## **SUMMARY OF WRITTEN REPRESENTATIONS**

## ON BEHALF OF PORT OF TILBURY LONDON LIMITED AND LONDON GATEWAY PORT LIMITED

## REGARDING AN APPLICATION FOR A DEVELOPMENT CONSENT ORDER IN RESPECT OF THE PROPOSED THANET EXTENSION OFFSHORE WIND FARM

## **DEADLINE 1 (15 JANUARY 2019)**

This document provides a summary of the Written Representations of Port of Tilbury London Limited (POTLL – 'Other Person' reference: TEOW-OP006) and London Gateway Port Limited (LGPL – Registration No. 20011837) (referred to as the IPs) relating to the application for an order granting Development Consent for the Thanet Extension Offshore Wind Farm (TEOWF). The IPs are the owners and operators of the Port of Tilbury London (POTL) and DP World London Gateway (DPWLG) respectively.

Both POTLL and DPWLG are significant multi-modal ports with associated logistics facilities. In the year to 30<sup>th</sup> November 2018 the two ports handled a combined total of over 23.8 million tonnes of imports and exports, equating to approximately 7% of total UK port capacity. Both ports are also subject to significant expansion plans including committed expansion at DPWLG for development to facilitate an additional 2.2million container (TEU) movements per annum alongside an additional 717,000sq.m of industrial floorspace and the Tilbury2 proposals, currently the subject of an application for development consent with a deadline of 20th February 2019 for the Secretary of State to make his decision.

The IPs have significant concerns regarding the impacts of the proposed TEOWF on shipping, and the resulting impacts on the ability of POTL and DPWLG to operate in an efficient and competitive manner. Such impacts conflict with the policies and objectives set out in the National Policy Statement for Ports, which demonstrates the essential role that UK ports play in supporting the regional and national economy. The impacts also conflict with the policies and objectives in respect of navigation and shipping set out in the National Policy Statement for Renewable Energy Infrastructure (EN-3).

Having scrutinised the assessments (including the Navigational Risk Assessment) submitted in support of the application to the extent possible in the time available, and noting the complete absence of any consultation with the IPs prior to the application for development consent, the IPs are of the view that those assessments are not sufficiently extensive and robust to address the stated concerns. In the absence of suitable assessments, POTLL and LGPL have proposed (at Annex 4 of Appendix A of their Written Representations) revisions to the DCO's Order Limits, which POTLL and LGPL believe would mitigate the potential impacts (this view is also shared by the PLA and Estuary Services Limited).