

# TravelWatch- **ISLE OF MAN**

## Arrey Troailt – Ellan Vannin



Representing and promoting the interests of Isle of Man Passengers

[www.travelwatch-isleofman.org](http://www.travelwatch-isleofman.org)

6 December 2012

Celtic Array Ltd,  
1<sup>st</sup> Floor, Churchill House,  
1 London Road, Slough SL3 7RL.  
(by e-mail: [info@celticarray.com](mailto:info@celticarray.com) )

Dear Sirs,

### **Rhiannon Wind Farm Proposal - Consultation under Planning Act 2008 Representation and Objection**

We write on behalf of our members and of the travelling public to express and record our concerns and objections regarding your above proposed development and its adverse effects on the vital ferry services between England and the Isle of Man (IoM).

We request that you read this letter in conjunction with our letter of 21 June 2012 to Celtic Array and with the Notes of Meeting held on 9 August 2012 with Celtic Array representatives Louise Rich, Laura Jeffs, Tom Suddaby and David Atkinson, where we describe the background and aims of our organisation, and express our concerns regarding the consequences of any adverse effects on the ferry links to the IoM.

Further to our recent meeting on 28 Nov 2012 with your Louise Rich and David Atkinson, and our visits to your community consultation exhibitions held on the island, 30 Nov to 3 Dec 2012, we wish to raise the following points and **request your answers to each as a matter of urgency.**

- In your Preliminary Environment Information document of October 2012 , para 8.133 states that 'Following the publication of the ZAP Report, two ferry companies (Seatruck Ferries and Isle of Man Steam Packet Company ) raised concerns about the potential for development to impact their regular routes. These concerns focused on deviations to direct routes, availability of adverse weather routeing... .' Whilst this statement may be correct, do you not agree that it could be interpreted as misleading, in that it gives the impression that the Steam Packet had NOT raised these issues before the publication of ZAP. We understand that the Steam Packet and Isle of Man Government have raised these concerns much earlier, and are still seeking a satisfactory response.
- The Preliminary Environment Information document contains some information on adverse weather routes in general, such as Figs 8.28 and 8.29 with plots from limited dates. Para 8.91 also refers to AIS data selected from the first two weeks in March and second half of June. We believe it is essential that adverse routeing data collected over much longer periods is used in order to build up an accurate picture. Can you assure us that you will be reassessing using the full records which we understand that the Steam Packet are making available?

- At the exhibition, the displays had little or no information on shipping and navigation issues, and no information on Manx ferry routes. In view of their importance to the Island, we are asking why you did not display this important information, at least at the three IoM exhibitions. We note that you provided Welsh language information at your North Wales exhibitions.
- At the exhibition, we were surprised at how little effort was made to draw the public's attention to your questionnaires. Are you able to summarise the response you received from the questionnaires at the three IoM exhibitions?
- In view of the late dates of the exhibitions on the IoM, and the very limited time scale for responses, will you extend the cut-off date beyond 20 Dec 2012? Do you undertake to accept and consider responses which you receive after that date?

We understand that the purpose of the processes of the Planning Act 2008 is to identify all issues and to attempt to resolve differences by 'statements of common ground' at an early stage. We have concerns that Celtic Array are waiting passively for the public to raise issues, rather than Celtic Array taking a pro-active role. Based on procedures in the UK leading to public inquiries, we would have expected a much more systematic and comprehensive tabulation of the pros and cons for your proposals. Will you be providing this as part of your preparations for the Stage 2 Consultations?

**We formally object to your proposal for the Rhiannon wind farm with the boundaries for development shown in your Community Consultation Document of October 2012 due to its likely impact on the Steam Packet's Douglas – Liverpool adverse weather routes.**

We note that in the same document, you refer to the Rochdale / engineering envelope used to present the combined worst case scenarios, and note that your proposals are subject to refinement and modification. Unfortunately at the 28 Nov meeting and at the exhibition, your representatives were not able to discuss your Indicative Turbine Layouts shown in Figures 4 and 5 of the Community Consultation Document. It appears that these are 'indicative' in the sense that the turbines have been spread out in order to fill the full area, with rectangular grids using spacings of approx 8.9 rotor diameters east-west, and approx 6.4 rotor diameters north-south (measured by scaling). We append (Appendix 1) a version of the same figures in which we have produced alternative layouts which comply with your stated criteria, with a minimum spacing of 7 rotor diameters, and with installed capacity of 2.2 GW. We have not discussed this alternative layout with the Steam Packet, but believe that it might have less adverse effect on the Liverpool adverse weather route. We are not necessarily suggesting that this alternative layout would be a satisfactory solution, but are submitting the details to demonstrate that in your proposals, you have made provision for 'wiggle room' to allow for negotiation with affected parties of the limits and boundary positions of Rhiannon. In accordance with para 1.15 of the Preliminary Environmental Information which confirms that 'the proposals are relatively flexible', we are seeking meaningful modification prior to Stage 2, and ask how soon will you be in a position to discuss the actual proposed layout and extent of the turbines array?

We shall be pleased to receive confirmation that you have received this submission, and look forward to your response to the points which we have raised.

Also, can you assure us that our comments re effective consultation will be taken on board should you decide to proceed with the even more contentious NE Area wind farm?

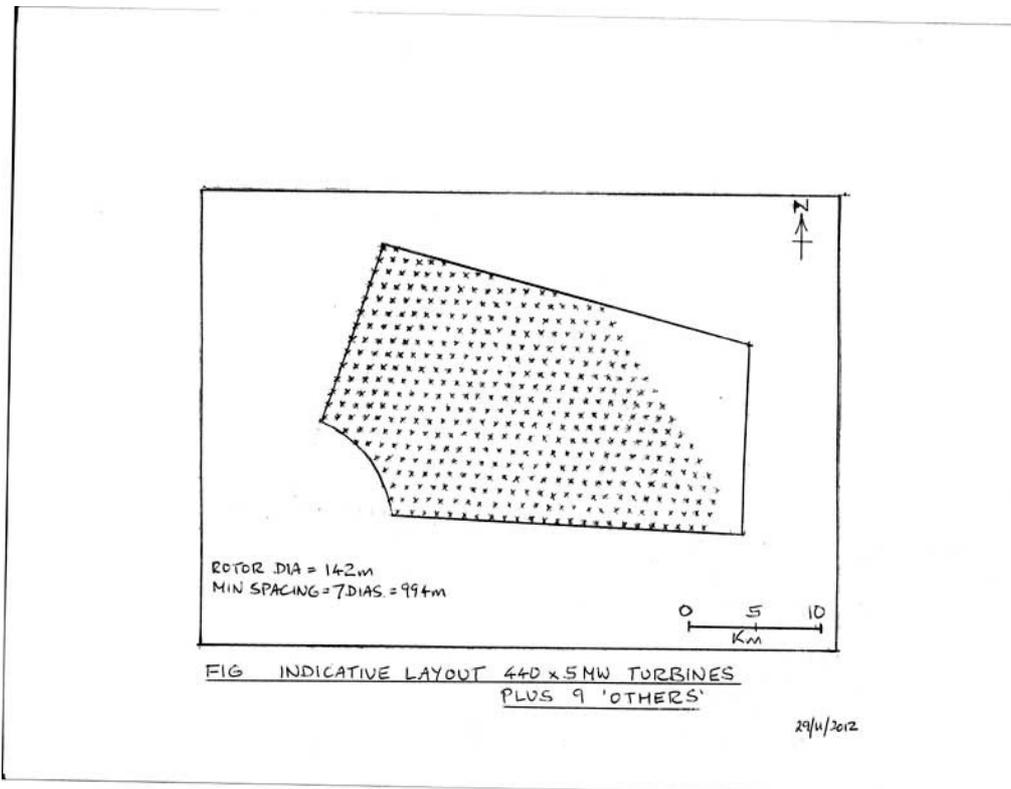
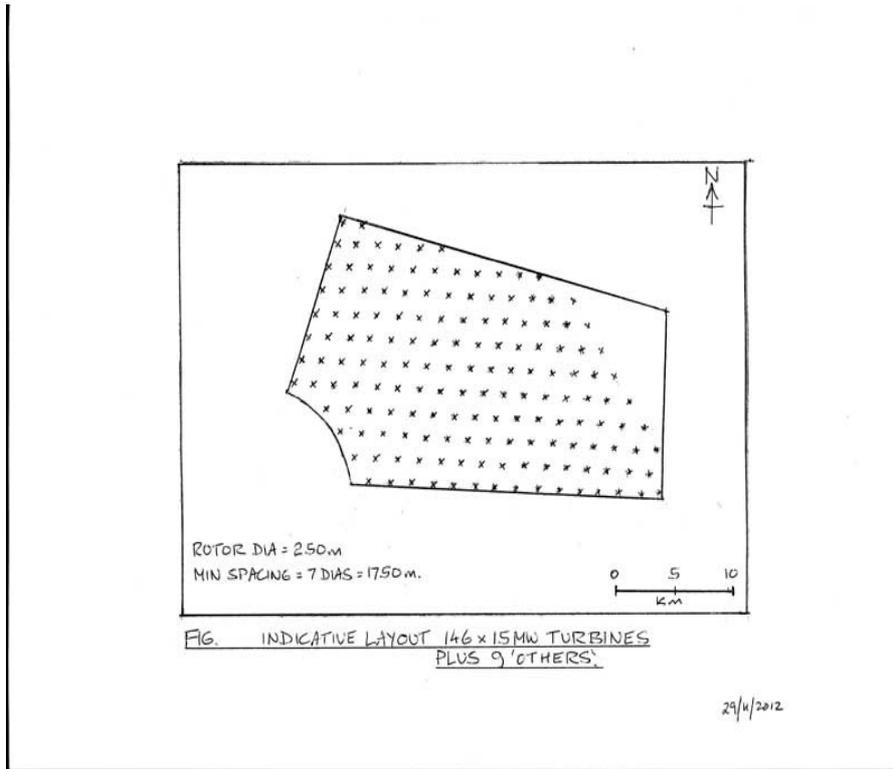
Yours faithfully

*Brendan O'Friel*

Brendan O'Friel  
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Chairman TravelWatch- Isle of Man

**APPENDIX 1**

2 no Figs of turbine arrays.



## APPENDIX 2

### Isle of Man Newspapers on-line Web Poll

<http://www.iomtoday.co.im/news/isle-of-man-news/a-very-real-threat-to-our-sea-going-lifeline-1-5178500?showResult=true&pollContentId=7.131036>

#### Results as at:

Tuesday, 4 December 2012

The windfarm company Celtic Array is proposing offshore wind farm development that will restrict our sea-going lifeline. What is your opinion?

- We need to protest in the strongest way possible and lobby our government to do the same.

988 (69%)

- If it has to happen, so be it. We need cleaner energy production.

84 (6%)

- We need the energy, but the siting of the development needs to change.

232 (16%)

- It doesn't matter what we do, large corporations will have their way.

137 (10%)