

**FEEDBACK ON THE INFORMAL PUBLIC CONSULTATION ON
CODE OF PRACTICE FOR ROWING ON THE TIDEWAY**

	Consultee	Organisation	Summary of Feedback
1.	CAROLINE SMITH	Assistant General Manager Head of Oil, Gas & Petrochemicals - Execution Team SMBC Europe Limited	<p>Overall I think this is a great improvement, not least in its visual appeal which will hopefully encourage more people to read it!</p> <p>I'm sure there's another round of proof reading to go, but here's a bit of a stream of consciousness:</p> <ul style="list-style-type: none"> - p7 - should the first Below be capitalised? "The Thames Below Teddington Lock" looks a little funny. Agreed and this text has been amended. - p14 - erroneous "-" at the end of the Rain section. Agreed and this text has been amended. - p14 - I honestly don't think that the "if you cannot see the opposite bank clearly then you should not go afloat" rule of thumb is in any way adequate. The 200m visibility rule is fine, but there are a lot of places on the river, and a lot of situations, where the opposite bank is less than 200m away. Also, looking across the river sideways is not something you actually do during an outing - it is much more important to look along the length of the river, particularly as the fog tends to gather over the water resulting in far worse visibility in a navigation direction. Publishing these sorts of rules of thumb also undermines any clubs with more stringent rules, as members will tend to point to the code and say they don't need to comply with the club requirement. We appreciate your comments on the section about restricted visibility and have amended the text accordingly which should give clearer guidance. - p18 - the formatting of "Restricted Zones" looks a bit odd. It may be clearer in the final version, or just need more of an outline. Agreed and this has been modified. - p19 and 20 - I don't really understand the relevant of "high water" and "low water" on the diagrams since the boats appear to be doing the same thing. If the shading is going to stay, the darker green boat navigating at high water should presumably be closer to the bank. Agreed and this has been modified. - p113 - note that some toggles are yellow, not red, so it may be worth just saying "Ensure that the manual inflation toggle is showing..." Agreed and this has been amended. <p>Some of this is rather pedantic, but overall I think it's a brilliant upgrade to the existing version, and the "how to navigate" pages with photos are particularly helpful.</p>
2.	DIANA EVERETT	Manager, The Dove Pier	<p>I would like to add: all rowing clubs must be made very aware of the way the river fetches towards the north shore just after Hammersmith Bridge on a rising tide, and rowing boats do not realise they are being carried towards Hope Wharf and The Dove Pier. I think the clubs should be advised that this must be impressed on every new rower. Things are much better since the buoy was put in down stream of the pier, but there are still some boats which don't realise and scrape past the buoy. These points are highlighted in the relevant section within the revised Rowing Code.</p>

3.	TIM ELLIS	Royal Air Force RC and Peterborough City RC	<p>As an experienced member of a non-Tideway rowing club, but someone who has raced in a significant number of the Head races (primarily the Scullers Head, Pairs Head and Vet Fours Head) and who helps run the Vets Eights Head, I have been passed a copy of the Consultation Draft of the Rowing On The Tideway Code of Practice for comment. Having read the document, I have the following observations, which are limited to the generic guidance and that relating to the stretch of river from Chiswick to Putney (which is all I have experience of sculling on).</p> <p>> Page 46 - Authorised Steers Accreditation. The requirement that 'steers must ... prove their understanding and knowledge of the Tideway Code of Practice' - does this apply to non-Tideway clubs rowing on the Tideway solely during the major Head races? (The TRRC website, which is referenced in the Consultation Draft, appears to deal with crews training on the Tideway and makes no mention of steers certification for the Head races. If it does relate to the Head races as well, then that should be made explicitly clear, preferably on both the TRRC website and in the Code of Practice.) The PLA fully supports the TRRC decisions that it is the responsibility of the visiting club to seek advice and guidance to ensure that their steers are fully conversant with the Rowing Code. For irregular visitors (HORRs, etc) then it is the organisers duty of care to pass on guidance on how to obtain information on the Rowing Code to visiting clubs.</p> <p>> Page 71 - Corney Reach Navigating on the Ebb Tide. When rowing inbound/upstream against the ebb tide, crews should always stay close to the MIDDLESEX bank, inside the GREEN buoys.</p> <ul style="list-style-type: none"> • <p>> Page 73 - Corney Reach Navigating on the Flood Tide. The details of how to row inbound/upriver with the flood tide should tell crews to stay on the starboard side of the Fairway, CLOSE TO THE GREEN buoys. Likewise, the detail for rowing outbound/downriver against the flood tide should refer to the MIDDLESEX bank and GREEN buoys.</p> <ul style="list-style-type: none"> • <p>> Pages 77 and 79. The detail on these pages appears to have been reversed. That for Chiswick Reach Navigating on the Flood Tide should come before Hammersmith Bridge Navigating against the Ebb</p> <ul style="list-style-type: none"> • <p>> Page 79 - Navigating on the Flood a Tide. When rowing inbound/upriver, on the starboard side of the fairway, surely it would be better to say KEEPING CLOSE TO THE GREEN BUOYS (even though there none between the one at Dove Pier and the LEP Buoy), rather than 'well away from the red buoys'. Mention of red buoys could be taken to imply that crews were on the Surrey side of the Fairway and, if you are looking for a red buoy, you are likely to subconsciously move towards it.</p> <ul style="list-style-type: none"> • <p>If the detail in the Code of Practice is actually correct and my comments are wrong, then that, too, is of concern as the document is obviously open to misinterpretation and would benefit from rewording. You are entirely correct and we value your comments, therefore P.71, P.77 and P.79 have been amended accordingly.</p>
4.	SIMON JUDGE	Narrow Boat Scholar Gypsy	<p>I've just had a quick look the rowing code, which is a lot easier to read than earlier versions! I had only three comments:</p> <ul style="list-style-type: none"> • Page 96 says Limehouse is not in use 2 hrs either side of LW. This depends on the state of the tide, at Neaps I have been in at low water – about 1m of water over the cill. Obviously it's not used much around LW. • I think it would be worth including some of the key points here for other users, in the rec users guide. The latest version includes some of them in the box called "rowing navigational buoys". I wonder if

			<p>that box could also say something like “Rowing boats use the inshore zone when rowing against the tide, and will cross from one side to the other when the buoys switch from one bank to the other”.</p> <ul style="list-style-type: none"> The hints on shouted warnings (page 37) might be worth squeezing into the rec guide. Actually that made me realise that the rec guide does not include the standard sound signals. <p>We also thank you for you comments and we will look to see how we can include these items in the next edition of the Recreational River Users guide in 2017.</p>
5.	MARTIN ANSLEY-YOUNG	Orion Rowing Club	<p>Some comments as requested on the draft 3rd edition of the Rowing Code of Practice – which I think generally looks great!</p> <p>1. Page 4 Suggestion: preface the explanation of working the slacks with an explanation of the general navigation rules Reasoning: the most common misunderstanding I encounter is that crews going with the stream think they have the whole of the center of the river at their disposal, in part I suspect because they have only ever focused on where rowers are likely to be; getting across the message very early on that there are two sides to the main channel as well as two slack water areas to the sides would be helpful I think (not least because it also highlights where other non-rowing craft will be) Thank you for your comment but we feel that Rule 9a is covered fully on P.19 and additional information in this section is unnecessary.</p> <p>2. Page 7 (and elsewhere) Suggestion: include early on page 7 and explanation of the difference between stream direction and tide direction, but after that – and everywhere else – only use the term stream direction. Reasoning: stream is simpler to understand than tide (both in theory and in practice), and using a single phrase is simpler than the potential confusion arising from using two We have decided to keep the wording as tide instead of stream, as this document is a guide for business as usual and we cannot cover every eventuality. Swelling or the laminate effect are covered in the Code on P.11.</p> <p>3. Page 13 Suggestion: In the opening ‘Questions to ask before you go afloat’ it would be good to include a short para along the lines of: “Don’t just think about conditions as they are now and in the part of the river in front of you – think about what conditions are likely to be at all places and times of your outing” Reasoning: it’s what is around the corner – both physically and time-wise – that is most likely to catch people out Agreed and this has been amended .</p> <p>4. Page 21 (and elsewhere) “[rowers] are allowed to work the slacks”: it is not clear to me whether this is a choice (may) or a requirement (must)... I had understood the latter, but the language in the Code is consistent with the former; it would be useful to have a clear statement as to whether working the slacks is an alternate set of rules or a supplemental one? Your point is well made and we have amended P.3 and P.21 to make this clearer.</p>
6.	NEIL PICKFORD		<p>page 73 - bullet point 2 - inshore zone is on the Middlesex bank here, not surrey. buoys are green, not red. Thank you and duly noted.</p>

7.	ALEX HESTER		<p>Thank you for forwarding this and congratulations to all on producing such an excellent document. Its contents, clarity and presentation are quite an achievement. I have only the most minor comments:</p> <p>1) Is there space for a line in the introduction (p.3) to make reference to how the code applies (or rather doesn't apply) to paddlers (i.e. kayakers etc)? It need only be one line to confirm that 'paddlers' are not 'rowers' and so should navigate as usual on the river, rather than being expected to use the inshore rowing zones etc. Also, that advice for paddlers is available separately. Agreed and various lines have been added to the Code to make it clear that the code is for rowers only.</p> <p>The distinction is helpful for both groups, so that they might each be able to anticipate the positioning of the other on the river. Reference to oarsmen "paddling" against the tide (p.4), might add to the confusion and should perhaps be replaced by the word "rowing". Agreed, we are currently looking at developing a new 'Paddling Code of Practice for the Tideway' and will certainly incorporate all your paddling comments into this new Code.</p> <p>2) To highlight (on p.21?) the care that should be taken to follow the curvature of the fairway when navigating round a bend, so as not to cut the corner and encroach into the inshore zone. I know that not cutting corners is mentioned later and that the route to follow is clearly illustrated but from my experience it is very easy to do, when travelling between buoys marking the inshore zone. Agreed and river positioning is covered in great detail within the Code.</p> <p>3) To consider amending the sound signal of three short blasts (p.38) from "I am and going astern" to "I am operating my engines (or propulsion) astern." Agreed and this has been amended.</p> <p>Hope that is helpful.</p>
8.	STEPHEN ANGELL		<p>I've had a read through the new rowing code - it's a really excellent document, very clearly describing the rules and the graphics are excellent. Good work.</p> <p>I might have missed this, but it's worth stating in the introduction that the rowing code is just for rowing clubs, and that other river users, such as kayakers, canoeists, paddleboarders, etc will be following standard ColRegs. I know that sounds a bit obvious, but I've met a few rowers who seem to believe this is the case and it's worth clarifying. Thank you for your supportive comments and we have revising the preface to make this distinction clearer.</p>
9.	NICK PAUL		<p>Dear Jonathan having had a discussion with , Chris Spencer Club Captain, Chris Kendall Learn to Row organiser, Robbie Coleman Assistant Water Safety Officer who also has many years experience both rowing and working on the river, the general consensus of those discussions is that the crossing point should be at the Blue Bridge. Below are our reasons.</p> <p>1. This crossing point would afford a clearer view to observe inward bound traffic around Blackwall Point. The most common traffic is Thames Clippers doing 30kts. It was felt strongly that having crews appearing from in between Follyhouse Moorings is a near miss or worse waiting to happen. At present there appear to be large vessels moored on the lower buoys which only adds to the concern of boats appearing out of nowhere and crossing in front of Clippers or ribs or another vessel.</p> <p>2. Thinking of the other side of the crossing point from Folleyhouse, Victoria Deep. There are lots of tug</p>

			<p>movements and big barge workings taking place. Even when this work is completed, there are plans to turn Vic Deep into a cruise terminal. This would mean big wide cruise ships in the berth, with perhaps fuel barges and fresh water barges alongside, meaning rowers would need to take a wide line around the berth if the proposed code was accepted. The Blue Bridge crossing would completely take out the dangers of having to navigate around the workings.</p> <p>We would suggest in the strongest terms that the Blue Bridge is the crossing point. I did attend the meeting when this was first drawn up and I must admit this proposed crossing slipped by me.</p> <p>You are more than welcome to come along to the club perhaps we can arrange a convenient time for all. Thank you for these comments and a review of the crossing point at Follyhouse has been undertaken. The crossing zone will be moved to between the Follyhouse Barge Roads and the Blue Bridge, across to the lower end of Delta Wharf.</p>
10.	MALCOLM COOK		<p>This is a personal response to the consultation on the revised Rowing Code. It is not on behalf of my rowing club.</p> <p>A significant deficiency in the draft code is that, unlike the 2009 version, the new code doesn't adequately define the limits of the crossing zones or the restricted zones. The draft code has maps which show roughly where the zones are. The 2009 version not only had maps; it also described the end points of the zones.</p> <p>For example, page 31 of the 2009 version explains that Syon Reach Crossing is "marked by two yellow stripes on the river wall of Kew Gardens. When coming from either direction the first mark indicates the start of the crossing zone and the second the end of it." The draft has only the maps on pages 55, 56 & 58 and the photo on page 57, which indicate that the crossing is slightly upriver of the red buoy, but there seems to be no mention whatsoever of the markers on the bank. We have amended the text to give clearer guidance. The Yellow Markers are now mentioned in the crossing the river section.</p> <p>Another example is the restricted zone at Chiswick Bridge. Page 27 of the 2009 version defines it as being from "Finish post to Quintin flagpole". The draft only has the maps on pages 66, 67 & 69, which have a yellow strip extending some way either side of Chiswick Bridge but there is no explanation of exactly where the zone starts and finishes. We believe the new guidance to be easier to understand than giving exact locations.</p> <p>Page 23 of the draft says that "The Local Crossings are defined by landmarks (see Upper Area Directions for more details)". But the Upper Area Directions (i.e. pages 55 to 88) make no mention of the landmarks which define the local crossings: there are only the maps which merely show the rough location of the local crossings. Agreed and this has been amended.</p> <p>Typo: The map on page 82 of the draft has "Beverly Brook" when it should be "Beverley Brook". Agreed and this has been amended.</p>
11.	ROBERT CRANE		<p>I am a recreational user of the Lower Reaches, with an 8m motor-sailer. I am not a rower, but the Draft document looks very good indeed. May I suggest the need for some further notes applicable to the estuarial reaches? Thank you for your comments, we have given clear guidance to all rowers outside of the Rowing Code area, which can be found on Page 19.</p>

12.	KEITH MAHONY		<p>Couple of comments from me personally -</p> <p>Travelling in the Inshore Zone (Pages 27 and 28). On Page 27 it says you should go 'line astern' in the inshore zone (against the stream) but on Page 28 it covers overtaking two boats abreast or two boats abreast overtaking in the inshore zone? Contradiction when it comes to 2 boats travelling in the inshore zone.</p> <p>We understand your comments, however these pages gives a clear distinction between proceeding abreast and overtaking.</p> <p>Crossing the river from one Inshore Zone to the other (page 22). I have long thought that crossing the river is particularly risky and requires action similar to what happens on the road where there is a requirement to either 'give way' or 'stop' before proceeding. The current requirement on the river is to 'give way' (after checking) but I wonder if this is enough. It may be a bit more difficult on water but I feel that stopping is a better option before crossing especially when a boat is being bow steered or it's a single requiring the 'master; to turn around - on the move - to get a 180 degree view of what is ahead.</p> <p>I have fallen foul of this when turning around left a 'blind spot' where a crew that was slightly out of position was moving towards me. I now stop to ensure I have a complete view of the river ahead. I don't know if incident statistics bear this out but something to consider at least as a recommendation.</p> <p>We feel that the Code explains this fully.</p> <p>Accreditation of steers (Page 46). Not new but I have noted the emphasis on accredited steers and it being a PLA requirement also that the steerer is the master of the craft. I wonder if there is cope for linking this more closely so that the requirement is for an accredited master of a craft achieved by having passed an accredited course - possibly with a form of certificate authorised by the PLA that delegated/designated people can issue . This would enhance the status and bring about consistency plus a steerer could be asked for their masters certificate post incident or proactively via spot checks.</p> <p>We feel that the current system works well and if you feel that there is room for further improvement, please discuss this with the TRRC.</p> <p>Verification of Compliance. It's a great code that has a lot for clubs and individuals to comply with. At the moment there is no real checking process and probably the only time compliance is checked is post incident or via the annual self-audit by clubs. In my last job I was responsible for compliance across the company and had auditors working for me who visited sites finding things that verified compliance or if not resulted in an action plan.</p> <p>In no way can this be replicated in the environment the code applies to but I think something should be done such as a small number of unannounced audit visits each year within a region that would give clubs another reason to make sure all was in order. Not suggesting this is for the PLA and probably rests more with BR and the TRRC.</p> <p>The PLA monitors navigational safety, however compliance with the Rowing Code rests with the TRRC and maybe interested in your ideas.</p>
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13.	KEVIN EAST	British Canoeing	<p>Thank you for the opportunity to consider on this Code of Practice for Rowing. British Canoeing comments;</p> <p>Whilst the target audience is the rowing sector much of The information and guidance should be of interest and relevance to all who navigate the tidal Thames. The title could have a strap line such as - A code of practice for rowers and navigation information for all who boat on the Tidal Thames above Putney and below Tower Bridge.</p> <p>Introduction page 3 and What is “Working the Slacks?”</p> <p>Discussion at PHRNG has led me to understand that the navigation Rowing Code advice for working the slacks only applies to oar powered boats (rowers) as stated in the consultation document. Confirming this would be helpful when KAYAKING AND CANOEING ON THE TIDAL THAMES 2014 GENERAL NAVIGATIONAL ADVICE states “Between Teddington Lock and Putney the “Code of Practice for Rowing on the Tidal Thames” details local navigation rules for vessels under oars to include canoes and kayaks as posted at www.boatingonthethames.co.uk/Rowing.</p> <p>If working the slacks does not apply to paddlesport disciplines the KAYAKING AND CANOEING ON THE TIDAL THAMES 2014 GENERAL NAVIGATIONAL ADVICE should be revised. Accordingly the Rowing Code can note that working the slacks navigation arrangement does not apply to paddlesport craft –canoes, kayaks and SUP’s .</p> <p>To make this clear a change can be made to the line “Working the slacks is a navigation system historically developed by working oarsmen to use the easier ‘slack’ water when paddling against the tide,.....” and revised to - Working the slacks is a navigation system historically developed by working oarsmen to use the easier ‘slack’ water when rowing against the tide,.....” This would further help to avoid any confusion that the Code applies to Canoeing and Stand Up Paddleboards when the link http://www.boatingonthethames.co.uk/ has the header “Paddling” for the entry on canoeing and SUP’s as paddlesports.</p> <p>Distinguishing between an oar powered vessel is rowed and a paddle powered vessel is a canoe, kayak or SUP would be a useful.</p> <p>If this matter of working the slacks is clarified for all to understand the Rowing Code could be used by paddlesport as virtually all of the rest of the information is relevant to the discipline. It would avoid duplicating this detail in a separate document for paddlesport.</p> <p>Thank you for your comments on the revised Rowing Code and we have included a number of your comments into the final edition of the Code, particularly making it clear that the code is for rowers only. We will also look to update the text on our Kayaking and SUP Guides. In addition we are looking at developing a new Paddling Code of Practice for the Tideway and will certainly incorporate all your paddling comments into this new Code.</p>

No Comments: Nil