



FEEDBACK ON THE INFORMAL PUBLIC CONSULTATION ON Code of Practice for Paddling on the Tideway

	Consultee	Organisation	Summary of Feedback	PLA Response
1.	DAVID RICHES	Master i/c Water Westminster School Boat Club Putney embankment resident Member Ranelagh Sailing Club and sometime tideway paddler	<p>I have been sent an email to comment on the draft code of practice for Paddling on the Tideway . From my perspective as a full time rower and coach on the Tideway , riverside resident and occasional paddler this is a very significant advance and will undoubtedly enhance safer boating activity on the river.</p> <p>The Equivalent Rowing Tideway code of Practice has markedly improved knowledge of the potential hazards and difficulties that may be encountered on Tideway and gone some way to educating river users and reducing accidents. This will also assist in avoiding potential conflict between different river users which may arise due to a lack of appreciation of the different guidance that is provided to sail , paddle and rowing boats.</p> <p>I congratulate the PLA in its promotion of safer river enjoyment for all users.</p>	<p>Thank you for responding to our consultation.</p> <p>We're grateful for your positive comments towards this Code of Practice and hope it is successful in improving safety.</p>
2.	NICOLAS ROUQUETTE		<ul style="list-style-type: none"> • The guideline are ridiculously over-comprehensive and long winded. No one is going to read 70 pages of exhaustive advice before going on a quick weekend kayak. I live by a slipway and people simply come down to the river with their crafts when the sun comes out in summer - they don't sit and read 70 pages of advice and won't unless they legally have to (think of the highway code which is not much longer). Neither should they have to . The river is a public space, not a private PLA highway for them to auction off to the highest bidder. • The guidelines seem to be a cynical attempt at outsourcing responsibility from the PLA, namely that the river is only "safe" if one follows 70 pages of advice and that therefore any accident which does/will happen will be the individuals' fault (or worse, the club's fault.. I can't believe that the clubs have agreed to this/not foreseen this implication). I suspect any investigation post-accident will reveal this fatal flaw in the thinking behind the guidance • The guidelines are not and cannot be publicised meaningfully to all users. I am on the pla notices mailing list but most people aren't. At the end of the day its either legal to kayak on the thames or its not 	<p>Thank you for responding to our consultation.</p> <p>This Code of Practice is designed to be an easy to read reference guide. There are many rules, Byelaws and Directions on the river so having a resource such as this code where they are all in one place and easy to understand is important.</p> <p>As a Port Authority, we have a duty of care to support paddle sport users to enjoy their activities on the tideway to the maximum, whilst conveying best practice and safety messages on what is the busiest and arguably most navigationally challenging and unique inland Waterway in the UK.</p> <p>We have good engagement with the paddling clubs on the tideway and with British Canoeing, so we are confident that this code</p>

			<ul style="list-style-type: none"> • The guidelines reflect lots of current details (ie there are no commuter services at weekends)... I don't see how they will continue to be updated in the future, and I certainly don't see that any of those updates will assimilated by the public • This idea that all paddlers must inform London VTS if they are out in the dark below Putney Bridge, either by phone or VHF radio does not make sense. Again, I am either allowed to kayak or I am not. I will often just go for a kayak (with lights) at night and don't see why I would have a legal responsibility to tell anyone. I don't tell the police if I am going for a walk in the park after dark. If the PLA are unable to provide a safe river, then they should admit to that and not force people to report their movements which is just sinister. 	<p>will be well publicised.</p> <p>We review our Regulatory Framework and other publications on at least a 3 yearly basis, which will take into account any changes. It's not possible to produce a Code of Practice that is 'future proof due to the dynamic nature of the river.</p> <p>London VTS and VHF in general has proven to be beneficial to safety on the river. Communication with other river users is very important in Central London, particularly with the increasing number of passenger boats and freight traffic for the Tideway Tunnel. This practice has also been implemented successfully by the rowing community for many years</p>
3.	GUY GREAVES	President, Tideway Scullers School	<p>1. The recommendation that all craft should be identifiable (Page 20). I understand that this may be difficult to achieve regarding privately owned craft, but should it not be an ambition for all boats launched on the Tideway?</p> <p>2. The map on page 55. I understand that you are encouraging 'paddlers' to keep out of the Fairway as much as possible as they are much slower than other craft (e.g. the use of the centre arch of Kew Rail Bridge when paddling with the flood tide – which would be difficult in and VIII). However, the indication to use the 'Middlesex arch' of Chiswick Bridge when paddling with the flood tide seems dangerous when Mortlake Anglian and Alpha Boat Club, Quinitn Boat Club and Tideway Scullers School all use the Middlesex bank when coming back to their boathouses on the flood tide. Would it not be safer to indicate the route as being within the Fairway, using the starboard side of the centre arch of Chiswick Bridge until beyond the Chiswick Marina? Of course, the same issue will occur approaching the University of London Boat house.</p> <p>I hope this is helpful.</p>	<p>Thank you for responding to our consultation.</p> <p>Regarding the identification of craft, Thames Byelaw 53 states that all vessels on the river, including privately owned craft, need to display their name. We have introduced an ID regime to Club boats to make this easier for clubs and to assist in identification (as explained on page 20) but this does not mean that private boats don't need to be identifiable. They can utilise the ID regime if they wish, or have a name on their craft</p> <p>Regards to kayakers inbound through number 1 arch at Chiswick Bridge – any person entering, crossing or proceeding on the incorrect side of the river for a short distance to get to their club would have to give way to anyone proceeding along the river – page 29 of the code is relevant here. It wouldn't be feasible to cover this type of scenario for all clubs on the river on the maps on page 50 onwards.</p>
4.	JASON COLE	Maidenhead Rowing Club	<p>I've had a look at this and it appears to be very comprehensive indeed.</p> <p>One additional resource I use to check the downstream fluvial flows is the "Maidenhead Rowing Club Flow" website which is updated daily. If the flows exceed 40 cumecs this can become a noticeable current.</p>	<p>Thank you for responding to our consultation.</p> <p>This information may be useful when determining fluvial flows, however any information the PLA publish needs to come from our own sources and equipment – the</p>

			The URL is here: http://mrcstats.azurewebsites.net/default	development of our flag system ensured it was an accurate representation of fluvial flows at Teddington Lock.
5.	JOHN WINDOW		<p>I note that no advice or recommendations refer to below the Thames Barrier.</p> <p>Paddle boards and canoes are becoming more popular especially in and around the creeks of Canvey Island with some making passage across from Essex to Kent and visa versa.</p> <p>There is also growing popularity with rowing (gigs and whalers etc). One large club and another growing more popular every week train and practice all round Canvey and should be taken seriously.</p>	<p>Thank you for responding to our consultation.</p> <p>Whilst there is general advice on ‘The Lower Tideway’ on page 66, more detailed coverage below the Thames Barrier is something we will look at at the Code’s next scheduled review and we will continue to engage with the clubs around Canvey.</p>
6.	PETER FINCH	RTS	<p>Page 5 - Diagrams – captions need reversing – Top : The Flood Tide Bottom: The Ebb Tide.</p> <p>I think the top one should read - The Flood tide (rising) is when the tidal stream is flowing inbound. <i>The diagram shows approximate time differences for high water between Woolwich and Teddington.</i></p> <p>The bottom one to read - The Ebb tide (dropping) is when the tidal stream is flowing outbound. <i>The diagram shows approximate time differences for low water between Woolwich and Teddington.</i></p> <p>Page 10 - “Time of day “ – “Commuter services don’t run at weekends “ is confusing, as Clipper services run regularly at weekends following mainly weekday timetables, with only the up-river trips to Putney ceasing.</p> <p>Page 13 - Boat Buoyancy – above Richmond Lock it is only non-tidal when the weirs are down.</p> <p>Page 15 - Recommendations – does it need to clarify that the inflatable boats mentioned are only those covered by the guidance?</p> <p>Pages 16 /17- Unfortunate the paddlers of the racing kayaks aren’t wearing buoyancy aids! Is C2 a racing canoe rather than a kayak?</p> <p>Page 24 - “Getting off the river “ – After reference to draw-docks suggest: “There are numerous stairs along the river but some may be locked making an exit to the bank impossible. A list of stairs can be found at http://www.riverthamessociety.org.uk/CMS/FILES/AccessToTheRiverThamesCOMPLETEPDF1.pdf “</p> <p>Page 26 - Col Regs – NOTE “where small man-powered boats are allowed “ – is an eight small? Suggest “where oar-powered boats are allowed “ or “ where oar-powered and paddled boats are allowed “.</p>	<p>Thank you for responding to our consultation.</p> <p>We have found your comments useful and have amended the code as follows, or responded to your comments as below:</p> <p>Regarding the diagrams for ebb and flood – the diagrams are correct as ebb turns to flood after low water, and visa versa for high water. However, they are a little confusing so we are making a change to the layout on page 5 to make this clearer.</p> <p>Page 10 – we agree that this is confusing, so we will clarify that commuter services are less frequent at weekends above Chelsea Bridge.</p> <p>Page 13 – we will change non-tidal to semi-tidal.</p> <p>Page 15 – we will clarify that only inflatables covered by this code are advised to remain above Putney.</p> <p>Pages 16/17 – images with a red border are place holders and we will source alternative images. We will amend C2 kayak to canoe.</p> <p>Page 24 – there are many steps on the river and your document is very comprehensive, however we cannot guarantee the accuracy of this and its content is out of our control so we’re not in a position to direct people to this within our code.</p> <p>Page 26 – we will change this to “Where man-powered boats are allowed...”</p>

			<p>Page 50 – The Upper Tideway – delete “sightseeing” before “cruisers” and alter to read “motor cruisers”.</p> <p>Also add “with some Class V passenger vessels “.</p> <p>Page 52 - Turk’s Pier near the White Cross needs a passenger vessel symbol.</p> <p>Page 54 - Is there a possibility that Kew Bridge Arch 1 will be re-opened? If so, text should reflect same.</p> <p>Page 58 – Central London but why Heart of London later?</p> <p>Page 62 – The Heart of London – again, not correct to say commuter services don’t run at weekends.</p> <p>List of organisations – add River Thames Society – www.riverthamessociety.org.uk.</p>	<p>Page 50 – we will amend as per your suggestion</p> <p>Page 52 – we will add a symbol at St Helena Pier</p> <p>Page 54 – No.1 arch is currently closed and there is currently no indication that this will change within the code’s 3-yearly review cycle.</p> <p>Page 58 – we have defined ‘Central London’ in this code as Putney to Tower Bridge, primarily for ease when referring to certain restrictions, such as those for Stand Up Paddleboarding. The Heart of London is Westminster to Tower, which is the most congested and busiest part of central London where particular care should be taken.</p> <p>Page 62 – we will amend the reference to commuter services as per our change to page 10.</p>
7.	PAUL	Active 360	<p>Does anyone have a simple river map showing where SUP paddlers can go with and without training ? If not it would be great to have this on your website as it may make more sense to people not familiar with London but thinking of paddling here</p> <p>The table is good but a map is more visual?</p>	<p>Thank you for responding to our consultation.</p> <p>We believe you could utilise the maps on page 51, 60 and 61, these being the areas of the river where the levels of TSK qualification are applicable. We’d be happy to work with you if this needs to be developed further.</p>
8.	RAY TYLER		<p>I find trying to miss these paddles people when I am making my way to the Thames I have to throttle back so to go past them.</p>	<p>Thank you for responding to our consultation.</p> <p>The code advises paddled craft to correctly position themselves on the river and maintain a lookout for wash from behind.</p> <p>If you wish to report an incident or near miss please contact London at the time and follow this up with a written report at www.pla.co.uk/incidentreport</p>
9.	SUE MIDDLEHURST		<p>I am all in agreement to develop a code of conduct that has been agreed and bought into by anyone using the tidal section of the Thames.</p> <p>And I applaud any code that "supports paddle sport users to enjoy their activities on the tideway to the maximum, whilst conveying best practice and safety messages.</p> <p>I have read the proposed document and I have a slight concern over the recommendations on page 25 – Lookout:</p>	<p>Thank you for responding to our consultation.</p> <p>We have recognised in the code that paddlers are most likely to encounter hazards from behind, such as overtaking craft and wash. The code explains how to position and manage groups on the river effectively to minimise this hazard.</p> <p>There is an expectation for all river users to</p>

Paddlers face in the direction of travel so can easily see oncoming hazards but they must also be very aware of quicker vessels that may be approaching from behind. Motor vessels can be easily heard and may even give a sound signal on their horn. Rowing boats however are much smaller and quieter and very often the steersperson is facing away from their direction of travel. Rowers may make their presence known by shouting a warning.

It is therefore essential that paddlers check behind them at regular intervals and is recommended that groups have two experienced paddlers at the rear of the group whose specific role it is to keep a lookout behind.

I am a veteran racing kayaker and experienced coach. Over the 45 years of being in the sport the only collisions on the water I have experienced is with fast moving scullers on the Richmond tidal way. On all occasions it has been the rower who has crashed through a group that I have been coaching as they had been going faster than us and had not seen or heard us. These collision have happened despite following the rules you have stipulated of having two experienced paddlers at the back of the group to keep a regular look out for fast moving rowing boats coming up behind us and to shout a warning to both the group and the rower if a collision looks likely. Though I have never had a collision with a rower when I share the river at Weybridge.

The reason why I have not had a collision as I paddle at Weybridge is not because there is less opportunity for a collision with a rower – in fact there is more as the rowing club is next door to the kayak club and the river is narrower. There are less collisions as both the rowers and the kayakers respect that both sports have equal right to be on the river and because of this mutual respect both the kayaker and rower are aware of each other's presence on the water and make avoidance moves simultaneous. There is not an expectation for the kayakers to be regularly checking behind them for fast moving rowers.

My question to you is why is there an expectation to look behind you when you are doing a forward facing activity?

If I was a walker on the towpath I would not be expected to keep looking behind me for runners and cyclists. I would be expected to be aware that these could be coming up behind me and that I will be required to let them pass without collision.

If I was a cyclist on the road I would not be expected to keep looking behind me for motor bikes, cars and trucks. I would be expected to be

maintain a good lookout – as per Rule 5 of the International Regulations for Preventing Collisions at Sea, as summaries on page 25.

That said however, a vessel overtaking does not have right of way and should not impede the vessel they are overtaking, as summarised on page 31.

Regarding your comparisons to a path or road, the river is different in that is constantly moving – up to 4 knots and potentially more around bridge buttresses, etc. and all river users have a duty of care to avoid collisions (see page 30) which should be in the form of mutual respect between other river users. We believe this code and the sharing of the 'Inshore Zones' with rowers will improve this mutual respect.

Keeping a lookout behind is similar to the use of your mirrors when driving a car and changing lanes – you shouldn't change lanes in front of a car and a group of paddlers shouldn't cross or move position on the river so to impede other craft.

Due to the change in rules to allow paddlers into the rowing 'Inshore Zone' there needs to be additional mitigation measures in place – this is explained on page 38 and supports the reasoning for keeping a lookout behind.

We believe that safety of navigation must come before performance or training – navigating safety may indeed mean paddling slower. Racing or paddling to improve performance should not take priority over other river users or prejudice safety decisions.

			<p>aware that these could be coming up behind me and that I will be required to let them pass without collision.</p> <p>If I was a runner and was told that I had to keep looking behind me wouldn't this be a trip hazard as I was not looking where I was putting my feet? This is the same in the boat, especially if the river is running fast. We are taught that to keep safe we need to at all times be in control our of boat and to do this we should be looking where we are going.</p> <p>If I was a runner who was trying to improve to become a faster runner I would need to stretch my legs and see how fast I could go. Consistently checking behind me would slow me down. To be safe and go faster I would need to be very conscious of direction of travel and any trip hazards. Why would this be different in our kayak.</p> <p>Looking forward to your response.</p>	
10.	ROLAND LUCAS		<p>Under the Section on Equipment and clothing, Lighting your boat, it says.</p> <p>Lighting must be a constant white light firmly fixed to the bows and to the stern of the boat. Each light should be visible for approximately 800m and through 180° The boat should effectively have white lighting visible through 360°.</p> <p>I use a racing kayak, which you will be aware is very thin, to the point that it will not take much of a wave to swamp the front of the boat right up to the cockpit which in turn is likely to wash away any light fixed to the front of the boat. I accept that the light could be made secure enough to withstand the impact of a wave, but when was the last time you saw one wave on its own. To design a fixing that could withstand half an hour of wind against tide is unrealistic.</p> <p>Given that canoes and kayaks come in a huge variety of shapes and sizes, trying to define where to place lights that will be effective for all models is not practical.</p> <p>Can I suggest that this section is reworded along the lines of:</p> <p>Lighting must be a constant white light visible for approximately 800m and through 360°. This will allow lights to be positioned where they will be most practical for the design of the boat being used.</p>	<p>Thank you for responding to our consultation.</p> <p>The ideal place to put lights on a kayak, from a visibility point of view is on the bows and stern, furthest away from the paddler so that the paddler themselves do not block the light, but appreciate your comments regarding issues with craft low to the water.</p> <p>The code caters for racing kayaks and the like being difficult to attach lights to on Page 22, in the fourth paragraph, which states:</p> <p>“On SUPs or kayaks and canoes low to the water, it is recommended that lights be fixed to the chest and back of the paddler.”</p> <p>We will also amend the text in the third paragraph to clarify that lights ‘should’ rather than ‘must’ be fixed to the bow and stern.</p>

11.	MARCUS GOHAR	<p>I have a few comments on the proposed paddling code. I would be grateful if you would consider them. Canoes and kayaks are different from rowing boats in that they take up less space and can see forwards but seeing backwards is more challenging. Racing boats also capsize quite easily and in some areas it is difficult to climb out of the water when a deep water rescue is impractical. This may affect where we prefer to paddle.</p> <p>Canoes and kayaks should be allowed to ride the slacks on the port side in the following places:</p> <ul style="list-style-type: none"> • Normal flow assuming paddling towards Teddington: The downstream end of Eel Pie Island to TYM. There are few exit points on the starboard side of the river and the tidal set above Eel Pie is also on the Starboard side. At the top of Eel Pie the navigable channel is very narrow and on the starboard side so it makes sense for us to be where large draft and rowing boats cannot go. • Flood tide assuming paddling towards Richmond Lock: Glovers or just above to Richmond Lock. <p>I also suggest that rowers and paddlers should remain in the fairway when navigating with the flow. On seeing a canoeist navigating upstream on the port side, some rowers have a tendency to abruptly leave the fairway and head straight for the paddler then complain! Furthermore, navigating with the flow close to the bank can easily result in a collision with a tree or some other bank feature. I would also prefer it if rowers stayed in the mainstream channel on the Glovers stretch - outside the island and the moored boats. This area, being calm and shallow, canoeists often use it to shelter from big washes or to practise basic skills.</p> <p>I would also like to see stricter regulation of powered craft, including commercial passenger boats. A few travel very fast with wash to match and I am sure our colleagues in the rowing community would agree.</p>	<p>Thank you for responding to our consultation.</p> <p>We have considered your comments regarding 'working the slacks' above Richmond.</p> <p>Padding on the port side inbound during the ebb tide at Eel Pie Island – page 52 of the code suggests that paddlers may wish to utilise the inshore side of Eel Pie Island – thus having easily accessible egress points, a reduced tidal flow and set and avoids vessels transitting the narrow navigable channel at the top of Eel Pie Island. The ebb flow is minimal for the majority of the tidal cycle compared to other parts of the river, due to the weirs at Richmond Lock.</p> <p>Remaining in the Fairway when outbound at Eel Pie Island – as your comment states, the river is narrow at Eel Pie Island – there would not sufficient river width to cater for inbound paddlers on the same side, while allowing room for other river users and larger vessels.</p> <p>The fundamentals of the International Regulations for Preventing Collisions at Sea advises vessels to turn to starboard when faced with a head-on situation. Having paddlers on the incorrect side in a narrow part of the river, which is also a blind bend, would cause confusion when a river user decides on what action to take to avoid a collision. If turning to port, there is a risk that the other river user would also follow the rules and turn to port, thereby not avoiding a collision. Keeping to starboard and avoiding collisions by turning to starboard (as per the rules) would mean avoiding action is predictable.</p> <p>If you wish to report an incident or near miss please contact London at the time and follow this up with a written report at www.pla.co.uk/incidentreport</p>
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12.	I	Chair of Chelsea Kayak Club	<p>My response to the Paddling Code consultation is as follows. In general I think it's well written and thought through but in some cases may be overly prescriptive and excessively detailed.</p> <p>Specific notes: P4 - The Thames below Teddington Lock is a tidal river and navigation is essentially based around the behaviour of the tide, which changes constantly. THE TIDE CHANGES REGULARLY, NOT CONSTANTLY</p> <p>P9 - As well as rain causing viability issues. VISIBILITY, NOT VIABILITY</p> <p>p11 - A 'group' should consist of no more than 10–15 boats - THAT'S QUITE A BIG RANGE. IF YOU WANT TO PUT A FIGURE ON IT, THEN I SUGGEST GIVING A SPECIFIC ONE, FOR EXAMPLE BASED ON 4-STAR CRITERIA. BUT IN GENERAL I THINK THIS IS OVERLY PRESCRIPTIVE.</p> <p>P11 - I disagree with the inclusion of like the 'dynamic risk assessment' symbol. It suggests paddlers should only do this at points where it specifies, whereas the code should be clear that they should be doing this all of the time. Also the points where it shows the symbol are rather unclear.</p> <p>P12 - Is this really the place for maintenance advice? The code already specific that leaders should be suitably qualified and know what they're doing - this seems like excessive detail to me.</p> <p>P13 - I have never in my life seen a high-vis PFD...</p> <p>P13 - Weak or non-swimmers should consider a higher rated PFD or possibly even a fully inflating life jacket if necessary. THIS MUST ABSOLUTELY NOT BE IN HERE. FULLY INFLATING LIFE JACKETS ARE VERY DANGEROUS IN A KAYAK SO THIS IS VERY INNAPPROPRIATE ADVICE.</p> <p>P28/30 - As well as the leader, groups should ideally have two experienced paddlers at the rear whose specific role it is to keep a lookout behind and inform, direct or control the group as necessary. I THINK ONE IS SUFFICIENT</p>	<p>Thank you for responding to our consultation.</p> <p>We have found your comments useful and have amended the code as follows, or responded to your comments as below:</p> <p>Page 4 – we will change the text as you suggest. Page 9 – thank you for spotting this – we will amend Page 11 – a group size may be dependant on the part of river you're in – central London for example may be safer to navigate with smaller group sizes. We'd like for kayak clubs to manage the size of the groups so that club paddles don't become 'events' which require Harbour Master approval under our Byelaws. Our advising of a maximum group size gives guidance to clubs on when we deem a club 'mass paddle' to be an event and hence, requires liaison with the Harbour Master.</p> <p>We have reworded page 11 to specify that only certain key situations or locations are marked with the symbol and have removed reference to Dynamic Risk Assessment when saying that "Individuals and group leaders must always take into account the conditions and their competence."</p> <p>Page 12 – The code is intended for a wide range of paddlers, not only leaders. Improper maintenance of life jackets was highlighted during an investigation into a fatality in 2015.</p> <p>Page 13 – We regret that we omitted "manually inflating" from the text. Auto-inflating lifejackets could indeed be hazardous but inflating lifejackets provide far more buoyancy than a buoyancy aid.</p> <p>Page 28-30 – We have amended the code to suggest 1 or 2 rear paddlers, depending on group size and location.</p>
13.	TOM SHARPE		<p>Richmond Canoe Club's Response to PLA draft Paddling Code of Practice - Paddling on the Tideway (Nov 2016)</p>	<p>Thank you for responding to our consultation.</p> <p>Whilst we acknowledge that Richmond</p>

		Commodore, Richmond Canoe Club	<p>I am writing on behalf of Richmond Canoe Club to thank the PLA for the opportunity to respond to this public consultation and look forward to working constructively with you in the future to make this guide something I am happy to promote and monitor at the club. We welcome a paddling code which the PLA says is there to "support paddle sport users enjoy their activities on the tideway to the maximum, whilst conveying best practice and safety messages".</p> <p>Summary</p> <p>Richmond Canoe Club welcomes the creation of a paddling code, the opportunity to be involved in its content and recognises the effort that has gone into its development so far. The Draft Code, however, while catering for recreational and adventure paddlers does not seem to reflect the needs of racing paddlers.</p> <p>Richmond Canoe Club is a racing club and we believe we should be regarded in the same way as the many racing rowing clubs using the Thames who have their own established Rowing Code. This means not being encumbered by the multiplicity of equipment and procedures proposed in some sections of this draft. It also means, for reasons of safety and pure practicality, defining parts of the river where the normal "keep right" rules of navigation are modified- in exactly the same way as the Rowing Code. In addition, given the tideway above Richmond Lock is semi-tidal and, as defined by the draft code "benign", compared with the Lower Thames, we believe it should be designated a Paddling Code Area where different racing paddler-helpful rules apply in a similar way to the Rowing Code Areas. Finally, there should be a recognition that racing K1, K2, C1 and C2 capsizes are frequent, part of the sport and the safety implications of this mean they should be treated differently from all other craft.</p> <p>We set out our recommendations below to enable racing paddlers and others to safely enjoy their Sport.</p> <p>Detailed response RCC comment on all points below: the semi-tidal tideway above Richmond Lock is a much safer and benign river with much less traffic than the lower Thames (where conditions are harsher and the draft recommendations make much more sense). We therefore believe different rules should apply.</p> <p>1. "Clubs are strongly advised to keep a log or sign-out board of who is afloat" (p.8)</p> <p>RCC does not currently operate a system like this. It could be</p>	<p>Canoe Club generally operates differently to the recreational and adventure clubs on the river, we believe that safety of navigation must come before performance or training – navigating safely may indeed mean paddling slower. Racing or paddling to improve performance should not take priority over other river users or prejudice safety decisions.</p> <p>As you say, there are a large number of rowing clubs on the river, the majority of which can be considered 'racing' clubs and they have their own established rowing code. The paddling code now enables paddlers to benefit from the modified "keep right" rules within the rowing code, which is hopefully seen as a benefit to the majority of clubs. Rowing clubs are also required by the code to follow similar procedures as those described in the rowing code and have no difficulty in doing so.</p> <p>We recognise that K1/2 and C1/2 capsizes are relatively common compared to other sports and this is reflected on P47, in that we'd like to be notified of capsizes caused by third parties or which involve the emergency services.</p> <p>We have considered your comments regarding 'working the slacks' above Richmond and defining the river above Richmond Lock as a designated paddling area, which is described below in reply to your detailed response:</p> <p>1. The code is intended to support paddle sport users to enjoy their activities on the tideway to the maximum, whilst conveying best practice and safety messages. It has been developed with input from British Canoeing and shares good practice</p>
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		<p>whose specific role it is to keep a lookout behind (p.28}</p> <p>It is the job of RCC coaches and group leaders to keep a lookout a head and behind. The number of coaches depends on the group size and often in a small group this "two person" requirement is not practical. In a dynamic, competitive race training environment where boat positioning is constantly changing having to have lookout paddlers fixed at the rear is not conducive to improved performance. The club believes above Richmond Lock it should be the responsibility of the group leader to ensure a proper lookout is kept ahead and behind.</p> <p>9. Group management -Group paddling does not give paddlers carte blanche to spread out across the river (p.28}</p> <p>RCC agrees that a group of paddlers should never obstruct other river users and the group leader's responsibility is to ensure this does not happen. A training group, however, cannot paddle in single file. This is because a) the coach cannot communicate easily with all the group, and b) it does not replicate a race situation. For example, a practice race start and initial sprint has to happen line abreast. RCC members always ensure other river users are never inconvenienced by its group training.</p> <p>10. Bridges- You may not cross {the river}[...] close to a bridge (p.29) Paddlers should keep well clear of all bridges for their own safety except when transiting a bridge. [...] Do not cross, turn or over take under or near a bridge (p.32}</p> <p>For many years RCC has run regular time trials during the summer where we turn directly under bridges. We also train using the eddies of bridges to learn the skills of dealing with turbulent water. We believe above Richmond Lock these rules should not apply.</p> <p>RCC proposed "Paddling Code Area" above Richmond Lock</p> <p>Richmond Canoe Club believes there should be a Paddling Code Area established above Richmond Lock (to Teddington Lock) in exactly the same way as Rowing Code Areas are defined downstream for the rowing community. These Rowing Code Areas are defined in the Rowing Code and list numerous places where the normal 'keep right' rules of navigation are not applied or even reversed for reasons of safety. RCC is looking for exactly the same sensible approach for the same safety reasons.</p> <p>Above Richmond Lock the river is quite different from the rest of the tideway. It is non-tidal for around 16 hours every day. When there is</p>	<p>a single paddler would be unable to adequately maintain a proper lookout simultaneously ahead and behind a group which, as you say, is constantly changing position. With the river being narrow and containing trees, bridges, bends and moorings, an adequate lookout above Richmond Lock is just as important as below the lock.</p> <p>9. The code states: "It is important that groups stay close together and are of a size and formation that does not baulk or otherwise impede other river users". Therefore, a Dynamic Risk Assessment should be carried out depending on the width of the river, river traffic, visibility, etc.</p> <p>Paddling in single file can be more of a hindrance to other river users, so a tight group is advised. There is slightly differing guidance for when paddling within the Inshore Zones however.</p> <p>10. The code is general guidance and indeed in some cases paddlers may need to cross near or under a bridge. However, this should be avoided where possible and we advise that if it is normal practice for your club, a risk assessment should be carried out to identify additional mitigations such as additional lookouts or informing London VTS before your time trials so that transiting vessels are aware and can pass through the area with caution.</p> <p>Proposed Paddling Code Area above Richmond Lock</p> <p>We have considered your comments regarding establishing a 'Paddling Code Area' above Richmond Lock.</p> <p>The principle of 'Working the Slacks', as rowers have been doing for a number of years, is for man-powered craft to utilise the</p>
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		<p>collisions should always be avoidable.</p> <p>RCC shares the river with Twickenham Rowing Club. Paddling on the left often enhances safety because we can see potential collision with rowers and avoid them. Paddling on the right has, on numerous occasions, resulted in rowing boats hitting kayaks from behind.</p> <p>To quote Ben Hunt-Davis (Gold medal winning Olympic rower who now paddles kayaks at Richmond), "Rowers tend or try to follow the navigation rules because they can't see what is coming so the safest approach by far is to stick to the correct side of the river. As a paddler I'm often on the wrong side of the river as I think that if or when I fall in I'll be able to swim to safety more easily. I can also see what's coming towards me and get out of its way."</p> <p>RCC believes the creation of a Paddling Code Area above Richmond Lock would enhance safety and improve the experience of all paddlers.</p> <p>Safety issues affecting paddlers outside the scope of a paddling code.</p> <ol style="list-style-type: none"> 1. Rowers keeping a lookout. <p>There have been many incidents of rowers running into the back of a kayak or group of kayaks. Although a paddler group leader (and assisting coaches) will do their best to keep a look out behind, rowers are low profile, approach at speed and collisions occur. This rarely happens with coxed rowers so clearly the problem is with rowers keeping a lookout. Paddlers face forward and a racing kayak paddler practicing a proper paddling technique cannot be expected to constantly look backwards. It seems to RCC the onus should be on rowers to look where they are going.</p> <ol style="list-style-type: none"> 2. Wash. <p>One of the biggest issues regarding racing kayak safety is wash from powered boats. Racing kayaks are unstable so wash can, and often does, cause capsizes. The worst offenders are commercial passenger vessels. Two vessels are particularly bad:, the Merrie Thames and the Connaught. It is not just a matter of speed and displacement as properly designed boats like the Henley produce little wash.</p> <p>Next steps</p> <p>I would be very grateful for the opportunity to discuss the content of this response with you, and for us to work together in order to ensure the Paddling Guide is a suitable code of conduct for Richmond Canoe</p>	<p>guidance within the code, i.e. "Paddlers should aim to be as close to the starboard bank as is safe and practicable". The Dynamic Risk Assessment would determine how close you are to the starboard bank regards to safety and practicality. The code will be amended to make this clearer.</p> <p>Safety issues affecting paddlers outside the scope of a paddling code</p> <ol style="list-style-type: none"> 1. Please report near misses or incidents to us so that we can investigate. Analyses of trends are important to improve the way we manage safety. Preferably, please contact London VTS at the time of the incident. 2. As above, please report these incidents so that we are able to investigate. <p>Next Steps</p> <p>We thank you for your help in developing this Code with British Canoeing and ourselves. Should you wish to discuss the development of the Code further, please contact the Assistant Harbour Master (Recreational) to arrange a meeting.</p>
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			Club paddlers. I'm sure you will want us, as the largest group of paddle sport users on the Thames, to fully acknowledge and respect this code. I look forward to hearing your views.	
14.	ALEX HESTER	Chelsea Kayak Club Committee	<p>On behalf of Chelsea Kayak Club, may I commend the PLA on this draft of the Paddling Code. It promises to be a great asset, contributing to both the safety and enjoyment of all those paddling on the Tideway. Comments on other sections of the document are listed separately but I want to address one part of the guidance in particular, namely the direction that "in the Upper Rowing Code Area, paddled boats should use the same navigation pattern as rowing boats". I know from previous discussions that we broadly agree on what is being proposed and yet our club remains concerned about the emphasis and practical application of the guidance in its current form. I hope that setting out those concerns will be helpful.</p> <p>I understand the necessity to have clear rules for navigation, as set out in Col Regs, plus the reasoning for having the Rowing Zone areas, which allow a departure from these rules. It is also sensible to allow other man-powered craft to work the slacks and minimise the effects of an adverse current. Where a problem occurs is when a one-size-fits-all approach is adopted, which fails to account for the diverse range of environmental conditions, craft, objectives or individual ability that may be encountered on the Tideway. As such, regulations need the flexibility to be adapted and applied judiciously, depending on the circumstances.</p> <p>The characteristics of the rowing boats, kayaks, canoes, SUPs and dragon boats using the river, not only differ between each group but between each type of boat within the group; so a racing kayak is different from a sea kayak, which is different from white water boat – the list goes on. So it is a challenge to set regulations that are suitable for all.</p> <p>The rules within both Col Regs and the Rowing Code are established and work well together. Each defines navigable water and where they meet, they share the same principles. The argument for paddled boats to utilise the rowing zones is also well made, but care must be taken that no vessel is compelled to navigate in a manner or area which compromises its safety. Both Col Regs and proposed Paddling Code recognise this, placing the onus of responsibility on the Master of a vessel, to navigate safely. However, there are sections of this current draft, that risk being interpreted as mandatory, in a way that could adversely affect the decisions of an individual or group leader, regarding route choice or position on the river.</p> <p>With finite resources of strength and stamina, man-powered vessels must be tactical and strategic to make optimal progress on the water;</p>	Thank you for responding to our consultation, for your positive support of the code and your continued efforts towards safety on the river

which is why rowers have historically “worked the slacks” on the inside of a bend. In addition to this, paddled boats may also make use of other features and areas of water, such as eddies behind bridges or the sheltered water behind aits. It is one of the defining characteristics of most paddled boats that they may effectively operate at the margins of the river and in areas inaccessible to other craft. Where this doesn’t compromise their own safety or conflict with the navigation of others, they should be able to do so. Allowing paddlers to move between the different sections of the river, including both the Fairway and inshore Rowing Zone, is not the making of a chaotic free-for-all, but endorsing their ability to select the most appropriate route for the circumstances.

It may be a rather grand title for someone in a canoe but each paddler is the Master of their vessel and with it comes all the responsibility of that title. It is this responsibility that is the foundation of good seamanship and is to be encouraged. However there is a danger that if the Paddling Code is too prescriptive in its guidance, it erodes this decision making responsibility.

“Safe leadership is a matter of judgement, what worked well in a given place at a given time may not be appropriate in the same place at a different time. Judging the situation by protocol or rules invites disaster. Leading in a safe manner means considering the consequences of everything we do, asking the question “what if” and learning from our experiences. Ultimately safety and risk reduction is about being aware of danger – but remember, what is dangerous for one group may not be dangerous for another. Rules and regulations will only limit the experiences an experienced leader can provide for a group.” Sea Kayaking (Robinson & Richardson), p143 (2007)

Allowing paddlers the latitude choose where they position themselves on the river, raises the concern that it could lead to confusion, both for paddlers themselves and for other river users. It is important that both the position and actions of any vessel can be anticipated, hence the need for agreed regulations. However, I believe the concern in this instance is largely misplaced, as paddlers would still be governed by the prevailing statutes for the section of water they are in. For example if you are in the Fairway, you follow Col Regs and the PLA bye laws; if you are in the Rowing Zone, you follow the same navigation pattern as the rowers, if at the margins or in the backwaters of the river, the regulations still apply but as you are no longer in the main navigation channel, there may be more freedom to manoeuvre (as you might in the open sea compared to a shipping lane). Rather than instigating confusion, it would more likely avoid it, as it allows continuity with how paddlers are expected to navigate in the rest of the Tideway. The only difference is that there is the option to utilise the Upper Rowing Zone, when appropriate.

We agree that anticipating the actions of other river users is important, which is the foundation of not only this code but the International Regulations for Preventing Collisions at Sea.

We have considered your suggestion of having different rules apply depending on whether you are in the fairway, inshore zone or river margins. However, we don’t believe that a river user could accurately determine what part of the river a paddler is on. For example, if you are outbound in Mortlake Reach on the starboard side of the river against the flood tide, it would be difficult to determine whether paddlers are in the inshore zone or the fairway and hence, which navigation rules apply. An approaching rower from behind would not know whether to continue in the inshore zone (if you were in

			<p>With the direction that "in the Upper Rowing Code Area, paddled boats SHOULD use the same navigation pattern as rowing boats (p.38)", it is clear that paddlers are expected to use the rowing zone. Most of the time, this makes perfect sense when proceeding against the current, as it allows a departure from Col Regs, to cross and navigate in the slower water on the opposite side of the channel. However, the decision to enter the rowing zone should be based on evaluating not only the benefits but any potential risks. The proposed Code highlights the differences between paddlers and rowers, pointing out that paddled boats are usually slower than rowing boats and that paddlers and rowers face in opposite directions when under way. It goes on to state "The consequence of that situation is very obvious – that there is an increased possibility of a rowing boat colliding into the back of a paddled boat when both types of boat are working the same slack water (p.38)". So it shouldn't be assumed that entering the Rowing Zone is the most appropriate action, especially if a safer route is available.</p> <p>This issue of route choice and decision making is recognised and addressed within the proposals, particularly with the explanation of a "Dynamic Risk Assessment" (p.11) and repeatedly in the detailed directions (p.50-67). Unfortunately the advice given can appear contradictory, when on the same page (p.51) it states "Both rowers and paddlers are OBLIGED to work the slacks in the Inshore Zones" and then below "Paddlers should employ a Dynamic Risk Assessment to decide where the safest place to be positioned is".</p> <p>This confusion is compounded by the use of the Dynamic Risk Assessment symbol to highlight areas where route choice might be particularly pertinent and then shading a corresponding section of the river in yellow. It unintentionally conveys that these are exclusively the areas where alternative options might be considered. Whereas a dynamic risk assessment should be a continuous process and that in practice, the areas shaded yellow may be extended or linked together.</p> <p>Conclusion: Predominantly the content and advice given is excellent and a tribute to the hard work and diligence of those who have prepared it. The issues above may be resolved simply with the revision of some wording and certain diagrams. My suggestions would be as follows:</p> <ul style="list-style-type: none"> • Replacing the instances of "should" (p.38), "obliged" (p.51) and "must" (p.54) with "may", would allow paddlers greater flexibility and discretion to use their judgement. The direction regarding the Upper Rowing Zones would read "in the Upper Rowing Code Area, paddled boats MAY use the same navigation pattern as rowing boats". 	<p>the fairway) or pass you on your Port side (if you were in the inshore zone). Considering paddling tends to be a group activity, this further magnifies this issue.</p> <p>We will amend page 51 to remove the word 'obliged' and replace with 'should'. This was a mistake in the draft.</p> <p>We do consider the Dynamic Risk Assessment process to be a continual one, however any decision on river positioning should follow the guidance within the code in a given area, i.e. above Syon "Paddlers should aim to be as close to the starboard bank as is safe and practicable". The Dynamic Risk Assessment would determine how close you are to the starboard bank regards to safety and practicality. If it is not practical to cross the river, then almost immediately cross again, then the code provides for this 'common-sense' approach.</p> <p>We will replace the instances of 'obliged' and 'must' with 'should'.</p>
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		<ul style="list-style-type: none"> • Add the following caveat (p.38/51): “Where congestion within the Inshore Zone increases the risk of collision, paddlers may consider an alternative route which offers safe passage, as part of a dynamic risk assessment”. It should be explicit that paddlers make a judicious decision regarding route choice. • Keeping the Dynamic Risk Assessment symbol but removing the yellow shaded areas in the topographical diagrams (p.50-67), would retain the advice for that section but avoid defining the limits for where it might be relevant or implying that a dynamic risk assessment might only be applied there. <p>Further to the Chelsea Kayak Club’s previous response, please find additional comments below:</p> <p>P.4 Is it possible to add that the direction of the tidal stream does not change at the same time as high or low water, rather that there is a delay, particularly after low water? (i.e. the tidal stream at Tower Bridge doesn’t start flowing inbound until 45mins/1hr after low water, depending on conditions).</p> <p>P.11 Is it worth making the point here, that a dynamic risk assessment is a constant process, rather than just being required “at times”? The yellow symbol should highlight areas which merit particular consideration, in addition to a continuous dynamic risk assessment.</p> <p>P.14 Specify a head torch, rather than just a torch (it leaves the hands free to paddle and if worn, is immediately to hand in an emergency).</p> <p>P.24 Could a graphic of a boat be added here (as per p.34/35), to illustrate port and starboard?</p> <p>P.28 I don’t think it is necessary to recommend two lookouts at the rear of a group, just specifying that a lookout(s) be nominated is adequate (same for P.30).</p> <p>P.30 “Any action should be taken to avoid a collision” – this should ideally be proactive rather than just reactive to a situation (i.e. anticipating the potential for incidents occurring and making an informed decision on route choice or position on the river, in advance).</p> <p>P.37 Could the instances of the word "rowing" on this page, be substituted with "proceeding" or similar. This section feels like it is talking to rowers (“rowers should work the slacks”), rather than about rowers (“rowers work the slacks”). Alternatively it could be used to just explain what paddlers should be doing when in the Rowing Zone.</p>	<p>Due to the reasons explained above, this would cause confusion in some circumstances so we are unable to amend the code as you suggest.</p> <p>We have reworded page 11 to specify that only certain key situations or locations are marked with the symbol and have removed reference to Dynamic Risk Assessment when saying that “Individuals and group leaders must always take into account the conditions and their competence.”</p> <p>Page 4 - we will amend this spread to include similar wording to your suggestion.</p> <p>Page 11 - We have reworded page 11 to specify that only certain key situations or locations are marked with the symbol and have removed reference to Dynamic Risk Assessment when saying that “Individuals and group leaders must always take into account the conditions and their competence.”</p> <p>Page 14 – we will add the option of a head torch</p> <p>Page 24 – we will add a graphic of a boat to better illustrate port and starboard</p> <p>Page 28 – We will amend this page and page 30 to suggest 1 or 2 rear lookouts</p> <p>Page 30 – as the ‘avoiding collisions’ states, good river positioning aids in avoiding collisions. The river positioning, group management and lookout sections all refer to being proactive and making early decisions.</p> <p>Page 37 – this page explains what the ‘Rowing Code Areas’ are and as such, naturally refer to rowing boats. The application of these areas for paddled boats</p>
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			<p>P.55 Please correct the spelling of Chelsea KAYAK (not KYAK) Club, on the map.</p> <p>P.57 Retain the DRA symbol but consider removing the yellow shaded areas. Otherwise, should Corney Reach (Surrey side) be coloured yellow? When paddling from Putney to Barnes Bridge (but not beyond) against the ebb, staying on the Surrey side avoids having to cross at Chiswick Steps?</p> <p>P.60 Add a DRA symbol at Wandsworth Reach and a note regarding tugs and barges manoeuvring around Smugglers Way transfer station and moorings at Plantation Wharf. Either delete or amend the yellow shaded areas accordingly. The option to paddle on the north side, outbound against a flood tide, would facilitate working the slacks or paddlers from Cremorne having to cross the river. I understand that there will be Tideway Tunnel works sited here temporarily.</p> <p>P.61 Add a DRA symbol at Nine Elms Reach and a note regarding tugs and barges manoeuvring around Cringle Dock. Either delete or amend the yellow shaded areas accordingly.</p>	<p>The spelling mistake will be corrected.</p> <p>Page 57 - If it is not practical to cross the river, then almost immediately cross again, then the code provides for this 'common-sense' approach, however we would not expect paddlers to proceed inbound on the incorrect side of the river for an impractical; length of time.</p> <p>Page 60 – the 'Commercial Freight Berths' are marked on these maps. Due to the number of bridges, moorings, piers and berths on the North shore, there would be no advantage in safety compared with the starboard side of the river.</p> <p>Page 61 – A symbol is present on the North side of Nine Elms Reach, due to the busy commercial sites on the South side. The North side is commonly used by Cremorne and Westminster Boating Base.</p>
15.	RICHARD BATE	Putney Bridge Canoe club	<p>Thank you for the opportunity to comment on your consultation document.</p> <p>I have been in regular contact with Jon Becket, PLA and Kevin East, British Canoeing as a Committee representative from the local Putney Bridge Canoe Club. From our base at Barn Elms we paddle all year round mainly in the Upper Rowing Code area. I am also a trip leader and Committee member of the 200 strong Portsmouth Canoe Club, one of the foremost sea kayaking clubs in the country who run a couple of trips through the Tideway to Greenwich and back.</p> <p>I have seen different drafts in the past 14 months and appreciate the work that has gone into this near final version.</p> <p>Here are my final comments:</p> <p>Page 11 Planning a trip There is a typo on the word 'Guidance' which appears twice on the page.</p> <p>Page 14 Personal Clothing and equipment - Paddle Leash</p>	<p>Thank you for responding to our consultation, for your positive support of the code and your continued efforts towards safety on the river</p> <p>Page 11 – thank you for spotting this spelling mistake which we will rectify.</p> <p>Page 14 – the paddle leash appears in the "Other items that paddlers may want to consider" section. We will amend the text to suggest a leash or a spare paddle is</p>

		<p>Amongst your list of items recommended for paddlers to wear or carry is a Paddle Leash. Current thoughts amongst senior experienced paddlers and coaches is that the potential hazards of being caught up in the leash in the event of a capsize outweigh any benefits. There have been near misses with them and at least one fatality.</p> <p>Much more common on trips of any length is to take a spare split paddle in case of a broken paddle or loss. So I think the 'paddle leash' should be removed from the list and/or replaced with 'a spare paddle' as seen in the green side bar.</p> <p>- Pogies The other item missing and essential in the cold months is a set of 'pogies'. Most experienced paddlers use these rather than a set of gloves; which stop you holding the paddle shaft properly.</p> <p>Page 20 Boat Identification I agree with having the name and contact details outside and inside a kayak in case of loss, theft etc. All of the Putney Bridge Canoe Club kayaks and paddles are marked clearly with the club logo. This was sufficient for the club to be notified by the Thames Police when one of our kayaks was stolen last year.</p> <p>As this proposal only applies to Club kayaks it does seem a lot of work to only cover a small proportion of the kayakers using the Thames? We are also not sure of a reliable cost effective method of applying individual self adhesive stickers? How do we fix stickers to slalom kayaks and race boats that have very small vertical areas visible? Who is going to maintain a register of all the kayaks? My Portsmouth Canoe Club mentioned above only has 4 Club kayaks, the 200 members generally using their own boats.</p> <p>page 60 Putney to Chelsea Bridge This is our only point of disagreement in the document. When we leave our base at Barn Elms to paddle downstream beyond Putney Bridge we are immediately confronted with several areas of concern: - potential collision of rowers starting, turning around and arriving accompanied by safety craft moving about, - a collection of buoys, rubbish collectors, moored craft - and Putney Pier with arrivals and departures of river taxis.</p> <p>Continuing past Putney Bridge down the starboard side there is considerable wash from river taxis that only use the southern half of the Thames for their routes as well as the stopping points near the Wandle and Plantation Wharf</p>	<p>considered.</p> <p>We will amend the text to suggest gloves or pogies.</p> <p>Page 20 - Regarding the identification of craft, Thames Byelaw 53 states that all vessels on the river, including privately owned craft, need to display their name. We have introduced an ID regime to Club boats to make this easier for clubs and to assist in identification (as explained on page 20) but this does not mean that private boats don't need to be identifiable. They can utilise the ID regime if they wish, or have a name on their craft</p> <p>Due to the number of bridges, piers and working berths on the North shore, there would be little advantage in safety compared with the starboard side of the river. There is large Tideway Tunnel infrastructure planned for the North shore in this location.</p> <p>This differs from the area below Chelsea to Vauxhall as there is large infrastructure</p>
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			<p>Consequently our practice for our short evening paddles has been to avoid this busy area by crossing the river to the calm and shallow waters of the north shore by Fulham football ground, continuing down and back on the north side. As with Fulham Flats (page 56) there are numerous shingle banks off the north shore which are avoided by rowers and powered craft,</p> <p>The exact same logic is used in the Paddle Code from Battersea to Vauxhall Bridge (marked in yellow) and where the Code says “may be the safest place for a group of paddlers to be.” We would agree and our practice over 15 years has safely proved this.</p> <p>page 62 General advice "When water levels allow, pass inside/under piers."</p> <p>Our general view would be to always first pass outside piers and pontoons. We would always try to stay as close to the shore and away from major traffic but to do so inside piers is potentially more dangerous.</p> <p>You can never know properly what sort of obstructions lie under the water, supermarket trolleys wire hawsers etc. Secondly if there is a capsize in the vicinity of a pier this is far far more difficult and dangerous to sort out than say in the fairway with current swirling around and jamming a kayak up against an obstruction.</p> <p>Checking the Code maps and from personal experience, most of the Thames piers are far safer this way on the outside: - Westminster, London Eye, Belfast, Bankside, Battersea Power station Putney, Dove.</p> <p>So we think the general default advice should be ‘if in doubt pass outside’ Its quicker and any issues, capsizes can be resolved safely and quickly.</p>	<p>planned for the South shore in this location, there are 2 paddling clubs on the North shore here and no marinas, and there is sufficient room to remain behind Cadogan Pier and the moorings on the north shore.</p> <p>Page 52 – we will amend the wording of the code for paddlers to consider the space available behind the pier. The code does advise to pass inside of piers where the water level allows.</p> <p>We agree that there are certain piers where the decision to go inside or outside should be taken carefully – this is where the Dynamic Risk Assessment symbol is used and in the Heart of London these are explained in more detail. Dove Pier is covered in great detail on page 56.</p>
16.	CORALIE VIAL		<p>Many thanks for giving us the opportunity to comment on the proposed Code of Practice for Paddling on the Tidal Thames</p> <p>This is a very useful and comprehensive document and the rules make perfect sense in respect to paddling downstream from Putney Bridge or for inexperienced paddlers wishing to launch themselves unprepared on any part of the River.</p> <p>The document already includes some good provision for the more benign portion of the river located between Teddington Lock and Richmond half lock. However, as a member of Richmond Canoe Club and very frequent user of this portion of the river, I believe a few more nuances would need to be introduced to give coaches and paddlers maximum safety on the one hand, as well as the opportunity to train to</p>	<p>Thank you for responding to our consultation.</p>

their full potential in what is an International competitive sport (several of our members are regularly representing team GB in their specialist kayaking or canoe discipline).

I would like to bring the following points to your attention to clarify behaviour you will have observed on that section of the river

1. Navigation on the left hand side of the river going upstream

Racing kayaks and canoes can feel particularly unstable and are subject to capsizing. This is a fully accepted part of the sport (good swimming abilities are strictly imposed conditions to joining the club) and a normal part of the learning experience for both our Junior and Senior novices. As paddlers progress through the sport, they will paddle crafts that are increasing in speed but decreasing in stability so relatively experienced paddlers will find themselves back to boats they are less confident in as part of their development.

At low tide, the Surrey bank of the river is very shallow pretty much all the way from Glover Island to the lock which makes it a very safe place to learn and practice in less stable crafts, for both individual paddlers and novice/intermediary groups (even at high water, it also remains the easiest bank to get out on). This means that in the event of a capsize, paddlers can self-rescue with ease and speed and without getting in the way of any other river traffic. A capsize along the many lines of moored boats located on the Middlesex bank would involve a much longer swim (potentially several hundred meters) or in certain places (along Eel Pie for instance), may force the upturn kayaker to cross the river to find a suitable exit place – something that one would try to avoid for safety reasons. Using the principle of dynamic risk assessment, it therefore makes sense to use that part of the river in such circumstances, especially since other vessels including rowing boats are generally unable to get as close to the bank and, especially at low tide or on an outgoing tide, should generally want to be travelling on the fairway away from the banks.

Another reason to paddle on the Surrey side when navigating in the main channel alongside Eel Pie Island is that due to the sand bank at the top of the Island, motorised crafts including the rowing boat coaching crafts coming downstream circulate closer to the Island. This is a very narrow channel with motor boat wash bouncing back from the harder Island bank, creating a higher risk of capsizing. A single kayak or group of novice/less experienced kayakers navigating on the opposite bank are reducing their own risk of capsizing, making it easier and much safer to self-rescue (or get an assisted rescue) and at the same time create far less disruption to other river traffic navigating up or down stream.

The principle of 'Working the Slacks', as rowers have been doing for a number of years, is for man-powered craft to utilise the slower-flowing parts of the river to improve safety and to be able to make efficient progress along the river. The river is benign for 16 hours a day whilst the weirs are lowered at Richmond Lock, with very little flow – therefore the benefits of 'Working the Slacks' are less pronounced.

As the river is narrow at Eel Pie Island – there would not be sufficient river width to cater for inbound paddlers on the same side, while allowing room for other river users and larger vessels. Page 52 of the code suggests that paddlers may wish to utilise the inshore side of Eel Pie Island – thus having easily accessible egress points, a further reduced tidal flow and set and avoids vessels transiting the narrow navigable channel at the top of Eel Pie Island.

		<p>2. Group of paddlers paddling abreast</p> <p>Start practice in line is an extremely important part of the training for both sprint and marathon kayaking and need to be practiced to ensure the successful development of the individual athletes (juniors, senior or veteran) and Richmond standings as one of the country top canoe club. Setting off in line is not simply about practising race starts, it also (and probably mainly) gives the group lead or coach a much better control on the group position on the river, keeping it closer together during the practice of interval training by using the flow of the river to even out differences in speed within the group. Making it both a safer and more productive training session.</p> <p>Whilst clearly it is the responsibility of each individual paddler within a group (as well as of the coach and support coaches in the case of novices and less experienced or junior paddlers) to ensure that training does not obstruct the navigation of other crafts or create unsafe situations, this stretch of the river is almost exclusively used by leisure crafts (outside the regular passengers boats in the summer months) and is relatively quiet so I am not sure how this practice (on this particular stretch of the river) is really hindering anyone as long as all paddlers are aware of correct protocol and ensure they disperse any formation that would disturb the course of scheduled boats.</p> <p>We do give way and adapt to sailing boats which are crafts that require special rules to practice their sport due to their inherent lack of control so whilst we would not expect motor crafts to give way to kayaks I would be very concerned to see restrictions imposed in this respect as it would be damaging to the sport. I absolutely appreciate that these rules must be set for recreational crafts setting of independently on the fully tidal section of the river but it would be more helpful to indicate that the practice of line start takes place between the two locks so that other river users are aware. I like to think that we maintain a friendly and considerate relationship with our fellow river users from Twickenham rowing club, a little bit of mutual understanding can go a long way, after all, whilst in different sports we are pursuing very similar goals of sportsmanship, fitness gain and self improvement.</p> <p>3. PFD and VTS</p> <p>If I read the document correctly paddlers that consider their boat sufficiently buoyant are exempt of wearing a buoyancy aid at their discretion (we follow the BCU recommendation regarding age and ranking of the paddlers in this respect). This is positive as more advanced paddlers above a certain age would generally not wear buoyancy aid in competition – neither do rowers I believe.</p>	<p>The code states:</p> <p>“It is important that groups stay close together and are of a size and formation that does not baulk or otherwise impede other river users”.</p> <p>Therefore, a Dynamic Risk Assessment should be carried out depending on the width of the river, river traffic, visibility, etc. We advise that if it is normal practice for your club, your risk assessment should identify additional mitigations such as additional lookouts or informing London VTS before this type of activity so that transiting vessels are aware and can pass through the area with caution.</p> <p>Page 52 states that “The area around Richmond is most commonly used by racing kayaks and canoes from Richmond Canoe Club. During a club race or when performing a ‘Race Start’, paddlers should ensure the river is clear of transiting vessels. Be aware of pleasure boats and consider having ‘spotters’ above and below to identify approaching craft.”</p> <p>The code does not explicitly restrict ‘race starts’ abreast. Any group positioned on the river should consider other traffic and the specific part of the river they are in. Our Byelaws state that vessels must not cross or enter a fairway so as to obstruct another vessel proceeding along the fairway, which is briefly explained on page 27.</p> <p>We advise paddlers to contact London VTS.</p>
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			<p>Again I believe the VTS is a recommendation (mostly for individual paddlers downstream from Putney) not a strict rule. This is welcome as it would be impractical and could detract valuable resources from real river safety operation given the number of our paddlers that train one or twice a day on what is a very familiar stretch of water.</p> <p>Finally, a separate river hazard that should be kept into consideration and may be worth a mention are fishermen. Many are extremely courteous but some cast extremely far into the river (or have several lines some close, some far blocking effectively a large portion of the bank). We are unable to see many of the lines until the very last moment, with some fisherman kept hidden from the river. Lines we spot may force us further into the middle of the river (we cannot always stop by the time we spot the line) and there have been instances of paddlers getting hooked by a line (one of my fellow paddler had to go to hospital – but that was on a different part of the Thames) because fishermen pulled the lines instead of giving the paddler the time to back paddle and detangle himself. Interestingly, they tend to move their lines for rowers as they know their lines are likely to be snapped but the same individuals get abusive to paddlers. This again is an accepted risk of the sport but I am mentioning this as there have been instances of fishermen throwing unidentified substances at paddlers they judged too near the side (when on the correct side) which is extremely scary yet we are unable to report the anonymous offender. Again, many fishermen are absolutely charming but I know some would prefer paddlers to be eradicated so I take the opportunity of this consultation to mention this – if we are unwelcome in the fairway and near the bank, it is not hard to feel a little paranoid and victimised.</p> <p>I hope you will find the above feedback constructive. I would be very happy to be contacted should you need any clarification on the points made above. Please note that those are my personal views based on 10 years of paddling, leading groups and racing experience. They are not meant to represent any official position from Richmond Canoe Club as a whole; I know you are having direct contacts with our Commodore Tom Sharp in this respect.</p>	<p>In regards to Richmond Canoe Club, perhaps one person from the club calls London VTS - for example when the club is carrying out time trials and there is a large number of craft expected on the river. VTS can then convey this information to vessels transiting Teddington Lock, Richmond Lock or Brentford Lock, as well as on the river broadcasts to other vessels which will enhance the safety of your club members.</p> <p>Please report instances such as this to London VTS at the time. We can liaise with the local Police if required.</p> <p>Thank you again for your comments, which are most welcome.</p>
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No Comments: