

TravelWatch- *ISLE OF MAN*

Arrey Troailt – Ellan Vannin



Representing and promoting the interests of Isle of Man Passengers

www.travelwatch-isleofman.org

14 November 2012

Jodie Hall
Dong Energy Walney Extension (UK) Ltd
33 Grosvenor Place
London SW1X 7HY
by e-mail: walneyextension@dongenergy.co.uk

Dear Sirs,

Proposed Walney Extension Offshore Wind Farm DCO Application Consultation under Planning Act 2008

Objection on Behalf of Ferry Passengers

We are writing on behalf of passengers who travel by ferry between England and the Isle of Man, to formally express our objection to your current proposals for the above wind farm development. Passengers are a group who appear to have been completely omitted from your consultations. There are around 550,000 Isle of Man passenger journeys made by sea each year via the ports of Liverpool and Heysham. Approximately 55% of these are made by visitors from the UK or further afield. These ferry services are regarded as the Island's lifeline and any disruption is detrimental to both the Island's population and visitors.

TravelWatch Isle of Man (TWIOM) is a well-established voluntary organisation founded to represent the interests of passengers using all aspects of public transport to, from and on the Isle of Man. We have links with other TravelWatch organisations in the UK. TWIOM aims to have good working relationships with, but is totally independent of, transport operators and governments. Our recent enquiries of both IOM Harbours and the Isle of Man Steam Packet Company (IOMSPC) have confirmed that your above proposals fail to demonstrate that you are taking adequate account of their possible effects on shipping services to and from the Isle of Man.

TWIOM neither supports nor opposes wind farms. Our objection arises because of the adverse effects of your current proposals on ferry passengers between the Isle of Man and Heysham. Your proposals constrain the existing shipping route, and together with the nearby proposals by Celtic Array Ltd for the NE Area of their Irish Sea Zone, they restrict bad weather diversion route options, with potentially damaging consequences for Isle of Man passengers, as we will demonstrate below.

Affected Ferry Services

IOMSPC have provided a service between the island, which has a rising population of 85,000, and ports in North West England for over 180 years. The IOMSPC current well-established service between Douglas and Heysham consists of two return sailings every day. The only exception is Christmas Day, when there are no sailings, and a short period in winter when there is only one return sailing on Saturdays and Sundays. This service also conveys vehicles and freight. For passengers, reliability of service and the costs of the service are very important. This is particularly so for IOM passengers because of the numbers connecting to/from UK rail services and other forms of public transport. Over 200,000 (36.5%) of the Steam Packet's passengers travel without cars.

Also, there are significant peaks in demand during the year, of which the most acute is the annual TT motorcycle festival when the IOMSPC undertake additional sailings in a very restricted time scale. Although the TT is in the summer months of May and June, adverse weather can affect operations. Any further constraints on the Steam Packet's operations would have a very serious effect on the TT Festival, causing great concern to the large community of motorcycle enthusiasts who come from many parts of the UK and from the wider world, but also to the Island's tourist economy.

Your latest proposals are unacceptable under normal operating conditions, as, together with Celtic Array's current proposals, they would constrict the long-established direct route between Douglas and Heysham. This appears likely to result in increased journey times, with associated increases in fuel consumption, crew costs and passenger fares.

Under Adverse weather conditions, your latest proposals are even more unacceptable as they would obstruct weather routing options resulting in:-

- Substantially increased journey times, with increased fuel and staff costs.
- Additional passenger discomfort resulting from worse routes and longer journey times.
- Disruption to timetable with consequent risk of missed connections to/from onward destinations.
- Increased likelihood of service cancellations to prevent discomfort, and for safety margin in restricted sea lanes, with consequent disruption to passengers including costs of overnight accommodation and even cancellation of journeys and holidays.

Inadequate Community Consultation for Ferry Passengers

- 15 Sept 2011: The plans displayed at Walney Extension Community Consultation event held at the Villa Marina, Douglas did not show the Isle of Man. The (undated) Walney Offshore Wind Farm leaflet and the (undated) Walney Extension Offshore Wind Farm leaflet issued at the event showed neither the Isle of Man nor made any reference to shipping routes. Hence any effect on ferry services not apparent to the Manx travelling public.
- January 2012: The (undated) Walney Extension Mini Consultation Report (First Round Events) made no reference to shipping or the Isle of Man. The Community Newsletter No 1 (Winter 2011) made only the briefest reference to a survey of shipping movements).

- 5 Sept 2012: Walney Extension Community Consultation event held at Villa Marina, Douglas. In the Walney Extension Preliminary Environmental Information (PEI) Non-technical Summary (August 2012) document, the only plans showing the Isle of Man are small scale (pages 26 , 35, 38), whereas the shipping plan on page 33 does NOT show the Isle of Man. The table on page 63 and accompanying text note that there is the 'potential for a significant cumulative impact to arise from the (Walney Extension) project' together with the 'Irish Sea NE Project' regarding 'shipping and navigation.' Despite Dong being a constituent part of Celtic Array, the Dong document does not show the nearby proposed Celtic Array Ltd Irish Sea Zone (NE Area) wind farm.

Cumulative Impact Assessment for Shipping and Navigation

As noted, the above PEI Section 3.2 makes no specific reference to the regular Douglas – Heysham ferry route which, in normal weather conditions, passes very close to the proposed Walney Extension wind farm. In bad weather, the wind farm would restrict alternative routings.

TWIOM has recently had sight of a letter from Dong letter dated 1 October 2012 which states, ' a cumulative simulation based on various realistic scenarios in the Irish Sea ... was undertaken on Monday 24 Sept (2012) at Fleetwood Nautical College and results ... will be distributed to key stakeholders in report form in the near future. This report will then form the basis of a cumulative impacts Navigational Working Group which will feature ... IOMSPC and government representatives.'

We are concerned that the late timing of this important exercise indicates it to be something of a belated 'damage limitation' afterthought, as we note your stated intention to submit plans to the Planning Inspectorate in March 2013. In view of this timescale, we request that you send the details of the results of this exercise to us as soon as possible, as a matter of urgency.

Objection to Walney Extension

For the reasons set out above, TravelWatch Isle of Man hereby registers our objection on behalf of Isle of Man passengers to your current proposals. TWIOM considers that your proposal should not be allowed to proceed in isolation. As a priority and with urgency, the combined effects on shipping and navigation of the proposed Walney Extension and Celtic Array Irish Sea Zone wind farms need to be fully identified and published widely. Such matters, including legally binding provision for IOMSPC Heysham and Liverpool routes through the nearby Celtic Array NE Zone, must be resolved to the satisfaction of shipping interests and of their passengers before the scheme is allowed continue.

At the well-attended TravelWatch Isle of Man Public Meeting held on 10 November 2012, a briefing was given by Capt Michael Brew, IOM Director of Harbours, and our concerns and reasons for objecting were fully described and discussed with our members and supporters. On their behalf, we request that this letter is placed on record and that you will provide us with a prompt and considered response.

Correspondence and Response

Will you please address any correspondence in connection with this submission to our lead member for wind farms:

John Pennington
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Your faithfully,

Brendan O'Friel

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