

CONSULTATION STATEMENT: C03-23

Pilotage Directions: Amendments

This consultation ran from 14/03/2023 to 14/04/2023. The below statement has been provided to summarise the Port of London Authority's (PLA) initial response.

A total of 9 responses were received. One of these related to PLA Consultation 02/23 on Thames CPD and has been dismissed from this consultation.

The responses can be summarised as follows:

| Relevant Section | Comment | Response |
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| Pilotage Direction 5 | The exemption from pilotage for dredgers operating to the East of Sea Reach 1 would be detrimental to safe operations. | The application of this exemption is not unilateral. It is subject to the requirements of the harbour master in consultation with our pilotage body and for a period the PLA will specify. Such an exemption would be subject to risk assessment and the approval of the PLA. |
| Notes to Directions | The empowerment of Crouch Harbour Authority (CHA) to authorise their own pilots in the PLA's jurisdiction requires clarification regarding the specific area and PLA oversight. | A memorandum of understanding (MOU) is being established with Crouch Harbour Authority. This will allow them to authorise their own pilots in a very limited part of the PLA pilotage area. A revised chartlet of this area will be included in the final draft which provides clarity on the areas which may be covered. PLA harbour masters will be on the examining panel in line with the arrangements with other neighbouring ports. These parameters were approved the PLA pilot training panel on 25 th May 2023. |
| Notes to Directions | The MoU between the PLA and CHA states an authorisation to 6.5m (rather than the 6.0m printed in the consultation notice). | The authorisation limit agreed between the PLA and CHA is 6.5 metres draft as opposed to the 6.0 metres included in error in the original consultation notice. |
| Pilotage Exemption Certificate Regulation 1.4 | The PLA pilot training panel should approve changes to PEC requirements. | The PEC regulations have previously been agreed the PLA pilot training panel. The minor changes made to tripping requirements have only increased the regulatory requirements for PEC applicants. |
| Pilotage Exemption Certificate Regulation 1.4 | The requirement for applicants of vessels >145m to prepare a passage plan for their examination should be extended to all PEC applicants. | This was agreed by the PLA pilot training panel on 25 th May 2023 and will be included in the final draft. |
| Pilotage Exemption Certificate Regulation 1.6 | There is a significant difference between the renewal criteria for PEC holders and PLA pilots. | Since a PLA pilot is authorised for all vessels within the size limitations and district limits and a PEC holder is restricted to specified vessel(s) and specified berth(s) the requirements are significantly different. |

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| Pilotage Exemption Certificates Regulation 1.2 | Support exists for the provision of PEC Bs to the East of Sea Reach 1 subject to appropriate examination and assessment criteria. | PEC Bs issued for this area will be subject to the same requirements as those issued to the West of Sea Reach 1. Applicants wishing to extend their area would be subject to an oral examination and practical assessment as per Pilotage Exemption Certificate Regulation 1.4. |
| Notes to the Directions 2.6 | Provision should be made in the Pilotage Directions for the repatriation of overcarried pilots. | The charges and arrangements are specified on page 16 of the PLA Charges 2023. This requirement has now been reiterated in the Notes to the Directions. |
| Pilotage Direction 3 | The definition of 'length overall' should not apply to objects overhanging the towing medium. | Definitions are aligned between all PLA regulations and this definition will not be amended. |
| Pilotage Direction 4 | The LOA requirement for vessels carrying dangerous goods to be subject to compulsory pilotage is not proportionate to the increase in risk (and should be increased in line with other vessel types). | The reduction in LOA requirement for vessels carrying dangerous goods and passenger vessels was thoroughly risk assessed during the 2016 pilotage directions review and has been re-assessed as part of this review. This reduction takes account of the increase in consequence severity for these vessel types. A review of the risk assessment did not identify any grounds to change this requirement. |
| Pilotage Direction 4 | The reduction in LOA requirement to the West of Margaretness is excessive and unjustified. | The reduction in LOA requirement to the West of Margaretness was thoroughly risk assessed during the 2016 pilotage directions review and has been re-assessed as part of this review. This reduction takes account of the increased risks involved in navigation through bridges, shallower water, narrower channels and increased traffic. A review of the risk assessment did not identify any grounds to change this requirement. |
| Pilotage Direction 4 | Pilots required to the west of Margaretness must be embarked at Gravesend resulting in additional charges to the operator. | The PLA operate a pilot station at Gravesend. From time-to-time arrangements have been made for pilots to be transferred to vessels at Margaretness but since no pilot station exists here, the PLA must retain discretion as to whether this service is or can be provided. |
| <i>Pilotage Direction 6</i> | The assigning of a pilot should not be in the opinion of a harbour master and removes the Master from his duties. | The wording of this direction is such that the harbour master must have grounds to require a vessel to take a pilot, whether this be due to damage or deficiency, or in the interests of navigational safety. Such a decision would not be made unreasonably. |
| <i>Appendix 6</i> | It is unclear which passenger vessels may be exempted from compulsory pilotage. | Pilotage Direction 5(3) permits the harbourmaster to exempt vessels >40m LOA or >4m operating draft subject to their requirements. Appendix 6 sets the upper parameter of this exception to passenger vessels up to 65m LOA. |
| <i>Appendix 6</i> | Table 1 is not representative of what was agreed at the pilotage direction review of 2016. Several amendments are suggested. | Minor amendments have been made to these tables to better reflect the content of Navigational Risk Assessment Working Group 53 as approved. A review of the risk assessments produced by the 2016 review identified that these changes were satisfactory. |

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Harbour Master