

15. RECOMMENDATIONS

15.1 Improve Control of Rowing and wider Safety of Navigation:

1. Repeal Notice to Mariners U6;
2. Introduce a Code of Practice covering rowing – sponsored by either PLA or ARA /TRRC as best fits PLA's SMS and regulatory requirements. Communication with and participation by all three recommended in the production of the Code. The Code should be local to the upper tidal Thames;
3. Introduce a river user's guide either separately or with the Environment Agency; see Promulgation below;
4. Increase simplification and promulgation of whichever rules are in place, including any Code. See promulgation below;
5. Address fragmented presentation of the various rules and requirements. Streamlining and combining of the actual legislation may be considered and would ease maintenance, promulgation and understanding;
6. Define the channel limits e.g. 1m smoothed contour;
7. Clarify the relationship between any guidance on rowing and the COLREGS:
 - a. Action taken to avoid collision is to be in accordance with the COLREGS irrespective of position on the river e.g. to alter to starboard in a head-on situation;
 - b. Requirements of Rule 9, applying to all vessels when within any defined narrow channel;
8. Such clarification to be included within any Code produced and within other guides and any notices & etc. (see Promulgation). Consider separate promulgation;
9. Identification of all boats used on the Tideway as required under Byelaws with standard sized and formatted name plus Club alpha/numeric code;
10. Enforcement of boat identification can be placed to rowing authorities / Clubs – require periodic reports of boats held, compliance with applicable rowing Code for construction and marking / identification. In parallel, PLA to monitor and enforce the present or amended Byelaw that requires boat identification;
11. A level of control is possible and recommended by noting boats joining the Tideway at manned entry points from enclosed waterways e.g. upper Thames, and canals;

THE SALVAGE ASSOCIATION

12. Maintain a log of transgressors from rules as noted on the river by PLA Harbour Service personnel & promulgate list at the manned entry points. Use the list to take action when the craft are seen again – e.g. informal advice through to action taken by PLA harbour service personnel in accordance with their powers. Whilst control works best with a registration scheme as seen on other waterways, it is understood that this may not be possible due to the open nature of the river. If a registration scheme were an option this would be recommended – i.e. not licensing but monitoring of river users, evidenced say by display of a permit, including day permits);
13. Increase enforcement, at least for a period of introduction of any new Rules or Code:
 - a. Inspection and licensing of all coach boats to be implemented as per Byelaws;
 - b. Review the type of Harbour Services vessel used – consider shallower vessels creating less wake, able to navigate all areas and at suitable speed to respond to issues;
 - c. Style of enforcement – consider less formal approach. Discuss options with rowing and other user groups. A closer matching with the user profile may assist as seen with police style (e.g. using cycle patrols & community policing) and on some other waterways. Co-operation and use of user group personnel may assist but thought difficult due to the voluntary nature. An alternative or to compliment this greater routine involvement with the user groups may assist.
14. Speed limit – greater enforcement with speed guns and/or speed indicator boards on bridges;
15. Formalise the dispensation from the 8 knot speed limit for rowers in addition to accompanying coach boats;
16. Formalise the requirement of rowing craft to act as ‘power driven vessels’ under the COLREGS when in collision situations;
17. Consider Markers/ colouring at some physical hazards to increase visibility;
18. No overtaking approaching bridges (within a distance to be further assessed, e.g. 200m);

THE SALVAGE ASSOCIATION

19. Consider monitoring wash levels particularly during any required certification process, but also in general use – more difficult on a tideway but Environment Agency apparently prosecute (if they do at all) under wash and damage caused rather than speed. (They monitor height of wash using simple stick gauge at bank);
20. Consider whether designated crossing points are advantageous as they have the disadvantage of concentrating crossing traffic but also have the advantage that it identifies where traffic is most likely to be crossing;
21. Consider the option of the application of Rule 9 through Kew Bridge on a tidal basis at Low Water;
22. Consider the options for navigation at low water between Kew Bridge and the Isleworth Ferry Gate;
23. Input to the PLA Navigation Safety Management System to be improved. Include specific problems of:
 - i. Collision risks at Kew Bridge
 - ii. Collision risks at Chiswick Bridge
 - iii. Collision risk due to conflict at change of tide.

15.2 Improve Promulgation:

1. Produce one publication combining all navigational controls. Ideally one set of rules consecutively numbered including the requirements of COLREGS, BYLAWS etc. and addressed under each topic e.g. application, speed, lookout and etc.;
2. Publish, be co-sponsor or otherwise actively involved in production of the rowing Code, if accepted;
3. In parallel publish a joint River Thames User Guide with Environmental Agency or
4. Publish a PLA Tideway User Guide or “Leisure Safety Code”;
5. The river user guide should include either a summary description of any rowing special rules / rowing Code of Practice requirements or have the rowing Code incorporated;
6. The river user guide should include a schematic / map of the river highlighting risks, special requirements such as at pinch points and other points of note.

THE SALVAGE ASSOCIATION

The guide should summarise safety features and requirements, (see present Environment Agency version), as well as any social /pleasure information;

7. A launch programme for the new regime including a series of introductory presentations and meetings at or hosting main Clubs. Work alongside the ARA / TRRC in presenting a joint front in respect of agreed rowing procedures and/ or present to senior figures amongst their body and agree an ARA / TRRC presentation that they will make to members;
8. Revision of the PLA website to become more user friendly and less impenetrable:
 - a. Greater visibility of any navigational rules;
 - b. Improved search facility or drop down indexing for leisure users – drawing attention to navigational rules;
 - c. Reproduction in screen viewing format and printable format of any Code plus other publications decided upon such as a river Thames / Tideway User Guide, if this does not include the rowing Code;
 - d. Production and greater visibility of a summarised version of the navigation rules for leisure use; i.e. more “glossy” than bland Byelaw reproduction;
 - e. Linking the web site with other sites including main user bodies (ARA / TRRC etc) and official bodies particularly from adjacent regions e.g. the Environment Agency;
9. Use the Tourist Information network and associated leisure interests to gain wider publication; link to their web sites, make guide available to them;
10. Work with TRRC / ARA to widely publicise the requirements. Link selected sections of websites. Ensure they pick up the changes as a theme and use internally;
11. Similarly tie in with other user groups and raise awareness possibly as part of a launch programme;
12. Provide leaflets at Thames Tideway entry points e.g. Limehouse, Teddington, Brentford Locks, etc. Use of map / schematic diagrams alongside written advice;
13. Marking of channel is possible but would introduce hazards; consider signage along the bank at strategic locations such as entry points, approaching bridges with diagram of channel and river width;

14. Other signage to be considered:
 - i. Speed limit;
 - ii. Simple notice of areas where rowing is anticipated;
 - iii. Depth gauges at all bridges;
 - iv. Signs at entry points to the river system; simple clear examples using schematics and/or plain language showing general rule / constraints including any channel, speed limit and presence of boats outside the channel (if this is permitted);
 - v. Signs at intervals (diagrammatic) showing that rowers may be following a track different from right hand rule (if this is permitted);
 - vi. Signs along the bank highlighting the position of the channel (if so designated); e.g. passing through centre arches of bridges, clear of sewage outfalls etc.;
 - vii. Warning signs indicating approach to crossing area (designate crossing or presence of slipways / club houses);
 - viii. Warning signs at crossing points.

15.3 Improve Cross-User Communication:

1. Form a new User Group with a more effective fixed agenda to concentrate on matters of safety as a high priority. Encourage greater interaction between river users and with the PLA to raise awareness of rowing procedures;
2. Increased informal contact with user groups including TRRC. Periodic (3 or 4 monthly) meetings with TRRC safety advisor to discuss general and safety issues;
3. Communication and transfer of information between PLA and ARA can be improved; variance in incident statistics highlights gaps in knowledge transfer. This may be partly attributed to possible adverse use of data:
 - i. Clarification of the use may be required – safety improvement or enforcement purpose;
 - ii. Consider measures to improve formal and informal data transfer:
 1. Anonymous reports / identity masking for safety improvement use from TRRC/ARA to PLA;
 2. Better communication at un-minuted meetings;

3. Regular quarterly of four-monthly meetings with TRRC safety adviser;
4. Guidance required on acceptability/standards for boat lighting as well as use to be better applied and enforced;
5. Observation cameras on bridges for a trial period with regular scheduled meetings between PLA and ARA / TRRC to review evidence.

15.4 Recommendations to be put to the ARA/TRRC:

1. Identification of novice crew / cox / steers person; day-glo vests worn by cox & bow/steers person for a probationary period (particularly if tied in with certification);
2. Alternately using differing colours all coxes / bow / steer persons to have day glo vests – seen used to good effect on the river. Improves visibility and conspicuousness;
3. Certification of cox / steersperson should be compulsory: syllabus recommended to include a minimum time on the water in a training capacity;
4. Certification of coach boat drivers should become compulsory e.g. RYA Level II with ARA specific modules;
5. Increased education and effective training amongst the rowing community – noted as Attachment H
6. Personal Buoyancy Aids – ARA to continue investigation/research/design for a suitable aid for rowers;
7. Increased internal enforcement by ARA/TRRC/Clubs. At least for a period of introduction of any new Rules or Code of Practice. To be tied in with promulgation, enforce the rules with regards positioning, overtaking and manoeuvring;
8. To improve internal enforcement consider appointment by TRRC of ‘duty marshals’ to monitor activities at busy periods such as weekends. Divisional Representatives should play a significant role in this respect. Improve reporting and enforcement procedures within Clubs and Divisions.

THE SALVAGE ASSOCIATION

9. Review of accident statistics and action on trends to be visibly improved. Include in discussions with PLA at periodic meetings. e.g. the ARA statistics contain several comments querying the use of 4's on the tideway, particularly for inexperienced crews. Incidents with rowers caught out by stream on bridges and fixed marks continue, including 2005 during Ladies Heads meetings;
10. Provide guidance and take up as a theme the fact that user risk assessments should include better assessment of interaction with other craft – i.e. is it assessed sensible to row set pieces without deviation in a dynamic environment seen on the river;
11. The Water Safety Code provides little direct input relating to navigation. And in particular does not touch on navigation or collision avoidance. Produce a local Code or promulgate any Code decided after this study, to include local hazards and rules and the COLREGS. Emphasise role of COLREGS and in particular in collision avoidance;
12. If a system of rowing routes outside the main channel is chosen by the PLA, emphasise within training and publications that rowers proceeding against the stream are to remain adjacent to the bank. There must be greater awareness of other users;
13. Lookout – decide upon standardised guidance on frequency and operation and promulgate this widely;
14. Lookout – make this the focus of a safety campaign within rowing community. Monitor accident and incident statistics; take action against those where poor lookout is a feature;
15. Lookout – other options include lead by powered craft and verbal control; rear view mirrors (no formal assessment seen). The current situation must be improved and if not by better application of standardised guidance then other means must be introduced for safety;
16. Review enforcement actions open to rowing authorities:
 - a. Greater publicity of offenders;
 - b. Restrictions on competitive rowing, including removal of ARA membership;
 - c. Sanctions against Club for members and hosted rowers;
17. Buoyancy – it is imperative that all boats are sufficiently buoyant. Ensure adoption and compliance with international / national standards;

18. Navigation Lights - Standardised design of lights for fitting forward and aft with lights also visible from side;
19. Lights - Boats to be fitted with light mounting brackets forward and aft standardised for lights in No 17;
20. Lights - consider forward light having characteristics of a combined fixed and flashing/pulsating light (with fixed light aft)– discuss with PLA;
21. Lights – coach boats accompanying rowers at night are recommended to have a white light plus red/ green sidelights;
22. Locate or design a standard fitting for lights and for light characteristics and recommend these within the safety Code or other guidance;
23. Coach boats must actually be coaching to enjoy the concession of exceeding 8 knots and must be approved and certificated by the PLA as acceptable for wash;
24. Coach boats or safety boat should accompany all rowers at night / poor visibility; particularly single scull as potentially most vulnerable;
25. Continue with noted work towards boat identification against a standard system for identification, including the use of a code sequence such as “LRC 27”;
26. Use of day-glo and reflective strips on the vests or tops of single scullers, and at least the bowman and coxswain in larger boats and / or designate novice coxes and steerspersons;

15.5 Physical Mitigation of Risks:

1. If the right hand rule only is permitted across the full width of the river, mitigation of physical hazards will be required:
 - Drying banks and shallows. Place fixed marks at the ends and possibly periodically along the length. These marks could be either fixed timber piles or withies, or small watch-radius plastic buoys. These markers would probably incur some increased risk of contact. They would in any case potentially reduce the available width of river for rowing and constrain the rowers to within the main channel for much of the time, with detrimental impact on congestion and other users. Outside of safety issues the use of markers would probably be detrimental to the sport, due to the higher density of traffic in the channel, risk of contact with markers, particularly for rowers and would negatively impact on the sport of rowing.

THE SALVAGE ASSOCIATION

- Fulham Flats and the Flats opposite the Bandstand: these are fairly uniform in width but do have protruding banks that extend a considerable distance into the river. Marking would further constrain the available channel width and place rowers towards the centre of the fairway.
 - Removal of debris and obstructions. Increased reporting by rowers and/or detection by PLA Harbour Service personnel of obstructions over flats and at the edge of the fairway would be required.
 - Piers - these are outside the main channel and so only a hazard to those passing close by – e.g. rowers potentially. Should be apparent but possibly will still be hit. Additional marking is not felt to be of benefit.
 - Tidal Stream: consider 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.
 - At Putney, the present rowing route against the tide follows the track close to the Surrey bank and inside the moored boats upstream of Putney Pier, separating rowers from craft in the main channel. This benefit would be lost under right hand rule for the majority of the time.
2. Under either right hand rule or defined channel, mitigation would be required at pinch points:
- Define and mark the channel limit on the bridge; i.e. similar to road bridges with height restrictions. Use lights in similar manner to centre span marking but relative to channel edges, as shown on PLA charts;
 - Where there is sufficient width for multiple passage including outside the channel passage remains as above;
 - At bridges consider making rowing vessels use the starboard side – this would significantly increase crossing of the channel, and associated collision risk during crossing;
 - At bridges consider rowing vessels to proceed with caution (cautionary area indicated on the bank) where they may encounter the main channel - avoid impeding the passage of any vessel following the channel – i.e. wait until clear;
 - At bridges 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. Channel limits could be marked at the bridges;

THE SALVAGE ASSOCIATION

- No overtaking within a set distance from bridges, e.g. 200m. Area marked on the bank side;
 - Depth gauges to be placed on all bridges for assessment of when / where safe to use side and main arches.
3. At blind bends; restrict overtaking or prohibit overtaking within a set distance, indicated on the bank;
 4. Past Syon it is recommended to retain the right hand rule due to narrowness of the river;
 5. If a channel is defined and suitable channel limit is chosen it can be shown that the outfalls from the sewage works are outside the channel and therefore not necessary to go over them. Marking of the channel may be possible by simple signage alongside the bank, rather than physical marks in the river;
 6. Under a defined channel regime 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;
 7. Removal of overhanging tree limbs at bank side, principally at the islands. Ongoing this would need better communication between the PLA and user groups, rowers in particular to report problems.

Report Prepared by

Michael A C Laurie
for and on behalf of
The Salvage Association

Jason M Bennett
for and on behalf of
BMT Murray Fenton Limited