



an important foraging and breeding area for seals and all of the three proposed substation sites are located close to the Pegwell Bay seal colony".

*My comment is this is meant to be an environmentally friendly project and the applicant has shown scant regard for any environmental impact. Again interesting technology but in the wrong location.*

### **Maritime & Coastguard Agency 13.12.19 -**

*MCA response to the applicants latest effort regarding a collision assessment -*

"The report recognises that one month's Automatic Identification System (AIS) data has been used in the assessment and notes that data on non - AIS vessels and near miss incident data has not been included"

*Why has the applicant not included this? To massage the figures to support a best case scenario? An amazing omission that in my mind speaks volumes of the applicants arrogant attitude to other users of the sea and to the planning authorities.*

"however when comparing the results against Hornsea One and Two sites (Appendix 42, paragraph 14) it should be noted that these two wind farms are more than 50 nautical miles where there are different vessel types in the area, different traffic patterns and densities, including where pilot transfers and pilotage operations do not take place. Collision risk is normally higher closer inshore where there are greater traffic densities and more constricted traffic routes".

"The two sites are not suitable for comparing collision risk".

*So in my opinion the applicant can not even compare like with like as they know it will show that this development is planned for the wrong location.*

*This issue of the site being the wrong location is further demonstrated by the below -*

"Also worthy of mention is the Maersk Nottingham incident in 2009 where, although not a collision incident, the vessel suffered engine failure, and without the assistance of the Thanet wind farm construction tugs she would have drifted into the wind farm site."

*Maersk are an international operator of many types of shipping. If they can suffer an engine failure so can other operators. The wind farm operator has no such experience and is a subsidy hungry organisation set up for one aim - get subsidy to make a profit. In my opinion their inability after all this time to submit meaningful like with like comparisons should cause a review of their fitness to operate any offshore wind farm. See below further illustration of the applicants repeated failure to address issues -*

"The MCA's concerns on navigation safety risk, as highlighted in our response to the Examining Authority for Deadline 6, have not changed"

"Overall, there are still too many outstanding elements of the NRA not agreed, for MCA to confirm that this assessment addresses and satisfactorily assuages our concerns".

"Our concerns remain that there has been a failure to obtain IP agreement regarding the risk to pilots, along with the other NRA related aspects".

"The MCA has considered the DCO/DML and we would like to highlight the following aspects which are not in line with the MCA, Trinity House and the Marine Management Organisations (MMO) agreed navigation safety conditions for offshore renewable energy installations (changes requested are shown in blue) "

*See pages 4, 5, 6 of the Maritime & Coastguard Agency letter dated 13.12.19 for the details of what needs changing. It is a substantial amount that yet again the applicant has failed to address or arrogantly believes they can ignore. Presumably as they view it as not being their lives at risk and that any damage to the environment from a collision such as oil spill is not important.*

### **Port of Tilbury London Limited and London Gateway Port Limited 13.12.19 -**

"Failure to properly consider growth" "This fails to recognise the particular characteristics of the area in the vicinity of the TEOWF which is subject to extensive new port development (including that at DP World London Gateway and Tilbury)"

"Applicants failure to properly consider local context for growth in the assessment of the TEOWF"

*A further example of the applicants inability to understand the impact of what they are proposing is provided by the below -*

"Thus, the absence of consideration for anchored vessels further draws into question the robustness of the conclusions of the CRA. [Vessels at anchor are clearly a material consideration for the purpose of safety of navigation and the Ports consider that the omission of such vessels is detrimental to the validity of the assessment".

*I can assure you that from my flat I can often see 2 or 3 ships at anchor and in storm conditions sometime 6 vessels. And that is only a partial view of the area involved. The applicant seems to have no understanding of the impacts of its operations. This is further illustrated by the below -*

"There is, however, no evidence that the matters raised by the Ports in their response to consultation on the specification dated 30 July 2019 (the Specification Response) (attached as Appendix A) were afforded due consideration by the Applicant and to the contrary, they appear to have largely been dismissed out of hand"

"The Applicant will seek to accommodate reasonable requests from IPs and, in the event that agreement cannot be reached, divergence of views will be recorded in the simulation report""However, following submission of the Specification \response there was no further discussion of the concerns raised therein and such matters remained unresolved. Furthermore, the resulting divergence of views is not represented in the second PTSB report. To the contrary, Annex 1 of the second PTSB Report is misleading in that it suggests such matters were addressed by the second PTSB, which does not appear to be the case".

*So yet again we have a applicant that is not consulting correctly and ignoring views it does not like.*

*See Section D - Reporting of the simulations. There is a long list of what was found wanting with the simulations on pages 6,7,8.*

*Page 9 has in the conclusion -*

"Reporting of the simulations: finally, the Ports have concerns that the reporting of the simulations, as set out in the second PTSB report, is not entirely representative of the simulations undertaken and that the the conclusions drawn out within the report are not therefore suitably robust".#

*I can not help wondering to what lengths and risk to life and the environment the applicant will go to get a result it wants?*

"In view of the above, the Port's concerns regarding the impact of the TEOWF on shipping and navigation interests are sustained and the findings of the second PTSB report do not allay the concerns in this respect raised during the Examination of the Application".

**Letter from Charles Russell Speechlys on behalf of Ramac Holdings (Trading) limited dated 12.12.19 -**

" We would submit that the very fact that the Secretary of State requires further details and additional evidence from the Applicant at this late stage is most telling"

"It is our client's position that the Applicant has had more than ample opportunity to put forward detail and evidence to support its case, but has failed to adequately do so throughout the whole DCS process".

*This speaks volumes about the applicants arrogance, lack of care and regard for due process and the safety of shipping and the environment and risk to life that arise from the risk of collision.*

**UK Chamber of Shipping - email sent 13.12.19 -**

"The chamber expresses its continued concern that an increase in risk of collision is not deemed to be "significant" within this application, especially when it coincides with a reduction in sea room. It is understood by all that a reduction in sea room, which subsequently reduces the navigable waters for vessels to safely manoeuvre, will increase the risk of collision"

*As I said before interesting technology but the wrong location for it.*

**Port of London Authority and Estuary Services Limited response dated 13.12.19 -**

"the PLA and ESL's concerns about the effects of the proposed Extension remain largely unaddressed by the Applicant . The extension would encroach into the existing shipping lanes, lengthening journey times into the Port for commercial services that would have to re-route around the extended wind farm. The National Policy Statement for Ports (January 2012) recognises that shipping will continue to

provide the only effective way to move the vast majority of freight in and out of the UK, and the provision of sufficient sea port capacity remains an essential element in ensuring sustainable growth in the UK economy".

"Two of the top ten largest ports in the UK are located on the banks of the Thames Estuary"

"The existing wind farm already presents challenges to ESL and PLA Pilots, especially during busy times and particularly during periods of strong winds, causing delays to vessels arrivals within the Port of London; these challenges would be exacerbated by the proposed extension. The PLA and ESL consider that any extension to the south and west of the existing wind farm will increase significantly the risks to navigation for all types of vessels, especially those using the North East Spit Boarding and Landing Area to enter or depart the Thames Estuary".

"With the above in mind, and in consideration of the PLA's and ESL's formal submissions made throughout the examining process, the PLA and ESL respectively request that the proposal to extend the existing off shore wind farm at Thanet is refused".

*In summary my comment is - Interesting technology but this is totally the wrong location to install it.*

Yours faithfully

A solid black rectangular box used to redact the signature of Ian W B Hide.

Ian W B Hide.