

Responses to the proposal to limit a person to walking 4 dogs at a time in a public space.

Agree with proposal (35)

With regards your above mentioned email, I am confirming that I am in agreement with proposed order.

I just wanted to comment regarding the post I have seen below. I whole heartedly agree with this as I walk my dogs over the fields at Farnborough which has now become 'unpleasant' and sometimes scary due to the large number of dogs being walked at one time. I continually see dogs which are not under control and nowhere near their dog walker, that petrify my 2 small dogs. The other problem is more than one dog walker walking with other dog walkers so there can be a pack of 10-12 dogs coming towards you which is both intimidating for my dogs and myself.

Although I believe the additional offence is sensible, I have concerns that the level of fine will still not provide a sufficient deterrent and that there are insufficient available resources to effectively enforce the protection orders. That being said, it is at least an attempt to address the serious issue of individuals walking large numbers of dogs which are clearly out of control.

Please see attached for details of new proposals from the Council with regard dog walkers in public places. I hope you will agree with me that it's a good move and it should be implemented sooner rather than later.

Regarding the proposals to limit dogs to no more than 4 per person I (as a dog lover) am entirely in agreement for the following reasons.

1. It's difficult enough to clear up every time after one dog, sometimes we see dog walkers with 11-14 dogs. They clearly cannot clear up after them all.
2. For reasons of safety (both human and canine) it is better to have a limit on the number of dogs allowed. I've seen examples of dogs attacking other dogs and people through lack of control and dogs going missing as the dog walker hasn't kept a proper eye on them.
3. Having had the lunches of at least two members of our Friends work party at Jubilee Park stolen and consumed by dogs in large groups that's another reason to limit them!

Good idea to govern the number of dogs, due to the Walker needing to be in control of the animals. I would like to suggest an addition to your first point / law. Failing to pick up after your dog has fouled. The addition being 'picking up 'and disposing of, in an official bin' or words to that effect. I volunteer with Friends of HighElms and we so so often come across Poop bags strung up on the lower branches rather than being disposed of.

I have seen your proposal to limit the amount of dogs under the control of one person. I would very much like to support this very sensible proposal. I do wonder though how it can be enforced. Rangers are very thin on the ground and, even if they saw someone breaking the bylaw, they may

be reluctant to approach a pack of dogs. So the proposal is sound in principle, but perhaps lacking in realistic action.

I am writing on behalf of our group in support of the proposed amendment on dog control offences, dated 10th December.

We have had a few cases where people have brought dogs into 'dog free' areas of parks, despite these areas being clearly signposted. Sometimes when challenged they have either denied seeing any signs, or in at least one case become abusive. Despite dog waste bins in appropriate parks, and dog waste bag dispensers in a couple of them we do have occasional examples of continued dog fouling, especially on College Green. We also recognise the issue of unlicensed professional dog walkers.

We hope that the effective implementation of this new order will go some way to eliminating the problem. We look forward in continuing to work with both Idverde and your enforcement team in this matter.

I would like to say that I agree to the proposal to introduce the new offence and increase the fixed penalty in the control of dogs on public land.

I think it is a sensible change for Bromley Council to make a limit of 4 dogs per walker mainly because when a person is walking many dogs at the same time they are often unable to spot where / when a dog leaves a mess in our parks and playing fields and thus not clean it up.

I would also suggest that Dogs should not be allowed to be walked on the Alexandra Park playing fields as we often find dog mess on the pitches which is pretty disgusting also has serious health implications / risks for children who play football on these pitches.

It is worth the Council reviewing the many diseases that children and adults can pick up from playing on pitches that have been soiled by dogs. I love dogs but I think a few selfish owners could do with some further guidance and sadly appropriate penalties if they won't behave themselves.

Looking at proposals they all sound reasonable and useful. We don't recall us having much issue with the professional dog walkers with multiple dogs but feel walking more than 4 dogs could lead to issues keeping control of them all. I know we had some talk a while ago around PCSO's being able to utilise the council powers. If this can be the case I could see them being a handy tool in tackling a bit of ASB or giving us options when we have dog on dog attacks, they tend to always be off leads. We would need to get a bit of knowledge out regarding areas etc.

I appreciate your efforts to introduce dog controls on public land. I run through Darrick Woods two or three times a week. I have no problems when individual dogs are let off the lead and I have never been attacked by a single dog. Most dog walkers are responsible owners. I have, however, been attacked by dogs which have been let off the lead by professional dog walkers. Dogs have a pack instinct and it is more difficult for a dog walker to control them when they are off the lead.

I have also been sworn at by professional dog walkers when I point out to them that they are legally obliged to keep their dogs under control.

Your efforts to reduce packs of dogs to four only are welcome. This will help runners through the park and reduce the incidence of single dog walkers having their pets pounced upon.

I like to see and meet dog walkers and their dogs in our parks, in general they make my life better.

A dog walker as just posted your email address asking to help them fight the planned change from a maximum of 6 dogs down to a max of 4 dogs. Sadly I totally agree with the planned reduction. I am a dog owner myself and have seen more than once careless dog walkers not picking up, walking in groups (ending up with HUGE packs of dogs) or simply having no control over them. 4 is my opinion the utter maximum one can safely walk in a busy London park. I totally support Bromley's plan. I am not a Bromley resident, but live in Crystal Palace, meters away from the park, hence walk my dog in the park which belongs to Bromley. I am actually quite shocked that in Bromley 6 dogs per walker are still allowed which I wasn't aware of, I thought 4 was a London wide decision.

I think it is a good idea to limit them to 4 dogs.

I am writing in support of your proposal to limit the number of dogs walked together by one person to four, and to increase the fine should this legislation be ignored.

I am aware of one dog walker who is trying to drum up support to contest your proposal, stating that it would detrimentally affect her business and that it's not fair. This walker says she walks no more than six dogs at a time, yet I have seen her many times with 7, sometimes 8 dogs. Her own dog was killed on the railway track some years ago, and I have come across one of her clients' dogs, running loose in the road when she lost it in Elmstead woods when it ran away from her.

I feel the number should definitely be restricted to four dogs maximum per person. I also feel I should say I have two dogs of my own and have had dogs for over twenty years, so I am not only a dog lover but very experienced around them. I have become increasingly concerned in the last five years that these dog walkers are getting more and more blasé and irresponsible towards their charges.

I do hope your proposal is successful.

Hope you are well and of course our best wishes from the Friends of Mottingham Woods for 2020.

In regards to Bromley Council's proposal to introduce an additional offence prohibiting one walker to be in charge of more than four dogs we would support the proposition. We also, currently have concerns from users about the large numbers of dogs inadequately controlled. Some are attracted from out of borough because it is my belief we have always to date adopted a more liberal approach.

As I hope your intelligence reflects, we continue to have far less problems in Upper Marvels and Elmstead Woods around motorbikes and rubbish, although the part that borders Elmstead Lane continues to be an attraction.

I note with approval the consultation on adding the dog walking numbers to the offence list and the increased fine.

We at the Chislehurst Society have received many complaints and concerns about the lack of control that dog walkers have and the increasing numbers of dogs seemingly allied to only one person.

We welcome this directive but obviously question the 'policing' of the actuality as it will only have

an effect if penalties are known to be implemented.
Thank you for taking this issue seriously.

When walking my (one) dog in Cator Park there is a male dog walker with up to seven dogs on occasions .At Sparrows Den, W .Wickham, I regularly see two women with as many as 13 dogs between them, all running free whilst the women are busy talking. I support this ban.

I am writing on behalf of the Friends of Scadbury Park re the above consultation notice we received.

We have discussed this matter and are in favour of the proposals. In Scadbury we suffer from dogs not being on leads but of more concern there are often 'professional dog walkers' in the Park with many dogs under their care often 4/5. Any action to help with this would be welcomed. We understand that in some London boroughs professional dog walkers have to be licensed and pay a fee to be registered. We wonder if this was considered by Bromley as it would be another check and limit on the number of dogs an individual could have in their care.

I was so pleased to see your notice in Well Wood about the implementation of how many dogs a dog walker can walk at one time. My previous dog had two legs broken and numerous bite marks on her body. Last year I was walking my 5 month old puppy when a dog walker who had six dogs approached us and two of her dogs proceeded to try and mount my dog and then they chased her away. Luckily another lady in the wood saw my dog running away and picked her up which I was grateful for as it was near a road. I can't see how it it's possible for a woman in her 60's to control six dogs. I did phone the council and report it but they only put me through to lost dogs which wasn't really helpful. It really is quite intimidating when walking your dog to suddenly be surrounded by six other dogs. Some of the dog walkers come from Croydon because there is a limit to the amount of dogs a dog walker can walk in that area. I was wondering does this rule apply to Sparrows Den too. I hope you do decide proceed with this rule.

Brilliant. Thank you for your work on the new dog order. I'm very pleased that one person isn't allowed to walk more than four dogs. I agree it's impossible to watch more and unlikely to be able to clear up all the mess.

This is the best local news for a while. I like dogs but sensibility and common sense is what gives this order it's strength. Well done.

I write in response to the proposals to introduce additional offences in relation to the control of dogs on public land.

I read with interest that the original offences do not cover "failing to control your dog in an open space". It was my understanding that this is a requirement of people taking their dogs out into open spaces?

If my understanding is in correct please could we amend the new offence to read "being in charge and control of more than 4 dogs per person in a public place".

I believe that most people are concerned with the control element of people walking any number of dogs and it would be my wish to see controlled dogs in the parks be in on or off lead and in any number.

I agree with the increase in fines, but would also urge for more patrols and monitoring of the rules to make sense and ensure adherence to them.

The Friends of Darrick & Newstead Woods fully support Bromley Council's proposal to restrict the number of dogs professional dog walkers can take at one time, plus having fines for people who don't clear up dog mess; our concern is how it will be policed and by who.

As a responsible dog owner, I fully endorse Bromley Council's proposals with regards to introducing an increase in fixed penalty notices and the new offence.

In fact, I wish the law would go further in that it was mandatory for all dog owners to keep their dogs on a lead whilst in public areas and thus maintain "proper" control of their animals at all time.

In my experience, I often witness owners busy chatting with other dog owners, paying no or little attention to what their dogs are doing, often being left to their own devices & /or causing a nuisance to other dogs who are being properly "controlled" whilst being walked on a lead.

The fact that dogs are allowed to roam parks off the lead, enables owners to ignore the fact that their dog has defecated and even if they have the intention to "pick up", I find it very hard to believe that they actually do, often because of the logistics to locate said item, because of the distance between the dog and its owner.

Surely it speaks for itself, the more dogs a person has on or off a lead the more difficult it becomes. I don't want to generalise, as I am sure that many professional dog walkers and others who allow their dogs off of the lead, manage to complete said task.

However, if dogs are kept on leads at "all times" it would make this more manageable. Some dog owners may express concerns that by keeping a dog on a lead they are not being exercised properly, but some retractable leads extend 8m or more.

Although I am aware that there are "council" notices on the entry / exits to parks, I fear that many dog walkers may not have read or are aware that they are there.

Should you and Bromley council be successful in your efforts to obtain said orders, it would be nice to see Wardens policing said parks so the message gets out there.

I agree to the introduction of the additional offence being consulted on and the increased fine:

- Being in charge of more than 4 dogs per person in a public place
- We propose to increase the fixed penalty offence from £80 to £100 for all offences.

I trust that you will employ sufficient officers to enforce this.

Happy to see this new offence control introduced and for the fine to be increased. I myself have 2 little dogs and often notice, mainly dog walkers singularly walking several dogs of all sizes and struggling to maintain control of them. I worry how large numbers of dogs can also be transported safely if a vehicle is used to travel to and from public places.

I'm happy with the introduction of the further offence but do not think the fine should be increased. In fact I'd be happy to see it reduced as I think £50 would be a sufficient deterrent.

I'm also assuming that your authorised officers are reasonable in their enforcement and that there is a robust appeal process including taking into account the circumstance of the incident and

the personal circumstances of the person being fined.

For info I am not a dog owner and the parks I generally use are Norman Park and Whitehall Rec.

Excellent suggestions

Completely support this initiative.... have noticed an increase in dog fouling around Marian Vian school which also adversely affect young school children as well.

Dog nuisance & fouling completely agree with the fifth item and fine.

As the father of a child terrified of dogs, I welcome your proposal to restrict the numbers of dogs per person to 4. I often encounter issues with dog walkers and my daughter even with 2 dogs, owners are unable to fully control their dogs when passing a child who is clearly terrified. Even on a lead, the space required to walk 4 dogs would fill the width of most paths and again cause problems when passing.

I would however comment that I would like to see the age of the person in charge be set a sensible level, to prevent the new rule circumvented (i.e. 8 dogs being walked with an adult and minor).

I should also like to comment that many dog walking businesses make use of the parks for commercial gain and should be further restricted or at least registered with the council to limit access to public green spaces.

I agree that a new offence of one person being in charge of more than four dogs should be implemented as the issue of uncontrolled groups of dogs needs to be addressed. I also agree with the proposal to increase the fixed penalty fine from £80 to £100 to act as more of a deterrent - I would even suggest the higher figure of £120 if possible as reference to that higher amount would I think have a greater impact.

I am a resident of Aynscombe Angle in Orpington.

As you know, this is adjacent to Priory Gardens.

While I support responsible dog ownership in all respects listed on your consultation letter dated 10.12.19, I do strongly feel that there are compromises and understandings to be reached over how we can genuinely prioritise the safety and upkeep of these public spaces.

I would like to ask you to consider the other factors that encroach on the above, that in many cases outweigh the detrimental effects caused by dogs and their owners.

1. The park is consistently populated by groups of men consuming large amounts of alcohol followed by public displays of inebriation. In general, these individuals aren't threatening, however, despite sitting on benches that have bins next to them, they leave plastic bags, ring pulls, cans and bottles behind.

2. Before Christmas, I had to report a man who was sitting on the steps of the walled garden to one of the rubbish pickers as he was openly pleasuring himself.

3. The ponds are absolutely full of discarded rubbish. It is so upsetting to see the waterfowl swimming through this, especially in key places such as by the bus stop at the end of the High

Street (opposite the petrol garage).

4. There is consistently smashed glass on the pathways. One patch of this has been there for at least two months. I reported this today to one of the rubbish pickers (this is what he called himself so I hope that's the correct term!).

5. I have witnessed, on two occasions, young boys driving mopeds around the park. What can be done to prevent this as it's completely unacceptable?

6. There are consistently groups of people hanging around in the car park behind Aynscombe Angle, using drugs and leaving their paraphernalia behind. Again, what is being done about this?

7. Finally, in order to access Priory gardens without walking through the no dog zone, I would either have to walk up Church Hill or along the High Street and use the entrance on the corner of the High Street and Court Road. This is completely nonsensical for me and all the other residents, as the entrance behind Aynscombe Angle is directly next to my house.

The times that I have walked along Church Hill, which has a very narrow pavement on only one side, I have experienced people speeding and driving aggressively and it feels extremely unsafe. One group of men in a 4x4 mounted the pavement and nearly knocked me down and another driver was speeding around the corner by Bark Hart Road so fast that the back of his car span out and hit the pavement 3 feet in front of me.

For this reason, I use the path that connects the dog enclosure to the car park behind Aynscombe Angle which would technically warrant a fine. Something I feel would be highly unjust for myself and the other dog walkers that do this for their own safety.

I realise that rules are important and that there will always be people letting the rest of us down but I would like to see more positive campaigns in place to encourage everyone to respect our public places rather than penalties focusing on a narrow group of people who are only a small part of a wider issue.

I would be happy to be part of an initiative that recruits the community to support the upkeep and protection of our public spaces but it always helps to have a figure such as yourself kick-start things so that the message can reach the widest audience possible.

I am happy to be contacted in relation to this and look forward to hearing from you.

I have recently seen a post regarding the reduction of the number of dogs being allowed to be walked at one time off leads by dog walkers.

I'm not sure where in the process this or any updates on the matter. However, I would like to voice my support for this change. I have recently been running in the park with my well behaved 1 year old dog; we were met by a lady walking 6 dogs off lead, 3 of which proceeded to aggressively chase and bark at my dog, which lead her to run away as they chased her around the lake. I spent around 5-10 minutes trying to locate my dog, she turned out to be in a bush, tail between her legs, scared stiff. The lady attempted to get the dogs back on leads; however, it was clear she had absolutely no control over the 6 dogs. I completely agree that 6 is far too many, especially when they are not yours, therefore, do not have the loyalty and obedience to listen to commands. It's dangerous to the community, children and other dogs.

I'm not usually one to get involved in things like this, as I imagine you have been bombarded with so many emails about it, and I'm sure you have more things worthwhile to be spending your time

on. However, after my recent experience I just wanted to ensure there was one more vote of support.

I agree with the proposal to introduce an offence of having more than four dogs in a public place.

I use Bromley parks (and indeed pavements) regularly and do feel that dogs can be intimidating. I would agree that being confronted by five or more large dogs under the control of one person is wrong and should not be allowed.

I do not object to the raising of the fine from £80 to £100.

I am writing to let you know that I am in favour of the new proposals to:

- introduce a new offence of being in charge of more than 4 dogs per person in a public place
- and increasing the fixed penalty from £80 to £100 for all offences.

Would like the number of dogs reduced to 3 (6)

In response to your letter attached, as a resident, dog walker and regular park user, I personally think that the wording should be "Being in charge of more than 3 dogs per person off lead in a public place".

I would have no problem with someone for example walking a Yorkshire terrier, a Chihuahua, a Maltese, a jack russell and a Pomeranian in a park if they were all on leads, but the additional offence would prohibit this.

On the other hand, I think someone cannot necessarily keep an eye on a Rottweiler, Siberian husky, a staffie and a Doberman pinscher off lead, but the additional offence would permit this.

Having seen a sign advising of your proposal to limit dog walkers to a maximum of 4 dogs per walk, I would like to wholeheartedly offer my support to this proposal.

I have 3 dogs myself, and walk the 2 smaller dogs separately to my larger dog because of the number of people walking large packs of dogs without a care in the world. My large dog is the most loving dog in the world, but having been attacked previously, he is terrified of everything, especially dogs running towards him, and he simply cannot cope with more than 3 dogs around him at a time.

I would therefore request that you lower that limit further to a maximum of 3 dogs at a time throughout the borough of Bromley, and I hope that Lewisham council might follow suit with the lower threshold, as they currently allow 4 dogs to be walked at a time.

As a daily dog walker at various public spaces in the Borough, including Keston and High Elms, I fully support the plan to restrict the number of dogs that one person is permitted to have under their control in public spaces. This is long overdue.

4 Dog limit

I regularly encounter large groups being walked - almost always by a dog walker rather than the owner. It is almost always the case that most of these dogs are off lead and at best loosely controlled.

While these 'packs' tend not to be aggressive dogs, they are exuberant and frequently intimidate walkers and other dogs by running around them, jumping up at them etc. The people walking them are in general unable to call them to order in time to prevent problems occurring with other walkers, dogs, children etc.

In addition to the lack of control that one person has over a large number of dogs, the problem of fouling is exacerbated as that person cannot possibly keep an eye on every dog at the same time, even if they were minded to pick/clean up dutifully (which many are not).

I do question whether the 4 dog limit is the right number. I do not think anyone can reasonably be in control of and adequately supervise that number of dogs. It would be better to set the limit at 3 or, alternatively, set the limit at 4 provided that no more than 2 of the 4 are off lead.

Fixed penalty level

I would support the increase in fixed penalty levels if the level of enforcement was also increased. It matters little what the level of the fine is if there are not enough resources to ensure that the rules are enforced.

Consultation process

I came across the notice about these proposals by chance while out at Keston. I do not think that they have been adequately publicised though. Searching the Bromley web site I cannot find any

reference to this consultation. You are likely to be vulnerable to procedural challenge (judicial review) if opponents to these plans are able to show that your consultation process has been inadequate.

I am Secretary of Hollydale Open Space, where many dogs are walked daily. On the whole walkers are very good at picking up after their dogs. We have a bag dispenser which is often used.

I agree that the fine should be increased and, more importantly I feel strongly about walkers with more than four dogs. I really think the upper limit should be three.

Our Park is very small, but in larger parks the problem would be greater.

I agree wholeheartedly with your additional bylaws. I feel however you should add to the paragraph about people picking up after their dogs have fouled that they dispose of it in a litter bin or take it home (and not hang it on trees and bushes as often happens!). Just picking up is not enough!

I also think that dog walkers should be allowed a maximum of three dogs and not four as it is difficult to keep an eye on where four dogs are fouling and some waste will get missed.

I have just seen the Notice about proposed additional rules and penalties for people walking several dogs in the park. The Notice is fixed to the upright holding the notice board outside the Information Centre – i.e. not very noticeable. It seems that I have missed the date for making comments but I would like to add my two penny worth just the same since it is something that has been concerning me.

I would fully support your proposals, in fact I would go further and suggest that a maximum of three dogs is sufficient for one person to properly control and clean up after.

Recently there have often been 3 or 4 groups of dog walkers with 8 or 10 dogs each in the park, meaning that there can be between 30 and 40 dogs milling about, plus the other individual dog owners with one or two dogs. It is quite intimidating and overwhelming even for me as a dog owner (of one Highland terrier) who is not afraid of dogs, as well as being off putting for a visitor just wanting to walk and enjoy the park. In addition to the packs of dogs - usually reasonably well behaved - some of the dog walkers shout incessantly to their dogs to come back or keep up, which is also irritating and a nuisance for others. I cannot imagine that even two dog walkers with 8 dogs can ensure that they clean up after all their dogs - which is also a nuisance and a hazard for people (and kids) playing football, or wanting to sit on the grass.

I'm afraid that the park, which seems to be more and more neglected in its upkeep together with the number of dogs, is becoming a less attractive asset to the borough even though at present it is still very well used by locals. Time to stop the rot!

Disagree with proposal (90)

Kennel Club response to London Borough of Bromley Public Spaces Protection Order consultation Submitted on 13 December 2019 by: The Kennel Club, Clarges Street, Piccadilly, London W1J 8AB, tel: 020 7518 1042, email: kcdog@thekennelclub.org.uk

The Kennel Club is the largest organisation in the UK devoted to dog health, welfare and training, whose main objective is to ensure that dogs live healthy, happy lives with responsible owners. As part of its External Affairs activities, the Kennel Club runs KC Dog, which was established to monitor and keep dog owners up to date about dog related issues, including Public Spaces Protection Orders (PSPOs) being introduced across the country.

As a general principle, we would like to highlight the importance for all PSPOs to be necessary and proportionate responses to problems caused by dogs and irresponsible owners. It is also important that authorities balance the interests of dog owners with the interests of other access users.

Maximum number of dogs a person can walk

The Kennel Club feel that an arbitrary maximum number of dogs a person can walk is an inappropriate approach to dog control that will often simply displace and intensify problems in other areas. The maximum number of dogs a person can walk in a controlled manner depends on a number of factors relating to the dog walker, the dogs being walked, whether leads are used and the location where the walking is taking place.

An arbitrary maximum number can also legitimise and encourage people to walk dogs up to the specified limit, even if at a given time or circumstance, they cannot control that number of dogs. We thus suggest that defined outcomes are used instead to influence people walking one or more dogs, be that domestically or commercially, such as dogs always being under control, or not running up to people uninvited, on lead in certain areas etc.

For example, an experienced dog walker may be able to keep a large number of dogs under control during a walk, whereas an inexperienced private dog owner may struggle to keep a single dog under control. Equally the size and training of the dogs are key factors; this is why an arbitrary maximum number is inappropriate. The Kennel Club would recommend the local authority instead uses the proposed "dogs on lead by direction" orders and targeted measures such as Acceptable Behaviour Contracts and Community Protection Orders to address people who don't have control of the dogs they are walking.

A further limitation of a maximum number of dogs per person is that that it does not stop people with multiple dogs walking together at a given time, while not exceeding the maximum number of dogs per person. Limits can also encourage some commercial dog walkers to leave excess dogs in their vehicles, which can give rise to welfare concerns.

We also note that commercial dog walking insurance is readily available; many policies are available which cost in the region of £100-150 per year will allow commercial dog walkers to walk six dogs off lead. While individual policy coverage may vary, these policies would typically cover financial claims arising as a result of commercial dog walking i.e. dogs attacking other dogs, or people, or getting lost. The widespread availability of insurance for walking six dogs off lead, and relatively low cost premiums is an indicator that commercial dog walking exceptionally rarely results in serious incidents, such as attacks on people or other animals. While we acknowledge reports of

uncontrolled groups of dogs being walked by one person have been made to the council, we would suggest that either an accreditation scheme is adopted or targeted measures such as Community Protection Orders are used against the individuals who are causing the problem. Accreditation schemes can be far more effective than numerical limits, as they can promote wanted good practice, rather than just curb the excesses of just one aspect of dog walking. Accreditation can also ensure dog walkers are properly insured and act as advocates for good behaviour by other dog owners.

Dog access

The Kennel Club oppose PSPOs which introduce blanket restrictions on dog walkers accessing public open spaces without specific and reasonable justification. Dog owners are required to provide their dogs with appropriate daily exercise, including “regular opportunities to walk and run”, which in most cases will be off lead while still under control.

Accordingly, the underlying principle we seek to see applied is that dog controls should be the least restrictive to achieve a given defined and measurable outcome; this is the approach used by Natural England. In many cases, a seasonal and/or time of day restriction will be effective and the least restrictive approach, rather than a blanket year-round restriction. For instance, a “dogs on lead” order for a picnic area is unlikely to be necessary in mid-winter.

The Government provided clear instructions to local authorities that they must provide restriction free sites for dog walkers to exercise their dogs. This message was contained in the guidance document for Dog Control Orders, and has been retained in both the Defra/Welsh Government and Home Office PSPO guidance documents, with the Defra guidance for PSPOs stating ‘local authorities should ensure there are suitable alternatives for dogs to be exercised without restrictions’.

Dogs on lead by direction

The Kennel Club welcomes ‘dogs on lead by direction’ orders, as these allow responsible dog owners to exercise their dogs off lead without restriction providing their dogs are under control, whilst allowing the local authority powers to restrict dogs not under control. We would also recommend local authorities make use of the other more flexible and targeted measures at their disposal such as Acceptable Behavioural Contracts and Community Protection Notices. Kennel Club Good Citizen Training Clubs and our accredited trainers can also help those people whose dogs run out of control due to them not having the ability to train a good recall.

Dog fouling

The Kennel Club strongly promotes responsible dog ownership, and believes that dog owners should always pick up after their dogs wherever they are, including fields and woods in the wider countryside, and especially where farm animals graze to reduce the risk of passing Neospora and Sarcocystosis to cattle and sheep respectively.

We would like to take this opportunity to encourage the local authority to employ proactive measures to help promote responsible dog ownership throughout the local area in addition to introducing Orders in this respect.

These proactive measures can include: increasing the number of bins available for dog owners to

use; communicating to local dog owners that bagged dog poo can be disposed of in normal litter bins; running responsible ownership and training events; or using poster campaigns to encourage dog owners to pick up after their dog.

Assistance dogs

When introducing a dog control PSPO local authorities should consider the potential negative impacts on vulnerable groups and their requirements under the Equality Act 2010. The most obvious potential adverse impact is upon those who rely on assistance dogs and blind people, who may either be unable to comply with conditions contained within the Order, or the effect of the Order would be to exclude them from accessing public spaces. Appropriate exemptions from dog fouling and dog exclusion Orders should be included in PSPOs, for blind people and those who rely on assistance dogs. Though the council should recognise that many disabled people enjoy the company of a pet dog (i.e. not acting as an assistance dog) and this also needs to be considered.

Assistance Dogs UK currently have eight member organisations which can be viewed here - <http://www.assistedogs.org.uk/>. However, the membership of Assistance Dogs UK is not a definitive list of all UK assistance dog organisations, and may change during the currency of the PSPO, it also does not provide for owner trained assistance dogs. We would therefore encourage the Council to allow some flexibility when considering whether a disabled person's dog is acting as an assistance dog.

We would encourage the Council to adopt the definitions of assistance dogs as used by Northumberland Country Council which can be found on page 2 of the attached document;
“(4) The term “Assistance Dog” shall mean a dog which has been trained to assist a person with a disability.
(5) The expression “disability” shall have the meaning prescribed in section 6 of the Equality Act 2010 or as may be defined in any subsequent amendment or re-enactment of that legislation”.

I write to you regarding your recent consultation on the proposed changes to the number of dogs allowed on dog walks at one time. Whilst I understand the case for addressing walkers who are unable to control their dogs in the park, I do not agree that imposing changes to the number of dogs per walker is in the interest of the community. As a dog owner myself, I see a number of dog walkers on a daily basis who are able to effectively control their dogs. I know a lot of the walkers are dependent on their dog walking business, and as a supporter for local businesses, oppose any changes that may harm their businesses. Instead I would support an increase in penalties for those who fail to control their dogs or to pick up their waste.

I am writing to strongly oppose the introduction of a restriction to 4 dogs per person walked in a public place.

This rule would adversely affect the income of responsible, reliable dog walkers such as my own who rely on being able to walk up to 6 dogs for their income. As a knock on affect this would make a real impact on lots of working people and elderly infirm people in the borough who rely on dog walkers to enable them to keep a much loved pet.

My dog walker has been in business for years, shows and trains her own extremely well behaved dogs, often walks very small dogs on leads along with a couple off lead - never over 6 as her insurance covers her for 6.

She has never had any altercations caused by dogs on her walk nor allowed her dogs to roam and

annoy or scare people and has them under control at all times.

This new rule and fine will mean that she may not be able to continue to run her business.

I totally accept that there are some unscrupulous walkers who do not have this level of control and safety, but it is very unfair to bring in this blanket ban and fine system to all the good responsible walkers & ruin their businesses for the sake of a very few people.

Can a dog walkers' licence not be issued that has a stipulation that a new walker cannot be in charge of more than 4 dogs until they have been in business for 3 years? Then no more than 6 maximum.

There will always be small scale walkers who never go over 4 dogs but for the wonderful walkers who can safely control up to 6 dogs this would be far fairer.

Please consider this proposal. Surely it would be more cost effective for the local authority rather than patrol areas and issue and administrate fines. Plus would reassure the public that a robust system is in place.

My dog walker has been walking my dogs for over 8 years and is exemplary in her behaviour and also in the way she controls the dogs in her care. She is insured in line with DEFRA to walk 6 dogs and also has a license from Bromley council to walk 6 dogs. She always makes sure she follows the law and has the relevant insurances needed. However it has been brought to her attention via another dog walker who saw a notice on a tree that the council is limiting dog walking to just 4 dogs. This would put my dog walker out of business and she is sick with worry (as are all the owners of the dogs). My dog walker is such an honest, hardworking, law abiding citizen it just seems so unfair.

I am writing in protest and hope you will think deeply about the serious implications of your actions on local people.

I have just heard that Bromley Council are planning to restrict professional dog walkers from walking more than 4 dogs at a time.

Although I have no vested interest I do know that dog walkers provide a critical service not only to professional people who are out at work all day, but also for elderly people whose only company is their dog.

By reducing the number of dogs to only 4 per session the walkers will, without a doubt be forced to raise their prices to the clients they will have remaining, and in the case of the elderly on a fixed income pension, you will most likely put the service beyond their abilities to continue to pay for the service.

Rather than penalise the many excellent walkers who abide by all the rules, apply for new licenses when the Council decide to issue them, have their premises inspected by the appropriate government bodies etc. etc., why not focus on the cowboy walkers? The ones who far exceed the maximum dogs allowed at any one time, who allow the dogs to run out of control, who never dream of clearing up any mess that has fouled the parks?

My elderly friend uses a top quality dog walker. She walks 6 dogs at each session. She trains all the dogs to recall before allowing them off the lead and she regularly posts on Facebook what her charges have been up to.

She will even take a sick dog to the vet if need be and she will provide care if the owner goes into

hospital which happened to my friend when she broke her ankle and needed respite.

She has been inspected by DEFRA, the RSPCA, a City of London vet who issued a 5* boarding licence and she is totally committed to giving a gold star service.

Another knock on effect will be a reduction in adoptions from animal rescues like FOAL Farm and Last Chance Animal Rescue because the walkers will have to raise their hourly charges to cover the reduction in numbers.

It all seems so grossly unfair to strike a blow at these people and I really suggest you should rethink through all the implications of this idea. We need more dog walkers, not less, at an affordable price.

I'm emailing as I'm incredibly concerned about the new proposal to ban walking more than 4 dogs at any time.

So many people, like myself, work full-time and are therefore unable to care for their pets in the day. We rely on our dog walkers to ensure our dogs get the exercise and socialisation they need to nurture their wellbeing.

Our rescue dog Dougie is walked by an incredible dog walker, who walks 4-6 dogs at a time and already has an immensely busy daily schedule. I've never known someone to maintain such control of an animal, and in response I've never seen Dougie behave more obediently.

I totally appreciate that not all dog owners or walkers are in control of their animal, but I desperately urge you to reconsider this restriction, because not everyone should have to suffer for the irresponsibility of a minority.

Wouldn't it be possible for those dog walkers who've never had any incidents or complaints against them to be allowed to continue to do their jobs? This ban may seem like a minor issue to some, but it has the likely potential to destroy livelihoods.

As a working dog owner I rely heavily on the services of my dog walker and they are invaluable to me – I vet my dog walker as I would a child minder and have been lucky enough to find someone who is more than capable of looking after 6 dogs – having each under control and totally responsible and professional, so much so I have used her for 11 years - but I have heard about the above proposal and strongly disagree with this on the following grounds:

Insurance covers dog walkers to walk 6 dogs at a time
DEFRA guidelines favour 6 as the upper limit
The RSPCA and The Dogs Trust guidance for dog walkers is also a 6 dog limit

So I would ask why Bromley thinks these organisations are wrong and are proposing to only allow 4? I would also be interested to know if Bromley Council engaged with stakeholders about this as there is no reference to this and would also question if anyone actually knows anything about business models or how responsible dog service providers operate? .

I agree that there has to be some sort of control so why not introduce something like a driving licence with points and to get this licence they have to have insurance and if they break the rules they are fined and points on their licence?

I am writing you about the proposed 4-dog limit for dog walkers in Bromley. As someone who relies on dog daycare for my dog with special needs, I strongly oppose this proposal. It took us months to find a dog walker who was suitable for our dog. Our dog walker has been a godsend for us, and our

dog – who is a rescue and had an abusive puppyhood – has grown to love not only the dog walker but the “pack” she is now part of. My dog walker is incredibly experienced and has full control of all the dogs in her care. She is very selective about the dogs she takes on and requires a trial period to ensure that any new dogs fit in the group.

If this limit were passed, my dog walker would have to reduce the number of clients she has, and as this is her livelihood, she would also have to raise her prices. At best, this would mean that we would have to pay more. At worst, we would have to find another dog walker, which would be incredibly challenging with our dog’s special needs.

I know I am just one person, but I hope you will take my experience into consideration. This proposal penalizes qualified, experienced dog walkers, as well as their clients. According to the Kennel Club, who also oppose dog walking limits, a better approach would be targeted measures such as Acceptable Behaviour Contracts and Community Protection Notices to address people who don’t have control over the dogs they are walking: <https://www.thekennelclub.org.uk/media/1159277/kc-dog-briefing-maximum-numbers-of-dogs.pdf>

I write regarding the proposal to limit the number of dogs a dog walker may have. Surely no-one is thoughtless enough to believe it is worse to have a person walking six under-control dogs than one person with an out-of-control dog? We wouldn't say that a parent with five children is less likely to look after them than a parent who has only one, would we? Even my four year old said that he didn't think anyone could make such an error. It is unfair to ruin people's businesses. Even those who do not like dogs do not want someone who is earning and paying tax towards the NHS and schools to have to stop-why should someone be forced to stop supporting themselves and others, and perhaps be forced to take benefits instead, when they'd rather run a business? Some of the dogs might belong to carers/teachers/nurses/doctors-and they might not be able to work if their dog -walker cannot look after their dog any more. Some people with disabilities might not be able to keep their dog if the person who normally walks him can't do anymore because they are prevented from walking more than four at once. This is very unfair on people who find their disability limits their life choices-please make sure that such a law, which would discriminate against people with disabilities, does not come to pass. Whether or not we like dogs-and I do think that certain dog-owners might be a problem, for their own pets as much as for other people-we should not discriminate against decent people because of a small minority, any more than we should stop parents taking their children to public places just because some parents do not look after their offspring as they should.

I am writing this email in opposition to the council’s recent proposal that being in charge of more than four dogs per person in public spaces will incur a fine; therefore please accept it in support of the professional dog walkers and carers who operate safely and effectively in Bromley.

I and many people I know rely on a professional dog walker on a daily basis, who runs a legitimate business based on caring for no more than six dogs at once. As a single person, I would not be able to go to work and earn a living myself without their services which may cease to operate if this proposal comes into effect. I would be seriously negatively affected by the council's proposal and therefore vehemently oppose it.

Amending the proposal to six dogs instead of four, however, would better support our dog caring community and help prevent non-professionals from operating unsafe practices. I am happy to be consulted further on this matter, and to publicly represent my point of view where required.

I understand there is a proposal to let people walk only 4dogs at a time, I use a dog walker/dog daycare for my dog, their service is essential to me & my partner (emergency services) they also have complete control over the dogs they walk.

Enforcing dog walkers/borders to have a licence that they wear as an armband (like doormen) would

be better maybe?

I'm uncertain why there is a proposed additional offence bringing the walking ratio of 6 dogs to 4.

I only have 1 dog but he is looked after by my dog sitter who is incredibly conscientious, often picking up other dog poo as well as the dogs she looks after. She has excellent control of the dogs in her care, ensuring she only takes on well behaved dogs.

This will seriously affect her business. It is disappointing that your agenda to deal with irresponsible dog walkers/ owners will impact those who are very responsible. Those with 4 dogs who are irresponsible will continue to be so but those with businesses who rely on walking up to 6 dogs will be detrimental impacted.

There must be other ways to deal with those that are irresponsible.

I wanted to write to you to oppose the proposed 4-dog limit that Bromley council is considering. An arbitrary limit like this doesn't work in practice: 1 badly-behaved dog can cause far more damage than 6 well-behaved dogs. This proposed restriction has the potential to penalize responsible owners and walkers.

As an alternative, I would suggest the Kennel Club's recommendation of Acceptable Behaviour Contracts and Community Protection Notices, as seen in this document:
<https://www.thekennelclub.org.uk/media/1159277/kc-dog-briefing-maximum-numbers-of-dogs.pdf>

Just a quick email to reinforce others you have probably seen due to the notice to limit group dog walks to a maximum of 4 walks.

Although I completely understand the reasons, I believe the limit should be 6 in accordance with guidelines from other groups

- DEFRA
- RSPCA
- Dog's Trust
- Dog Care licensing

As a person who regularly uses dog care, my worry is that if licensed dog walkers are obligated to drop their numbers from 6 to 4 dogs then the cost of dog care would have to greatly increase and it's already extremely expensive.

In addition, licensed dog walkers have an obligation to maintain control of the dogs in their care or risk their licence so penalising them would seem harsh, and not fixing the route of the problem which is unlicensed dog walkers/carers.

I am a retired pet sitter and, whilst I no longer walk dogs (except my own), I should like to comment on the above consultation.

Most professional dog walkers all have business insurance, which allows them to walk a maximum of 6 dogs. Surely if insurance companies are happy with 6, then the council could be too?

The number of dogs is actually irrelevant. Many owners own one or two dogs and these can be just as uncontrollable. They rush up to strange dogs and people and cause mayhem. How can you legislate against that? Training is key here and most professionals know exactly what their clients' dogs are doing.

The Kennel Club is against arbitrary limits of numbers and DEFRA recommends 6.
<https://www.thekennelclub.org.uk/media/1159277/kc-dog-briefing-maximum-numbers-of-dogs.pdf>

In conclusion, I think 4 dogs is prohibitive and will penalise those dog walkers working hard to run a professional business. 6 is a far more acceptable number. The results of reducing the numbers will mean some dogs will be left home alone all day, and less professional walkers will increase.

I look forward to hearing the results of this consultation.

Just wanted to register my concern and disagreement with this proposal.

My dog Max is looked after by a dog walker. Her business is registered with the council and was recently reassessed and rated with top marks by your assessors. My dog goes to her for day care/a walk and boarding as required. It is his second home. She walks 6 dogs without any problems. She carefully picks the dogs she cares for and they all have to pass an interview walk with her and her own dogs to make sure they will fit in with existing dogs and have the required level of recall skills and behaviour. Please check out the posts on her Facebook page where you will see how in control of our dogs she is.

If you restrict the number of dogs she can walk you are likely to make her business uneconomical and unviable. If she has to reduce the number of dogs she cares for and/or she has to increase her fees this will have a big impact on me. I am a widow and I live alone and work 3 days a week. My dog is very nervous but loves being with her and her charges. I cannot even think about trying to find another carer for him.

It seems illogical to me that you allow her to care for 6 dogs plus her own 2 but now want to restrict the number she can walk to 4. My understanding is that her insurance company, the RSPCA and the Dogs Trust all say that 6 is an acceptable number for a professional dog walker. Why do Bromley Council think they know better?

I know there are other unprofessional dog walkers who walk many dogs. I have seen them myself. They stand chatting in the middle of the park and leave their dogs running around. HOWEVER you should not be punishing registered, licensed professionals as well as these people. You need to not make the reduction to 4 dogs or find a way for licensed professionals to carry on as they are whilst punishing those who choose to behave badly.

Concerning the above, please could you confirm how many complaints the Council has received about dogs being out of control when walked in groups of more than 4 dogs? Please also confirm what issues have arisen from the same, and whether any have resulted in harm to people or other animals?

I ask as someone who has walked daily in most of Bromley's parks for the past 30 years, and cannot recall a single incident. I own 2 dogs and don't ever walk with 4 dogs, but am concerned that dog walkers are being unfairly targeted.

If dogs are out of control, in my own experience it is usually individuals with just 1 dog they are either unable or unwilling to control. However, most dog owners and walkers are very responsible. If there is no justifiable reason to impose further sanctions on dog owners then I oppose the proposal to restrict the number of dogs to 4 per person in public places.

I also oppose an increase in the penalty for all dog related offences from £80 to £100. These charges are disproportionate to the offences named.

Two days before Christmas I was alerted to a letter pinned to a tree at Well Wood where I walk my dogs, headed "Consultation re Proposed Additional Offence in Relation to Control of Dogs"

I am a local business owner/operator. I have been operating a dog care (Daycare, boarding and walks) from my home in Bromley for nearly 10 years. I am Council Licensed with it being renewed last year under the new rating system, with a 5 star 3 year licence.

I apologise for the lengthy email but there's a lot to cover and a lot of information that I am keen to share with you.

Whilst I fully agree with the proposals in your letter, the final proposal "Being in charge of more than 4 dogs per person in a public place" would have serious implications for my business and the service my clients rely on. It will cause problems for every dog care business in our borough, and any dog owner who relies on the essential service we provide.

Bromley Council hasn't previously set a limit to the number of dogs one person can walk. I am alarmed and concerned that this proposal, if brought in will have a seriously detrimental effect on the business I have worked so hard to establish. My daily business is modelled on 2-3 walks of up to 6 dogs (sometimes fewer but never more than 6). In real terms, having to reduce my walks to 4 dogs would reduce my customer base by 1/3, reducing my earnings from an hour's walk from £81 to £54. I do not earn a fortune and work extremely hard for my income. Reducing my income by a third would mean I would not be able to invest in a van to replace my existing vehicle which is now unreliable and not cost-effective. I had been researching an electric vehicle purchase in 2020 as an environmentally-friendly alternative, but if this proposal comes in, it would be impossible for me to finance.

My clients are not wealthy people; the dog care I provide is not a luxury. It is as essential to them as daycare is for working people with children. I have clients who work for the NHS, single parents, and teachers, plus some elderly people who without me would find it almost impossible to keep their only companion as they can't walk their dog themselves.

I personally assess every dog I take on. I am very selective about which dogs join my walks and never take on dogs with behavioural issues such as aggression. I cannot see how any of my group dog walks are a threat to the public or walking 6 dogs or 4 would make any difference. The only outcome would be a severely reduced income and that I could no longer provide the ongoing service my customers need - many of whom have been with me for years. I have even mentored dog walkers starting up so they can learn from my experience.

I am a small business that operates as a sole trader. I pay my taxes and because I am self-employed, I have a healthy work/life balance and don't impact much on services such as the NHS (I pay for my own private medical cover instead). I also don't take up a daily space on public transport on a daily commute (which I used to do before I started my business).

Can you explain why the number of dogs has been set to 4? You may be unaware that in October 2019, new licensing laws for dog daycare were brought in by DEFRA. Their guidelines state that 6 is a permissible number to walk as a group. My business insurance (provided by Cliverton who are a dog-walker specific specialist) covers me for third party liability for up to 6 dogs. In addition, I have held a license with Bromley Council for 7 years, to board up to 6 dogs. I was also granted a licence to provide daycare for up to 6 dogs in addition to my own 2 (total 8 dogs), on 1st January 2019 for three years.

DEFRA "The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 Guidance notes for conditions for providing home boarding for dogs November 2018" (DEFRA)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762467/animal-welfare-licensing-home-boarding-for-dogs-guidance.pdf

Guidance states: No more than 6 dogs per person can be walked at one time and owner's consent is

needed to walk with other dogs.

As the DEFRA legislation states dogs are not permitted to be left alone, then I have to walk the 6 dogs in my care together. Can you see the problem here? Has the Council's licensing department been consulted about the proposal? Which stakeholders have been involved in this proposal? To date I can still not see the consultation proposal on Bromley Council's website. Don't such proposals need to be in the public domain? Hardly anyone in the community of dog walkers that I know personally has heard about the consultation!

The Dogs Trust (working with Pet Industry Federation (PIF) and RSPCA) published a guide for professional dog walkers last year. It states: The maximum number of dogs that can be walked at any one time should not exceed the number stated in the walker's insurance policy and comply with local authority requirements regarding the number of dogs.

Any professional walker I know works to a high level of competency and is experienced in handling groups of up to 6 dogs. We largely follow the guidance outlined by the Dogs Trust and are responsible, experienced professionals.

www.dogstrust.org.uk/news-events/news/2019/animal-groups-join-forces-to-launch-guidelines-for-professional-dog-walkers

There is a very bad feeling amongst the dog walking community, that where we would expect support for our small businesses which provide valuable services to the public, that we are being ostracised and dictated to by a council who have little empathy or understanding as to how our businesses operate.

I am fortunate that I can offer daycare and boarding, but other contemporaries of mine who only offer dog walks are questioning whether they will be forced to close their businesses if this new ruling comes in to place. They have monthly outgoings like all of us and being self-employed can be a struggle, with no sick pay or holiday pay. Had you thought how this proposal will affect people's livelihoods in the borough?

I can understand if this proposal is a reaction to the many dog walkers who are unregulated and walk more than 6 dogs at a time. Some of whom travel from outside our borough because their own Councils have already imposed restrictive numbers of 4 dogs per group. I witness these people almost daily, and take pains to avoid their unruly groups as they are a threat to my calm, controlled walks.

I fear that your proposal will target the responsible and professional walkers who already abide by rules. It will not have any effect on the rogue walkers who will continue to take no notice and are probably also uninsured. It is those people who pose a threat to the public and the dogs in their care. Owners employing their services may well be unaware of the poor service they are getting. I have two dogs in my care who came to me having previously been let down by an incompetent walker.

I'd be very happy to liaise further with you if you would like a professional, experienced input on legislation affecting dog walkers. Have you for instance considered licensing professional dog walkers? It might not be an immediate problem-solver but it would perhaps reassure the public that our industry is sufficiently regulated. Perhaps that could be an alternative?

I implore you to look again at setting the limit of numbers of dogs that can be walked. Could you not reconsider changing the limit to 6? It would make the world of difference - especially to a friend of mine who personally owns 5 dogs and is extremely stressed by the new proposal.

Alternatively, as I am already licensed by Bromley Council to have 6 dogs plus my own 2 - total of 8, in my care. I have been inspected and assessed in great detail, would I be except from the new proposal?

There is a high demand for proficient dog walkers in our borough. There is already a shortage of licensed dog daycare places (many businesses are still operating without licenses as a quick search on Facebook for example, might demonstrate); yet more restrictions will put people off running their own legitimate businesses.

Don't you think it's a pity that we can't treat dog care professionals with more respect - providing valued services to their communities, as they do in the USA?

I look forward to hearing your comments and do please get in touch if I can be of further input.

I have seen the notice posted in my local park (Well Wood) about the intended restriction on the number of dogs that can be walked by one person.

I do agree that in the past year or so there has been a problem in some parks where commercial dog walkers have been exercising many dogs and they may not have been under proper control. I have seen it in my local parks in West Wickham and Biggin Hill where these commercial/professional dog walkers have quite a few dogs with them off the lead, and this does appear to be intimidating to some people.

However, as a dog owner and trainer myself, I feel I need to make a couple of points. I own five dogs. I am a Kennel Club Accredited Dog Trainer under their KCAI Scheme, I run the local dog training club in Coney Hall (The Gypton Dog School), I am also Chief Instructor at a KC Registered Dog Training Club in Orpington (St.Edwards DTC), and I am a volunteer Assistance Dog Trainer with the charity Dog A.I.D. I compete in dog obedience as a sport, and have done for over forty years. These are the main reasons that I have more than one dog. Three of my dogs do competitive obedience (one is retired now but in his day he competed in obedience at the highest level including at Crufts). My small breed dog does trick training and is my demo dog in training classes, and the other is a show/pet dog.

I do feel very strongly that the new regulation should only apply to the commercial dog walkers. My husband and I are not always available to walk our dogs together, so there are occasions when only one of us takes the five dogs out to the park. Under this intended new system we could be fined for walking our own dogs, who are all under our control as they live with us 24/7 - unlike the commercial dog walkers who only see the dogs they are out with for an hour a day.

The other point I wanted to raise is that some years ago I enquired of the Council if it was possible for me to use the park for occasional dog club sessions at my own dog club - such as recall training in a real situation for example. I was informed that it's against the regulations to use parks for any activity where people have paid to take part, i.e. they have paid me for the session. Surely this must cover the commercial dog walkers too? They are earning a living by using free venues, are sometimes causing a nuisance, and vastly increasing the amount of dog waste in one place. Even if they clear up after the dogs in their charge, it does mean the dog poo bins are almost always full.

Can you please let me know if restricting the new rules to commercial/professional dog walkers only is something that the Council would consider? I feel that would be the fairest way to implement it. After all, there are very few other people like myself who own more than four dogs - in fact I have never met anyone else in forty odd years of dog walking in local parks who owned five or more dogs!!!

It has been brought to my attention that Bromley Council wish to allow people to walk only four dogs at a time. Whilst I can see the point of view of local farmers etc. this would seriously affect many of the conscientious dog walkers in the local area who have full control of the dogs they walk and carefully plan the dogs they walk with each other.

A solution to the problem might be to licence the dog walkers instead which would stop just any one setting themselves up as a dog walker and walking a large number of dogs with no experience and as part of this they would have to have their own insurance policy.

I do not see why some dog walkers should be penalised for the few dog walkers and people that walk large groups of dogs without control.

It has come to my attention that Bromley propose an additional offence in relation to control of dogs. I have read the proposal and I am in disagreement with this proposal.

I have a wonderful dog walker that is incredibly responsible and is insured and looks after our dog so amazingly.

This proposed new offence would impact so horribly on her ability to make a living. She only takes 6 dogs at a time and is incredible at controlling all the dogs.

I do understand that there are a lot of irresponsible dog walkers out there that have too many dogs and do not know how to control them but I propose maybe a license for dog walkers and that way allowing them to walk more than four dogs responsibly.

I am convinced that the unscrupulous dog walkers would then be forced to take better care and not walk too many dogs.

I had researched my dog walker very well before I chose her (which is what everybody should do) and in the three years that I have used her she has never disappointed. I would hate to lose her because she can't make a living with fewer dogs. Please consider this before something is implemented.

She would be totally willing to get a license. I'm sure this is a better idea than enforcing this proposal. Not sure anyway how you would go about doing so. It would mean officers out there to enforce it in all public parks and other places. I'm fairly sure enforcing a license would require less feet on the ground.

Thank you for reading this and hope you can be understanding about the issue.

I am a resident of Bromley and it has been brought to my attention that there has been a proposal to implement a rule in respect of commercial dog walking group sizes.

It is always reassuring to see the council taking an interest in this business area, which is sadly abused by some individuals who do not pick up after the dogs they walk, spend their whole time on the phone whilst walking and seem to demonstrate little care towards those dogs entrusted with them.

Finding a good business to entrust a much loved member of the family with is hard, and indeed it is tricky to differentiate the cowboys from the hard working professionals. However in order for these professionals to thrive and set the right example they need to be able to run a profitable business. I for one have no problem with my dog being walked in a group of 6 because the business I use operates with the highest standards and professionalism.

This therefore begs the question- what does a policy of 4 dogs at a time aim to achieve, when it clearly will not solve the issue at hand and will penalize good honest businesses?

I for one feel this is quite a lazy suggestion to solve an issue which would be best addressed with some kind of standards agency or vetting process, should this be a concern of the council. I urge you to consider other approaches to assist with the issue, as penalizing existing businesses will just create a higher demand for the service and henceforth more "cowboys" looking to make some quick cash.

Having excellent care for my dog is of upmost important to me and therefore I am happy to be part of this discussion, should you require any residents and service users to consult with.

I have seen this notice around and about and having thought about it wanted to send you my objections.

I have a dog so use dog walkers and whilst I would agree that there are some dogs walkers that don't behave correctly the ones that I use always do. Their insurance allows for 6 dogs and they are always conscious of health and safety when out. I have observed them many a time from afar and they are always in control of their dogs. Bearing in mind that this is can be someone's sole business it feels a bit harsh. I have also seen dog walkers that don't pick up the dog poo or don't look like they are in control, but I don't think having only four dogs will make a difference to this and it is only a handful of dog walkers that are like this. Wouldn't it be better to have dog walkers apply for a license from Bromley that they have to have visible whilst working. That way if they are not behaving in the right way they can be reported straight away. I hate seeing the odd few bad dog walkers giving the good ones a bad name and it feels wrong to tarnish them all with the same brush.

I wanted to express my opposition to the proposal to implement the above rule. I would actually welcome dog walking being a licensed activity if it removed some of the sub-standard walkers I see almost daily, who often walk for more than 6 at a time, fail to pick up dog waste, and clearly have little understanding of dog behaviour or responsibility that comes with having other people's dogs in their care.

Please therefore consider how essential my dog walker is to us and our dog, and that for a trained professional it is perfectly possible to walk 6 dogs under control without causing any risk.

I am writing in response to your consultation letter dated 10.12.19, specifically regarding being in charge of more than four dogs in a public place. To be clear and direct, I do not agree with this proposal.

Can I request the objective in this proposal? This isn't stated on the letter – have seen a hard copy strapped to a tree locally but can't easily access it on the Bromley website, any links or further rationale would be appreciated.

My wife and I use the services of a professional dog walker on a daily basis, who is insured for walking up to six dogs. It is also my understanding that DEFRA advise that up to six dogs can be walked at once*, plus the RPSCA and Dogs Trust concur.

*https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221091/pb11577g-dogcontrol-orders.pdf (page 13)

Rather than reduce numbers of dogs under supervision of one individual, in our view it would be better practice to make dog walking a licensed activity. This would ensure the individual in charge should act in the most responsible manner. Whilst it requires more administration it would surely be a more effective way of regulating the quality of dog supervision in the borough. Especially in

light of the specialist guidance stated above. Again, it would be good to know what research and conclusions Bromley Council has adopted ahead of making this proposal? I do not count local park users and residents in this category, for obvious reasons - their views are subjective and not necessarily professional. Additionally, who are the "key stakeholders" referenced in this proposal? I would appreciate the opportunity to liaise with them directly please.

In our case, reducing the number of dogs our walker can take at a time (from six to four) would mean we would be unable to use his services and create us problems with our working commitments. I can imagine we would not be alone in this scenario. Furthermore, it would negatively affect business models of most professional dog walkers which would affect more dog owners in the borough. Have any professional dog walkers been consulted ahead of this proposal? We have every confidence in the professionalism of our long-term dog walker who himself would welcome better regulation & administration to address concerns, including licensing local dog walkers. Reducing the number of dogs to four isn't necessarily going to resolve current concerns, depending on what they are – again more detail is required to understand what these are.

If you can come back to me on the specific requests please, namely:

- What is the objective of the four-dog proposal?
- What is the rationale behind the proposal (detail and specific concerns Bromley Council are looking to address)?
- What professional and specialist research/groups have been consulted ahead of this proposal?
- Have any professional dog walkers in the borough been consulted ahead of the proposal?
- What is the council's position on licensing dog walkers?
- Who are the key stakeholders referenced in the proposal?

I have been passed your letter to stakeholders on the above proposal and as a Bromley resident who uses a dog walking service provider I am writing to object to the limitation to 4 on the number of dogs that an individual may be in charge of.

I regularly use an individual to take care of my dog during the day. He walks up to 6 at any one time. He is insured and is an excellent example of responsible dog walking and care. He knows all his charges, cares about them and manages them properly at all times. His ability to earn a living would be curtailed if you introduce this new limit.

What is the object of such a limit? Insurers, DEFRA guidelines, the RSPCA and the Dog Trust all give guidance that 6 is a good number. Bromley is being inconsistent and introducing an arbitrary limit which will have no effect on irresponsible dog care - which is presumably your aim.

My dog day care provider has written:

"I would actually welcome dog walkers being a licensed activity if it removed some of the sub-standard walkers I see almost daily, who often walk for more than 6 at a time, fail to pick up dog waste, and clearly have little understanding of dog behaviour or responsibility that comes with having other people's dogs in their care.

This sledgehammer to crack a nut approach will not deal with the problem; instead it will affect decent, responsible professionals like me who have extremely high standards and a responsible approach, not just as a cash-in-hand hobby job.

I personally know some walkers who only do dog walks and would struggle to make ends meet if they had to reduce their client base, having worked extremely hard to build up a business to be viable."

I very much hope that you will reconsider the limit and raise it to 6 in line with the bodies mentioned above and dog day care insurers. Also, consider introducing a proper scheme which helps not

hinders responsible dog day care cover. These providers give a good and properly insured service for people who work all day but need their dogs walked and any measures which reduce the numbers of these providers risk dog owners taking short cuts and perhaps leaving their animals with uninsured providers or worse still, on their own all day.

I would like to strongly object to the proposal of restricting the number of dogs a dog walker can walk to 4. Our dog walker, runs a very professional service and I guarantee that she has control over all of her charges at all times during her walks. Restricting the numbers will make her business less viable which will lead to her having to raise her charges to her customers. She doesn't only walk dogs of full time workers but people who are unable due to health or disability to walk their companions so this will severely affect them financially.

I would like to know how you will go about enforcing this change i.e. how many people will be patrolling the parks at any one time? I am sure this proposal will not stop the unlicensed/uninsured dog walkers who will just carry on, risking the fine.

The only problem I have encountered during walking my own dog is with other dog owners who have no control of their aggressive dogs not with dog walkers.

I hope that my opinion will be taken into consideration.

I write this email to you in the hope that you reconsider your position on dog walks over 4 dogs, my friend has her own Dog walking business, she is what I and most people consider to be a professional Dog walker and carer for dogs. If you go ahead with your proposal of these new rules it could possibly ruin her business as she will either have to employ a helper, which she can't afford to do or let clients go, to accommodate the new proposed regulations.

Maybe Bromley Council could consider a registration system for professional dog walkers so they are not punished because of irresponsible dog owners, if you regulate a registration system properly making sure that the professional walkers have public liability insurance etc., it could be successful and give the council the chance to build up a network of people who could actually help Bromley Borough to be better.

I am a small business owner myself and i know how a potential change in rules can damage successful small businesses who provide a great service in the community.

Please reconsider or maybe think outside the box to help small business owners overcome this issue.

I would like to ask you, if one of your colleagues or yourself could visit my dog walker's Facebook page as she has recorded a video over the last week showing what she does and how she controls dogs in her care & she also highlights the issues with the inconsiderate dog owners that she sees on a daily basis whilst at work!!!

This may help the council to make a more informed final decision.

I am writing to express my concern on the proposal of changing the amount of dogs one person can walk at any one time.

My concerns are as follows:

If people are dependent on the need of a dog walker, due to work, illness or age etc., this could

impact their ability to be able to afford a dog walker. A dog walker is running a business & if they are limited to 4 dogs per walk then they would naturally have to increase their prices which some people may not be able to afford.

This could have an impact on dog wardens & the amount of dogs being surrendered to rescue shelters as people won't be able to walk the dogs themselves.

I fully understand that some people, both professional walkers & individual owners, are not being responsible when it comes to walking their dogs. However, I would say that this is the minority rather than the many.

How would this proposed new law be policed? I'm sure that local residents would rather the already tight council budgets are utilised in more important areas such as road maintenance, support for elderly, support for youth & support for local mental health support etc.

As an alternative, would you consider ensuring that all professional dog walkers are registered with the council. This could also incur a small fee which would increase council revenue.

I would be happy to have a more detailed conversation with you should you wish to discuss further.

I would like to object to the proposed 4 dog rule in a public place. I'm not a professional dog walker (I only have 1 dog), but the majority of the professional dog walkers I see on a daily basis are responsible dog walkers. This proposed rule will jeopardise lively hoods and could end the business of responsible professional dog walkers. You are always going to have few that spoil things for everyone. There are loads of people who rely on these dog walkers on a daily basis.

Maybe the council could have a licensing system, which could be used to ensure that the dog walkers who are abiding by the rules are not penalised.

I am writing to object to the proposed additional offence to the control of dogs - the 4 dog rule.

My husband and I are both full time working adults who rely on the services of dog walkers during the day. Our dog walker is an extremely competent and fully insured to walk 6 dogs at a time. Introducing this rule would impact families such as mine as well as many others who rely on similar services. In addition this would have a dramatic impact on her ability to earn a decent wage. You're proposing a reduction of 33% in her income! How is this good for the economy?

I appreciate that I do not fully understand the rationale behind this proposed additional offence; I am not convinced that there is a one size fits all approach. Businesses that are licensed and insured to work up to 6 dogs should be allowed to do so. Or your rule needs to say you can only walk 4 dogs unless you are insured to walk more. This shouldn't be penalising businesses within our community.

As a dog owner who uses a dog walker regularly this new ruling impact on our lifestyle and the health and wellbeing of our dog as our dog walker would possibly be unable to walk our dog and the impact on their business would be huge.

It has come to my attention that Bromley Council has proposed an additional offence in relation to the control of dogs on public land in the borough. I find it unbelievable that by restricting people to walk no more than four dogs at once is acceptable. I was previously a professional dog walker and had never had any issues walking a pack of dogs; I personally had a limit to 6 dogs per walk, although was perfectly relaxed to walk more. When I was still walking, I would find it was people with just one dog that had more issues with their dog causing a nuisance for others as they didn't have a pack. Dogs walk in a pack and stay within their pack.

There are many unprofessional “dog walkers” out there that have no insurance or certificates and very irresponsible, but to penalise people who actually are responsible walkers OR people who actually have 5 dogs they own, usually down to rescuing dogs. I grew up around a family that had 7 large dogs in one household; this would be unfair to have to do 2 separate walks every morning and evening.

I spend a lot of my time abroad where they don't allow dogs off lead, as a vast majority of the population in that country are scared of dogs, and it really is so sad to think that this country is making so many rules and restrictions of people that in the end people just won't want a dog, as why have one that can't enjoy their walk. It is totally unnecessary and the emphasis should be more on having the right people, who are licensed to walk more than 4 dogs that have proved themselves as responsible people.

I am writing to you as I have recently become aware of the restrictions on dog walking that are proposed by Bromley Council.

I rely on a dog walker and dog day care to take my dog for daily walks whilst I am at work to maintain his needed level of exercise and his quality of life. I'm sure you would agree that it would be cruel and neglectful of me to leave a dog locked inside for 8 hours with no interaction or space to exercise for 5 days a week.

We, as a family, spent a lot of time asking for recommendations for a reliable, trustworthy and friendly person to take care of our dog during the week. We found someone who was all of these things, fully insured to walk 6 dogs at a time. Imagine our surprise when we were told that they may not be able to continue their dog care business as the new restrictions imposed by Bromley Council would mean that their business, and other dog walkers, would no longer be viable.

I understand that there have been instances of walkers with too many dogs that are not within their control but please do not let the few tarnish the reputation of the many. Our dog walker is not the only person who will be affected by these new restrictions, it will affect many trustworthy, reliable and sensible dog walkers and in turn will affect the families that rely upon those dog walkers to help take care of their pets.

I am writing to express my concern regarding a proposal to limit the number of dogs that any individual may walk at one time, to a maximum of four animals per individual.

Whilst I could understand the annoyance caused by irresponsible people who fail to supervise, control and clean up after their dogs, surely there must be an exception to this proposed 4-dog limit.

Many responsible, loving, and sometimes elderly, dog owners employ professional dog walkers, who are licensed and insured for up to six dogs, and who follow a professional code of conduct - ensuring the animals in their care are well controlled and who clean up after them.

It seems unfair to in effect, to punish those professional dog walkers who are registered and insured, and who have built up a business based upon good practice, Good reputation and their clients, who rely upon them.

I have used my dog walker for almost 4 years. I am 53 years old and have MS so need additional walks for my dachshund, Twiglet. He is my only dog and he benefits from his group walks, where he is able to socialise with other dogs and go for longer walks than I can manage. She has already made sure Twiglet complied with all requirements in order to walk him, such as statutory requirements e.g. microchipping, identity tags are clearly visible and other healthcare best practices e.g. twiglets vaccinations are up to date.

Please consider making reputable, licensed, insured and registered dog walkers, an exception to this 4-dog maximum rule.

I am writing to object on the above proposed consultation.

I use a dog walker who has walked my dogs for the past 3 years. If you cut her numbers of dogs down she will lose business & have to give some of her dogs up.

She is fully insured & is very capable of walking 6 dogs. She knows my dogs well & has always shown responsibility for all the dogs she walks.

I hope this email is taken into account if the consultation is decided.

As dog owners in the borough and regular users of a licensed dog walking/daycare service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as dog owners who rely on professional dog caring businesses in Bromley we firmly oppose this unnecessary restriction. A sledgehammer to crack a nut maybe?

I oppose the proposed introduction of a new offence in relation to Control of Dogs on public land in Bromley Council.

I understand from your Notice dated 10.12.19 that you would like to impose a limit of one person being in charge of no more than 4 dogs at a time in a public space. Prior to this I believe that there has been no limit imposed.

As I am sure you are aware DEFRA (Department of Environment, Food and Rural Affairs) Guidelines favour an upper limit of being in control of 6 dogs at a time. The RSPCA and Dog Trust guidance limit for Dog Walkers is also 6. As a dog owner, I rely heavily on a local responsible Dog Walker who regularly walks up to 6 dogs at one time. He provides a very professional service, is very experienced and is insured to walk up to 6 dogs at one time. Such a person is perfectly capable of walking 6 dogs safely at one time and he has never experienced any problems at all in doing so. Were he to be limited to 4 dogs, it would not make his business model financially viable and myself and our wider community would lose this valuable and important community service. It is essential that we have responsible dog walkers to ensure that dogs are walked appropriately and safely and not only do these dog walkers provide a valuable service to dog owners, but they help keep our open spaces safe for other public space users by their presence in these sometimes enclosed and remote areas at various times of the day.

My Dog Walker would actually welcome dog walking becoming a licensed activity if it helped remove

some of the sub-standard walkers that he sees almost daily. Such people often walk more than 6 dogs at a time, are uninsured, fail to pick up dog waste and clearly in his opinion have little understanding of dog behaviour or responsibility when it comes to having other people's dogs in their care. It seems clear to us all that the intention behind your proposal is to stop such walkers who are in effect doing it as a hobby for some cash in hand. However in effect it would be punitive to those responsible Dog Walkers on whom we rely to provide their excellent, professional and valuable service and would drive them out of business.

I ask that your limit is extended to 6 dogs per person for the reasons set out above.

Please do not hesitate to contact me if you require any further information or comments.

I have just seen the announcement in a Petts Wood group and I would like to make a few comments as a dog owner.

I believe that the rule to put a dog on a lead when ordered needs a definition of who an authorised officer is – however, I see this is an existing rule that I knew nothing about.

As to the main change - I personally and honestly believe that five dogs or one really makes no difference what so ever, this sounds like a blanket rule that sounds good in practice but will do little in reality.

My Westie was attacked by a Jack Russell in Willett recreation ground a long while ago – the owner was very apologetic, but, I've seen her over the years attempt to walk her dog without a lead in the park and rush to put it on if she sees another dog...

the fact is, dogs are animals and I understand that anything can happen at any time but fundamentally you can either control a dog or you can't. I believe it should simply be easier to class a dog as dangerous and/or ban owners from having dogs if they can't keep a dog under control – this excludes anyone who is fully aware and keeps their dog under control - For example, I had a second Westie who was a very abused rescue – she would aggressively bark, however, I am an experienced dog owner and would never take her off the lead, and would warn others.

I can't say I have seen anyone walk more than 4 for some time, however, maybe again the rule should be changed that you need to be assessed in order to be a dog walker or commercially look after dogs (there are rules for performing animals/home assessments, so, I don't see this as out the ordinary) as this will raise the calibre and quality over the borough.

As a polite request – please bring back dog waste or just generic refuse bins! Walking the block near where I live, 5 years ago, I would pass 6 refuse bins and 2 dog waste bins... Nowadays, there is one bin! I'm a good owner and have had to carry waste for the best part of 45 minutes during a walk sometimes. I swear other than laziness, this is one of the main reasons dog owners leave their waste and I'm fed up of having to avoid it when I go to pick up my own dog's mess. It makes a disgusting task in to an even more disgusting one.... I really think that a fine of £100 should be higher still.

I am writing in my private capacity rather than an official one.

I'm a dog walker myself and thus regularly in Chislehurst and Walden Rec. I have to say that the 'professional' dog walkers we get there are fine and it is not often we see more than 4 dogs being walked at a time. There are a very few private individuals who have more than 4 dogs (small breed) and this would disadvantage them being able to walk them all together; again I personally have not experience or heard of any issues regarding them so see no need to change the current arrangements.

We do, however, get some inconsiderate dog walkers who do not clear up after their dogs and the

Friends have been running a campaign for years now and providing free dog poo bags. The problem continues nevertheless. I have no issue with you raising the penalty amount but I fail to see it will make any difference unless you employ people to enforce this. Are there any plans to do so? I recall from previous years the number of enforcement penalties issued across the Borough is ludicrously low.

When will the outcome of your consultation be known please? If you do go ahead and implement can we please have some posters for the Rec?

I am writing regarding your advertised proposal to introduce a new fixed penalty offence for persons being in charge of more than four dogs in a public place.

I fully sympathise with the concerns of the public and the Council about irresponsible dog walkers who exercise large numbers of dogs, which they are unable to control or properly manage, in our public parks and spaces.

However, there are many highly responsible and professional dog walkers whose livelihood would be threatened by reducing the limit to four dogs at a time. We employ a local dog walker who is extremely professional and has the highest standards in terms of the required behaviour of the dogs (and their owners!) in his charge. He is fully insured, and his insurance covers him to walk six dogs at a time. Enforcing a change of local laws to reduce this number to four would reduce his income by a third and potentially make his business unsustainable.

It is my understanding that DEFRA guidelines suggest 6 dogs as the upper limit, as do the RSPCA and the Dogs Trust. It seems to me that there should be consistency on this matter across public bodies and I would urge you not to introduce this new order. I would suggest, instead, that the Council considers making professional dog walking a licensed activity, so that only people with the appropriate skills and understanding of animal behaviour are allowed to walk groups of dogs in our public places.

I'm emailing to express my concerns re the proposed 4 dog limit in Bromley council parks. I own my own dog walking business and have run it successfully for the past five years. I walk up to 6 dogs on each walk; this is the recommended limit as stated by DEFRA, dogs trust and also most insurance companies. I am animal care qualified, first aid trained, public liability insured and have built my skills and experience over a long period of time. If the council decide on a 4 dog limit it will undoubtedly have a massive effect on my business. My earnings would be cut by a third whilst my outgoings will still be the same and I'd have to potentially part with current clients. Or I would be forced to work longer hours, which in the winter would mean dark walks which simply isn't safe for myself or the dogs.

I, like many others are very careful in deciding which dogs join our group walks in order to keep a calm and well behaved group. It is not merely a money making scheme. Many of the dogs I care for are rescues and without walkers would most likely still be in rescue centres as their owners are at work all day.

Upon looking at your website I was unable to find any information on the new proposals. In fact, I only found out about it myself due to another walking spotting a letter stuck to a tree in Well wood. I also have various contacts who are licensed boarders for up to 6 dogs who the council have also not informed of the changes. I walk in various parks in the Bromley borough and haven't seen a letter on any other park notice board. Can you confirm where these letters have been distributed to allow others to voice their concerns?

I would also like to know why 4 is the number of dogs chosen and deemed safe? As stated previously, DEFRA recommend 6 as a limit, as do many insurance companies. In my personal experience it only takes one troublesome dog to cause a problem, issues arise when dogs are badly behaved, not if there's 4, 5 or 6. Why is 4 the magic number? Croydon council have a 4 dog limit, what I often see in that area is supposedly pro walkers hiring someone to walk with them, often with no experience, consequenting in groups of up to 8 dogs. Now that IS too many! I worry that if Bromley bring in the proposed same rule that this will be the outcome. Us as walkers can only charge so much for a walk so we may have no choice but to hire staff also, close down, or do even more walks for the same money, and spending even more time in public parks. Would it not be better to have a dog limit of 6 per group regardless of how many people are present? This would prevent excessive numbers of dogs and walkers all going around together.

I often experience individual dog owners, particularly in Crystal Palace Park, whose dogs are off lead while owners are on the phone, talking with friends, jogging or generally not paying attention. These are the same people who often fail to pick up after their dogs poo, I often offer these people a bag, or just pick it up myself – the glamorous life of a dog walker! When real pro walkers take dogs out, they are our sole focus. We do watch them 100% of the time. We don't allow for unruly behaviour. And if any unwanted behaviour was to occur dogs are immediately put on the lead, and we are perfectly capable of walking 6 on lead if we need to, I have done this a few times during the summer when there's tempting picnics about. I do understand that not all of us are so strict with the dogs in our care, but the majority of us are. Is there a way of having the legitimate walkers licensed and registered? Similar to the daycare and boarding license? If we wore ID tags and members of the public have an issue with a specific walker, then that can be reported via an ID number. Can I also ask what some of the concerns raised with walkers were?

During your consultation, would you be able to tell me who if any of your decision makers will have a pet related background. I would like to think that the decisions being made are made by a neutral party. And are not just based on complaints alone. I'm sure if you look on many of our websites you'll find as many more glowing reviews for walkers than you've had complaints. Surely it needs to be a fair panel?

I genuinely feel there must be a better solution for the issues being raised. Whilst I do agree there are a few irresponsible walkers, I think it is completely unfair to punish the many and most likely put some out of business for the sake of a few bad ones. I do agree that something needs to happen to address the concerns but I think there should at least be some further discussion and we should all be allowed to put our ideas forward as local residents and hard-working small business owners.

I have used my dog walking/daycare service for a number of years on a weekly basis and also for holiday boarding. This is a licensed business, approved and inspected by Bromley Council for 6 daycare/boarding dogs in addition to the owner's dogs.

Also:

- Dog walkers' insurance covers for 6 dogs
- DEFRA guidelines favour 6 as the upper limit
- The RSPCA and Dogs Trust guidance is 6 dog limit.

I would welcome dog walkers being a licensed activity if it removed some of the irresponsible dog walkers who have little understanding of the responsibility they have to the dogs in their care and to the community at large. However, businesses like my dog walker/daycare are in a different league, with standards that are extremely high. Why should they be penalised because of other dog walkers bad behaviour? Just reducing the number of dogs to be walked is not the answer, and won't mean that some dog walkers act more responsibly. I would be very interested to know what consultation this plan has had. If complaints have been made regarding specific dog walkers, can they not be followed up, rather than a blanket approach to all dog walking businesses.

As a dog owner, resident of Bromley, who relies on a highly professional, dog caring business, I firmly oppose any plan to make walking more than 4 dogs an offence for a licensed business, approved by Bromley Council.

I am emailing you about the consultation restricting the number of dogs that owners/paid dog walkers can walk with.

I do not think that this rule is helpful to dog owners or local dog businesses like walkers and boarders. The majority of owners and walkers take great responsibility in looking after their dogs and ensuring that they do not cause a nuisance to members of the public. The few who don't do this should be directly targeted rather than a blanket rule that will have unintended consequences to those who are responsible.

I am a dog owner and I also run my own business as a business coach.

I have recently found out that the Borough of Bromley wishes to reduce the number of dogs a person can walk at one time to 4 instead of 6.

I use a dog carer on a regular basis and she has a licence to walk 6 dogs at a time. In fact, I now pay more for dog care to cover the cost of that licence.

If she can't walk 6 dogs at a time, she could potentially go out of business because her income would fall so much that she wouldn't be able to cover her living costs.

While I understand that there will always be some people who walk too many dogs and don't keep them under control, I believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service.

It seems crazy that dog carers have very recently had to pay for a licence and get insurance to walk up to 6 dogs, but Bromley council is reducing the number to 4.

As a business coach, I do what I can to help small businesses succeed and thrive. I thought that Bromley also wanted to help small businesses. But if this proposal goes through then it could put many small dog caring organisations out of business.

So, as a dog owner who relies on professional a dog caring businesses in Bromley, I firmly oppose

this unnecessary restriction.

I'm emailing as a dog owner, and regarding all the other boroughs that reduced to this four dog rule, did actually cause Crystal Palace Park to become very busy with dog walkers with six or more dogs. I can understand more than 6 dogs would not be manageable, but I don't object whatsoever to a group of six dogs, as my dog walker is insured for six dogs plus that is DEFRA guidelines, so I don't understand why all boroughs are reducing to four dogs in a group in parks.

I think Bel Air in Dulwich actually allow six, three off lead and three on lead.

You get many irresponsible dog owners with just one/two dogs too so it's not just dog walking businesses, most dog walkers that I do see with six dogs, their dogs are all under control and seem happy.

If Bromley heads this way too, it is really going to affect small businesses plus dog owners, as this will cause a reduction in numbers and dog owners possibly having to find alternative care.

Why can't Bromley keep to six dogs with four off lead and two on lead please as this would make sense to me with you coming into line with the DEFRA guidelines of six dogs per walker?

When all this four dog rule was introduced in other Boroughs, did they even think to consult dog pet minding businesses at all? Have you done the same?

So I'm hoping that the Bromley borough will see sense and keep to six please with two being kept on a lead as surely this will work just fine in my opinion, as I could be affected by this with my dog walker too, with maybe having to reduce numbers and saying goodbye to some clients.

Also there are several dog owners who I know that have five dogs and this will just cause them to have to split their walks too.

As far as I'm concerned it is not intimidating seeing a group of six dogs whatsoever and it saddens me that small businesses and dog owners would be affected by this if Bromley reduce to four dogs per walker/dog owners too.

I am a member of Friends of Cator Park & Alexandra Recreation Ground and have been using Cator Park almost daily as a parent and a dog owner for the last 30 years. In this time I have not had any issues with people walking groups of 4 or more dogs. My view is that this additional offence is not needed. The existing four offences are sufficient.

I have met several professional dog walkers in the park recently while walking a friend's dog. These have been walking groups of more than 4 dogs all of which have been well behaved and are in fact an asset as it provides an opportunity for dogs to socialise. An important need for pack animals such as dogs. The new offence will greatly reduce the viability of professional dog walking. This is a service that is also an asset for many people including elderly and infirm owners who benefit greatly from the companionship of dogs but are not able to walk them themselves.

Where I have had issues with other dogs these have been with single dogs and generally due to the attitude of and lack of control by their owners. The number of animals is not relevant.

You say in your consultation notice that there are growing concerns about increasing numbers of uncontrolled groups of dogs being walked by one person. The key word here is "uncontrolled". Uncontrolled dogs are a concern even when there is just one. My view is that the existing four offences are sufficient to deal with the issue of uncontrolled dogs whether in groups or singly.

I also note that the notice refers to concerns rather than evidence. Is there any body of factual evidence supporting the concerns? Introducing a new offence that could impact on the livelihood of professional dog walkers without the support of factual evidence is unwise.

With respect to the proposed increase in fines for the existing offences I feel that this is unnecessary as the existing level is sufficient. As the former Metropolitan Police Commissioner, Sir Robert Mark, said the greatest deterrent is the fear of detection. In the recent years that I have been using the Park it is very rare that I have seen an authorised person in a position to enforce these regulations. If there are insufficient officers to patrol the parks, such that the risk of detection is low, changes in the offences and increasing the level of fine will have little impact.

I am writing to you with regard to Bromley Council's proposed four dog rule which applies to dog walking throughout the borough.

I have been a self-employed dog walker for the past six years. I have full liability insurance, am first aid trained and have never had as much as a cross word from any of the dogs in my care. I am insured to walk up to six dogs at any one time, and have been doing so since my business was born in April 2014.

I am bitterly disappointed that Bromley are proposing this new rule, on what I can only assume is a blanket approach to all dog walkers. I have many clients who work full time, who rely on the service that I provide. My walks are carried out in a calm, responsible manner and we are respectful of other people using the public spaces around us.

I appreciate that there are many other dog walkers, who do not take the same professional approach as I do, however I feel it is greatly unfair that we should all be punished in the same way.

DEFRA's guidance states the maximum number of dogs one person can control is six. The kennel club mirror this guidance also. I would ask that you consider this in your proposal.

I propose a licensing scheme, where professional walkers such as myself, who are insured, are licensed by the council to operate in the borough with an allowance of six dogs. This would also bring in further revenue for the council.

I await your response.

I am sending my own opinion regarding this matter. I am an owner of 6 small dogs, all are rescue dogs. I take them for a daily walk at my lunch break. They are well behaved. Only 1 dog needs to stay on the lead, the rest is obedient and well behaved. We never ever had any incidences with people or other dogs.

I am concerned about the limit put on the number of walking dogs. I cannot take 2 hour break to walk dogs twice. Who will I leave behind every day?

I live in Chislehurst now for 21 years. There is only 1 dog walker who brings 8 or more dogs for a walk at once. He controls the dogs at all times. Have never observed otherwise. But I can understand the other members of public when they see so many dogs suddenly roaming around in the park.

Certainly we dog owners and tax payers cannot be punished because 1 individual who floods the park with dogs over 1 hour a day!

Please consider my view when making decisions which will have an impact on multiple dog owners.

As dog owners in the borough and regular users of a licensed dog walking/daycare service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as dog owners who rely on professional dog caring businesses in Bromley we firmly oppose this unnecessary restriction. A sledgehammer to crack a nut maybe?

I am writing in response to the notice (regarding the above) posted in local public parks which I use regularly.

Whilst I feel the existing four offences affecting designated public land are rightly in place, I consider the new proposal of being in charge of no more than 4 dogs in a public place wholly unfair for those who run a reputable dog walking service.

These services take a lot of time, planning, consideration and expense to set up. We have had a regular dog walker for six years; before we engaged him, we asked about his experience as a dog walker, where he would be walking our dog and how many dogs he'd walk as a group; on his group walks he walks a maximum of six dogs. We also asked about his insurance and know that he is insured to walk six dogs at a time. This is his livelihood; the service is run as a professional concern and to limit dog numbers to four would have a tremendous impact on his business and we his clients. We are fully confident that he can handle and control six dogs and have seen him doing so many times.

I have checked DEFRA guidelines and see these approve 6 dogs as the upper limit and the RSPCA and Dogs Trust guidance for dog walkers is also a 6-dog limit. It seems therefore, inconsistent that Bromley are suggesting this new rule.

I am interested to know which park user groups and 'stakeholders' have expressed concerns regarding the number of dogs a walker is in charge of? I walk our dog regularly in Crystal Palace & Cator Parks and Alexandra Recreation Ground and have never witnessed any dog walkers who are not able to control the 4+ dogs they are walking. On the contrary they are always very attentive, have good control of the dogs and are conscientious in picking up dog waste.

I would ask you to give careful consideration to the points I have raised as the council discuss the new proposal and would appreciate a response to this letter.

I am writing to object the above proposal.

My dog walker currently walks (and is licenced to walk) up to 6 dogs. She is very responsible and extremely professional and I don't think it's fair to change the current policy due to a minority of irresponsible dog walkers who purely do it for money and don't care about the dogs or the public places they walk.

She regularly picks up other people's dog waste and her dogs are extremely well behaved and sadly if this proposal is accepted she might not be able to continue with her business.

Please could you log my objection and keep me notified of any decision.

I wish to register an objection to the four dog walking rule which may be coming into force.

I use an extremely reputable dog walker for all of my dogs. She is extremely competent and never would allow a dog to be out of control. Unfortunately it is not the dogs or the number of dogs which are a problem. It's the owners. They are often distracted, on their phones or just generally not paying any attention to where their dogs / dogs are.

If you want to restrict the number of dogs being walked at one given time then why not introduce a license scheme with a small fee. This would then wheedle out the good from the bad.

You would potentially put a lot of local businesses out of action with this rule - please make this a top priority consideration.

As dog owners in the borough and regular users of a licensed dog walking service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner who relies on professional dog walking businesses in Bromley we firmly oppose this unnecessary restriction.

I wish to submit my comments on the consultation to reduce the number of dogs allowed to be walked in Bromley. My dog walker operates in your area and this proposal could see a responsible small business owner, who provides an essential service in the community, cease trading. I appreciate there is a need for dogs to be under control in public places but couldn't there be additional regulation or permission for certain individuals, rather than a blanket ban that will penalise those who are working honestly.

As a dog owner in the borough and regular user of a licensed dog walking service it has been brought to my attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

Whilst I appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – I believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. I understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner relying on a professional dog walking business in Bromley I firmly oppose this unnecessary restriction.

Thank you for the opportunity to respond to the proposed changes in ruling re dogs in public spaces.

I am a dog owner and utilise all the parks in Bromley. As a dog owner I see dog owners and professional dog walkers daily.

99% of dog owners I see in Bromley act in a responsible fashion, they are aware of their dogs' whereabouts, they monitor them to make sure that they do not cause stress to any member of the public and clean up any foul. In fact we always call out to each other if we have seen their dog doing a poo and the owner comes over directly.

Dog walkers are even more vigilant. They are aware of how the dogs mix together and are quicker to put a dog on lead if they sense any discomfort. They are more than able to monitor 6 dogs... they know them... every dog has its own schedule of pooing for example, so they walkers are armed with multiple bags. All the pro dog walkers I know, know which dogs might react in different circumstances and again will distract them with treats or put them on leash if necessary.

Here is the problem with the proposal:

- 1) Reducing the number of dogs on a walk will make a very low paid job impossible to sustain.
- 2) This will lead to less dog walkers (and there really aren't that many in Bromley) thereby taking dog owners who need to go out to work in a position where they cannot work effectively.
- 3) If numbers reduce, then the cost of dog care will increase massively
- 4) What is the actual problem with 6 dogs? Dog walkers will only take that number IF the mix of dogs works, dog walkers are rightly picky about which dogs they accept into the walking group.
- 5) As their license is to 6, why reduce to 4 dogs... which 2 dogs have to be left at home on their own for a couple of hours whilst the other 4 get to have exercise and sensory fun?

I would be interested to hear why this proposal has come in in the first place... are people perceiving a threat of dogs where there is none? Dog walkers don't take on volatile or reactive dogs... they are aware of their license and their livelihood.

I agree that everyone should pick up dog foul... sometimes you can't find it (leaves etc. make good camouflage) but then you pick up a poo you can see... like carbon offsetting!

Sometimes I meet families who are afraid of dogs and I show them a couple of tricks, chat with them and within minutes they are petting the dog... so maybe there needs to be a little more interaction with people who don't have awareness of dogs and "dog language".

Dog owners and dog walkers use the parks and public spaces every day of the week, in all weathers and all seasons. Please do not restrict our use of an essential resource due to a couple of complaints from people who might perceive a threat (which might not be based on fact) who use a park on a

sunny weekend.

As a dog owner in the borough and regular user of licensed dog walking services, it has been brought to my attention that there is a proposal to limit the number of dogs walked per person in a public place to four.

I believe the proposal is unfair to the many excellent dog walking services in the borough who provide an important, responsible, professional service. Reducing the number of dogs they can walk will be detrimental to their flexibility, so will cause problems for their clients as well as reducing their income. As the insurance paid by dog walkers allows up to 6 dogs, I would question why they should not be permitted to walk this number.

At a time of economic difficulty, shouldn't we be promoting small businesses in Bromley? This proposal could drive people out of business and onto benefits.

I do, of course, appreciate that there are probably irresponsible dog walkers and I don't question the need for measures to deal with those - but I fail to see why the majority of responsible dog walkers should be penalised due to the behaviour of a minority. The proposed solution is akin to reducing the sale of glass bottles, cans and cigarettes due to the problem of broken glass, discarded cans and cigarette ends littering public places - i.e. simply not fair on the majority of responsible citizens.

As dog owners in the borough and regular users of a licensed dog walking service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner who relies on professional dog walking businesses in Bromley we firmly oppose this unnecessary restriction.

As dog owners in the borough and regular users of a licensed dog walking service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner who relies on professional dog walking businesses in Bromley we firmly oppose this unnecessary restriction.

I am writing in relation to the proposal of the 4 dog maximum rule that Bromley would like to impose.

I am a professional dog walker based in West Wickham and am upset to see that we are going to be asked to walk only 4 dogs at a time.

I take pride in my business and I am good at my job. I daily pick up litter, discarded dog poo bags, and dog poo that do not belong to me or my pack.

I only take on well behaved dogs, with good training and am very considerate to all other park users. I find it very annoying that people believe that it's the professional walkers that seem to cause a nuisance, when regularly I see owners with their own out of control dogs, talking on phones, doing their daily jogging, gossiping with friends oblivious to their dog fouling or being a nuisance to other park users.

Of course as with all trades there are some unprofessional walkers who aren't good at their job, however these people aren't going to listen to this new rule regardless, whereas the professional walkers will abide the rules and will have to take the money cut.

What I would like for Bromley to take into account is raising the 4 dog to a 6 dog maximum. This follows the KC club guidelines and is what we are currently insured to walk.

I am a single mother who created this business to work within school hours for my Son. I physically will not be able to do additional walks due to the time frame I have to work in. This change in dogs will lose me £48 per day, £240 per week!

There are many other points I could put across, but these are the main ones from me.

We are dog owners who live in Bromley and who use many of the parks and green spaces. It has been brought to our attention that there is a proposal by the Council to limit the number of dogs walked per person in a public place to 4 and that you are currently in a consultation period on this. We would like to put forward that we firmly oppose the introduction of this new offence.

We regularly use a wonderful licensed dog walking/daycare service, who we trust completely and is meticulous and professional with the care of the dogs and keeping them under control. We appreciate that there are a small number of 'dog walkers' that may walk too many dogs and do not have full control over them - however it seems extremely unfair to penalise the many responsible dog owners and excellent licensed/insured dog walking small businesses for the actions of those few that are irresponsible?

Many of these small businesses provide an important, responsible, professional service and this reduction in the numbers of dogs that they are able to take on would almost certainly put some of them out of business. We also understand that their insurance allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

We sincerely hope you will reconsider this proposal of a new offence and find a different solution to controlling those small few dog walkers who are unable to control their dogs. An irresponsible dog walker will still be an irresponsible dog walker, regardless of whether they have 4 or 6 dogs in their care. Your proposal may seem like an easy short term solution to a reported problem, but it will not solve the issue in the district and will detrimentally affect local small businesses.

We look forward to hearing from you, and we would be very happy to discuss this further,

I would like to express my support for the local dog walkers in light of the recent proposal of banning them from walking no more than 4 dogs at a time.

I rely heavily on my dog walker as I work full time and need the service that she provides.

In all the time I have been using her, I have never heard of her having a problem whilst walking the dogs and she runs her business at a very high standard.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

I am a professional dog walker who carries full insurance to walk up to 6 dogs, carries full public liability and appropriate motor vehicle business insurance, has been DBS checked, comes highly recommended by all of my clients and who wholeheartedly adores all the dogs/cats/rabbits in my care. I have turned my passion for animals into my livelihood and I couldn't imagine my life any other way. However, the introduction of this new offence could have serious implications for not only myself but for the many clients who rely on me and my services.

I pride myself on providing affordable and personalised care for each of my clients. By reducing the number of dogs that I would be permitted at any one time I would have to let go of up to a third of my clients and increase my prices for those remaining. I have dedicated much of my time, both inside and outside of traditional working hours, to vet, bond with and care for the dogs in my charge. Having to let any one of them go would be a massive blow for me financially but most importantly personally, as I care deeply for them all.

I follow professional standards which are laid out in the contracts given to my clients once my rigorous vetting process is complete. The dogs each undergo a two-week trial period to ensure they integrate well into the group, bond well with me and behave to the standards I expect of them. These standards include, among others, immaculate recall and appropriate social skills when greeting people and dogs outside the group. Meaning my dogs are always under control and are a pleasure for members of the public and other dogs to meet and greet.

My business insurance, DEFRA, The RSPCA and The Dogs Trust all agree that 6 is an acceptable number of dogs for me and other professional dog walkers to be responsible for. And that is exactly what I am: responsible. I take great pride in the fact I abide by the by-laws set out by Bromley Council, however, the introduction of this offence, I feel, will only penalise the responsible dog walkers. With no enforcement of this new rule, much like in Lewisham parks, the unprofessional, irresponsible and substandard dog walkers will continue to walk over the permitted number of dogs. Only the professionals who want to remain on the right side of the law and uphold the reputations we have worked so hard to maintain will conform.

I, therefore, endorse the idea that dog walkers must apply for and hold a Bromley council approved licence to walk six dogs in Bromley parks. The revenue raised from such a scheme would fund the presence of more wardens and/or community support officers in our local parks to ensure that ALL Public Spaces Protection Orders are monitored and enforced.

I have asked my clients to make contact with you to communicate the vital role professional dog walkers have in the community and to their lives personally. On behalf of my clients and my professional dog walking colleagues, I implore you to consider my arguments and endorsements so that the community as a whole can benefit from any changes Bromley Council seek to implement.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

As a dog owner who works full time, I rely on an amazing dog walker who is fully insured, fully qualified and fully vetted and abides by every legal and moral obligation to care so lovingly for each and every one of her dogs.

She currently is licensed to walk up to six dogs at one time, allowing her to take on a certain number of clients at a certain cost. Should this proposed offence be approved, this would gravely affect her business, forcing her to reduce the number of dogs she has been able to care for as well as increase the price she charges for care.

Besides from the obviously detrimental effect on her livelihood, it would put me - and my dog - in a terrible position, whereby I would either incur financial strain or else force me to drastically rethink my working life if I could no longer afford dog care services.

It may not be obvious to you, but these decisions have a huge knock on effect for so many people and animals and I do not believe this proposal would serve the common good.

It seems obvious that there are easier and more effective ways to achieve better control of dogs in public places, for example, requiring licenses for professional dog walkers and imposing fines on the owners badly behaved dogs, as an incentive for them to ensure their pet behaved in a manner that did not cause nuisance or harm.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

I know our dog walker has been in touch with you, and I would like to echo her concerns. The introduction of this new offence could have serious implications for her business and those of us who rely on her services - and those like us who rely on other reputable walkers. I feel strongly that this offence only serves to penalise the responsible dog walkers in the borough.

Having a dog walker / sitter that we know and trust is the only thing that enables us to have a work / life balance and a happy, healthy pet. We wouldn't trust our dog with just anyone, and if the introduction of this offence leads to reputable small pet care businesses going out of business it would be a tragedy. I would again like to highlight that DEFRA, The RSPCA and The Dogs Trust all agree that 6 is an acceptable number of dogs for professional dog walkers to be responsible for. As I know our dog walker has done, I, too, endorse the idea that dog walkers must apply for and hold a Bromley council approved licence to walk six dogs in Bromley parks. The revenue raised from such a scheme would fund the presence of more wardens and/or community support officers in our local parks to ensure that ALL Public Spaces Protection Orders are monitored and enforced.

I don't believe that reducing the dog walking limit from 6 to 4 will actually solve the problem that people seem to have. I'm thinking around picking up dog mess and dogs out of control.(you do not make it clear which problems you are referring too)

Will people not team up together and effectively larger groups of dogs will appear in our parks. Which is the opposite of what you may be trying to achieve?

How would this be policed?

I feel it's necessary to look at other ways to deal with the problem. Whether that's three dogs off lead at any one time maybe that should be explored.

Maybe walkers have a license and ID number again one to be explored. The income from this could

go towards the funding of an inspector/park person with some authority to fine/ see IDs etc.

Let's be honest dog walkers are the target. When it comes to Dog owners however there are those owners that do not pick up and it's almost impossible to prove. It would be interesting to see how many come from each category.

With regard to out of control dogs again quite often these are with the owners. Dog walkers often vet the animals before they take them on, know when to keep them on leads etc.

Dogs off the lead in residential areas to my mind should be looked at because they can cause many different accidents.

Again I don't think this is really walkers. Generally they will keep the dogs on the lead until it's safe to let them off. Anyone walking a dog in a residential area that is not on the lead should be prosecuted. How would you put this into action?

These are just my thoughts at this point in the consultation process.

I write regarding the above which in my opinion is yet again an overreaction to a "problem" that is virtually non-existent. If this is an attempt to curb the activities of professional dog walkers then be honest and say so. If this is the case then have them register then regulate their activities like you would any other business.

To issue a fixed penalty for having more than four dogs in a public place is ludicrous. There are many many well-meaning folk who have dogs then over the years take in others which often means they have more than four. The pensioner who is on their own and sees the dog as a companion will fall foul of this proposal as will the rate payer who has dogs for recreation. I have three gun dogs, if I have another does that mean I walk them in two groups or take along a family member?

Perhaps you can elaborate on who is an "authorised officer". We are all well aware of the numerous cutbacks we have seen in the Borough of the last few years and wonder who is going to take on the task of policing this??

This will be an own goal if introduced as I have said above if it is aimed at professional dog walkers then legislate accordingly, leave the private individual alone.

As a dog owner who regularly uses the services of a licensed dog walking/daycare service, I am horrified that there is a proposal to limit the number of dogs walked per person in a public place to four. Have you considered how that will affect someone who actually owns more than four dogs? Do you also realise how this will affect people who have to go out to work or go on holiday, people who rely on licensed dog walkers and their daycare/boarding services?

I appreciate that there will always be some irresponsible people who walk too many dogs and seem unable or unwilling to control them or to clean up after them, but it is unfair to penalise those who take their responsibilities seriously. Six dogs with an experienced dog handler is not too many, and their insurance policies allow up to six dogs so I cannot understand why you are being so heavy handed when there is no reason for it.

Small businesses in Bromley and indeed elsewhere, need to be helped and if this proposal goes through then it could put many out of business. Please think this through carefully as there are a lot of people who are very much against your heavy handed approach.

I am writing to support the case of properly registered and insured dog walkers against the proposal to limit the number of dogs per person to 4 in Bromley parks. I support the concept for normal dog owners/walkers, but people earning their living from walking dogs who occasionally need to walk more than 4 dogs should not be penalised. Can I suggest that if dog walkers can prove they are registered and insured then they should be allowed to walk (say) 5 or 6 dogs at a time.

I support the principles of dog control - what person wants to see dog fouling permitted as an example. However I have two issues:

1 The current four offences are simply not enforced. I speak as an owner of two dogs and one who has a local campaign against fouling of footpaths and recreation ground nearby. The types of people who allow poor dog behaviour are not put off by threats of fines, appropriate signage or any other action. Therefore, increasing fine levels will have no effect.

2 In charge of more than 4 dogs. I'm not sure what problem is being addressed here? The issues I've seen with dog bad behaviour, usually relate to single dogs. One or two dog owners with 4 or 5 dogs usually have them well under control. I assume this is an attempt to try to gain control over "professional" dog walkers, but if the issues are dog fouling, then I refer you to my point 1 above.

I therefore cannot support any change unless there is a step-up in enforcement levels - which, in these days of Council cutbacks, simply will not happen.

I am writing regarding Bromley Council's intention to limit dog walkers to four dogs. My dog walker, is really professional and caring, and is loved by all the dogs entrusted to her. If she were limited to only walking four dogs at a time, her livelihood might well be affected, as would mine and many others if she found it was not worthwhile to carry on caring for our dogs while we were working.

If it were possible for her to be granted an approved licence to walk six dogs at a time, it would mean many of us could continue working without worrying about leaving our dogs at home alone. I attach a picture of her at work. It shows the love she has for her dogs, and the love the dogs have for Amie. This love from her dogs shows the control and respect they give to her. Please consider this case carefully.

May I offer some comments as a Bromley resident of 20 years plus.

I am a private dog owner, not a business.

I feel strongly that limiting dogs from 6 for example to 4 would seriously impact local well run dog walking and boarding businesses.

Most well run business owners only accept dogs that are trained and well controlled. The problem is some owners who persistently allow dog fouling and do not have any control over their own dogs. They are the issue.

A business only stays viable if they can safely demonstrate their competency and being trusted. I use these services to further enhance my dogs' wellbeing if I can't be there for various reasons, appointments etc.

Owners should not be abdicating responsibility they should ensure that the dog is trained. And that they have assessed the business and given the relevant permissions and that their dog is safe out

with others.

Most issues I see in the parks are individual dog owners who really don't care. More damage is done with one badly trained dog than a few walked by someone who is in control of their dogs.

I think it is a perception issue and very much a regulation issue. People leave children's playground gates open, so dogs get in, cyclists cause danger by speeding around the park nearly missing all walkers. Please tighten up on the dog owners, without perhaps not targeting the dog walking/boarding businesses.

Bromley will be much disadvantaged if they have to close down. It's only in the actual parks that people seem to have issue's, it is often that most do not know what the regulations are.

How do you manage to enforce our existing dog regulations? I read your notices and check the website, lots of owners plainly don't as they allow their dogs to foul & don't pick up. I have never witnessed a business dog walker ever not pick up or correct their dogs. I often ask for their cards so I know who they are. If they did not do the right thing and obey the rules than I would not use them. How easy is it for anyone to register? Who inspects then and follows up? If you have bad business practice why not withdraw their licence.

So some information you receive is I feel in- accurate.

Please reconsider this addition to your regulations, please tighten and try to enforce the ones we have.

I believe that Wandsworth license covers 6 dogs what is their experience? Most people walking more than 4 dogs might have help. It is a matter of perception, dog knowledge, ability and common sense. Most dog owners are responsible, sadly not all, the dog walkers usually educate the poor owners & Direct them to trainers; it is an asset, not a problem. If Bromley Borough enforcement is lacking now, what will this law do except to shut business owners out that are providing an essential service. The insurers cover for 6 dogs so why rule at 4 it makes no sense. It's not the numbers it is the people concerned. You will have just the same issues with 1 or 4 it's people's inability to do the right thing and obey the rules.

I am against the new proposal of being in charge of 4 or more dogs per person.

I respond as a dog owner, but more importantly as a consumer of professional dog walking services. You may have noted the use of professional to describe my dog walker; I do so with strong meaning because when I first required someone else to help with dog walking, I never imagined the lengths someone would go to in creating such a professional service. This goes from the fully kitted out dog friendly van with travel cages and air conditioning, full insurance and the loving care and attention to the animals you have entrusted with them. I know our walker takes her job incredibly seriously, both from looking after the pets but also the social responsibility that comes with it, taking care when near other walkers, picking up other people's litter and ensuring her dogs are under control. This is a career choice for her, not a part time job.

The economics of the job seem to work with 6 dogs at a time and a requirement to not exceed 4 would put her out of business. You can understand that the van, kit and insurance do not come cheap. I can imagine this would be the same for a lot of dog walkers and as a consumer I think this proposal would have a detrimental effect on the local industry, severely limiting choice, the potential quality of the services provided and animal welfare.

People who are unable to walk a dog may be faced with no viable option and those walkers that continue to operate on the breadline will potentially find ways of cutting back, how will the dogs travel safely, will they take out professional insurance that covers themselves or their liability.

If there have been serious concerns raised then I think an alternative arrangement should be examined, potentially licensing dog walkers and having them display their license number at all times on themselves and their method of transport. This would hopefully bring under control any rogue walkers who do not provide a professional service and give members of the public a way to raise issues.

I am writing to strongly protest against the proposed Public Spaces Protection Order that will make it an offence to be in charge of more than 4 dogs per person in a public place.

My wife and I own a lovely dog, and I am extremely concerned about the costs this will impose on our dog walker, who is excellent and always in control of the dogs that they walk. People need to work, and it is only reasonable that we should be able to employ a dog walker during the day without the council unfairly legislating on our private business.

I accept that we need to protect our public spaces, but Bromley is London's largest borough and to impose this restriction on such a massive portion of public space is unfair. I could understand it applying for example on certain signposted fenced off urban parks, but Bromley has many extremely rural areas in which dogs can safely be exercised without disturbing other residents. It seems an extreme abuse of power to impose this restriction borough wide, as opposed to merely reserving the right to set specific prohibitions on specific parks on a case by case basis.

I am shocked that Bromley Council sees this consultation and potential law change as a worthwhile use of its time, when there are so many more pressing challenges on the borough's streets with homelessness, drunkenness and economic problems.

I am also concerned about the process for the consultation. There is no mention of the proposed law change on the borough's own website: (https://www.bromley.gov.uk/info/200089/street_care_and_cleaning/242/responsible_dog_owners_hip), and although some parks did feature posters advertising the proposed law change, there are many parts of Bromley public space in which this notice would not have been visible which would be affected by the changes. The Council should step back from such a draconian rule change, or should at the very least accept that its consultation process has been seriously flawed without adequate consultation or communication to the stakeholders about why the proposal is necessary.

A posting on the 'Next Door' website has made me aware of the proposed introduction to make it an offence to walk more than 4 dogs at a time. I have a really poor copy of the letter so forgive me if I'm not 100% correct in my terminology. I understand that responses are due by January 20th.

As a responsible dog owner, I employ a dog walker 2 days a week to help me out. He is a lovely young man, a responsible dog walker who has set up a proper dog walking business and I am proud to be one of his customers. I would be aghast to think that his business will be affected detrimentally by these changes.

I would implore you to make these proposals more widely known in order that everyone has a fair chance to respond to this so that you are all fully aware of the feelings of residents.

I own a dog and use licensed dog walkers registered in Bromley both for walking my dog as well as day care. I have used these 3 services for 8 years since my dog was a puppy. I carried out careful research to ensure that I was using only reputable dog walkers, fully licensed, knowledgeable and trustworthy.

It has been brought to my attention that there is a proposal to limit the number of dogs walked per person in a public place to 4 dogs. Whilst I appreciate that there will always be some individuals who walk too many dogs and those same people may be unwilling or unable to control them, likewise

banning everyone from walking more than 4 dogs is hugely unfair to those of who are excellent, caring, law abiding and responsible. It is akin to using a sledgehammer to crack a nut.

All of the dog walking services I use are small businesses in the borough provide an important, responsible, professional service. I understand that the insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number of dogs in our parks.

If this proposal goes ahead, then it could put many out of business as it may no longer be viable for them to continue. There are only so many daylight hours to walk and so if the dogs being walked are reduced, it is impossible for the extra walks to take place and so the dog walkers will lose critical income.

And therefore as a dog owner who relies on professional dog caring businesses in Bromley, I firmly oppose this unnecessary restriction and would ask you to strongly review and reconsider.

I am writing with regard to the proposed change in the number of dogs allowed to be walked by one person from six to four within the Bromley borough.

I believe my own dog walker has already written to you outlining her concerns regarding this change and I would like to echo these concerns on her behalf. I don't know if you own a dog, but for the majority of dog owners, they are part of the family and therefore it is extremely important to find somebody trustworthy and professional to care for your dog. It can take some time to find the right person.

This change would impact many dog owners, whose dogs have already bonded with their dog walker. As my dog walker has stated, she would potentially need to let some of her clients go in order to keep her business running, meaning that some owners would need to start the process again of finding someone they can trust, whilst their dog would very much miss their walks with someone they know and trust. Clearly, this change would also affect her business and many others like her, and cause personal upset to owners and dog walkers alike.

The reasons for this change appear to be regarding complaints about dog walkers congregating with large numbers of dogs in parks. I have come across my dog walker and colleagues of hers in the park several times and she is never standing idly chatting whilst the dogs in her charge run around out of control. Responsible dog walkers are in control of their dogs and focused on them the entire time. Perhaps the few dog walkers who are acting unprofessionally should be approached separately, rather than issuing this new rule which will not change the behaviour of irresponsible dog owners/walkers but will certainly have a negative impact on many small businesses and dog owners.

I am writing about the new four dog rule Bromley council is proposing.

This rule if introduced would have a hugely detrimental effect on dog walkers and owners who depend on those dog walkers. If dog walkers are only allowed to take four they will have to let owners down as they simply won't be able to fit everyone in. There are many people who rely on daycare, boarding and walks for their dogs.

Most importantly it seems to me that it is not the amount of dogs being walked that is of concern but the walkers or owners ability to keep the dogs in their care under control and walk responsibly, and this is an entirely different matter. It is unfair to penalise good dog walkers who do a brilliant job.

I am writing to oppose the proposal from Bromley Council to implement a borough rule that the maximum size of a group of dogs being walked will be 4.

I depend on using a professional dog walker to support my work. He is very capable in controlling 6 dogs and in fact I feel the issue is not the number of dogs walked but the professionalism of the walker. There are many irresponsible people walking less dogs so it's possible that licensing individuals could be a much better solution.

My dog walker and many like him who understand dogs and provide excellent care will lose business and struggle to continue if the number of dogs permitted to be walked at one time is reduced.

I hope you are able to consider my opinion in your consultation.

I walk my dog a few times a day in different parks in the Bromley area, so am familiar with many dog walkers and the number and behaviour of dogs they are walking. I have only ever come across two who do not seem to have reasonable control of the dogs they are walking - both have been in Jubilee. One is a local walker who always walks with another walker and they have a number of small dogs bothering others. Another is a walker who comes from another Borough because of newly introduced limits on the number of dogs they are allowed to walk at once in other Boroughs. All the other dog walkers I meet have good control of the dogs they are walking - and also clean up after them. There are plenty of dog owners who do not have good control of their own dogs and plenty of others who do not clean up after their own dogs. I'm concerned that LBB's proposals create unnecessary underlying tensions between those using public spaces, where people are monitoring, chastising and vilifying others without cause. There have been extreme ramblings on social media as a result of this consultation. My view is that as long as dogs are under control a specific cap on numbers is a little arbitrary. I meet owners who have 5 well-behaved dogs of their own, so the introduction of a cap would mean them walking only some of their dogs at once. I also encounter an owner of 5 spaniels - and they are all a nuisance and behave aggressively chasing my dog (but they don't bite). It comes down to how they are trained and controlled. Ultimately, there are already laws in place to address out of control dogs, so it may make sense to rely on those and perhaps put signs up on park notice boards reminding members of the public of these and what they can do to report owners with out of control dogs, rather than confuse by also introducing local policies?

Meantime, I've had a few unpleasant conversations with cyclists in areas where they are not allowed to cycle and one told me he was allowed to cycle across Jubilee because he had spoken to the Council who informed him that although it was 'not allowed', this was not enforceable. The new gate on Southborough Lane has made it even easier for him to access and leave a Jubilee each day. I would be interested to see whether measures will be taken to address existing regulations before introducing new ones - whether this is regarding control of dogs, cleaning up after dogs, putting all litter in bins, cycling where it is not permitted, or residents with gardens backing on to public parks dumping rubbish in public parks - otherwise I'm not sure any new measures carry due weight to be effective.

On the matter of the new gate to Jubilee, on Southborough Lane, I expect you have received feedback about it already. I do hope LBB didn't have to pay for it, as although I appreciate it is trying to look natural and rustic; it is not of good workmanship and is unlikely to last long. It's also not clear its purpose if it is supposed to be a barrier as my dog ran straight back through it (because the gate scared him - don't ask!) and I just got him to stop before he ran into the road. However, the main issue is that the latch is too high as well as being in the inside of the gate and is very difficult to operate, especially with any aches and pains. The floor level is also all uneven in the same spot where you try to reach and open the latch, making it all very challenging.

I'm an ordinary member of the public who walks our dog at Crystal Palace Park (CPP) regularly throughout the week, usually for around 1.5 to 2 hours between 9.00 and 12.00 but also at other times of day on some occasions. I know and talk with a number of professional dog walkers. Also, for up to two days a week and for longer holiday periods I leave my dog with a dog walker who

regularly walks at CPP as well as at other places.

I've been visiting the park with my dog regularly for well over 10 years. During all that time I have never experienced any difficulty with any of the dog walkers or heard any member of the public or park staff complain of any actions by dog walkers or their dogs. I've only experienced difficulties in the park on a very few occasions. These all related to different members of the public who were walking their own dog (or two dogs) at the park, when either they didn't seem to be fully in control of their dog or the dog(s) appeared likely to be aggressive. I saw a few of these myself and on a few other occasions I was warned and given a description by dog walkers to beware of a particular person / dog(s) who had been seen in the park.

I do not agree with the proposal to restrict dog walkers to having a maximum of 4 dogs with them. My main reasons are:

- I have never seen a dog walker at CPP who was not in reasonable control of their dogs so there is no need for the new restriction
- I can understand the Council wanting to impose some limitations on the number of dogs being walked if there really are a lot more dogs being walked in the park. However, I understand dog walkers have insurance for up to 6 dogs and I think it is much more fair and reasonable to allow them to walk 6 dogs at a time.
- I think it is unfairly harsh on dog walkers to limit them to less than 6 dogs per walk. They are trying to earn a reasonable living, like the rest of us, and are providing a service to people like me. I don't want them having to work much longer hours, cut walks short or having to charge exorbitant prices due to an extremely restrictive new protection order when I seriously query its necessity.
- A fairer alternative to the 4 dog rule would be to place a restriction on the number of dogs which can be off lead at any one time e.g. perhaps restrict dog walkers to 4 dogs off lead plus 2 dogs on lead.
- The Council's proposed protection order does not address the only real problem I'm aware of i.e. anyone having a dog which is dangerous or out of control. Problems are much more likely to be due to a member of the public with inadequate animal management skills than to any of the professional dog walkers I have met.
- In general, it seems to me, the focus has changed and more people nowadays have a small or medium sized dog. That's the type of dog I generally see with professional dog walkers. It does seem incredibly restrictive and unnecessarily punitive if the Council is saying a dog walker cannot control 6 small / medium sized dogs. Also, people who rely on dog walkers to look after their dog are generally responsible dog owners whose dogs are more likely to be easy to control (and the dogs benefit from the socialization of being with other dogs.) So, basically the Council is penalizing responsible dog owners, because imposing this new protection order will definitely make it much more difficult for a professional dog walker to survive. Is that really what the Council is trying to do?
- The professional dog walkers appear to me to be a responsible and helpful community and the Council should be supporting them, not penalising them (and ordinary dog owners like myself who rely on their services).

I would also like to point out that it's taken quite a lot of effort on my part to find out about the Council's proposals and consultation (by asking one of the dog walkers after I'd heard a rumour about the possible new protection orders.) I haven't seen any notices in the park, certainly not at any of the car parks I've visited or at the café. There doesn't seem to be anything on the Council's website or it's somewhere really obscure. It appears that the Council has not made much effort to be fair in this matter by displaying notices prominently so that people can send in a response. I do wonder if the Council is trying to sneak this change in and whether a challenge at the Administrative Court would be appropriate.

I regularly use Crystal Palace Park to walk my dog and another park user has just told me about the

council's proposal to prohibit people from walking more than four dogs at once.

I would have responded earlier if I had known about the consultation but it seems that there has only been one notice posted in the park and this is on a gate at a side of the park that I don't use. It is a pity that the consultation was not publicised more widely so that you could get the views of a greater number of park users, particularly those of us who visit the park frequently.

I understand the council's desire to ensure that dog walkers in the park are fully in control of the dogs they are responsible for but I am not aware of any dog walkers who behave in an irresponsible or inconsiderate way. Indeed if a dog is lost, or if someone has had an encounter with an owner with an aggressive or out of control dogs, it is often dog walkers who alert other park users and the park staff.

I have been walking my own dogs in Crystal Palace Park for over 20 years. From talking to dog walkers in the park I know that most of them are registered to look after 6 dogs and so they have been able to walk this number of dogs at the same time. This seems a reasonable number to walk at one time as long as the dogs are properly controlled and do not make a nuisance of themselves. I have not been aware of dog walkers having more than 6 dogs in their pack and I have never encountered a dog walker who does not have their dogs under control or who does not pick up after the dogs they are responsible for.

My own dog goes to a dog minder for 2 days each week and I know that the proposed change would make it very difficult for my dog minder to continue to make a reasonable living as a dog walker. She is registered and insured to have 6 dogs in her care and regularly takes 6 dogs out for two long walks a day, three of these are her own dogs all of whom she has rescued, so this means she is limited to having 3 dogs boarding with her either for the day or longer periods. At the moment she is able to take all 6 dogs out for two long walks a day, probably 1-2 hours each time.

In addition to the dogs she has in her own home she also separately collects other dogs from their own homes to take them directly to the park for a daily walk and then straight back to their homes so she is generally walking for at least 6 hours a day with additional time needed for collecting and returning dogs to their own homes. If she has to walk her own dogs and the day care dogs in two groups she will have to reduce the time she takes each group out for, (so providing a less good service to her clients), or reduce the number of additional dogs she walks separately which will then reduce her income. This might well mean she cannot earn enough for her and her family to live on.

As a community we all benefit from responsible and registered dog walkers who are regularly visited and inspected. Walking regularly with an established group of dogs leaves my dog both well exercised and well socialised. A well looked after and well exercised dog is much more likely to be happy and confident, and less likely to feel threatened or frightened by unknown people or dogs.

In choosing a dog walker for my dog I talked to other owners and asked for recommendations. My dog walker required me to walk my dog with her other dog charges a couple of times before she agreed to take my dog on. This was so that she could be certain my dog would fit in with her group and would obey her commands. This seems to be common practice amongst the dog walkers in Crystal Palace, and demonstrates a sensible and responsible approach.

I fear that restricting dog walkers to 4 dogs will mean that many dog walkers are forced to seek more remunerative work. This could lead some owners to turn to unregistered and less responsible dog walkers who will flout the regulations and walk larger numbers of dogs at a time to maximise their profits. Dogs walked in very large groups are less likely to be fully under control and much more likely to pose a danger or inconvenience to other park users.

Most of the dog walkers I see in the park are walking small or medium sized dogs, a reflection of the fact that smaller dogs are now much more popular than large ones. Professional and experienced dog walkers should be well able to control and manage 6 dogs of this size. If the Council wants to

place a limit on the number of dogs one person can walk at a time I think it would be much more sensible to set this limit at 6 so that the professional dog walkers who currently use the park on a regular basis can continue to do so and to run their small businesses.

As an additional precaution if it felt the need to do so the Council could say that of the 6 dogs a walker was allowed to have with them 2 had to be on a lead. This would allow the dog walkers to still walk the number of dogs they are registered for, and they could rotate the dogs on the lead so that they all got a reasonable amount of exercise, and the walker would not need to schedule extra walks. Personally I don't think this extra measure is necessary but it would both meet the Council's requirements and protect the livelihood of local dog walkers many of whom have been using the park for many years without causing any problems for other users.

I do not believe that a blanket ban of being in charge of more than 4 dogs should be applied. Surely the main issue is dogs not being under control - even if this is just one dog under a person's charge. Therefore, the number of dogs under the charge of a walker, in my opinion, is irrelevant (as long as they are under control) and as such imposing this ban will have little or no effect on the perceived problem.

This would also severely impact the many professional dog walkers in the borough (including my own) who provide a vital service to your residents. My own dog walker is thoroughly professional and is insured to walk up to 6 dogs with the owner's consent.

Please note that I fully support and abide by the council's existing dog control policies and actually wish they were better enforced (I am always picking up other dog's excrement!).

I am responding to your consultation regarding the "Proposed additional offence in relation to the control of dogs on public land in the borough".

I object to the introduction of this offence and the increase in the fixed penalty charges for the following reasons.

1. The information regarding the concerns raised from various groups is made only in general terms, therefore it is impossible for anyone responding to your consultation to discern whether this is a localised problem or a wider issue. Certainly in my 30 yrs plus of using predominantly my local park and less frequently Beckenham Recreation Ground, Crystal Palace, Norman Park, Keston Ponds and other public areas, I have never had a problem with people walking more than 4 dogs. In contrast they have had full regard for the animals in their charge and have in my personal experience only allowed 4 or less off the lead at one time. The number of dogs is not the real issue; the control is the primary concern. The current 4 offences cover any lack of control exhibited by anyone in charge of 1 or more dogs.

2. The fact that concerns have been raised is undoubtedly due to the lack of any authorised officers being present to resolve the problem. An extra offence will not solve this. Likewise neither will increasing the fixed penalty.

3. I have exercised a dog of my own and one owned by a friend with dogs in the charge of a dog walker some off the lead some on. Realistically would an authorised officer be able to tell how many dogs were in the charge of each person in these circumstances? Would he/she take the time to find out? If there were no cause for concern i.e. no other offence committed would he /she need to intervene?

4. I would actively encourage any person who is prepared to act responsibly to use my local park and to become a friend of this space, I include responsible dog walkers whether they have 1 or 6

dogs.

Our public spaces do require users to negotiate and compromise with each other and that is an important lesson for all age groups and those taking part in any activity in these spaces. Sadly people don't learn these skills at home anymore, no one has to negotiate over TV programmes or meals, you can have what you want in your own space. This does lead people to complain or act as if they have the overwhelming right in a public space. No public order offence or fixed penalty will have any effect unless there is someone to deliver on them. We therefore need more authorised persons to enforce the adequate offences we have in place.

Thank you for forwarding this message. Unfortunately as this was the first time I had heard about the proposal I haven't been able to respond before the 20th January deadline.

The opportunity to comment does not seem to have been adequately publicised as I have had several comments from dog walkers in the park that they have not heard about the consultation.

As someone who is a dog owner and also an event organiser in Crystal Palace Park I feel that the proposal is misguided and will not result in significant improvement in the perceived nuisance of dogs. Throughout all the events that I have organised the worst dog related incident was a dog that was being walked individually, peeing on a stall.

Perceived risks from dogs have been significant, from my non dog owning or park going colleagues, but regular park users such as schools that I have worked with or event organisers are better informed and realise the risk is minimal.

The existing measures in place should be sufficient to manage any issues. Dog owners or walkers with more than 4 dogs should not be penalised en masse because of lack of resources to enforce existing measures.

On the whole dog walkers are responsible custodians of green space. Why not harness the dog walking community in a positive way

https://www.ourwatch.org.uk/uploads/pub_res/Dog_Watch.pdf

Poor management of dogs in public space is as much of a problem for dog walkers as any other park users but rather than demonising an entire group why not tackle those actually causing a problem.

I also only heard about this today via social media.

I can say 100% that any negative experiences I have had with dogs in parks - with or without my own dogs - have been irresponsible owners with 1 or 2 dogs and not professional dogs walkers. In my view this policy is very damaging.

Responsible ownership needs to be applied to actions and not numbers.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

I hope this objection has made it to you in time as I understand the deadline is today.

I am a dog owner and I use the services of a dog walker who sometimes walks the dogs she has in her care in Bromley.

She carries full insurance that covers her walking up to 6 dogs. She carries full public liability, has been DBS checked and carries any other insurances she needs to cover her and the dogs. These were all things we made sure she had before choosing her to look after our dog. She also came highly recommend to us by other dog walkers. When we first started to use the services of our dog walker our dog had to pass a trial to ensure that she got on with the other dogs in the dog walkers care, she had good recall and was well behaved. We also had to fill out detailed paperwork about our dog and had a couple of meetings with the walker before she took our dog on.

I have also had the pleasure of joining my dog walker on a couple of her walks where she has had multiple dogs with her (always within the limits depending on where we are walking). She was

always aware of what the dogs were doing, had them under control and picked up all the poo's they did. I have also met other dog walkers whilst walking my dog and the majority of them are responsible professionals who follow the rules, and have control of the dogs in their care. I have rarely witnessed a dog walker who has more dogs in their care than the rules allow, doesn't pick up mess or doesn't have the dogs under control.

It is deeply worrying and saddening that the rules for the amount of dogs a person can be in charge of in the borough is changing. If the changes go ahead it is highly likely to impact me financially as well as potentially force me to look for another dog walker. My dog has such a strong bond with my dog walker that it would be a really disappointing to have to use the services of someone else. I also can't begin to imagine how difficult it's going to be for hardworking responsible individuals like my dog walker who will be impacted significantly by the changes. They will find they will have to turn clients away ultimately losing income.

I feel this change has been a knee jerk reaction to a small number of complaints and once implemented will not be properly enforced as in Lewisham. The small number of dog walkers who aren't acting responsibly (because unfortunately there are some) by picking up mess, having control of their dogs or have more dogs than the limit in the borough they will continue to act as they currently do. Meaning that the problem/complaints that the borough is currently having will continue and responsible dog walkers will continue to get a bad reputation.

There has been a suggestion for getting dog walkers to apply for permits, which would be charged for, allowing them to walk 6 dogs in the borough. I feel that this would be a much better solution to the problem as this would allow the council extra funding to employ dog wardens to enforce the dog limits, fine anyone they fine not picking up dog mess or who is over the limit/doesn't have a permit and help discourage things like dog thefts which can happen on walks. It also means that the council can go and vet the dog walkers to make sure that they are responsible and in control. This permit would also be a sign to dog owners that they walker that they use or choose to use in the future can be trusted and will reassure the public that Bromley's parks are dog friendly, cleaner due to less dog mess and safe to visit. I realise that this option is a lot more work and will cost more money than simply changing the limit, however it is by far the better option for everyone. It is also worth noting that DEFRA, The RSPCA and The Dogs Trust all agree that 6 is an acceptable number of dogs for professional dog walkers to be responsible for.

I implore you to consider my arguments and endorsements so that the community as a whole can benefit from any changes Bromley Council seek to implement.

It has been brought to my attention that Bromley council intends to impose a limit of 4 dogs per dog-walker. Whilst, as a dog-owner, I would welcome some kind of licensing in this area, I am concerned that this limit would cripple many small businesses and make it even harder to find a reliable dog-boarder/walker.

In addition, I would be interested to know if you have consulted with any local dog-walkers about this proposal? I am led to understand that in contrast, dog walkers' insurance covers 6 dogs, DEFRA guidelines favour 6 as the upper limit and the RSPCA and Dogs Trust guidance for dog walkers is also a 6 dog limit.

Undetermined (3)

Can you clarify for me please, who would be the authorising officer, Ward Security or any Idverde staff? I am assuming all the correct signage necessary is in place including maps showing what areas in Biggin Hill the PSPO order covers?

The other thought, rather than fine anybody with more than 4 dogs, can you not send a message to all dog walking companies, they must register with Bromley Council and to pay an annual sum to allow them to use Bromley parks and open spaces. Obviously signage, using social media, libraries etc. to promote this action, but could become a useful income generator.

Failing to pick up after your dog has fouled

- Failing to put your dog on a lead when directed to do so by an authorised officer

- Allowing your dog into a no dog / exclusion area.

- Allowing your dog off lead in a dog on lead area.

The additional offence being consulted on and to have effect by introducing a new order is:

- Being in charge of more than 4 dogs per person in a public place

We propose to increase the fixed penalty offence from £80 to £100 for all

I would suggest one additional penalty offence - that of slinging plastic dog-poo bags into the bushes.

As someone who spends considerable time picking up litter in Keston and Hayes Common, the amount of plastic poo bags collected is increasing and is very unpleasant to remove.

It may well already be an offence under the Littering Bylaws, but it can't hurt to add to this update.

Perhaps as well as the penalty notices, Bromley could also post more light-hearted signs that may get through to some people's consciences (example poster in email)

Having seen your notice on a tree in Jubilee Park and having looked at the Bromley Council website I cannot see any information regarding PSPO's and would ask you to confirm if this an initial advance notice of the proposal to introduce PSPO's in the borough.

There is no evidence of anti-social behaviour involving dogs and creating PSPO's have a detrimental effect on the community and I would like to have the opportunity to work with the council to promote responsible dog walking / behaviour without the need for PSPO's.

I would very much like the opportunity to discuss this with you at some time in the near future.