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**Director of Planning & Building Control**  
**Michael Gallagher, M.R.T.P.I.**

Jack Farnham  
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Offshore Scoping Response  
C/o B9 Energy Offshore Developments Limited  
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9<sup>th</sup> April 2014

Dear Mr Farnham

**Re: Consultation on First Flight Wind Offshore Scoping Report**

Thank you for providing the Isle of Man Government with the opportunity to review and comment on the above document. We found it a very interesting consultation document and eagerly await its outcome. On behalf of the Isle of Man Government (and our agency Manx National Heritage), I would comment as follows.

The Isle of Man Government is supportive of a transition to a low carbon economy ensuring the continued energy security of the British Isles for future generations. The generation of energy from renewable sources is not just essential environmentally but will create economic opportunities throughout the British Isles, creating new jobs in the construction and operation of offshore wind farms. I would also draw your attention to the recent Isle of Man Government announcements regarding our own strategy to develop offshore renewable energy projects in the Isle of Man territorial sea.

The document provides the reader with an overview of what First Flight Wind will undertake in order to develop their proposals within the Irish Sea. The Isle of Man Government is satisfied from this document that First Flight Wind will endeavour to meet all international standards and best practice when undertaking and analysing the data obtained within the proposed site, and will ensure appropriate mitigation measures are in place to address any concerns identified throughout the Environmental Impact Assessments which will follow in due course. We appreciate that First Flight Wind will have to progress along a rigorous consenting process prior to any development being permitted.

The Isle of Man Government would expect that the cumulative and in-combination impacts of developing wind farms within this proposed site (in close proximity to the boundary of our territorial waters) will be thoroughly investigated, as well as the downstream effects from all turbines.



The Isle of Man Government has recently published the Manx Marine Environmental Assessment (see <http://www.gov.im/categories/planning-and-building-control/marine-planning/manx-marine-environmental-assessment/>), which provides a comprehensive source of baseline data. We would urge you to take account of its contents in your work.

Whilst support of the concept of developing offshore renewable energy projects, the Isle of Man Government has particular concerns on the impacts in a number of areas:

- Air navigation;
- Marine navigation; and
- habitats and species found within the Isle of Man waters (particularly those protected under Manx law or identified as threatened or declining by the OSPAR Convention).

All of which may be affected dependent on the proposed location of the turbines within this site.

We would welcome any further information relating to the redistribution of shipping lanes and navigation routes within the proposed site, particularly those which might affect shipping traffic to and from the Isle of Man (Ferry and Freight Operations). Safety of shipping and navigation systems is a key concern of the Isle of Man Government. Wind turbines can interfere with Marine Radars and can cause impact on the detection and tracking ability of other vessels in the vicinity, particularly in bad weather. The Maritime Coastguard Agency recommends that mariners are not to pass at a distance of less than 2 miles from such structures and clearly marked limits of travel (Marine Guidance Notice 372). This can reduce the risk of impact of the turbines on marine radars and potential consequence of maritime casualty.

The Isle of Man Government continues to be concerned about the impact of wind turbines on ship navigation systems. The Isle of Man Government acknowledge that auto sea cluttering and fine tuning are available on marine radar, however it is also known that clutter adjusting also impacts on the radar ability to detect close by objects/targets, particularly if they were relatively small. Any significant risk of incident due to interference with navigation systems is of concern to the Isle of Man Government who depend upon a good safety record with regard to transport to and from the island. The Isle of Man depends upon our transportation systems for our economic development e.g. tourism, import of goods. First Flight Wind are urged to fully engage with both Isle of Man Government, the Isle of Man Steam Packet Company and Mezeron Limited on this issue.

Wind farms can impact upon air radar systems. The movement of turbine blades can give false readings and therefore potentially increase the risk of an accident. The Isle of Man already experiences issues with current wind farms concerning radar signals but at present it is manageable. As a small offshore island it is highly dependent upon these transport networks. The development of the proposed wind farms between the Isle of Man and Northern Ireland could severely affect its air systems which in turn may threaten the viable operation of key business routes for air travel. It is noted that dialogue has already commenced between the Isle of Man Airport and First Flight Wind on this issue.

At this stage you are requested to note that

- The Selex ATCR 33 PSR has been set up to reduce wind farm interference by specifying areas of non-initiation of aircraft tracks. This can result in the complete loss of PSR targets as they transit through the area of the wind farm, these effects have been noted in observations and results of radar flight trials.
- The Isle of Man Airport is also in the process of commissioning a Multilateration (MLAT) Mode S surveillance system. With this type of system there is the possibility of 'multi-path' returns from the turbine blades which can cause the SSR target to jump or stagger. This has been observed in the area of Walney wind farm during evaluation of this new system.

- It should be noted that some aircraft that are flying under both Visual Flight Rules and Instrument Flight Rules may request a radar based Deconfliction or Traffic Service. Air Traffic Controllers at the Isle of Man Airport are licensed and approved to provide Deconfliction, Traffic, Procedural and Basic Services outside controlled airspace (ATSOCAS). It is completely at the pilot's discretion as to which agency he/she communicates with and requests a service from.

We would also welcome further information on any telecommunication or power cables which may be affected by the proposed development, of particular concern would be those running through Isle of Man territorial waters.

The Isle of Man Government would like to highlight the impact of wind farm proposals on a number of nature conservation issues.

Manx National Heritage have advised that its interests in the wind farm developments in the Irish Sea centre on public amenity and coastal wildlife. As custodians of coastal properties which support breeding seabirds and seals Manx National Heritage are concerned that the marine environment remains able to sustain healthy populations of these animals on land and at sea, particularly at their feeding grounds. Manx National Heritage expect the assessment process to take account of the importance to the Isle of Man of the seabirds on the Calf of Man, in particular the Manx Shearwaters. As the Scoping Report indicates, shearwaters range between here and Ireland in some numbers to search for food and it is quite possible that the birds breeding on the Calf are amongst them. It is noted that under the heading 'Potential trans-boundary impacts' the possibility that there will be impacts on seabirds from the Isle of Man is acknowledged and is considered to be 'in scope' for the purposes of the EIA. Similarly, under Protected Sites, the potential for cumulative effects to impact on receptors in the Isle of Man is recognised and scoped in, though presumably this again relates mostly to highly mobile species such as seabirds which depend upon coastal habitats over here.

In relation to marine mammals and basking sharks (the 'marine megafauna'), the Report again provides welcome reassurance that impacts on these species will be fully considered in the EIA. We would like to emphasise the international importance of the Irish Sea for basking sharks (IUCN red listed, OSPAR priority species), particularly the area to the south west of the Isle of Man. Detailed information now exists on the distribution of basking sharks in Manx waters and beyond. In 2009 74% of all British Isles public sightings of basking sharks were reported from the Isle of Man (Marine Conservation Society 2009). We would hope that you will ensure that the use of this proposed site by basking sharks is fully assessed. Recent tagging work by Manx Basking Shark Watch may give additional insight which will assist with this. We would also like to draw your attention to additional research into cetaceans that has been carried out since 2005 by Manx Whale and Dolphin Watch which has highlighted the importance of Manx waters for Risso's dolphins and other cetaceans. The presence of cetaceans and basking sharks in Manx waters is enjoyed by visitors from vantage points on the Island's coast. EIA consideration of trans-boundary and cumulative impacts on these species is also welcome. Basking sharks, cetaceans and other marine megafauna are protected within the Manx Territorial Sea under the Isle of Man Wildlife Act 2009, with the Department of Environment, Food and Agriculture (DEFA) being the administering authority for this legislation.

Similarly, with regards to commercial fisheries, DEFA administer the Fisheries Act 2012 within the Territorial Sea, and while the Manx fleet have limited fishing activity in the proposed development area, we note that the Scoping Report makes only limited reference to the impact on Herring spawning grounds. It is possible that relevant fisheries spawning areas for this and other species may occur in Manx waters and so it would be appropriate to ensure that this is stated within the text. The impact of the wind farm developments would also be of major concern to the commercial fisheries industry within the Isle of Man, particularly from potential effort displacement, so it would be useful if our commercial fishing baseline data was considered and included in the text. We would also appreciate being kept up to date on any progress via inclusion

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of both DEFA and the Manx Fish Producers (iomfishermen@manx.net) in the list of consultees in the Fisheries Working Group outlined in Chapter 8, section 8.1, and any communications via the appointed Fishing Liaison Officer.

Given our close proximity to the proposed site boundary, it may be necessary to consider the visual amenity of some areas of the Isle of Man which may be affected by the wind farm extension. It appears that the visual impact of the proposed wind farm on Isle of Man receptors, has been scoped in and there will presumably be further discussion on ways to mitigate any adverse effect on much appreciated views across to the Mountains of Mourne.

In conclusion, the Scoping Report appears to cover the main environmental elements which the Isle of Man Government would expect to be addressed in the Environmental Impact Assessment. As with other Irish Sea wind farm developments, the crucial point is that the cumulative effects should be thoroughly examined as there are many pressures on marine life around the Isle of Man.

The Isle of Man government would welcome further involvement opportunities as stakeholders and would appreciate being kept updated of any future developments within this site. Should you require any further information or clarification on any of the above, please do not hesitate to contact myself.

Yours sincerely

**Michael Gallagher**  
**Director of Planning and Building Control**

