

National Infrastructure Planning,
Temple Quay House,
Temple Quay,
Bristol BS1 6PN

Dear Sir / Madam,

RE: Response of Port of Sheerness Ltd to The Examining Authority's third written questions and requests for information (ExQ3) Issued on 16 May 2019

QUESTION

3.12.16. Port of Sheerness Ltd (PSL)
Effects on navigation-shipping routes adjacent to the development

In the Applicant's Response to [RR-011] Port of Sheerness Ltd PSLM-1, it is stated that:

- a) "All existing routes remain navigable by existing vessel traffic and potential changes to these routes (in terms of time and distance) that may arise as a result of the proposed project have been identified and assessed. The conclusions are presented in Table 10 of the NRA (PINS Ref APP-089/ Application Re 6.4.10.1) and are that the changes are considered minimal."
- b) "The changes to routing are considered to be minimal with no alteration to shipping lanes/routes beyond a reduction in the route between the Array and land to the south-west; this change is in an area with significantly less traffic than other routes within the immediate area. As such it is not expected that there would be any significant effect on routing of traffic."

Does Port of Sheerness have any further comments to make on the development proposal in relation to shipping traffic and potential commercial or economic consequences of any effects to shipping and port operations?

RESPONSE

Port of Sheerness Limited(PSL), is the Statutory Harbour Authority for the River Medway and a 50% shareowner in Estuary Services Limited(ESL). ESL & Port of London Authority(PLA) as formal IP's have made various representations regarding the effects on navigation routes adjacent to the proposed extension and, in particular NE Spit / Tongue / Elbow routes and pilotage boarding and landing areas. PSL pilots make significant use of these pilot boarding & landing areas and consider the extension proposal will result in economic and commercial consequences for all three stakeholders, should it be Consented in its current form. PSL support submissions made on behalf of ESL at various stages of the Consultation process and continue to support through their shareholding in that company.

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PSL would support a commercial discussion and engagement that mitigates any/all of these issues through pragmatic and robust navigational risk assessments and commercial impact reduction.

QUESTION

3.12.20 Port of London Authority (PLA); Maritime and Coastguard Agency (MCA); Trinity House (THLS); POTL/LGPL and PLA and London Pilot Council (LPC); Thanet Fisherman's Association (TFA); UK Chamber of Shipping (UkCoS); Port of Sheerness Ltd (PSL)

Textual changes to the NRAA made at deadline 5

Would the IPs comment on the recent textual changes in regard to traffic projections made at Deadline 5 to the NRAA (rev B) [REP5-039] insofar as relevant to this DCO application:

- a) Para 121: "...slightly downward trend in chargeable ship arrivals over recent years..." albeit "...PLA figures do not include other estuary ports...";
- b) Para 122: "...precautionary 10% uplift in hazard likelihood has been applied...in line with other OWF NRA assessments...and is reflected in the Tilbury 2 NRA...";
- c) Para 123: "...It is important to note ...[that the MMO] future analysis for the region assumed that overall freight tonnage would increase, by between 1% and 2% per [sic] the trend for larger vessels would continue, and that the Thanet Extension OWF would be consented."
- d) Para 124: downward or static trend for recreational and fishing activity; and
- e) Para 125: additional WSV (traffic) associated with the TEOW; "WSV engaged on other projects within the Thames Estuary and transiting through the study area are anticipated to remain largely the same...based on consultation."

RESPONSE

PSL were not directly consulted in regard to the HAZID workshop or the development of the NRA or NRA Addendum and therefore cannot comment on the textual changes other than:-

There has been an increase in chargeable ship arrivals at Medway ports using NE Spit Boarding and Landing Station of 7.82% comparing 2016 and 2017 Pilotage Acts and 5.16% comparing 2017 and 2018 Pilotage Acts, representing a total increase of 12.98% over a 3 year period. PSL consider this trend will continue. Whilst the trend may be for larger vessels in the Estuary as a whole, the River Medway has terminals unsuited to such vessels and therefore consider the continued use by smaller vessels in the future should be taken account of when quantifying and forecasting future trade.

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QUESTION

3.12.21 Port of London Authority (PLA); Maritime and Coastguard Agency (MCA); Trinity House (THLS); POTL/LGPL and PLA and London Pilot Council (LPC); Thanet Fisherman's Association (TFA); UK Chamber of Shipping (UkCoS); Port of Sheerness Ltd (PSL)

Additions to the NRAA made at deadline 5

Would the IPs comment on the recent textual changes in regard to risk assessment made at Deadline 5 to the NRAA (rev B) [REP5-039]:

- a) Para 135: Additional Risk Control: Enhanced promulgation of information (redrafted); Shipping and Navigation Liaison Group Terms of reference (redrafted); Post-consent Monitoring (redrafted); Enhanced optimisation of TEOW line of orientation etc (redrafted); Aids to Navigation etc (redrafted);
- b) Paras 141 to 144 and Table 19: New insertion in rev B;
- c) Para 145: "...*the assessment of cost benefit in the original NRA remains valid.*"
- d) Para 146: Summary results of the hazard workshop (New Annex C to Deadline 5 submission) "...*ID's 4-18 [sic]...were updated based on IP comments...*";
- e) Ranked Hazard list (now Table 20) changed to omit columns for individual baseline and inherent risk scoring with colour grading; the highest inherent risk score now being 4.80 (previously 4.34); residual risk scores added to rev B.
- f) Para 147: hazards with baseline risk ALARP-rated now seven in number (previously four in number);
- g) Paras 152-154: New paras on hazard likelihood including a return rate for all commercial vessel collisions of 1 in 10 years to reflect stakeholder concerns;
- h) Para 157: hazards with inherent risk ALARP-rated now eight in number (previously four in number);
- i) Paras 158-160: New text on residual risk assessed;
- j) Paras 169-173: New Text on Risk Control Validation;
- k) Para 174: Added conclusions text on hazard consequence scores provided by PLA/ESL at D4C "...*which has been used to update some hazard consequence scores.*"

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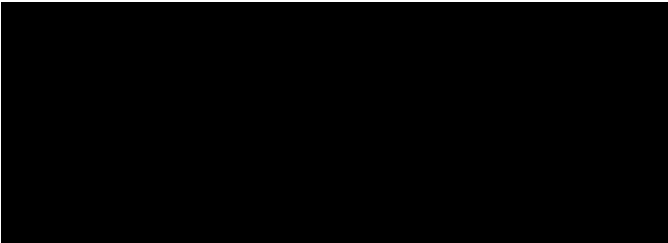
- l) Para 178: Added text on feedback from DPWLG on risk consequence scores; and
- m) Para 184: New text varying the Recommendations made in the revA NRA Addendum.

RESPONSE

PSL were not directly consulted in regard to the HAZID workshop or the development of the NRA or NRA Addendum and therefore cannot comment on the textual changes. In consideration of the lack of common ground between the stakeholders and Applicant, PSL consider a further HAZID workshop and revised NRA together with a further pilot transfer bridge simulation be conducted prior to any Consent on the proposed development.

PSL would support a commercial discussion and engagement that mitigates any/all of these issues through pragmatic and robust navigational risk assessments and commercial impact reduction.

Yours Faithfully,



Anthony Slater
**Senior Manager Marine Operations,
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Port of Sheerness Limited.**

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