



**Isle of Man
Government**

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The Planning Inspectorate
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Dear Sir/Madam

Walney Extension Offshore Wind Farm

I am the Director of Civil Aviation for the Isle of Man and submitted information to the hearing held in Douglas, Isle of Man on Tuesday 18 March 2014. My evidence consisted of an explanation of the chain of responsibility for international air navigation in the Isle of Man.

During the hearing, much was made of the fact that the airspace between the UK and the Isle of Man is either Class G or Class F airspace and radar cover is not *required* to meet the minimum standard laid down by the International Civil Aviation Organisation (ICAO) in their Standards. However the Isle of Man currently provides radar services to aircraft flying within that airspace.

The people of the Isle of Man have economic and social needs which are heavily dependent upon air and sea routes to and from the island. In the case of the air routes, recognising the climatic conditions that often prevail, as a proactive and safety conscious society, we have elected to provide more than the minimum level of Air Traffic Service to flights crossing the Irish Sea.

The hearing was seeking quantifiable evidence based submissions and this aspect is something the Isle of Man and the developer of this wind farm do not currently have. What we do know is: -

- The current primary radar system at the Isle of Man Airport is affected by the existing wind farms off the English coast.
 - This system is being replaced by a new system that uses different frequencies to those currently in use – this is a consequence to recent changes to telecommunication standards in the UK, similar to the change from analogue to digital TV.
 - Additionally the Isle of Man is currently testing a new secondary radar system to replace the current equipment. In addition to conforming to current ICAO Standards, this system will
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also enhance radar coverage in areas of airspace that currently suffer from shadowing from high ground, therefore providing improved safety levels.

- During the testing of our replacement radar systems, we have identified interference which we believe originates from existing wind farms off the English coast.

The imponderables which we and the wind farm developer face when considering both our current and replacement radar systems include: -

1. The new wind farm is located much closer to the Isle of Man.
2. The new wind farm contains more units.
3. The new wind farm contains significantly larger fixed structures.
4. The new wind farm uses significantly larger moving reflective surfaces.

In conclusion, the Isle of Man is fully entitled to set our own level of aviation safety above the minimum and ICAO *encourages* this in their recommended practices. Our enhanced safety standard is predicated upon the use of radar systems and these are being impacted by existing wind farms off the English coast. We have absolutely no doubt that the proposed new wind farm will have a more significant impact upon those radar systems. The Isle of Man Government is supportive of the generation of renewable energy but the lowering of our aviation safety standard is not an acceptable by-product. We therefore feel that the mitigating measures should be made available to the Isle of Man Airport (at the developers cost) as part of the permission to build this wind farm.

Yours faithfully



Hartley A. Elder
Director of Civil Aviation