

Section 56(2) Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**Application by Five Estuaries Offshore Wind Farm Limited for an Order Granting Development
Consent for the Five Estuaries Offshore Wind Farm Project**

Planning Inspectorate Reference: EN010115

RELEVANT REPRESENTATION BY

PORT OF TILBURY LONDON LIMITED (PoTLL)

1. SUMMARY

- 1.1 The Port of Tilbury London Limited (**PoTLL**) does not have an in-principle objection to the proposed Five Estuaries Offshore Wind Farm (**FEOWF**), and is very supportive of the renewable energy objectives the scheme would deliver. However, PoTLL has several concerns about matters in the draft Development Consent Order, and there are areas where more information, detail and agreement by PoTLL to the proposed approach is needed. PoTLL's primary concern is around the impact of FEOWF's proposed export cabling corridor on the deep-water channels that large vessels necessarily rely on to access and operate the Port of Tilbury (the **Port**).
- 1.2 Details of PoTLL's position will be set out in its Written Representations or other written submissions in the Examination process, given the material submitted by FEOWF is substantial and PoTLL requires more time to evaluate it to fully inform its position. At this stage, PoTLL refers to and supports the Port of London Authority's (**PLA**) Relevant Representation, which sets out the PLA's concerns, as shared by PoTLL, over the potential short and long-term impacts to navigation, capacity and operation of the ports. These are particularly from works associated with the export cabling corridor, where impacts may include:
- permanent impacts because of FEOWF cable depths;
 - temporary impacts from cable laying and repair;
 - permanent impacts from interaction with third party schemes (cable crossings);
 - temporary impacts from interaction with third party schemes (simultaneous operations);
 - permanent impacts from the location of the offshore sub station platforms;
 - temporary and permanent impacts from the safety zones;
 - temporary and permanent impacts from dredging; and
 - temporary impacts to onshore navigational equipment.

2. OVERVIEW OF THE PORT OF TILBURY

- 2.1 This Relevant Representation has been prepared by PoTLL as the landowner and statutory harbour authority of the Port (comprising both Tilbury1 and Tilbury2). PoTLL holds its statutory undertaking pursuant to the Port of Tilbury Transfer Scheme 1991 (given effect by The Port of Tilbury Transfer Scheme 1991 Confirmation Order 1992), which transferred the powers and duties of the Port of London Act 1968, within the area of the Port, to PoTLL.
- 2.2 The Port is located on the north side of the river Thames in Essex and is 22 nautical miles east of central London. It is London's major port and is one of the largest multi-purpose ports in the UK, covering over 1,000 acres with 56 berths, over 10km of quay, 31 independent terminals and 5 million sq ft of warehouse space. Currently there is a single point of access to the Strategic Road Network via the A1089, catering to 8,000 vehicle movements per day. The A1089 routes north to the A13 and onwards to the M25 via Junction 30. The Port of Tilbury provides fast, modern distribution services, by water, rail and road for a full range of cargoes, cruise passenger traffic, and is home to the London Container Terminal.
- 2.3 PoTLL is the key employer in the area, directly employing around 700 full time staff. Taking account of tenants and including induced, indirect and operator and tenant jobs, the Port of Tilbury supports up to 11,000 jobs in total.
- 2.4 The Port offers operational support for a range of cargo, including bulk handling operations of containers and grain and dry bulks, paper and forest products, cargo with roll on/roll off berths,

recycling and a deep water cruise facility. It is a critical link in a wide range of supply chains for companies catering to all parts of the UK economy. It is the UK's greenest port, with a focus on sustainability and ongoing investment in renewable power, water and fuel saving solutions and continues to expand to meet demand for its services.

- 2.5 The location and facilities of the Port are such that it is frequently the 'safe port in a storm'. The location upstream in the river Thames provides shelter from adverse weather. This means vessels are often diverted from other ports when adverse weather means it is unsafe to dock in those ports, such as Felixstowe. Similarly, when access to Dover is blocked due to road congestion, vessels will divert to the Port due to its close proximity.
- 2.6 In addition to its current large-scale operations, PoTLL is embracing growth through its partnership with Thames Freeport to facilitate an economic zone which will stimulate global trade, foster innovation and support the energy transition across 1,700 acres of development land. The Thames Freeport was designated in November 2021 by the Designation of Freeport Tax Sites (Thames Freeport) Regulations 2021 (the Freeport Regulations), and final approval was given in March 2023. The Thames Freeport will mean continued public and private investment and development at the Port as a major logistics hub and expansion to the east of the Port. The key objectives of PoTLL's future expansion are to: create new employment opportunities, facilitate economic growth to assist regeneration on a local and regional scale, and drive PoTLL's economic contribution to meet the needs of PoTLL's current and future customers (relevantly including renewable power).
- 2.7 For the important social and economic reasons outlined above, it is vital that the Port operate without disruption or interference during the construction and operation of FEOWF.

3. **POTLL'S PRIMARY CONCERN**

- 3.1 The facilities at the Port relevantly include deep water facilities complete with a deep water jetty, meaning larger vessels can and do divert to it to unload cargo to avoid shipments being delayed, ensuring timely shipping – essential in the case of time sensitive and perishable goods.
- 3.2 While FEOWF does not fall within PoTLL's jurisdiction, its proposed export cable corridor crosses the deep water routes which service both the PLA and the Port. The deep water route is the only approach available for large vessels to access the Port. Therefore, PoTLL restates that its primary concern is around the impact of FEOWF's proposed export cabling corridor on the deep-water channels that large vessels necessarily rely on to access the Port (and PLA).
- 3.3 PoTLL reserves the right to submit more detailed representations in respect of matters raised in this Relevant Representation, and to alter, amend or expand on its concerns through the Examination process.