

FEEDBACK ON PUBLIC CONSULTATION ON FISHERMAN'S GAT PRECAUTIONARY AREA

PROPOSED REMOVAL OF CHARTED WARNINGS

Consultee	Organisation	Comment/Question
1	Mike Fawke Medway Pilot	<p>In response to the above consultation, I do not see the logic in removing the line around the precautionary area.</p> <ul style="list-style-type: none"> • If the chart is supposedly becoming too busy it must be in the Princes Channel area, so how does taking information away from somewhere else reduce that. • The addition of a mid channel buoy in the Princes Channel and possible channel edge lines are the culprits and perhaps they should be examined before reducing information elsewhere. • Just because the F Gat has got less traffic now is no reason to reduce it's importance. For many reasons it may become a vital backup to the traffic flow in and out of the Thames and Medway, and the initial reasons for having the precautionary area are still valid.
2	John Stafford Pilot PLA	<p>For me I have always thought the precautionary area as superfluous. I consider that this area is no more hazardous than other areas in the district, in fact considerably less. Yes there is a T junction but 99% of the traffic in that area must be pilot or Pec used. There is ample time to discuss traffic between the ships involved as well as VTS. Because the convergence is mid way along the Black Deep there is plenty of time to form a traffic image.</p> <p>So I agree that the precautionary area should be removed. I wouldn't even have an exclamation triangle. Save those for where it is really needed and don't scatter them around the Estuary where they lose impact.</p> <p>The hydrographic office is correct. The chart is "busy" but then let us not forget, so is the district. It is just that the people who work regularly in the area are used to this and tend to make no mention.</p>
3	C Bordas Medway Pilot	<p>Having studied the relevant charts at home for some time I cannot see where the chart is becoming 'too busy' even after the proposals are brought into force. I understand that 'too busy' means some form of information saturation of the chart in question and that the shading of the precautionary area provides more of a hindrance than a help to a ships master or pilot navigating this area. I stress to add that I hope my comment does not apply to pilots.</p> <p>Please therefore consider the following:</p> <ul style="list-style-type: none"> • From the information supplied in your own email a further 164 vessels a month are now being routed through the Princess Channel. This alone increases the prospect of incidents occurring. To try and mitigate this risk a routing system and extra buoyage is being deployed. If, in the event of there being an incident though, there is the possibility that all Princess Channel traffic may be routed via the Fisherman's Gat. This would include vessels whose masters have little or no experience of the area and may benefit from the extra warning. • Removal of any type of navigational warning on the basis of a downturn in traffic using the particular area, does not, in my view, provide a sufficiently comprehensive reason. In the even of an incident in the Princess Channel, then traffic levels in

			<p>the Fisherman's Gat would quickly return.</p> <ul style="list-style-type: none"> • Please also note that the size and hazardous nature of vessels using this area has increased significantly since the introduction of the scheme and therefore increased the risk. • If the chart is 'too busy' in this area, then the mariner is most likely to be using the wrong scale of chart as I just don't see where this is occurring when the correct charts are being used for navigation. Even if my understanding of this is wrong, then it will certainly serve to prepare the master of any ship for the information and shipping that he/she is likely to encounter on passage to the Warp. • I would also like to remind you that by far the majority of non piloted vessels that are using the South Channels just have one person on the bridge at any given time. Of these vessels most will have very rudimentary passage plans if any at all and their ability to communicate with the VTS or other shipping can sometimes fall far short of what I think is acceptable. If there is the possibility that they may have to be routed though the Fisherman's Gat then removal of the precautionary area may well make it easier for these people. What effect does the resulting complacency have on other shipping navigating in their vicinity? • If the UKHO are allowed to interfere with local traffic management schemes on the basis of their argument so far, then it doesn't bode well for those mariners who will be using Admiralty Charts to find their way to Elbe 1, Maas Centre or last but not least the Wandelaar. Presumably the UKHO are in contact with the German, Dutch and Belgian authorities about busy charts as well. I suspect not.
4.	Graham Durward-Akhurst	Medway Pilot	<p>With reference to the consultation notice regarding the proposed changes to the Fisherman's Gat Precautionary Area, I am in basic agreement with the proposals, especially with the alterations to the Tongue Anchorage.</p> <p>With regard to the removal of the Shading around the Fisherman's Gat Precautionary Area, the argument that the chart is becoming "busy" is not really an issue if the correct scale of chart for the area is being used. I appreciate that the number of vessels using the Fisherman's Gat has reduced in recent months, but I feel the shading should be kept to highlight and remind vessels that they are approaching an area of conflicting traffic.</p>
5.	S J Nichols	Medway Pilot	<p>I have considered the proposal and its implications and in my view the effective down grading of the Fisherman's Gat Precautionary Area is not a "sensible revision".</p> <p>My reasons are as follows:</p> <ul style="list-style-type: none"> • While it is true that not as many vessels use the Fisherman's Gat route now since the dredging of the Princes Channel, the confluence of the Fisherman's Gat and the main Black Deep channel still remains a considerable risk area. From the outset, only larger ships have used this route, and all vessels have Pilots or experienced PEC holders. This factor, plus the very valuable input from London VTS, has resulted in a well-managed area with all parties aware of the dangers and what is required. To the outsider, this route may now seem simple. It is not and there is no room for complacency. • The proposed Wind Farm to the north of the Fisherman's Gat is another good reason for not downgrading the Precautionary Area. Should the proposal go head, seeing and judging vessels in the Black Deep will be much more difficult. In addition, the Wind Farm will make for a very cluttered radar picture. This, combined with the possibility of false echoes (often encountered when large side vessels are crossing at 90 degrees) will make navigation far more complex. • Finally, with the demise of the North Edinburgh Channel for navigation, the Fisherman's Gat route is the only usable southern route alternative to the Princes Channel. If for any reason the Princes Channel is either partially or wholly blocked, most vessels will have no option but use the Fisherman's Gat. There is, therefore, the possibility of a very congested Fisherman's Gat route used by mariners unfamiliar with the hazards.

			<ul style="list-style-type: none"> I do appreciate that it is a long time since there was a significant incident in the Princes Channel, but up until now, this Channel has been made relatively simple and straight-forward for the use of all mariners, particularly those vessels exempt on length. Now, however, with the introduction of the North Deep-Water Route, the Princes Channel is anything but simple. To some it will prove confusing and against convention. In addition, the moving of the Princes 5 Buoy further to the South and the introduction of the new Princes Mid Buoy has narrowed the sea room available. The larger and deeper ships attracted to the Princes Channel from the Fisherman's Gat, have little room for manoeuvre or error. While Pilots and VTS may be able to negate much of this risk, it only needs one poorly navigated vessel to create a very serious problem. The possibility of using the Fisherman's Gat as the alternative Southern route has, in my view increased. <p>For the above reasons, the marking of the existing Fisherman's Gat Precautionary Area should remain in place.</p>
6.	J Clandillon-Baker	Pilot PLA	I agree that the proposal to remove the FGPA is logical and don't believe that the change will have any adverse impact on navigation safety in the area.
7.	John Gurton	Medway Pilot	<p>It is my opinion that the markings on the chart should remain in place for the following reasons.</p> <ul style="list-style-type: none"> One cannot assume that due to the increase in traffic in the Princes Channel reduces the need for caution in the FG area. If an incident should occur in the Princes Channel (the Risk of which must have increased due to the buoyage and channel changes) transit of the FG would be the advisable option. The FG is also the Channel of choice for large container ships at the right state of tide and for departing LNG carriers. The LNG may well increase to 3 vessels per week depending on the fluctuations in that market. Even one vessel per day requires the same level of caution as twenty. The proposed installation of the London Array windfarm on the Longsand with associated proven effects caused by wind turbines on a vessel's radar picture surely raises concerns of maximum caution in transit of the FG. In my opinion the dialogue box on charts relating to this precautionary area should include a warning of radar interference once the turbines have been installed. The statement of the chart appearing too busy can only apply to the smaller scale charts which would not be the chart of choice to be used if transiting the area.
8.	J.F.B. Mills	Medway Pilot	It would seem a sensible idea to de-clutter the chart with respect to the Fish Gat Precautionary Area symbols. The retention of the ! would be sufficient in a now somewhat reduced traffic area.
9.	John Piggott	Pilot PLA	<p>In response to the consultation notice regarding the Fisherman's Gat area, I offer the following response.</p> <ul style="list-style-type: none"> I would personally be against the removal of the Magenta Edge illustrating the Precautionary area based solely on the argument that the chart is "busy". There are a considerable number of Estuary charts, but only 1183. 1607 and 1604 contain both the Fish gat and NES area. The other charts you would be doing a dis-service too, for they could hardly be considered busy under the NES argument being far removed from the new print features and will not detract from their clarity. Although traffic in the FG has declined considerably based on you figures, it still remains a viable route into the Thames Estuary with the same dangers as associated with previous risk assessments, it only takes two vessels to cause a close quarters situation regardless of the number per day using it. The current highlighting of the area draws the Mariners attention to the chart note, which we all know are all too easy to ignore, a warning triangle might be insufficient for this purpose.

			<ul style="list-style-type: none"> • With respect, the principal alterations to the NES chart area are broadly adjustments to existing features, although I do concede that additional symbols have been added, but conversely some symbols (i.e. Princes App Buoy) will be removed or just amended. • Finally, should a unfortunate incident restrict the passage of traffic in the Princes Channel due to the increase of movements, then the principal point of entry would be the FGat, attracting considerable additional traffic, and any chart feature that reduces risk is welcome, especially on the smaller scale charts, as not all vessels carry the largest scale charts available.
PLA Response			<p>The views of people responding to the public consultation were generally evenly divided between those supporting the removal of the charted precautionary area boundary and associated shading (but not the exclamation mark); and a small majority who felt that it should not be removed.</p> <p>On the basis of the feedback received, and assuming that these broad views are indicative of the views of the wider constituency, the PLA Navigational Management Team is now of the opinion that the status quo should remain. To that end, we will advise the UKHO of the results of our consultation and the views of the majority of those navigating in the area.</p>