

PORT OF LONDON AUTHORITY

**FEEDBACK ON THE PUBLIC CONSULTATION ON
PLA GENERAL DIRECTIONS**

	Consultee	Organisation	Summary of Feedback	PLA Response
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General Direction 3

1.	JOHN BECKETT	VTS OFFICER - PLA	we have "Pushed Convoy" and "Tug and Tow" - both definitions include pushing craft ahead. Is the new "pushed convoy" definition needed? Or do we intend to alter "tug and tow" to just towing astern, which would have a knock on effect to the Pilotage Directions and Length Overall definitions too. If keeping "Pushed Convoy" we should also clarify how LOA is calculated.	'Pushed Convoy' relates to lighting requirements for pushed vessels only therefore requires a separate definition. LOA is not relevant to this requirement.
2.	J RUDD	MARINE ENGINEERING SUPERINTENDENT - PLA	ae) "LNG" means liquefied natural gas;ag) "LPG means liquefied petroleum gas; - Should these be two separate bullets al) (ii) "Moored" in relation to a Vessel, means made fast both ahead and astern by anchors; Is this not a vessel at anchor in accordance with the COLREGS? aw) "Pleasure Vessel" has the same meaning as in the Merchant Shipping (Survey and Certification) Regulations 1995 and in addition, includes Vessels which are bareboat chartered;- The bareboat charter part of this sentence needs to be removed to ensure that individuals read the whole definition as set out in the MSR. Leaving this in as "in addition" implies that any bareboat charter is considered a pleasure vessel under these GDs.	Agreed. Thank you for the observation Perhaps, but in the context of the GD's we wish this term to be used for this purpose. Aw) This is intentional. Bareboat charters are for private use of craft and should therefore be considered pleasure vessels for the purpose of these directions.
3.	G LEWIS	RYA	(s) The proposed amended definition of "Exclusion Zone" removes the word "temporary", which suggests that it is intended that the harbour master could impose an "Exclusion Zone" permanently. In the RYA's view, the harbour master would not have authority to impose an "Exclusion Zone" permanently. (am) The proposed definition of "Navigation" is very wide, particularly in light of the definition of "Vessel", and potentially includes any uncontrolled movement on the	Agreed, amended to reflect that the power to implement exclusion zones is vested in the Authority. This definition matches the definition included within the HRO

		<p>water by anything that floats that is capable of carrying a person or a thing. In the RYA's view, the definition of "Navigation" ought to refer to the control or direction of the course of a vessel, along the following lines: "navigation" means the control or direction of the course of a Vessel on or in the water for whatever purpose, whether travelling between two locations or not, but does not include any Vessel under tow";</p> <p>(ap) The definition of "Passenger" ought to exclude the Master and any Pilot, as well as the Crew (the defined term "Crew" does not include either "Master" or "Pilot");</p> <p>(aw) Firstly, the proposed definition refers to the Merchant Shipping (Survey and Certification) Regulations 1995 even though these were revoked and replaced in 2015. Secondly, the PLA acknowledges that the definition of "pleasure vessel" in the 1995 & 2015 survey regulations needs modification (because a bareboat chartered yacht would be commercial under the 1995 & 2015 survey regulations whereas it would be inappropriate for it to be so under these directions) but the drafting of the proposed solution ("and in addition, includes Vessels which are bareboat chartered") is too simplistic and does not deal with the various well known issues surrounding payment and who may use the yacht. Also, as drafted it could mean that the definition includes all "Vessels" that are bareboat chartered, even if they are oil tankers, which is clearly not what the PLA intends.</p> <p>The RYA would remind the PLA that a specific definition of "pleasure vessel" (which included in its scope recreational boats on bareboat charter) was developed by the PLA in conjunction with the RYA and that this specific definition formed the basis of the definition of "pleasure vessel" used in the Merchant Shipping (Boatmasters' Qualifications, Crew and Hours of Work) Regulations 2015. Using the definition of "pleasure vessel" in the 2015 boatmaster regulations would have two key benefits: (1) it would actually achieve the PLA's objective (which the proposed definition in the directions would not); and (2) there would be consistency as to how a vessel is treated under both these directions and the 2015 boatmaster regulations, thus avoiding unnecessary confusion or</p>	<p>Definition removed as not required in the context of the defined term</p> <p>Amended to match that in the HRO and Boatmasters' Qualifications, Crew and Hours of Work Regulations 2015</p>
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			<p>conflict between the two regulatory regimes;</p> <p>(az) Although it hasn't changed substantively, the definition of "Reporting Vessel" would be unduly onerous for small pleasure vessels given some of the new directions that would apply to Reporting Vessels, including Directions 5 (Pre-arrival and departure notifications and information), 7 (Reporting vessel movements) and 30 (Navigation between Wappingness and Bell Lane Creek). Depending on its design, a recreational boat of 50GT might only be between 50ft and 70ft in length which, given that one of the other criteria for a Reporting Vessel is length of more than 40m (130ft), in the RYA's view is too small to be subject to the onerous obligations applicable to Reporting Vessels. Moreover, the skipper of a recreational boat of under 24m in length may well not know the gross tonnage of his or her boat, particularly if the boat is registered on the small ships register (for which a tonnage measurement is not required). In the RYA's view, in the definition of "Reporting Vessel", pleasure vessels should be excluded from the 50GT parameter (i.e. a pleasure vessel would still be a Reporting Vessel if it were over 40m in length);</p> <p>(bo) The definition of "Underway" also ought to exclude vessels that are "Berthed" (the definition of a "moored" vessel does not include one made fast to the shore);</p>	<p>Part (ii) amended to state "Commercial Vessels of gross tonnage of more than 50 tons which ordinarily also navigate outside the Thames"</p> <p>Agreed, definition changed</p>
4.	D CURTIS	PILOT/DPC - PLA	<p>(e) Berthed – does not make mention of a vessel using spud legs, common on dredging vessels.</p> <p>(l) Conning position - makes no mention of the Bridge wings when berthing the vessel</p> <p>(q) Designated anchorages - emergency anchorages also can be found in the VTS Manual (due to be replaced)</p> <p>(x) Harbourmaster and deputies and assistants why is the DPC missing?</p> <p>(al) i made fast ahead / astern – incorrect nautical terminology should read fore and aft.</p> <p>(li) see above</p>	<p>agreed - although added to definition of moored</p> <p>not required within the context of the direction where this definition is applied</p> <p>Not Applicable - Public use document and the public do not have access to VTS Manual/QMS</p> <p>it does state and "officers authorised to discharge the Harbourmaster's duties through one of the PLA's VTS centres"</p> <p>terms used for consistency with the Byelaws</p>

			(bc) Ship towage should also include pushing on	bc - This definition is used for consistency with the vessel licensing byelaws.
5.	HYWEL PUGH	PILOT - PLA	(al) no mention of dredgers that do not moor but drop a spud tube to the river bed.	terms used for consistency with the Byelaws
6.	C MIDDLEMISS	WATERMEN AND LIGHTERMENT OF THE RIVER THAMES	<p>In the Definition and Interpretation Section of the 2020 edition of the GD, 'Notices to Mariners', 'Thames Byelaws' and 'Speed Restriction' are not included but were included in the 2016 publication. Moreover, item (ay) of the Definition and Interpretation Section refers to Notice to Mariners. Additionally, Thames Byelaws are referred to extensively in the body of the document, as are Speed Restrictions. Is this an oversight and should these have been included in the Definition and Interpretation Section of the 2020 version of the GD?</p> <p>With much of the PLA's communications carried out electronically these days, should 'Communications' have been included in the Definition and Interpretation Section?</p>	<p>Thames Byelaws definition added to 2020 version, Notice to Mariners not added because it's only used in the one definition. Speed Reduction is defined, speed restriction not defined as not used in any Direction</p> <p>The PLA communicate through numerous methods and does not feel it necessary to define them in this publication</p>

General Direction 4

7.	JOHN BECKETT	VTS OFFICER - PLA	GD 4 - the first paragraph mentions "operating primarily in the Thames" - could we use the same wording as para 4.3 which refers to "intra-port" vessels, for consistency and simplification?	'primarily in the Thames' is deliberately intended to infer a subtle difference from 'intra port vessel' where intra port vessels operate exclusively in the Thames.
8.	G LEWIS	RYA	<p>Direction 4.1 – Passage Plans etc. It is unclear why this direction is only to apply to “existing” Commercial Vessels (in contrast, Direction 4.3 refers to new services rather than new vessels);</p> <p>Direction 4.2(b) – Passage Plans etc. Every vessel navigating in the Thames causes a “risk to navigational safety”, however small, so as drafted this provision would entitle the harbour master to demand this information from everyone navigating on the river. It would be unduly onerous for the skipper of a pleasure vessel to be compelled “to provide any information requested in respect of, but not limited to; the Vessel, its equipment, its general condition, certification, organisational and ship management systems, competency of Crew, and be subject to a formal risk assessment”. This provision should be qualified by a reference to the risk to</p>	<p>4.1 - Agreed, existing removed</p> <p>4.2b - Provision now qualified with 'material'</p>

			navigational safety being “undue” or “intolerable” or something similar and be disappplied to pleasure vessels. Pleasure vessels are, of course, already required to have passage plans under SOLAS V;	
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General Direction 5

9..	HYWEL PUGH	PILOT - PLA	Ecdis ? a number of ships are now fully ECDIS Dredgers if using spud tubes won't require boatmen Safe Working Load of the towage bollards	The term 'charts' applies to both electronic and paper format. appropriate suggests if not required then provision not necessary The Pre arrival notification is not the most appropriate way to obtain this information – Please contact the HM team if you wish to discuss further.
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General Direction 6

10.	J RUDD	MARINE ENGINEERING SUPERINTENDENT - PLA	6 MARKING OF STERNS OF PASSENGER VESSELS 6.1 Except as described in General Direction 6.2, every Passenger Vessel of Class IV, V and VI (as defined by current Merchant Shipping Regulations) and every Vessel subject to the High Speed Craft Code, which regularly navigates upstream of the Gravesend Pilot Station must have, at or on her stern, an area of high visibility orange coating. So far as is practicable the coated area must be: a) of between 3.75 and 4.5 square metres, i.e. 2.5 to 3.0 metres horizontally and a minimum of 1.5 metres vertically, evenly distributed either side of the Vessel's centre line; During the build of the new Woolwich ferries the question was raised as to whether the high visibility sections would be better placed on the sides of the ships as they were usually showing a side aspect to any vessels navigating in the fairway. It was agreed by the Harbourmaster that this seemed sensible; however there is no scope within the GD to permit any deviation from GD6 b) in a vertical or near vertical plane facing directly astern; c) evenly illuminated from sunset to sunrise by suitably screened lights directed onto the reflective material; d) equally effective in indicating the presence of the Vessel in daylight, as it is when illuminated between sunset and sunrise; and e) created using a coating proven in the marine environment, which is of a single base colour and does not include any text, pictures or other forms of illustration,	There is no reason why the high vis coating cannot be applied to the side in addition to the stern. With regard to specifying specific colour ranges, the PLA do not feel it is appropriate to do so within the directions. Consideration is ongoing as to whether guidance will be released outlining expectations. It is acknowledged that more consistent enforcement is required in relation to this GD.
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			and is also acceptable to the Maritime & Coastguard Agency. Should the PLA not be specifying the colour range they would expect to see such as RAL2009 (traffic orange), or better still investigate whether a retroreflective stick on coating is available similar to those used on SAR assets? There are examples of Class Vs running around with which meet the technical requirements for size, but have used Red Oxide paint, which is a proven marine coating but is open to interpretation of whether it is "high visibility". In addition, although the GD states that it needs to be acceptable to the MCA, it is my understanding that this is to ensure it does not conflict with other regulations set down for ships under COLREGs etc and not that it meets the PLA requirements as the MCA have limited powers to enforce the other navigation authority's local laws.	
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General Direction 7

11.	JOHN BECKETT	VTS OFFICER - PLA	<p>GD 7.2 Do these reporting requirements only apply to inbound vessels? Currently, only it is inbound but the GD doesn't state this. This should be made clear either way.</p> <p>7.2.d) - reporting that the Pilot ladder is rigged in accordance with SOLAS regulations. This slightly differs from GD 11 that states that ladder arrangements must comply with SOLAS Regulation V/23 and IMO Resolution A.1045(27). It should be made clear that all ladders must comply with the updated V/23 and A.1045(27) regardless of their year of build/install, which I believe is the intention of the original GD. If vessels are only required to comply with SOLAS, then these new requirements wouldn't apply to vessels built / ladders installed prior to 1st July 2012.</p> <p>GD 7.3.2 - intraport vessels not required to give 10 minutes notice - what is the justification, from a safety perspective, for intraport traffic not needing to give 10 minutes notice? It may have wider implications - does this apply to Tilbury Dock departures too? Particularly with PECBs now, we'd rather sort out any issue with the PEC or POLARIS voyage whilst they are safely alongside / moored. Not to mention the benefit of providing traffic</p>	<p>7.2 amended to clarify information required for inbound and outbound vessels.</p> <p>7.2(D) amended to 'in accordance with GD 11'</p> <p>7.3.2 – Revised to include 10 mins notice requirement in light of comments</p>
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			management ahead of their departure time.	
12.	D CURTIS	PILOT - PLA	7.3.2 All reporting vessels should give 10 minutes notice as far as possible. 7.5b SR1 is sufficient for this not SR4	7.3.2 – Revised to include 10 mins notice requirement in light of comments 7.5b - This reflects existing practice law 2016 GD 14 with no known issues

General Direction 9

13.	G LEWIS	RYA	Notification of bunkering. As drafted, this direction would require an individual recreational boater to notify VTS every time he or she refuels a boat (including a club safety boat) by hand from fuel cans from the shore, including when the boat is on a trailer/trolley or alongside a pontoon, which would be unreasonable. In the RYA's view, this direction should be disapplied to pleasure vessels refuelling by hand (i.e. not from a fuel pump);	9. Agreed - hand refuelling now exempted
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General Direction 10

14.	C MIDDLEMISS	WATERMEN AND LIGHTERMEN OF THE RIVER THAMES	There is no mention of what arrangements have been made for the safe disposal of such waste. The discussions between the PLA and Thames Water in respect of the Tideway Tunnel project provided an ideal opportunity to ensure the adequate provision of such facilities, particularly as the current London sewer system runs very close to the Thames, as evident from the number of discharges into the River. Given that vessel owners have been working towards installing waste tanks into their vessels to meet the January 2023 deadline, what action has the PLA taken to ensure the adequate provision of sewage disposal terminals along the Thames?	The PLA is planning to provide facilities to assist operators in meeting these requirements by 2023.
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General Direction 12

15.	JOHN BECKETT	VTS OFFICER - PLA	GD 12.3 - "VHF Channel used by London VTS for that part of the river" - could we use the new "VTS Sector" definition - i.e. "the VHF Channel for the VTS Sector in which the vessel is in" 12.4/5 - should the LNG prefix also be included?	Change unnecessary LNG prefix unnecessary – LNG vessels do not have separate requirements to other specified vessels.
16.	G LEWIS	RYA	Direction 12.3 – VHF. This would require all vessels carrying VHF to maintain a listening watch while underway	Agreed, now applies only to those required to carry under the direction

			or at anchor, making it an offence to fail to do so. This could have the effect of discouraging people from carrying VHF voluntarily, which seems to the RYA to be counter-productive. In the RYA's view, Direction 12.3 should only apply to those who are compelled to carry VHF under Direction 12.1 (unless exempt under Direction 12.2);	
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General Direction 13

17.	G LEWIS	RYA	11. Direction 13.1 & 13.4 – AIS. In the RYA's view, the requirement to notify VTS of any defect to a vessel's AIS etc. and to transmit navigation status should only apply to those vessels that are compelled to carry AIS under Directions 13.2 and 13.3;	Agreed, now applies only to those required to carry under the direction
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General Direction 14

18.	FRANK HART	VTS SUPERVISOR - PLA	I think there are two typos in the GD 14 14.4 refers to gd 16.3 should this be 14.3? 14.5 refers to GD 16.1 should this be 14.1?	Many thanks. Following feedback, the majority of GD 14 is under further review, so will not be included in this revision.
19.	JOHN BECKETT	VTS OFFICER - PLA	GD 14 - Navigation in Restricted Visibility I don't feel the Consultation Notice accurately describes the changes as it states "Simplified regulatory limitations and requirements for Navigating in Restricted Visibility...". However these changes are not purely simplification but completely new regulation. 14.1 - this paragraph effectively states no vessel can navigate west of SR1 in visibility less than 2 cables. It makes no distinction between commercial, pleasure, piloted, PEC or reporting vessels, so seems to apply to all vessels between Teddington and SR1. Is that the intention? 14.2 - no specified vessels (or vessels with haz goods in bulk) to navigate west of Gravesend in res viz (<5 cables) - this conflicts with the DSIBB and the new GD 24.6 that states that Specified Vessels are not to navigate (at all) in res viz. It would also impact on intraport bunker barges. Can you clarify its impact on other vessels which carry some hazardous goods (and are classed as hazardous in POLARIS), such as some cobelfret ferries etc. 14.5 - (i believe the ref to 16.1 should read 14.1) mitigation measures to navigate in res viz <2 cables - will there be a process of how VTS are to be kept aware of which vessels are approved or which masters, PEC	Many thanks. As a result of feedback received, the majority of GD 14 is under further review, so will not be included in this revision. The intention will be for the future requirements to apply to reporting vessels only.

			holders or Pilots are allowed to navigate in res viz <2 cables? Will there be a new PEC endorsement for this for example? Would this exemption also be able to be applied to Specified and Hazardous vessels? This would be quite onerous to manage and implement, considering we can't accurately calculate the visibility down to something as precise as 2 cables, especially as the GD includes "along its intended passage".	
20.	G LEWIS		Direction 14.1 – Restricted Visibility. In the RYA's view, it would be unreasonable to prohibit all navigation west of Sea Reach No. 1 Buoy when visibility falls below 0.2nm. A small pleasure vessel without any facilities on board which is "overtaken by conditions restricting visibility" could be required to anchor indefinitely to await an improvement in the weather conditions. The existing equivalent direction only applies to vessels over 40m in length overall. In the RYA's view a threshold below which this direction is disapplied should be retained and the RYA would suggest that this direction should only apply to Reporting Vessels;	Agreed. The intention is for this to apply to reporting vessels only. However, following feedback, the GD is under further review and the majority of the content will not be included in this revision.
21.	D CURTIS	PILOT - PLA	14.1 ?? Dense fog in Lower Hope Reach (common) but clear each side what's the problem ?? 14.3 No always possible on ULCSs see point on 14.1 14.5 should refer to 14.1 not 14.5 the reference to the Harbourmaster does this include the DPC ? 14.5 what are the specific mitigation measures ? Notes 1. How is this enforceable for PECs ?	Thanks for your feedback. As a result of feedback received, the majority of GD 14 is under further review, so will not be included in this revision. Further consultation will be undertaken prior to the next revision.
22.	G FAULKENER	GPS MARINE	14.6: Please defined what Restricted visibility is?	Please check the definitions
23.	HYWEL PUGH	PILOT - PLA	14.2) Gravesend is too late to abort. 14.3) Designated anchorage, Barrow 3 etc 14.5) Doesn't make sense	As a result of feedback received, the majority of GD 14 is under further review, so will not be included in this revision. Further consultation will be undertaken prior to the next revision.
24.	C MIDDLEMISS	WATERMEN AND LIGHTERMEN OF THE RIVER THAMES	4. In Section 14, Navigation in Restricted Visibility, reference is made to visibility of less than 0.2 nautical miles (Nm) and 0.5 Nm, whereas in the Definition and Interpretation Section, item (ba) Restricted Visibility, here it is defined as visibility of less than 0.5 Nm. Also, 0.5 Nm is used in Subsection 29.6. To avoid confusion, it would be helpful if (ba), in the Definition and Interpretation Section could define Restricted Visibility without quoting a minimum distance or the same figure is used throughout the document.	Thank you for the observation. As a result of feedback received, the majority of GD 14 is under further review, so will not be included in this revision.

General Direction 15

25.	G FAULKNER	GPS MARINE	How would this direction affect a workboat with a safe manning level of 2 crew	This is type of craft only requires the master and one additional crew member immediately available to take over the Navigation of the Vessel in an emergency or as circumstances may require.
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General Direction 17

26.	G LEWIS	RYA	In the RYA's view, this direction amounts to an unlawful sub-delegation of authority. Section 111 of the Port of London Act 1968 gives the "Port Authority" power to give directions for, amongst other things, designating areas which vessels are to refrain from using. This section does not, however, authorise the Port Authority to delegate power to the harbour master to designate parts of the harbour at his or her discretion as being closed to navigation. Any attempt by the harbour master to designate parts of the Thames as being closed for navigation (whether temporarily or permanently) under this provision would be ultra vires; and	Drafting error. Correction applied to clearly state that the power to implement exclusion zones is vested in the Authority.
27.	HYWEL PUGH	PILOT - PLA	London Gateway has a 100 mtr exclusion zone.	No changes to existing GD here.

General Direction 18

28.	G LEWIS	RYA	Signals for speed reduction. In the RYA's view, this direction should make it clearer that it refers to a person responsible for any vessel, installation, works or activity in respect of which it is desired that passing vessels reduce their speed when passing.	Thank you. Amended accordingly
30.	D CURTIS	PILOT - PLA	Pass with caution is much better phrased it's not just speed which is the issue	Speed reduction ties in with existing requirements under the PNTM. However, this will be given further consideration for the next revision.

General Direction 20

31.	D CURTIS	PILOT - PLA	Must ask VTS for their approval	Central London is not provided with a TOS and VTS do not have sufficient visibility of the traffic image to be providing permission to navigate against the prevailing direction of traffic movement.
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General Direction 24

32.	J RUDD	MARINE ENGINEERING SUPERINTENDENT - PLA	Is there scope to have a reduction in spacings for vessels less than 20m LOA as per COLREGS? On smaller vessels it is impossible to meet the 2m separation on all navigation lights.	The PLA is not aware of any complaints or enquiries regarding difficulty in complying with this GD. Please contact us to discuss further.
33.	HYWEL PUGH	PILOT - PLA	24.1) Red Light in fog ? 24.5) Insert LPG we all understand that.	24.1) No change to existing requirements 24.5) LPG is not the only substance in this class

General Direction 25

34.	G FAULKNER	GPS MARINE	What evidence is provided by the PLA for approval to be exempt from this direction?	Documentary approval will be provided.
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General Direction 27

35.	NEAL OAKLEY	N/A	27.1 - under what conditions might permission be denied? Is this necessary to apply to commercial and pleasure given the risk profiles are very different? What is the risk that drives this restriction when a person could launch from a fixed structure or shoreline and fly over the navigation channel and be in full compliance with CAA ANO requirements.	Permission would be denied if there is a perceived risk to the safety of navigation of vessels on the Thames. We agree that launching from the shore also poses a similar potential risk and we are working to address this.
36.	MARK DAVIDSON	ENVIRONMENT AGENCY	The change below is most relevant to the EA (SSD) Marine Team, though we do not currently use UAV's from vessels, and have up until now only operated one 2013 pilot scheme to survey seagrass beds (from a land base) in conjunction with CEFAS. It seems entirely appropriate given the sensitivity of the Thames estuary ports and infrastructure as a potential terrorist target that UAV's operated from vessels are regulated (by the PLA- as the principal regulator of vessels), so that we know whosoever is operating one either DOES HAVE permission to do so, or that if one is observed in the air, for example by a member of the public, it can be traced back by the port authority to a permission or identified as a rogue operator and potentially a threat, whereupon appropriate action to "take it down" can be taken, if necessary in conjunction with HM Forces or the police. The PLA is well placed to regulate this as other vessels' masters navigating the river (who may themselves be vulnerable to an airborne threat) are often the most likely people to spot a UAV from their vantage points on vessels.	Many thanks for the feedback
37.	E FAWCETT	N/A	I'm told (perhaps wrongly) that permission will not be given, however, as your notice says, times are changing.	Many thanks for your feedback. Permission may be granted for use of drones and would be given

			<p>Lockdown excepted, the Upper Tideway is increasingly crowded, and wash is cited by rowers, other river users and houseboat owners as somewhere between annoying and plain dangerous. Many of the boats, including coaching launches, are there, essentially, to allow someone to observe something.</p> <p>My feeling as a coach, is that for experienced crews that do not need a safety boat, a drone can supply excellent footage for subsequent analysis. This kind of video is being used in rowing all around the world.</p> <p>I can easily understand that the PLA do not wish the Upper Tideway to become a drone corridor. However, I wonder if there could be a trial scheme with a single drone, perhaps under the auspices of the PLA, or the TRRC? Obviously this would need to have an appropriately qualified pilot and be identifiable both electronically and visually.</p> <p>The details would need to be resolved, but I wonder if crews could book and pay for slots of drone coverage within specified time periods. My guess is that five or ten minutes of good footage would be enough. It would not be necessary for the drone to follow a crew for the whole outing.</p> <p>More generally, I think we are moving to a time when in-boat location devices, screens and bow cameras will be able to improve both safety and coaching while reducing launch numbers. Drones could be an important part of this.</p>	<p>based on a risk-based approach. In accordance with the General Direction, an application would need to be submitted to the Harbour Master.</p> <p>The formal application process is still in development, but the PLA's current guidance gives an indication of what is likely to be required: https://www.pla.co.uk/Safety/Use-of-drones/unmanned-aerial-vehicles-UAVs</p>
38.	J BECKETT	VTS OFFICER - PLA	<p>GD 27 - Unmanned Aerial Vehicles - do the PLA have the ability to create GDs which apply to UAV pilots? PLA Act section 111 suggests GDs can only apply to vessels, and GD 3.2 also suggests GDs can only apply to vessels.</p>	<p>Thanks you for your feedback. The wording has been slightly amended to make it clearer this Direction applies to a vessel.</p>
39.	C MIDDLEMISS	WATERMEN AND LIGHTERMENT OF THE RIVER THAMES	<p>Given the recent problems at Gatwick Airport and elsewhere with unmanned aerial vehicles (UAVs) and the difficulty in locating and identifying operators, should Section 27, Use of Unmanned Aerial Vehicles, not include some enforcement action such as 'unauthorised UAVs will be brought down'?</p>	<p>This level of enforcement is not within the powers of the PLA</p>

General Direction 28

40.	NEIL OAKLEY	NA	28.3 b) - Duplication within this requirement (typing error)	Corrected – Thank you.
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General Direction 31

41.	J RUDD	MARINE ENGINEERING SUPERINTENDENT - PLA	<p>Please confirm whether this applies to all vessels pushing ahead? If so I would strongly object to this amendment due to the impact many smaller vessel operators. A standard Thames lighter is only 26m LOA, 6m beam and 2.5m moulded depth as opposed to a Euro barge of 47+m x 12.5m x 5m moulded depth which is where I believe the intent is.</p> <p>If a broad sweeping approach is adopted regardless of size, there is a danger of operators reverting back to towing barges instead of pushing due to the cost implications and logistical challenges of meeting the requirements set out in this proposal, and I would suggest that towing anything on a hook has a far higher risk rating than pushing a Thames lighter in the dark with lights in accordance with the COLREGS.</p> <p>31.3 On a pushed convoy that ordinarily navigates both above and below London Bridge, the masthead lights referred to under General Direction 34.1 may, when the Vessel is navigating above Cherry Garden Pier, be placed at a reduced height above the hull, no lower than the top of the hatch coamings. The lights referred to under General Direction 34.1. a) must be equally spaced.- Incorrect reference 34.1a) is not within this document</p>	<p>31 – this was intended to apply to all vessels. There has been no feedback or indication from tug operators that they will not be able to comply.</p> <p>31.3 – Corrected. Thank you.</p>
42.	J SPENCER	MANAGING DIRECTOR - GPS	<p>have checked with barge owners and even with ILENT in Holland (the Dutch Government organisation responsible for inland waterways compliance), and it seems that the regulations iro height of mast head lights (top light in a triangle) and side lights on barges is not strictly enforced because:-</p> <p>a) A 5m mast is unwieldy and requires stays. This detracts from its value and creates risks and dangers when working the craft and when raising and lowering the mast. In particular the trip hazards created by stays is considered to be unacceptable and a non-stayed 5m mast is too heavy to handle, even in aluminium. On the Thames, the aim should be for masts to lower forward so</p>	<p>a) 5 metre requirement now removed in light of these comments.</p>

		<p>that the triangle is as far forward as possible but not overhanging the bow. On many barges a 5m mast may be too long to be able to be used in this way.</p> <p>b) Side lights are not usually left on barges because they are prone to damage. This means that they have to be fitted every time they are needed. On the Continent, side lights tend to be between 1m and 1.5m above the deck to facilitate installation and removal without crew members having to climb to install them. Installations to hold side lights are invariably prone to damage by ropes, other craft and cargo handling equipment. Side lights and side light mountings 2m above deck would be particularly vulnerable and as a result I think that this would lead to a significant amount of no compliance and mis-aligned side lights due to mounting bracket damage.</p> <p>These regulations should also state what lights the tugs should not display, ie side lights and, at least if the convoy is under 50m, a mast head light. I think on convoys over 50m the tug should display a single mast head light, but I can't find this in the CEVNI regulations.</p> <p>Article 3.11 of the CEVNI regs seems to cover lights for hipped up combinations, these are:- Towing vessel – single mast head light, side light on the side opposite the tow and single stern light Towed vessel (non self-propelled) – all round white light at mast head, side light on the side opposite the tug and single stern light.</p> <p>In my view the General Directions should clarify the lighting required for tugs and craft when towing on the hip and that clarification should extend the application of the CEVNI system on the Thames.</p> <p>What time scale will be allowed for craft to be modified and crews to be trained? This needs to be sufficient to allow operators sufficient time to comply.</p> <p>The Thames Freight Standard should be modified to mandate the installation / provision of lights to meet the new GD</p>	<p>b) the sidelights referred to in this GD are those required under Thames Byelaw 35.2 (ii) which are on the pushing vessel. This GD only requires the lights to be shown not more than 1 m from the sides of the convoy. There is no requirement for sidelights to be mounted on barges.</p> <p>These regulations are complementary to, and describe what lights should be displayed in addition to, the Thames Byelaws. Tugs are still required to display sidelights as per the above and a single masthead light.</p> <p>These requirements will apply to all pushed convoys regardless of certification.</p>
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Appendices

43.	C MIDDLEMISS	WATERMEN AND LIGHTERMENT OF	It is assumed that the Appendices from the 2016 edition of the GD will be included in the 2020 edition as is.	The placement of the information contained within the 2016 GD appendices is currently under review.
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