

**7. ROWING RULES: RECOMMENDED CHANGES**

**7.1 Options**

**7.1.1 *Four options considered***

7.1.1.1 Four main options are considered. Within each main option are discussed varying alternatives for consideration:

1. Retain Notice to Mariners U6 of 2002:
2. Retain Notice to Mariners U6 in modified form;
3. Withdraw Notice to Mariners U6 of 2002 and revert to and enforce Rule 9 of the COLREGS across the width of the river; i.e. the river is assessed as the fairway and all vessels proceed on the starboard side of the river. Mitigation of physical hazards would be required;
4. Withdraw Notice to Mariners U6 of 2002 and replace with some other control:
  - a. Revert to Rule 9 of the COLREGS within a narrow channel, less than the width of the river.
  - b. Define the narrow channel with areas of water outside this available for navigation by some craft. These areas are tidally dependent. Better designation may assist river users to reduce conflict / assess risks better.
  - c. Have control of rowers through a subsidiary Code of Safe Practice designed by and enforced by the ARA/TRRC/Clubs/PLA as best from a regulatory perspective.

**7.1.2 *Option 1***

7.1.2.1 This was not held as justifiable from regulatory view nor enforceable in full as drafted. The present Rowing Rules cannot continue without amendment. Nor should the overall package continue un-modified, as effectiveness of control of navigation has been seen to be deteriorating. The regulatory and risk control weaknesses should be addressed. Irrespective of the option chosen the additional issues of promulgation, communication across user groups and enforcement can be improved, with assessed beneficial effect to navigational safety. Doing nothing is not recommended.

**7.1.3 Option 2**

7.1.3.1 Following widespread consultation no meaningful and practical amendments were identified that would significantly reduce the risks and make the Notice to Mariners a suitable regulatory tool.

**7.1.4 Options 3 & 4**

7.1.4.1 One option is simply to remove the Rowing Rules (Notice to Mariners U6) and require all vessels to proceed on the starboard side of the river under the COLREGS and Rule 9 in particular. This would mitigate the previously identified increased risk of head-on collision and some crossing situations under the present regime. This definition introduces simplicity and benefits for collision risk, but potentially not for other risks.

7.1.4.2 Obstructions, particularly on the Middlesex shore present hazards, with risks increased if rowing vessels are required to navigate in their vicinity. Part of the difference in resultant risk assessment of these hazards may be due to differing interpretations as to how close to the shore the rowers would have to be under Rule 9 of the COLREGS. The risk at present is kept low by rowers keeping to the opposite side of the river. Without identifying and marking the limits of the channel it is difficult to see how rowers would be kept away from some of the hazards; particularly when interpreted by the rowers as having to remain close to the un-marked shore, as presently described in the Rowing Rules. This interpretation appeared common throughout the study. It is felt and reported that rowers will tend to do this to keep out of the path of power driven vessels, though we have seen only limited examples of this during the winter assessment period with relatively little traffic other than rowers.

7.1.4.3 If the limits of the channel are defined other than the river edge, dependent on the charted depth chosen, the channel remains clear of most of the introduced physical hazards. The contact risks could be reduced by remaining within this channel (whilst still to the starboard side), but risk of collision due to congestion would probably increase.

7.1.4.4 Separately it is assessed that this would have a detrimental effect on the sport of rowing. Whilst this is outside the consideration of navigational safety it should be taken into account in any navigational study of this section of the Thames, due to the numbers and majority of rowers.

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- 7.1.4.5 Without marking the channel on the river, it will be difficult for rowers to identify the edge, particularly when away from physical references such as the bridges. Rowers tend to use the edge of the river more whilst seeking the weaker current and calmer water, particularly as they require less depth, whilst deeper draft power driven vessels will be constrained to the deeper sections near the centre of the channel. The rowers are thus more susceptible to moving close to the physical hazards outside / on the edge of the unmarked main channel.
- 7.1.4.6 In practical terms the application of the rules would be crucial. As seen in other areas not covered by the Rowing Rules the rowers will tend to “work the slacks”. There will be considerable resistance to a change to rowing only on the starboard side of the river, whether this entails rowing near to the physical hazards or alternatively in the main stream and traffic flow. Without greatly increased policing and enforcement it is difficult to see the option working in practice.
- 7.1.4.7 Alternatively should the rowers under this regime congregate into the main stream, away from the introduced physical hazards, this would increase congestion in the main channel. It is probable that either the benefit to the risk of collision would be reduced through overtaking risks, or that congestion would increase, or both. Whilst not a direct safety consideration the probable detrimental effect to the passage of both powered craft and to the sport of rowing should be considered.
- 7.1.4.8 Mitigation of physical hazards would be potentially possible under this option (the right hand rule).
- Drying banks and shallows. Place fixed marks (piles / withies) at the ends and possibly periodically along the length. This would probably incur some increased risk to traffic of contact, particularly rowers (from observation and record).
    - Fulham Flats and the Flats opposite the Bandstand: these are fairly uniform in width but do have protrusions that extend a considerable distance into the river. Marking would further constrain the available channel width and place rowers towards the centre.

- Removal of debris and obstructions – stuck tree limbs and shopping trolleys have been noted – increased reporting by rowers and/or detection by PLA harbour service personnel of obstructions at the edge of the fairway. Also tree limbs formed a potential hazard along banks, particularly on the islands; control and removal of low overhanging limbs is recommended.
- Piers- these are outside the main channel and so only a hazard to those passing close by – e.g. rowers potentially. Should be obviously apparent but possibly will still be hit. Additional marking not felt to be of benefit.
- Tidal Stream: one suggestion has been the use of “tape / streamer” type markers fixed at bridges to better indicate tidal stream direction; this could present a hazard to some craft, dependent on length / type of marker.

**7.1.4.9 Other aspects:**

- At Putney, the present rowing route against the tide follows the track close to the Surrey bank and inside the moored boats upstream of the pier, separating rowers from craft in the main channel. This benefit would be lost for the majority of the time.
- See below – mitigation at pinch points

7.1.4.10 Some of the apparent regulatory conflict and the difference between options 3 and 4 is the definition and understanding of the limits of the narrow channel.

7.1.4.11 The Rowing Rules require rowing vessels to keep “to the starboard side of the fairway” when proceeding with the tide and “as close as practicable” to the appropriate shore when proceeding against the tide. The fairway or channel is not physically marked on the river, nor is the limit specified in any publication we have encountered. The lack of physical marking is at least in part a response to rowers needs for a ‘clear’ waterway.

7.1.4.12 If another limit to the channel is specified, dependent on the charted depth, the derived channel width gradually reduces from Putney to Richmond. If a smoothed 1m depth contour is chosen (as shown on PLA reference charts / maps) the channel is 45m wide at Putney, 35m wide at Chiswick, reducing to around 30m for much of its length upriver and then to 20m and less past Syon crossing. This channel runs through the main or centre arch of all bridges, often not extending to the buttresses/ piers. Of greater variation is the width outside this channel, altering by location and tidal state.

- 7.1.4.13 Allowing 10m width for a 'sweep' type rowing vessel (8m width + clearance) the 1m depth channel along much of its length is 2 to 3 boats wide. Given that other users in this stretch tend to be no wider this appears a valid interpretation. This is a constraint but also indicates a possible source both of confusion and possible options for improvement.
- 7.1.4.14 If the above definition of the channel is accepted there would appear a reduced regulatory conflict for vessels navigating outside it, provide they adhered to the wider COLREGS. Whilst navigating outside the channel they would fall under COLREGS with regard actions to avoid collision etc., but not, it appears with regards Rule 9 and their position within the channel. It is possible for the rowers to proceed outside the channel in several locations under review and thus generally follow tracks used at present, but with better discipline to remain out of the channel and not impede other craft within it. This would have to be tied in with improved lookout, general situational awareness and correct reaction where risk of collision did exist.
- 7.1.4.15 The tracks followed would be at user convenience so long as they did not impede on the traffic proceeding along the channel. On this basis the best format would appear to be for a local Code of Practice. This would have to ensure that such vessels did not impede vessels within the main channel and that if encountered any action, particularly action to avoid collision, should be in compliance with the COLREGS.
- 7.1.4.16 Mitigation would be required at pinch points:

Under bridges where the main channel has to be used there are a number of options:

- Define and mark the channel limit on the bridge; i.e. similar to road bridges with height restrictions;
- Where there is sufficient width for multiple passage including outside the channel passage remains as above;
- Rowing vessels are made to use the starboard side – this would increase crossing and re-crossing of the channel, with increased risk of collision during such crossings;
- Rowing vessels proceed with caution (area indicated on the bank) and avoid impeding the passage of any vessel following the channel – i.e. wait until clear;
- Reduce the channel width to one vessel (10m) and have single passage through; control would be required e.g. give way to oncoming craft from one side. Problems with congestion and waiting near bridges / hazards would arise;

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- No overtaking within a set distance from bridges, e.g. 200m. Area marked on the bank side;
- Depth gauges to be placed on or immediately prior to all bridges for assessment of when / where safe to use side and main arches.
- At blind bends restrict or prohibit overtaking within a set distance.

7.1.4.17 Up-river of Isleworth Ferry Gate the 1m depth channel is approximately 20m wide and 18m off the Ait and similar off the Surrey shore. Theoretically at High Water it is possible for several craft to be abreast, though this reduced to two streams only at Low Water. However, navigation on the Ait side is hampered by hazards including sewage outfalls and other physical hazards. The available channel is actually narrower than apparent. Due to the narrowness it is recommended to retain the right hand rule. If a suitable contour is chosen for the channel limits it can be shown that the outfalls from the sewage works are outside the channel and therefore not necessary to go over them if required to proceed on the right. Marking of the channel may be possible by simple signage alongside the bank, rather than physical marks in the river, or possibly by specialised buoyage with limited radius of movement.

7.1.4.18 At Kew Bridge navigation becomes more problematic and tidally dependent. At High Water rowers can use the Surrey side arch, but the Middlesex arch is not normally used as under the Rowing Rules all traffic is either on the Surrey bank or in the main channel. At Low Water all traffic is constrained to the main channel. The local characteristics on the Surrey side at Kew Bridge would make waiting for clear passage, so as not to impede traffic in the channel, more problematic than at Hammersmith and other bridges. One option for consideration is to introduce a tidal constraint such that the right hand rule would apply below a certain height of tide to be determined and marked on the bridge. However, the benefit of traffic keeping to the right would be tempered by the increased requirement for crossing.

7.1.4.19 Up-river of Kew Bridge the width of the 1m depth channel reduces to approximately 30m, however, we still believe that there is sufficient width of additional river for rowing outside of this channel at most stages of the tide. Consideration may be necessary for other options at the lowest tidal state. Any tidally based constraint would need to be indicated visually on the river by suitable means such as a depth mark.

7.1.4.20 Overhanging trees have been seen to be a problem alongside some islands – previously floating debris caught on low branches. Removal of debris and obstructing branches is recommended. Ongoing this would need better communication between the PLA and user groups, particularly rowers, for the reporting of obstructions.

## **7.2 Summary & Recommendations**

7.2.1 Without further defining the extent of the narrow channel it would appear that should Rowing Rules simply be revoked all rowing vessels would have to follow the positioning specified under Rule 9. This would increase risk to rowers from physical obstructions and hazards. These may be mitigated to some extent by physical marking, but would still leave some hazards. It is felt that the requirement to maintain the starboard side of the river under Rule 9 would be difficult to enforce.

7.2.2 Defining and physically marking a channel could reduce the risks from contact with physical obstructions. The most appropriate marker would be solid wooden piles or withies, however, they would probably frequently be hit by rowers. The markers would in any case potentially constrain the rowers to within the main channel for much of the time, with detrimental impact on congestion and other users. Outside of the safety issues it would probably be detrimental to the sport.

7.2.3 Rowing vessels can safely navigate outside a defined main channel and be separate from traffic using that channel, this can be permitted and it is not necessary to regulate for in itself. We believe this can be done, up to Syon, though up river of Isleworth Ferry Gate Crossing it can be problematic. Several other initiatives are required including a promotional drive, increased internal and external enforcement, and application of the requirements under COLREGS where vessels do interact.

7.2.4 Should the rowers be permitted to follow routes outside a defined main channel, alternatives may be considered to the routes followed under the present Rowing Rules:

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- Removal of crossing points at Chiswick Steps and the “Ship” below Chiswick Bridge. This would place the tracks in line with general COLREGS within the channel. This would introduce some hazards from flats on the Surrey shore, particularly opposite the Bandstand. They have characteristics of sudden protruding sand banks between pools of apparent safe water. Overflow outfalls from Beverley Brook situated up-river of Barnes rail bridge have not been seen operating but are reported to send water to mid-stream following heavy rain. There are few reported conflicts between rowers and power driven vessels at this location under the present regime, with traffic direction in line with COLREGS for the majority of the time. Crossing hazards may be reduced, though this is uncertain. Crossing would still take place around Chiswick Bridge for access to clubs / slipways but may be less well defined.
- Reversion to previous Chiswick crossing up-river of the bridge – balanced views amongst the rowers and assessed equal risking.
- Syon onwards. The majority of rowers advocate reversion to previous system and removal of the crossing. This is not seen as justified from a risk control view.

## 7.2.5 Our main recommendations are:

- Define the fairway limits e.g. 1m smoothed contour
- Repeal the Rowing Rules under N to M U6 from PLA documentation
- Clarify the requirements of Rule 9, applying to all vessels when within the defined narrow channel.
- Clarify action taken to avoid collision is to be in accordance with the COLREGS e.g. head on situation in particular.
- ARA/TRRC/PLA to produce improved and consistent guidance (Code of Practice) on routes recommended for rowers. Outside the defined narrow channel this can be as best aids rowing.
- When navigating within the narrow channel rowing vessels should:
  - (i) Avoid impeding vessels which can safely navigate only within the narrow channel (Rule 9 COLREGS)
  - (ii) With the stream – proceed on the starboard side of the channel but note this does not have to be up to the edge of the river and proximity of hazards.
  - (iii) Against the stream, if rowers have to enter the channel at Bridges or Pinch Points, they should approach with caution and if necessary wait until it is clear of approaching traffic i.e. to avoid impeding passage for vessels on the starboard side of the fairway starboard side.