of who will pay for anything other than the simplest of mooring and fendering changes must be addressed in a cooperative way between all the parties.</p>	<p>Thank you for responding to our consultation.</p> <p>This document is intended to be general guidance and applicable to all houseboat owners – however each vessel should consider its location and typical conditions when following this guidance.</p> <p>This guide covers the main principles of long term vessel mooring and it is the responsibility of the houseboat owner / facilities to ensure it is adequately moored and bear any associated costs.</p>
4.	RICHARD JENKINS		<p>I just wondered whether it'd be prudent to include some recommendations about using suitable cable for mains electricity supply to houseboats - many seem to use domestic-grade cable which isn't rated for external/marine use - nor is it usually rated for the high current that could end up flowing (usually it's ~15A, when I'd say it should be ~50A rated or so).</p>	<p>Thank you for responding to our consultation.</p> <p>This guidance is focussed on mooring arrangements for houseboats, rather than design or layout of the amenity connections; however your comments are still valid, but unfortunately we are not in a position to recommend appropriate cable sizes for residential vessels.</p>

5.	RICHARD BRITTLEBANK		<p>Many thanks for including me in your consultation invitation - I have read the Consultation draft of your Guidance document Houseboat Mooring First edition, 2016 with interest and note that no mention is made of gangways. Is this because that particular topic is not within your mooring guidance remit?</p> <p>Gangways are addressed in detail on page 59 of your PASSENGER VESSEL OPERATIONS A Code of Practice for the Tidal Thames – Third edition (2016) and whilst I appreciate that it would probably be unnecessary and in any event, impractical to try to impose passenger vessel standards on houseboats, with the ever-present risk to all forms of marine craft of gangway incidents, some practical guidance might not go amiss?</p> <p>Best regards & keep up the good work.</p>	<p>Thank you for responding to our consultation.</p> <p>We have taken on board your comments and included a small section on access arrangements for houseboats.</p>
6.	HILARY PEREIRA		<p>I am commenting as an individual on the guidance currently out for consultation on houseboat moorings</p> <p>The purpose appears to be to help houseboats mitigate the impact of wash, a particular issue at some pontoon moorings like at Hermitage. Although not clear why guidance is needed just for houseboats rather than all boats at these moorings, the document should be helpful in this aim</p> <p>However, it risks being over-prescriptive and as such could have unintended consequences for residential boat owners at other sorts of moorings, especially on the upper reaches. There are several perfectly satisfactory bankside moorings without pontoons, where mooring to pilings is and should remain acceptable. Ground chains are not mentioned but have their uses in the right locations. Whatever the formal classification of the waters, it is alarmist to suggest wave heights of 1.2m have to be anticipated, eg inside Brentford Ait or Eel Pie island. To imply only boats of the types mentioned are appropriate appears to challenge the many smaller boats, like narrow boats, that have proven perfectly satisfactory at some sheltered moorings on the Tideway. So 'facilities and vessels should be able to withstand the prevailing conditions' needs to relate more firmly to the mooring in question. Any specification of what residential boats 'should be' risks straying outside the PLA's formal powers.</p> <p>My concern would be reduced if: (a) it was confirmed as helpful non-mandatory guidance and (b) of most direct relevance to only some residential moorings on some sections of PLA waters and (c) removing any suggestion that it contains 'requirements' which have to be met when RWLs are</p>	<p>Thank you for responding to our consultation.</p> <p>There is an array of guidance from the RYA on mooring vessels; however houseboats are unique vessels in that they are permanently moored and lived on. Mooring ropes perish over time and are generally checked less frequently than ropes used and handled on a regular basis. As such, mooring arrangements should be more robust than a vessel moored temporarily.</p> <p>We have amended the guidance to remove the implication that houseboats need to be moored to a pontoon however, this document is intended to be general guidance and applicable to all houseboat owners - each vessel should be considered on a case-by-case basis on it's location and size.</p> <p>The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance needs to reflect this. There are areas</p>

			determined.	<p>of the river that 1.2m waveheight is uncommon, however mooring arrangements must have a certain degree of safety allowance, account for extreme situations and account for unlawful vessels creating excessive wash. It would not be safe to presume there will be benign conditions all of the time on the Thames.</p> <p>We have also amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions.</p> <p>It should be noted that new houseboat moorings go through a River Works Licensing process – there are a variety of conditions and requirements stipulated on all River Works Licences and we would expect houseboats to be suitably moored as part of the approval. In addition, we do not recommend ground chains for houseboat moorings.</p>
7.	ANDREW WALLACE		<p>This email is in response to your consultation draft 'Houseboat Mooring'. I write as somebody who has lived afloat in the Port of London for over 25 years, moored at Swan Island in Twickenham.</p> <p>The predominant reaction from here must be disbelief: the draft may have relevance to houseboats moored below Tower Bridge, or elsewhere where there is no speed limit, but the proposals are completely different from current best practice here at Swan Island.</p> <p>The main points of concern are: # size of the wash. The draft states that wash of 1.2 metres is acceptable, and that is definitely not the case here, where wash of 0.15 m is uncomfortable. Neither vessels nor facilities here could withstand 1.2 m of wash: there would be widespread damage and danger. Many boats here are moored in shallow waters: a wave that size would break into</p>	<p>Thank you for responding to our consultation.</p> <p>The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance needs to reflect this. There are areas of the river that 1.2m waveheight would not be common.</p> <p>We have slightly amended the wording suggesting rope of diameter 40mm; however mooring arrangements must have a certain degree of safety allowance, account for extreme situations and account for unlawful</p>

			<p>surf, increasing its potential for devastation. Slipping operations, and boats moored abreast for the PLA's annual draw off, would be particularly vulnerable.</p> <p># the size of mooring lines. My boat is not the smallest here, and is about 10 m long. I buy mooring lines of the size recommended by chandlers, which are a fraction of 40mm diameter listed in the draft.</p> <p># residential boats to be Dutch or Thames barges. As stated, my boat is not that large, and there are other small boats lived on here. Other boats at Swan Island are houseboats: rectangular floating boxes, intended to be immobile homes afloat.</p> <p>It appears that an oversight by the PLA has resulted in a draft document which is, in key respects, absolutely inappropriate for Swan Island. I would be grateful if you could confirm, as soon as possible, that the draft is not intended to apply to those living afloat on Swan Island. It would be a waste of time for both of us to contest a document which is not intended to apply here.</p> <p>I am copying this response to the Managing Director of Swan Island.</p>	<p>vessels creating excessive wash. It would not be safe to presume there will be benign conditions all of the time on the Thames.</p> <p>This document is intended to be general guidance and applicable to all houseboat owners – however each vessel should be considered on a case-by-case basis. If the PLA were to be involved in some form of incident investigation regarding a houseboat experiencing wash for example, the factors such as location, vessel type and the passing vessel itself would all be considered by an investigating officer.</p> <p>We have also amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions.</p>
8.	BARRY SINGLETON		<p>We are the holders of 2 River Works Licences for barges at St Mary's Churchyard, Battersea. In general terms we recognise the good sense of providing a moorings guide, provided that it is accepted that it is no more than a guide and does not have the writ of a rule of law.</p> <p>Much of the suggested guidance is sensible. However there are various matters with which we disagree.</p> <ol style="list-style-type: none"> 1. The Tidal Thames: You rightly refer to the tidal Thames being defined as Category C. But defining the Thames in this very general way when dealing with houseboats is inapt. It is true that a Category C waterway means that any vessel can expect a wave height of up to 1.3m. Wave heights of 1.3m may reasonably be expected in Sea Reach. However that should not be the expectation when referring to the Thames upstream from Wapping. Above Wapping it must be extremely unlikely to expect waves higher 	<p>Thank you for responding to our consultation.</p> <p>Houseboats are unique in that they are permanently moored and lived on. Mooring ropes perish over time and are generally checked less frequently than ropes used and handled on a regular basis. As such, mooring arrangements should be more robust than a vessel moored temporarily.</p> <p>The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance needs to reflect this. There are areas of the river that 1.2m wave height would not be uncommon and indeed naturally occurring waves over 1m are</p>

			<p>than about 0.3m unless generated by inconsiderate creation of wash from ship movements. You are well aware of the outcry that there has been on the river during the past year or so, mainly as a result of the activities of Thames Clippers, and you have increasingly recognised the justice of the complaints that have been made and taken steps to address them.</p> <p>If, as we suggest, it is not reasonable to require houseboats in the Thames above Wapping to have to deal with wave heights of as much 1.3m rather than, say 0.3m, your advice, if based on such a requirement, therefore exaggerates the extent and size of the provision that should be made to ensure that moorings are secure. Your advice is therefore somewhat devalued.</p> <p>2. Your advice that ropes should be 40mm min. diameter is presumably because you rely on the Category C classification. It seems an arbitrary and excessive size for a houseboat above Wapping. We have a 170 ton 30m Dutch barge that we take all over Europe. The TRIWV regulations do not require such a diameter rope as you suggest and we suggest that for many barges a 20mm or 26mm rope would be ample. You seem to recognise that your 40mm figure should not apply to every boat as you suggest that the boat owner refers to his supplier. We suggest that you should simply say that the rope used should be suitable for the particular boat on the particular mooring. At the end of the day that is all that can reasonably be required.</p> <p>Finally, the guidance cannot be used as a substitute for dealing with the wash issues that continue to arise. We recognise that you are taking some action in that regard but we are concerned that you should not use a failure of a boatowner to comply to the letter with your Guide to be used as an excuse to justify excessive speed creating wash on the river.</p> <p>Yours faithfully,</p> <p>Barry & Anne Singleton</p>	<p>not uncommon at Putney.</p> <p>We have slightly amended the wording suggesting rope of diameter 40mm however mooring arrangements must have a certain degree of safety allowance to account for unusual situations giving due consideration to the potential conditions. It would not be safe to presume there will be benign conditions all of the time on the Thames.</p> <p>This document is intended to be general guidance and applicable to all houseboat owners – however each vessel should be considered on a case-by-case basis. We are more than happy to visit a houseboat mooring to provide advice.</p> <p>Regards to the wash issues you refer to, this guide is intended to ensure houseboats are moored as securely as possible, can withstand routine conditions of the river and be equipped to deal with extreme conditions without compromising the integrity of the mooring – however this in no way excuses excessive wash from vessels for which we will take enforcement action where necessary.</p>
9.	DAVID SPRING		<p>As the IWash representative for houseboat residents of Nine Elms Pier/Tideway, I would voice the following comments on your new mooring guidelines for public consultation, and have circulated them to residents.</p>	<p>Thank you for responding to our consultation.</p> <p>This document is intended to be</p>

		<p>NEP/Tideway IWash rep.</p>	<p>There is much of concern within these guidelines, and it was noted in preliminary discussions with the IWash steering committee the PLA have already referred to them as a code – and therefore doubtless aimed ultimately to be enforceable ;</p> <p>The mooring requirements quoted seem unnecessarily stringent and thereby expensive, and unsuitable for all scenarios anyway. For instance - many boat cleats/posts will not safely accommodate the 40mm rope specified, and damage to a mooring line is often far preferable to damage to a cleat or it's boats supporting structure. [The specified 6 mooring ropes of 40mm polyprop doubled, has a total breaking strain of 1.7 mega Newtons - the same as 6 Jumbo jets at full thrust]</p> <p>The PLA's current stance conveniently chooses to ignore the overriding longstanding bylaw on wash ; The Thames Navigation Licensing and General Byelaws 1993 Byelaw 26, safe speed: The master of every vessel shall navigate such vessel at all times at a safe speed and with due care and caution to prevent avoidable damage or unreasonable disturbance to persons, other vessels or moorings or the river banks and in such manner as to show reasonable consideration for all persons and property in upon or about The Thames or the banks or towpaths thereof or any land of the authority.</p> <p>Instead your guidelines highlight the historic bureaucratic quirk of our tidal Thames moorings being in category C waters [waves of up to 1.2m - unseen here !] in order to somehow exonerate excessive boat wash – a very different entity in both cause and effect ?!</p> <p>You allow numerous exemptions to the current longstanding 12 knot speed limit here – under paid licence.</p> <p>You create passage plans for the Riverbuses to pass residential moorings based on the arbitrary 12 knot speed limit, whilst asking their skippers to take into account a maximum tide speed of just 3.5 knots [the Inspector of River Police quotes up to 8 knots] – and in the full knowledge the Riverbuses have no accurate speed indicators fitted anyway !</p> <p>Your retrospective diktat on boat suitability for the tidal Thames is of even greater concern – up to 8 of the 15 boats left on Nine Elms Pier alone seemingly now deemed unsuitable, purely in</p>	<p>general guidance and applicable to all houseboat owners – this will not be referred to as a 'Code'. Each vessel should consider its location and typical conditions when following this guidance. We are more than happy to visit a houseboat mooring to provide advice.</p> <p>We have slightly amended the wording suggesting rope of diameter 40mm, however it is not an uncommon occurrence for 40mm ropes to break when being used on commercial vessels – ropes deteriorate over time and additional load such as snatching can be placed on ropes during bad weather conditions, strong river flows or incorrect mooring arrangements.</p> <p>All users of the tideway have a duty of care to ensure their vessel is safe and can endure any potential conditions. However, we have included in the guidance: <i>"This guidance does not remove the master's responsibility for reducing wash when passing a moored boat or structure."</i></p> <p>The Byelaws you refer to are the Environment Agency's Byelaws for the non-tidal Thames above Teddington in West London and therefore are not, and have never been, applicable to the tidal Thames. Notwithstanding this the PLA ensures our byelaws are enforced and our recent efforts in this respect have been made public and have resulted in a significant reduction in wash complaints demonstrating the PLA's commitment to addressing this issue.</p> <p>The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance</p>
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10.	MICHAEL WOOLF		<p>Thank you for sending me a copy of the draft Houseboat Guidance document.</p> <p>Many of your colleagues including in particular Ben Fanning will know that I have been heavily involved in matters relating to moorings and vessels on the Tidal Thames for more than 25 years and during that time have acted for a wide variety of boat owners and mooring owners.</p> <p>If the guidance notes to which you refer relate specifically to residential houseboats as opposed to other moored vessels including non-residential leisure boats, restaurant boats etc., this naturally limits my relevant experience.</p> <p>Likewise, if your consultation notice relates essentially to “safety of navigation” this again limits the areas where my experience would be relevant.</p> <p>If on the other hand you are interested in all aspects of mooring all types of vessels on the Tidal Thames and the problems that arise in trying to establish such moorings and subsequently managing them that is something where I might well be able to make a useful contribution.</p> <p>I attach a photograph of the moorings on the Seine in Central Paris. It maybe that there is something to learn from many rules and regulations that apply to these vessels.</p>	<p>Thank you for responding to our consultation.</p> <p>This document is intended to be general guidance and applicable to all houseboat owners.</p> <p>Houseboats are unique in that they are permanently moored and lived on. Mooring ropes perish over time and are generally checked less frequently than ropes used and handled on a regular basis. As such, mooring arrangements should be more robust than a vessel moored temporarily.</p>
11.	ANDRE BURBIDGE	Hope Pier Limited	<p>Thank you for giving us the chance to comment on this document. Hope Pier is located on the Middlesex bank about 150 metres above Hammersmith Bridge.</p> <p>Wave height up to 1.2 metres</p> <ol style="list-style-type: none"> 1. Notwithstanding the MCA Categorisation, the waves caused by wind and tide at our location in the upper reaches of the tidal Thames, are nowhere near this height. 2. Furthermore, the turbulence arising from storm conditions is directional, predictable, occasional and, in these sheltered waters, of limited power. It is entirely different in character from the wash caused by vessels passing at speed, which has considerable force and steepness, comes from different 	<p>Thank you for responding to our consultation.</p> <p>We were not made aware of incidents or issues arising from last year’s boat race. We welcome near miss and incident reporting so that we can focus our efforts in reducing the likelihood of any incident. For 2017’s boat race, we will ensure there is a closer link with houseboats that may be affected.</p> <p>The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance needs to reflect this. There are areas of the river that 1.2m waveheight are</p>

		<p>directions, and, if vessel movements are frequent, is persistent and anarchic.</p> <p>3. As far as we are aware, storm conditions during the past 30 years have caused no significant damage to boats moored at Hope Pier (many of which are narrow boats), nor to the infrastructure. The wash from vessels travelling at speed (e.g the infamous fireboat and the flotilla of vessels following the university boat race) has threatened life and limb, caused breakages and damaged boats and infrastructure.</p> <p>4. We consider the reference to wave heights of up to 1.2 metres to be a red herring. The document should make it clear that the perpetrators, not the victims, are responsible for the adverse affects of excessive wash, and that the PLA will rigorously enforce Byelaw 57 concerning wash and draw off.</p> <p>Reporting wash</p> <p>5. Serious wash has been reported in the past by individuals moored at Hope Pier. With regard to the university boat race, the wash from the racing boats and official launches is manageable, but the vessels following the last race generally pass too close and too fast, far in excess of the 8 knot speed limit, generating a hazardous and destructive wash. The problem did not occur in 2015 after a complaint had been made. The company will monitor, record and report any future incidents, and would welcome the opportunity to discuss the issue with the PLA to see if appropriate measures could be adopted every year.</p> <p>Guidance or requirements?</p> <p>6. The document refers to "the requirements of this guidance". Is the document mandatory or advisory? If both, which bits are which? It is unsatisfactory for the document to purport to be "guidance" if it is, in fact, intended to be "requirements".</p> <p>Pontoon facilities</p> <p>7. Depending on the circumstances, pontoons could also be securely attached to the bank or to chains and anchors instead of piled structures. The document provides some useful advice, but, in our view, is too prescriptive if intended to be mandatory.</p>	<p>uncommon, however mooring arrangements must have a certain degree of safety allowance, account for extreme situations, snatching and account for unlawful vessels creating excessive wash. It would not be safe to presume there will be benign conditions all of the time on the Thames.</p> <p>However, we have amended our guidance to include the following wording: <i>"This guidance does not remove the master's responsibility for reducing wash when passing a moored boat or structure."</i></p> <p>We ensure that commercial operators are made aware of Byelaw 57 and we continue to enforce this where necessary however, we feel this guidance is not the appropriate place to include advice to navigating vessels.</p> <p>This document is intended to be general guidance, showing best practice. Each vessel should consider its location and typical conditions when following this guidance. However, we would expect all new houseboat river works licence applications to meet best practice as per this guidance, as part of our approval process.</p> <p>We have amended the guidance to remove the implication that houseboats need to be moored to a pontoon. We have also amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions.</p>
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			<p>Boats</p> <p>8. Narrow boats are generally flat-bottomed, robustly constructed, take the ground readily, and cope well with wind and tidal conditions when moored in sheltered inland waters such as these. We would be unable to obtain insurance for our boats if this were not the case. By virtue of their size, narrow boats are also easier to maintain and provide accommodation for smaller households. We object strongly to the exclusion of narrow boats from new residential moorings on the tidal Thames in favour of larger, heavier vessels. We would regard it as a violation of our fundamental human rights if any restrictions were introduced, which prejudiced the continued existence of our residential boats and moorings at Hope Pier.</p> <p>Mooring lines</p> <p>9. Our understanding is that polypropylene rope is more prone to UV deterioration, and less strong and elastic than polyester or nylon rope. Also 40mm Ø is far too thick for tying to the mooring points on smaller boats, such as narrow boats. Even if it could be tied, such rope would be disproportionately strong and could lead to the bollards and cleats to which they are attached being damaged. The arrangement of mooring lines will also depend on the shape of the vessel. This section seems over-prescriptive and inappropriate for many circumstances.</p> <p>Fenders</p> <p>10. The humble tyre is inexpensive and easy to install and replace, does not rotate and transfer paint from one surface to another, as many pneumatic fenders do, and involves re-use rather than disposal of a natural resource. When used as beds beneath houseboats, they also provide a habitat for invertebrates, which is particularly valuable in areas where persistent wash has removed the mud and silt to the detriment of wildlife. Useful advice could include not allowing fenders to dangle in the river, causing flotsam to become trapped.</p> <p>We trust the PLA will take account of our views.</p>	<p>We have slightly amended the wording suggesting rope of diameter 40mm however mooring arrangements must have a certain degree of safety allowance.</p> <p>We acknowledge that using recycled tyres as fenders is a suitable option; however there are environmental impacts when used for 'tyre beds', as well as navigational hazards if they float free.</p>
12.	ANDY SOPER		Thank you for the opportunity to comment on your draft of a Guidance Document for Houseboat Moorings.	Thank you for responding to our consultation.

		<p>Chairman, DBA - The Barge Association,</p>	<p>DBA - The Barge Association is a UK based club for anyone interested in barges and barging and many of our members, including myself, live on board full-time. We have some 1500 members owning over 1000 craft. Publishing a guidance document is a very good idea and most of the advice is sound. However we do have a number of comments that we believe could improve your document:</p> <p>The Tidal Thames 'The waterway is defined as Category C by the Maritime Coastguard Agency, which means any vessel can expect a wave height up to 1.2m'. The waterway is the Thames Estuary and while significant natural wave heights can be expected in Sea Reach and beyond it must be extremely unlikely to encounter waves much above 0.3m except when enhanced by inconsiderate wash from ship movements from Wapping upstream. It is a quirk of history that the categorisation procedure lumped the estuary and the river into one category. We do not agree that the Thames upstream from Wapping, where most houseboats are moored, merits C classification and this distorts and devalues some of your advice.</p> <p>Pontoon Facilities 'Service lines' - we suggest that 'Shore service connections' might be a better understood term and avoid confusion with 'mooring lines'.</p> <p>Boats It would be appropriate to add some words here relating to the strength and size of bollards and cleats on the houseboat - or to expand later paragraph on Bollards, Cleats and Rings. The adjacent photograph shows a barge with very slack stern lines and no aft breast line although a suitable bollard is visible in the picture.</p> <p>Mooring Lines While 40mm may be appropriate for a large Thames lighter it is likely to be overkill for many other craft. Our 21m / 70 ton barge has 3 mooring ropes of 26mm diameter which exceed the requirements of the EU TRIWV regulations but are rarely needed even when mooring on large commercial rivers and canals. Smaller 20mm lines are much easier to set up, can be secured to mooring bollards much more effectively. We suggest that your wording reflects the advice given in the bollards and cleats section 'Have a diameter sufficient for the size of vessel (which for a Thames lighter sized vessel would</p>	<p>The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance needs to reflect this. There are areas of the river that 1.2m waveheight are uncommon, however mooring arrangements must have a certain degree of safety allowance, account for extreme situations, snatching and account for unlawful vessels creating excessive wash. It would not be safe to presume there will be benign conditions all of the time on the Thames.</p> <p>We have taken on board your comments on 'Service Lines' and made the amendment you suggested.</p> <p>Regarding your comments on the images – we will endeavour to find replacement photos before this document is published however subsequent versions will have replacement imagery.</p> <p>We have slightly amended the wording suggesting rope of diameter 40mm however mooring arrangements must have a certain degree of safety allowance and considered on a case-by-case basis.</p> <p>We have also amended the section on fenders, taking on board your comments.</p> <p>Wash assessments have been carried out to determine the impact of vessels travelling at varying speeds and the wash created. The PLA is working on ensuring commercial operators' schedules have suitable allowance for reducing speed and we continue to discuss matters of wash with both the river community and commercial operators to ensure their passage</p>
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			<p>be 40mm diameter)'. Further on it is suggested that the lines should be the weakest point of the mooring system which seems to conflict with the 40mm diameter requirement as well. We suggest that the paragraph in italics be changed to read 'Best practice is to double up all mooring lines for secure, long term mooring' - although this again conflicts with the weakest point paragraph.</p> <p>Mooring Bollards, Cleats and Rings Rings are mentioned in the heading but not in the text? Fenders Not sure how it can be assessed that tyres are 'fit for purpose'. They will presumably have been retired from vehicle service as not fit for purpose. We suggest 'Tyres, if used, should be replaced periodically as the tyre loses its effective dampening ability with time'</p> <p>The adjacent photograph shows a barge with a spring that is so slack as to be underwater, its lead is fouling two fenders and it is not doubled up - not best practice.</p> <p>Conclusion The Guidance Document, with some changes, will provide good advice to existing moorers and provide a basis for review of arrangements for provision of new moorings. It will not, on its own, solve the wash issues that exist on the Thames. As we have commented, above Wapping, waves are created by vessels proceeding too fast for the prevailing conditions, especially at low water and when boats are taking the ground or floating off. Speed limits help mitigate wash issues but must be seen as a maximum speed and not a target passage speed. Commercial operators must set a lead by ensuring that there is sufficient slack in schedules for skippers to set a speed that does not force them to press on without regard to others and by following the lead, given by the PLA, by specifying and purchasing low wash craft. It is inappropriate speed that causes wash issues and this must be your primary focus of operations management for the safety and comfort of all river users. Happy to clarify any comments or provide further feedback.</p>	<p>plans are appropriate.</p> <p>We have amended the guidance to include the following wording: <i>"This guidance does not remove the master's responsibility for reducing wash when passing a moored boat or structure."</i></p>
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13.	BERYL MCDOWALL		<p>The Residential Boat Owners' Association (RBOA) has members living on a wide variety of craft, both wide and narrow beam, and of a variety of styles, on the rivers and canals of Britain, and on tidal waters, creeks and harbours.</p> <p>This Association supports the principle of a guidance document, as evidenced in your Consultation Document, and supports the points raised by Clive Wren (from Hope Pier</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the wording suggesting rope of diameter 40mm, as well as the wording in the fender section however mooring arrangements must have a certain</p>
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		RBOA General Secretary	<p>Moorings) and by The Barge Association. However, we feel that the guidelines for mooring lines and fenders are far too prescriptive, and in some cases too prescriptive, taking into account the wide range of craft to which they are likely to be applied.</p> <p>The RBOA believes that the PLA's current perceived need for improved mooring of boats is an unacceptable solution to solve a problem caused by various vessels capable of high speeds, including the Clippers operating a passenger boat service on the Tidal Thames above Wapping; such craft, even though some are designed as low-wash craft, are frequently seen to be travelling far too fast. Whilst there may have been the odd craft in the past causing unacceptable wash, the current perceived problem with the mooring of boats appears to have been exacerbated by the range of vessels currently using the river. It is RBOA's view that it is these which need improved regulation, not the boats moored on the tideway. Additionally, we are given to understand that on some waters "low wash areas" have been established to help counteract this wash problem.</p>	<p>degree of safety allowance and considered on a case-by-case basis.</p> <p>It is the responsibility of the houseboat owner / facilities to ensure it is adequately moored and that mooring arrangements have a certain degree of safety allowance, account for extreme situations, snatching and account for unlawful vessels creating excessive wash. It would not be safe to presume there will be benign conditions all of the time on the Thames. However, we have amended the guidance to include the following wording: <i>"This guidance does not remove the master's responsibility for reducing wash when passing a moored boat or structure."</i></p> <p>Wash assessments have been carried out to determine the impact of vessels travelling at varying speeds and the wash created. The PLA is working on ensuring commercial operators' schedules have suitable allowance for reducing speed and we continue to discuss matters of wash with both the river community and commercial operators to ensure their passage plans are appropriate.</p>
14.	GLYN RICHMOND	Pier Master – Imperial Wharf Marina Ltd.	<ul style="list-style-type: none"> Wave heights of 1.2m are not a great concern, the surging caused by the Clippers is, attention should be drawn to all commercial and private vessels that due care and consideration should be shown when passing residential and or small boat moorings – this, after all, is basic marine etiquette and should be shown by ALL river users. Driftwood/Rubbish collection, there seems to be more driftwood in the River this year than in the past, some are a considerable danger to moored vessels of any size, but particularly for small GRP/Wood vessels, we her at Imperial have had trees, timber dockside fendering and gas bottles 	<p>Thank you for responding to our consultation.</p> <p>We ensure that commercial operators are made aware of Byelaw 57 and we continue to enforce this where necessary however, we feel this guidance is not the appropriate place to include advice to navigating vessels</p> <p>300 tonnes of 'driftwood' is removed from the Thames every year and we</p>

			<p>jamming in between the boats and the pontoons, this is inherently dangerous. I would ask that this aspect of the River clean-up is increased for safety factors.</p> <ul style="list-style-type: none"> No mention in the consultation paper has been made for allowing enough slack in cabling/services etc from shoreside to vessel to allow for movement of the vessel. Adequate slack must be allowed to allow for services to enter the vessel. Extreme weather, it would be helpful to be informed either by Notice to Mariners or email of any extremes in weather or tide that may not be obvious to vessel owners, ie. The datum tide of a couple of years ago, which caused a lot of problems for small vessels running aground with no warning. Use of Mooring Compensators, I have advised all my berth holders of the value of using Mooring Compensators in their Mooring lines, I use them on all my lines and they have proved invaluable in negating the snatch and tug of the lines on the cleats and bollards shoreside, also saving the lines themselves from breaking under duress. <p>The above comments are drawn from the experiences noted at Imperial Wharf Marina, where we have an eclectic mix of vessels from 38m Dutch barges to 7m speedboats and all sizes and configurations in between.</p>	<p>are looking at installing more driftwood collectors in the river to increase this number. We also support charities such as Thames 21 to make the river cleaner.</p> <p>We have included advice in the guidance for ensuring adequate slack in service lines.</p> <p>We publish our tide predications online and in September 2015, we issued a Notice to Mariners to advise river users of predicted high (and low) astronomical tides, however we would not be able to do this for short notice extremes in weather or tide. We recommend that a vessel is able to safely moor at all tide states.</p> <p>Mooring compensators do have their uses in certain situations however in some cases they can make the movement of a houseboat worse, which is why reference to these is not included in the guidance.</p>
15.	CRBA LIMITED	CRBA	<p>We continue to act on behalf of the CRBA Limited.</p> <p>We write with reference to your consultation notice on houseboat mooring guidance dated 11 October 2016 . This letter should be treated as our client's feedback/response to the consultation .</p> <p>Our client does not understand what has prompted the need for this new mooring guidance and our client requests that the PLA provides reasons for this proposed change by return.</p> <p>Our client is aware that Oplac and other individual houseboat moorings, including Hope Pier; The Barge Association; and Nine Elms have submitted their objections to the proposed new guidance . We confirm that our client agrees with , and herein adopts, those objections to the proposed guidance .</p>	<p>Thank you for responding to our consultation.</p> <p>All users of the tideway have a duty of care to ensure their vessel is safe and can endure any potential conditions. The purpose of this to give general guidance and show best practice on how to achieve safe mooring.</p> <p>In response to your queries: a) The PLA is responsible for safety on the tidal Thames and our powers stem from the Port of London Act, which is available to view on our website.</p>

			<p>Moreover, our client queries (a) the PLA's entitlement to issue such the new guidance ; (b) the enforceability of such guidance if it is issued; and (c) its legal status? We should be grateful if you would provide clarification of this by return .</p> <p>Finally, in your consultation notice you state that the PLA Wash Forum has "reviewed and commented on" the guidance . However, we understand that some participants in the Forum have objected to the proposed guidance, on the basis that it appears to apply retrospectively to make many boats not fit for purpose. Our client notes with concern the PLA's failure to bring this to the attention of all boatowners .</p>	<p>The Port Marine Safety Code states that Port Authorities must identify risks within their harbour limits and reduce that risk to as low as reasonably practicable. This guidance serves as a control measure to that risk.</p> <p>b) The PLA issues licenses for any 'works' in, on or over the Thames. This river works licensing process includes consideration on planning grounds, engineering and navigational safety, as well as other factors. We would expect all new houseboat river works licence applications to meet best practice as per this guidance. The document is intended to be guidance and therefore, is not directly enforceable.</p> <p>c) The guidance document is intended to demonstrate best practice. If for example during an incident investigation where a passing vessel created wash which caused damage to a mooring and the mooring arrangements are found to be inappropriate, then this will have a bearing on the investigation outcome.</p> <p>The PLA set up the wash forum so that we could better communicate initiatives, such as this guidance, to the river community. Our informal consultation process includes 6 weeks consultation online and those that are set up to receive Notice to Mariners receive notifications of our consultations.</p>
16.	MATTHEW WHITTELL		<p>I am the owner of a houseboat (Broedertrouw II) moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and</p>

			<p>While most of your draft guidance concerns aspects of mooring which are the business of CYBC, I have specific concerns in connection with your proposed guidance on the types of houseboats that may be moored (under the heading "Boats"). This guidance is unduly prescriptive, seeking to specify both types and sizes of possible houseboats. PLA should not be in the business of specifying craft, but of stating sound principles based on important criteria (such as the ability to withstand Category C waters, health and safety etc.). If you absolutely have to specify types of craft, it seems curious that you exclude the use of industrial pontoons as bases for houseboats, with their proven ability to survive on the tidal Thames. What superstructure sits on top of such a heavy duty base is surely a planning matter rather than within the remit of PLA.</p> <p>It is particularly worrying that your draft guidance for large size boats is likely to materially and adversely impact the ability for houseboats to provide relatively affordable living in London. It will, by contrast, benefit financially any party that earns revenues based on vessel length, such as most mooring companies. Your guidance should be even handed in dealing with all parties involved in the houseboat community and should not explicitly favour any particular party or category of parties over any other.</p> <p>Your guidance also ignores the long history of houseboats and moorings on the tidal Thames which have clearly withstood the test of time. It would be normal, in bringing modern guidance to bear on existing structures and communities, to "grandfather" pre-existing situations. In this case, you should be explicit that your guidance refers to any new vessel seeking a new mooring and that you are not seeking to pull the rug out from under existing (sometimes long term) contracts.</p> <p>I would propose the following language should replace the prescriptive wording in your draft guidance.</p> <p>1. Any houseboat should be constructed to a standard compatible with a permanent mooring on Category C waters.</p> <p>1.1 A statement to this effect in a marine survey from a reputable marine surveyor will be deemed evidence of a satisfactory construction standard</p> <p>1.2 Any houseboat with a documented mooring history on the tidal Thames of 3 years or more will not be challenged under this guidance</p> <p>1.3 Any houseboat with adequate insurance from a reputable underwriter will not be challenged under this guidance.</p>	<p>made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p> <p>Regarding your suggestions:</p> <p>1. Any houseboat should be constructed to a standard compatible with a permanent mooring on Category C waters.</p> <p>We feel that the purpose of this guidance is to demonstrate a standard for a permanent mooring on Category C waters and this statement would thereby devalue the meaning of the document.</p> <p>1.1 A statement to this effect in a marine survey from a reputable marine surveyor will be deemed evidence of a satisfactory construction standard</p> <p>A construction standard would not ensure the vessel is suitable for Category C waters and would not ensure it is moored appropriately.</p> <p>1.2 Any houseboat with a documented mooring history on the tidal Thames of 3 years or more will not be challenged under this guidance</p> <p>Whether the houseboat has moored</p>
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				<p>for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or it's safety.</p> <p>1.3 Any houseboat with adequate insurance from a reputable underwriter will not be challenged under this guidance.</p> <p>Whether or not the houseboat has insurance should also not have a bearing on the robustness of the mooring arrangements or it's safety..</p>
17.	JONATHAN KNIGHT	Chairman, Grove Park Group	<p>As Chairman of the Grove Park Group residents Association I am writing in support of the Strand On The Green Association in asking you to refuse the application to moor a houseboat on Stand on the Green opposite Café Rouge. This historic stretch of river and its buildings, 5 of which are listed, is totally unsuitable for the mooring of permanent houseboats. If this application is granted it will establish a precedent and the views of and from the tow path will be detrimentally altered.</p> <p>As I understand it planning permission also needs to be granted by Hounslow Council as permanent pontoon piles in the river bed constitute development. Should such an application be made we will object to Hounslow on these grounds. To my knowledge they have previously refused a similar mooring application further down stream in Hartington Road. The river bank along this stretch is council property and accessible by the public. Should a houseboat be moored here there will inevitably be applications for services such as sewerage, mains water and electricity supply causing disruption and alteration to the current public space adjacent to site.</p>	<p>Thank you for responding to our consultation.</p> <p>However, your comment regarding a particular river works licensing application cannot be considered in relation to this consultation on the houseboat Mooring Guidance.</p>
17.	REBECCA ILLING		<p>I am the owner of a houseboat BLUE MOON moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop</p>

			<p>choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	<p>small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
18.	DR A CAIRNCROSS		<p>I am the owner of a houseboat "Alderley"] moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p>

			<p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
19.	MICHAEL BURROW		<p>I am the owner of a Houseboat Maddalena moored on the Thames at a mooring operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my serious concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>

			<p>I am concerned that your guidance threatens my future and the future of my neighbours. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	
20.	THOMAS UNDERWOOD		<p>I am the owner of a houseboat Buccaneer moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>

21.	ADRIAN OWEN		<p>I am the owner of a houseboat OFFA moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats including OFFA have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
22.	PETER BURNET		<p>I am the owner of a houseboat Spirit of Chelsea moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I would raise my concerns with your proposed guidance on 2 issues</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement.</p>

			<p>1. Moorings. Being an experienced global sailor of large yachts, I advise that your proposed mooring technique is not applicable or appropriate to the vessels moored at CYBC due to the nature of being moored stern to pontoons and whilst Kevlar is an excellent product for mooring warps, the cost is prohibitive and it is not normally specified for this purpose. It must be noted that the Boats at CYBC have been safely moored on the pontoons for some 50 years using lesser quality warps and a unique mooring configuration of warps</p> <p>2. It appears your proposed guidance is too prescriptive regarding size and style of boats as I wouldn't have thought it within your remit to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice providing they meet with Planning Permission where appropriate. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many smaller houseboats have been moored for many years without trouble, unless they suffer from excessive wash, that I understand you have the power and ability to control, so I am concerned that your guidance threatens the future of our community as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes that have been safely moored at CYBC at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or it's safety.</p>
23.	SUZANNE THOMAS		<p>I am the owner of a houseboat Saoirse moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be</p>

			<p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
24.	CHRIS BIRD		<p>I am the owner of a houseboat Isis, moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats, which I believe is too prescriptive. It is not clear to me why the PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice: I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the</p>

			<p>Many boats currently moored at CYBC are based on a pontoon structure, and were purpose-built by the Chelsea Yacht & Boat Co themselves. These have clearly lasted for decades, and it is hard to see why you exclude them from your guidance.</p> <p>I am also concerned that your draft guidance stating a preference for large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that the PLA is supportive of this aspect of houseboat life, and of diversity in general.</p> <p>Many houseboats of this sort have been moored for many years without trouble. My own is a case in point: it was built in the 1960s with a hull of 1/4" steel plate, and has suffered little or no wastage. I myself have owned it for more than thirty years, and I am concerned that your guidance - by not mentioning boats of this type - threatens my future and the future of my neighbours. It would at be normal to "grandfather" existing arrangements of this type, so it would be helpful if you could be explicit that your guidance refers only to new boats seeking a new mooring, and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
25.	AMANDA THOMPSON		<p>I am the owner of one of the Houseboats on Cheyne Walk. I understand you are working on proposed guidelines for boats and am concerned by this.</p> <p>We have been here for many years pre 2nd world war I think with no problems what so ever. I am so worried that your guidelines may threaten the existence of this kind of mooring.</p>	<p>Thank you for responding to our consultation.</p> <p>This document is intended to be general guidance, showing best practice. However if for example during an incident investigation where a passing vessel created wash which caused damage to a mooring and the mooring arrangements are found to be inappropriate, then this will have a bearing on the investigation outcome. We would also expect all new houseboat river works licence applications to meet best practice.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement.</p>

				Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions.
26.	TOM BOUWENS		<p>I am the owner of a houseboat, Aku Aku, moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
27.	RICK STROUD		<p>I am the owner of a Houseboat Veronica moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p>	Thank you for responding to our consultation.

			<p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats including mine have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
28.	ELIZABETH EDGE		<p>My houseboat is "Susan Margaret" moored in berth 59. My problem, and I would think also that of the boat moored parallel to mine in berth 60, is that we are attached by at least one mooring line to the "landing stage" which is a lightweight pontoon and is very seldom entirely out of the water consequently and particularly when the river busses travelling upriver accelerate as soon as they pass under the speed check under Battersea Bridge (as I have observed happening very many times) the landing stage is affected by the wash and its movements follow through to my boat.</p>	<p>Thank you for responding to our consultation.</p> <p>The PLA is working on ensuring commercial operators' schedules have suitable allowance for reducing speed and we continue to discuss matters of wash with both the river community and commercial operators to ensure their passage plans are appropriate.</p>

			<p>I would add that the PLA must be aware of the size of the boats on berths 59 and 60 as the Harbour Master visited during the Planning Permission proceedings for the boat now moored in berth 60 and, as I recall, the only query that arose was where the four small boats then moored on berth 60 were to be re-located.</p>	
29.	MARGARET ALLEN		<p>I am the owner of a houseboat Aquila moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats including mine have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support.</p> <p>It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
30.	CHRIS & ERICA SAGE		<p>We are the owners of a houseboat 'Chelsea Muse' moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited</p>	

			<p>(CYBC).</p> <p>We want to raise our concerns in connection with your proposed guidance on Boats.</p> <p>We believe your proposed guidance is too prescriptive. It is not clear to us why the PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. We would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>We want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance. Many, like ours, were designed and built decades ago specifically for mooring on this site; many (ours included) have also obtained local authority planning consent to ensure their designs have been deemed acceptable. We purchased our houseboat in the assured knowledge that it and neighbouring boats of a broadly similar design had been accepted for decades without any question as to their river worthiness.</p> <p>We are concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. We would hope that the PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats including ours have been moored for many years without trouble. We are concerned that your guidance threatens our future and the future of our neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>We look forward to your response to this consultation.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
31.	MAIA NORMAN		<p>I am the owner of Houseboat Blackhoe moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC). I've</p>	<p>Thank you for responding to our consultation.</p>

			<p>lived here for 16 years, I adore it! It is so special - every black cab driver I speak to has a story to tell about them, so many people seem so fascinated with them.</p> <p>I am greatly concerned that your new rules on houseboats will endanger the character and the community of this part of London.</p> <p>Its not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. This individuality is what makes the houseboats interesting - one of the reasons I have emigrated to the UK from California. I'm not interested in homogeneity and uniformity and I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general. Eccentricity is a huge part of our English charm - God forbid our wharf should be turned into the equivalent of a suburban tract of Wimpey homes.</p> <p>I can't see why the PLA is not more supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I'm concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response - please reassure me you'll not destroy this important part of Chelsea history.</p>	<p>Large superstructures atop small pontoons for example, can create an unstable condition which exacerbates the impact of wash, wind and weather. PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>It is not our intention to impact on the diversity of houseboats on the river, or to destroy the history of the river. All users of the tideway have a duty of care to ensure their vessel is safe and can endure any potential conditions. The purpose of this to give general guidance and show best practice on how to achieve safe mooring.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or it's safety.</p>
32.	DIANA MAYES (BORWICK)		<p>I am the owner of a houseboat; Artemis, moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p>

			<p>and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to contribute to possible instability of the moorings.</p> <p>It would also reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine, which was purpose built by Chelsea Yacht and Boat Company Ltd) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
33.	CLAY SMITH		<p>I am the owner of a houseboat Fleetside moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety,</p>

			<p>have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	<p>as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
34.	PAUL GOTT (QC)		<p>I am the owner of a Houseboat Potemkin moored on the tidal Thames at 106 Cheyne Walk, a mooring licensed from the PLA and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>From aerial photography, found in the book "Above London" by Alistair Cooke (pub 1980), I am aware that Potemkin has been moored in the same place that it is currently moored, since at least 1978. This is likewise the position of a number of houseboats moored at the Battersea Bridge end of the moorings on Chelsea Reach. Potemkin has been in my ownership since 1995, and during that 21-year period has remained moored in the same location as it was photographed in 1978. In addition, many of those boats (including Potemkin) have been specifically designed and built for the Chelsea Reach moorings, and the pontoon structure of those moorings, on which they have safely and happily sat for the best part of 40 years.</p> <p>I cannot see any rational, reasonable or valid reason for houseboats of this kind to be excluded from your proposed guidance on Boats, in respect of which I have concerns which I consider to be legitimate.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why the PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure (as Potemkin has been for at least 38 years, and continues to be) what they look like and how big they are should be matters of</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p> <p>This document is intended to be</p>

			<p>individual choice.</p> <p>I would, with genuine respect, suggest that a statutory public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc. The boats moored at Chelsea Reach have safely withstood some of the most severe events in living history, including Windstorm 87, the Burns' Day Storm of 1990, Storm Kyrill (2007) and the St Jude Storm of 2013.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would have hoped that the PLA would be supportive of this aspect of houseboat life. As a statutory public body, I am surprised to find the PLA and its officers purporting to act in anything other than an inclusive manner and to find that the PLA is acting in such a way as to prejudice diversity in respect of houseboat life.</p> <p>I am concerned that your guidance threatens my future, the future of my family, the future of my neighbours, and the future of the diverse community of the houseboats on Chelsea Reach, which have been here for many years. Such a position would interfere unjustly with a very considerable number of the rights of houseboat owners at Chelsea Reach and would, as I have indicated above, appear to be irrational and unreasonable.</p> <p>It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I am e-mailing you using my professional e-mail address, but in my private capacity.</p> <p>I look forward to your response to this consultation.</p>	<p>general guidance, showing best practice. However if for example during an incident investigation where a passing vessel created wash which caused damage to a mooring and the mooring arrangements are found to be inappropriate, then this will have a bearing on the investigation outcome. We would also expect all new houseboat river works licence applications to meet best practice.</p>
35.	ERIN DONAVAN		<p>We are the owners of a houseboat Mudlark moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be</p>

			<p>I believe your proposed guidance might be too prescriptive. I'm not sure why PLA would want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats, including ours, have been moored for many years without trouble. In fact, we date our original ownership of a houseboat here since the 1980s. We have always enjoyed the community, and hope to continue to do so. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation. Thanks for your consideration,</p>	<p>read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
36.	DAVID BEAUMONT		<p>OPLAC/iWash Response to the PLA consultation on their Houseboat Mooring Guidance</p> <p>1. We are concerned that this document has been referred to by the PLA both as 'guidance' and as 'a code of practice.' Also the documents refers to "the requirements of this guidance"; It is not clear if the guidance is advisory or mandatory. We believe the PLA should urgently clarify whether the guidance will, if it is not already, ever become a code, with the ensuing inspections, certifications and enforcement, possibly resulting in the removal of River Works Licences from residential</p>	<p>Thank you for responding to our consultation.</p> <p>1. This document is intended to be general guidance and applicable to all houseboat owners – this will not be referred to as a 'Code'. We will investigate all wash complaints equally however if during the investigation the mooring arrangements are found to be</p>

	OPLAC	<p>houseboats. It is also unclear if wash complaints will be discarded or treated differently depending on whether the complainants are thought to be in compliance with the guidelines or not. Failure to clarify the above points will encourage the view that this is, at worst, a cynical exercise to clear a 'super highway' for clippers along the river, free of troublesome houseboats. We also note that the document itself introduces meeting the guidance as being a pre-requisite for obtaining new River Works Licences.</p> <p>2. Related to this we are concerned that your guidelines/code may become retrospective - affecting houseboats that have been happily moored in their locations for decades without wash problems. We would like the PLA to acknowledge that houseboat moorings that predate the Clipper wash issue are in an entirely different category to new houseboat developments.</p> <p>3. We think that whilst guidance and advice for the victims of wash is welcome, the PLA's main aim should be directed to ensuring that the perpetrators do not create the inconsiderate wash in the first place. Or that if they do, they know they will be prosecuted. It is inappropriate speed that causes wash issues and this must be your primary focus of operations management for the safety and comfort of all river users.</p> <p>4. We would like to see a companion and comprehensive set of PLA guidelines to be published for vessel operators including for timetable setting, acceleration and deceleration and maximum speeds according to location. Such guidelines should also include the type of vessels that are suitable for high speed or high wash operation, with research undertaken by the PLA into this if necessary and not done already.</p> <p>In particular, on a strongly tidal river where flows can reach 8 knots in places, we would like all vessels to have a means of measuring their speed through-the-water. It is astonishing to us that this is not a mandatory requirement for the speed limit exempt vessels such as the Clippers and even more astonishing that none of the Clippers have this basic equipment. Any companion set of guidelines to vessel operators should remind them of the PLA's longstanding bylaw 57 on wash:</p>	<p>inappropriate, then this will have a bearing on the investigation outcome. We would expect all new houseboat river works licence applications to meet best practice.</p> <p>2. The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or it's safety.</p> <p>3. We ensure that commercial operators are made aware of Byelaw 57 and we continue to enforce this where necessary.</p> <p>4. We have amended the guidance to include the following wording: <i>"This guidance does not remove the master's responsibility for reducing wash when passing a moored boat or structure."</i></p> <p>The PLA is working on ensuring commercial operators' schedules have suitable allowance for reducing speed and we continue to discuss matters of wash with both the river community and commercial operators to ensure their passage plans are appropriate. High speed vessels are issued with 'Certificates of Compliance' which includes, among other things, an assessment of a company's safety management system, appropriate qualifications and vessel suitability.</p> <p>It is worth noting that the Thames does not flow at 8 knots in any part and 3.5 knots is a realistic figure at the top end of the scale for tidal flow rate.</p>
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			<p>57. WASH AND DRAW-OFF Except in an emergency, the master of a power-driven vessel must, at all times when underway on the Thames, ensure that the vessel is navigated at a speed and in a manner such that any wash or draw-off created by the vessel must not compromise:</p> <p>a) the safety of others using the Thames, the foreshore, adjacent piers, moorings, berths, jetties or other facilities; or b) the integrity of the foreshore.</p> <p>We also note that the Clipper operators, by omitting through-the-water speed measuring devices from their craft, appear to be in breach of the PLA's existing short guidance on wash section (a) below:</p> <p>PLA GUIDANCE ON WASH AND DRAW OFF This guidance on Wash and Draw off is produced in support of Byelaw 57. Master of a power-driven vessel, in determining safe speed in respect of wash or draw-off, should take a number of factors into account, including but not limited to:</p> <p>a) the speed of the vessel through the water; b) whether the vessel is accelerating or decelerating; c) the hull form and wash and/or draw-off characteristics of the vessel; d) the manoeuvring characteristics of the vessel; e) the charted depth and height of tide; f) the strength and direction of the wind; g) other marine related activities underway on the Thames, the foreshore and/or adjacent berths, moorings and facilities where the safety of persons may be compromised by unacceptable wash or draw-off; h) the content of current navigational information broadcasts made by London VTS in respect of locations and activities where vessels are requested to proceed with caution or at slow speed; and i) the density and type of vessel traffic in the area and the potential for the build-up of a cumulative wash and/or draw-off effect.</p> <p>01/07/2012</p> <p>We believe such comprehensive guidelines are even more essential given that the PLA specifically licence the Clippers and other vessels to breach the 12 knot speed limits and reach</p>	<p>The speed over the ground which a vessel is capable of measuring, together with an estimate of the tidal flow, is sufficient to gauge the speed of the vessel through the water. Even if we can accurately measure speed through the water, this would not automatically give a representation of the wash created. Therefore, we do not feel that vessels without a speed log breach our wash and draw-off guidance.</p> <p>5. We have slightly amended the wording suggesting rope of diameter 40mm; however, it is not an uncommon occurrence for 40mm ropes to break when being used on commercial vessels – ropes deteriorate over time and additional load such as snatching can be placed on ropes during bad weather conditions, strong river flows or incorrect mooring arrangements.</p> <p>Mooring arrangements must have a certain degree of safety allowance, account for extreme situations and account for unlawful vessels creating excessive wash. It would not be safe to presume there will be benign conditions all of the time on the Thames.</p> <p>6. The MCA categorises the tidal Thames to the West of Denton, Gravesend, as Category C – as such, our guidance needs to reflect this. There are areas of the river that 1.2m waveheight is uncommon, however mooring arrangements must have a certain degree of safety allowance, as mentioned above.</p> <p>7. During the assessment of a River Works Licence application, the</p>
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			<p>speeds of 25 and 30 knots.</p> <p>5. We have found some of the guidelines rather ill-thought through. For example, 6 lines, doubled, of minimum 40mm polyprop has a breaking strain of 1.7 mega Newtons - the same as 6 Jumbo jets taxiing at full thrust. Furthermore the guidelines do not differentiate between:</p> <ul style="list-style-type: none"> • locations along the tidal Thames • the size of vessels • the layout of vessels within groups of vessels • the site specific factors at particular moorings such as river bed or mooring infrastructure. <p>We do not believe that any existing boat on the tidal Thames complies with the minimum guidelines. Because of all this we suggest the PLA urgently apply their guidelines themselves to some volunteer houseboats so as to get real world and practical experience. It would be a small cost for the PLA to supply and fit their recommended ropes and fenders. We think this exercise would be much more valuable for all of us than a paper consultation and ideally should precede such a consultation in any event.</p> <p>6. Re. "The waterway is defined as Category C waters by the Maritime Coastguard Agency". As you know OPLAC do not believe that the entire tidal and semi tidal Thames should be 'Cat C'. We doubt there have ever been naturally occurring waves of 1.2 metres anywhere above Wapping. It is disingenuous to use this existing (and we believe erroneous) categorisation to justify excessive, inconsiderate and dangerous man-made wash on the tidal Thames. This paragraph should be removed from the guidance. In any case wash is very different to natural waves and can be much more destructive at lower wave heights. On the tidal Thames wash has regularly caused damage to houseboats, natural waves never have as far as we are aware.</p> <p>7. Some consideration needs to be given for the need to move vessels quickly in the event of an emergency, e.g. fire or an adjacent vessel sinking. 12 lines of 40mm+ polyprop per boat would not make this easy.</p>	<p>navigational safety of the movement of vessels to and from their mooring is considered.</p> <p>8. 300 tonnes of 'driftwood' is removed from the Thames every year and we are looking at installing more driftwood collectors in the river to increase this number. We also support charities such as Thames 21 to make the river cleaner.</p> <p>9. We ensure that commercial operators are made aware of Byelaw 57 and we continue to enforce this where necessary however, it is the responsibility of the houseboat owner / facilities to ensure it is adequately moored</p>
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37.	SALLY WILKINSON		<p>I am the owner of a houseboat Stow moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or</p>

			<p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	<p>is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
38.	ANDREW PRYNNE (QC)		<p>I am the owner of a houseboat Periwinkle moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety,</p>

			<p>have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats including Periwinkle have been moored for many years without trouble. Indeed like its neighbouring boat Potemkin, Periwinkle was designed and built by CYBC for the specific purpose of occupying its residential mooring at CYBC. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	<p>as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
39.	LUCY SHAPLAND		<p>I am the owner of a houseboat (Puddleduck) moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats (including Puddleduck) have been moored for many years without trouble.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the</p>

			<p>I bought Puddleduck last year and in November 2015 until June 2016 it was extensively refitted by CYBC - everything was checked and double checked as this is my first houseboat, and at no time did anyone at CYBC, whom I consider to be excellent at their work, suggest that Puddleduck was in any way unsuitable to be moored indefinitely at Cheyne Pier.</p> <p>I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p>	<p>mooring arrangements or its safety.</p>
40.	CONSTANT TEDDER		<p>Dear Jonathan,</p> <p>I am the owner of a houseboat Houseboat Chairman moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>River life should be something the PLA wants to encourage and this means balancing the needs of the waterways for transportation and those living on the river.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats.</p> <p>Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. My boat has been moored in it's position for over 40 years. And is in good condition.</p> <p>Pontoons are sufficient. Perhaps other defensive boom measures can be taken by Chelsea Boat Company if the wash from the passenger boats causing difficulties. Or a speed restriction in certain sections of the river, would be another solution. I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>

			<p>affordable living in London. I would hope that PLA is supportive of river life and of diversity in general.</p> <p>Many houseboats (including mine) have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	
41.	CHARLOTTE WOODROFFE		<p>I am the owner of a Houseboat Trafalgar, moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>I have lived here for the last 11 years, without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>

			<p>arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	
42.	RUTH IVO		<p>I am the owner of a houseboat Rudyard Kipling moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats, including the Rudyard Kipling, have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>

43.	JOHN BODENHAM		<p>I am the owner of a houseboat of The Odyssey moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p> <p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>Many houseboats, including The Odyssey, have been moored for many years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Please could you be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I look forward to your response to this consultation.</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
44.	STEFANIE HARWOOD		<p>I am the owner of Houseboat Mallard, moored on the tidal Thames at 106 Cheyne Walk, a mooring owned and operated by Chelsea Yacht and Boat Company Limited (CYBC).</p>	<p>Thank you for responding to our consultation.</p> <p>We have slightly amended the guidance on the type of boat and made clear the bullets within the boat</p>

		<p>I want to raise my concerns in connection with your proposed guidance on Boats.</p> <p>I believe your proposed guidance is too prescriptive. It is not clear to me why PLA should want to specify types and sizes of houseboats. Provided any boat is safe and secure, what they look like and how big they are should be matters of individual choice. I would suggest a public body should be focused on principles. The main principles could be in line with your aims in specifying types of boat, for example, the ability to withstand the waters in which the boats are moored, health and safety etc.</p> <p>I want to draw to your attention that many boats currently moored at CYBC are based on a pontoon structure. These have clearly lasted a long time and it is hard to see why you exclude them from your guidance.</p> <p>My own houseboat was built for me by the Chelsea Yacht and Boat Co in 1967, as being 'fit for purpose' moored at its present position. The then owner's son, Peter Osgood, a Marine Architect, was responsible for passing the plans. The Mallard has remained in the same position since then, with proper maintenance, the steel hull checked, and dry docking carried out, when required by the insurance company. We supplied and hung strong pieces of timber strung with tyres where appropriate, which have acted as effective fenders. Except for occasional exceptional circumstances, and unless passing craft have exceeded the 'through the water' speed limit, I have not knowingly experienced any serious wash or other high wave problems.</p> <p>I am concerned that your draft guidance preferring large boats is likely to reduce the ability for houseboats to provide relatively affordable living in London. I would hope that PLA is supportive of this aspect of houseboat life and of diversity in general.</p> <p>I feel it is important that you realise that many houseboats, including mine, have been moored for many</p>	<p>section are separate and should not be read together as one requirement. Smaller, un-ballasted vessels could be suitable for some areas but would be more susceptible to wash and river conditions. Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather.</p> <p>PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>The guidance is applicable to all houseboats. Whether the houseboat has moored for a long period of time or is a recent mooring should not have a bearing on the robustness of the mooring arrangements or its safety.</p>
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			<p>years without trouble. I am concerned that your guidance threatens my future and the future of my neighbours as it is not of a type that you seem to support. It would be normal to "grandfather" existing arrangements of this type. Therefore, may I ask you please to be explicit that your guidance refers only to new boats seeking a new mooring and that you are not seeking to find reasons to remove people's homes at some point in the future.</p> <p>I feel you should be addressing your concern towards the safety and protection of all users of the tidal Thames, of which the houseboat dwellers are apparently now under undeserved threat,</p> <p>I look forward to your response to this consultation.</p>	
45.	JACKIE WILLIAMS		<p>I am the owner of a houseboat "Amari" moored on the tidal Thames at 106 Cheyne Walk since 1974 on the mooring operated by Chelsea Yacht and Boat Company Limited (CYBC) under a River Works Licence issued by the PLA.</p> <p>I am very concerned about the proposed guidelines of the PLA on boats which seems to discriminate against smaller boats although there have been small boats moored along this part of the Thames for at least 150 years.</p> <p>It is not clear why the PLA should suddenly want to specify types and sizes of houseboats on the basis that smaller boats are less secure when the only incidents creating havoc in memory have been due to gale force winds outside anybody's control.</p> <p>The responsibility for ensuring our moorings are secure is not with the PLA but with our mooring managers, the CYBC, whose staff are committed to checking pontoons, gangplanks, mooring ropes and fenders in return for which we pay increasing mooring and maintenance fees.</p> <p>Since all our boats have steel hulls and rise and fall daily</p>	<p>Thank you for responding to our consultation.</p> <p>Large superstructures atop small pontoons can create an unstable condition which exacerbates the impact of wash, wind and weather. PLA River Works Licence applications are considered on planning grounds, engineering and navigational safety, as well as other factors.</p> <p>It is indeed the responsibility of the houseboat owner / facility to ensure it is adequately moored and that mooring arrangements have a certain degree of safety allowance, account for extreme situations, snatching and account for unlawful vessels creating excessive wash, etc.</p> <p>The PLA has a responsibility for the safety of all river users and this guidance is intended to be general guidance, showing best practice.</p> <p>Small boats on trot moorings differ from houseboats as they are not residential and not secured to a structure.</p>

		<p>about 20 feet with the tides we are perfectly able to withstand buffetting from river craft.</p> <p>Greater stability is also ensured by the substantial pontoons linked to all the boats by individual gangplanks. The fact that the PLA installed mooring trots for rowing boats and small motorboats some metres away from our residential houseboats and nearer the navigation channel indicates that you certainly did not consider even very small boats a hazard on these moorings.</p> <p>The PLA was set up to oversee navigational safety but our boats are not in the navigation channels. With radar speed detection port control should prevent boats like the Thames Clippers exceeding the 12 knots speed limit from Wandsworth Bridge. The PLA could also communicate with Transport for London which licenses these boats, to enforce regulations.</p> <p>Research shows that even an increased speed of 0.86 knots increases damage to the natural environment and we have noticed a difference in the volume of mud in the river due to boat wash which is a cause for concern.</p> <p>This part of the Thames is a conservation area and has featured boats from Greaves boatyard from the 1860s when they ferried the painter William Turner across the river to Battersea to the converted landing craft of World War II. None of these boats have been large.</p> <p>Traffic on the river has greatly decreased since the Clean Air Act when huge coal barges plyed their trade. The jobs of Thames watermen have also vanished with the loss of trade in the docks as you know. Even the pleasure boats of the 1960s have halved in volume.</p> <p>Your draft guidance preferring large boats is also likely to reduce the ability for houseboats to provide relatively affordable living in London.</p>	<p>The PLA's remit is not only within the navigation channel but the entire width of the river. We are responsible for the safety of all river users.</p> <p>The PLA is working on ensuring commercial operators' schedules have suitable allowance for reducing speed and we continue to discuss matters of wash with both the river community and commercial operators to ensure their passage plans are appropriate.</p> <p>It should be noted that the speed limit between Wandsworth Bridge and Lambeth Bridge is 12 knots, however certain vessels have a PLA 'Certificate of Compliance' to exceed this, up to 25 knots. The vessels are licensed by the Maritime Coastguard Agency.</p> <p>Wash assessments have been carried out to determine the impact of vessels travelling at varying speeds and the wash created. The PLA are also working with the representatives of the Wash Forum to more accurately measure the effects of wash and work on this project is ongoing.</p>
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No Comments:
None

The revised version of the Houseboat Mooring Guidance can be found [here](#). This will be published soon, promulgated via a Notice to Mariners.