From: Robert Hunter | Isle of Man Steam Packet Company
To: Mona Offshore Wind Project
Subject: Mona Windfarm Development - Isle of Man Steam Packet Company
Date: 16 January 2025 17:37:56
Attachments: [redacted]

Dear Sir / Madam,

Reference: - Effect of the Mona Windfarm Development With respect to IOM Steam Packet Company's Existing Shipping Routes and Operations.

I would like the opportunity to place on record for the benefit of the Mona offshore windfarm development Planning Inspectorate, the effects to the Isle of Man Steam Packet Company's existing routes and operations caused by the proposed Mona Windfarm site development.

The Isle of Man Steam Packet Company operates year round lifeline ferry services between the United Kingdom and the Isle of Man. The Isle of Man's national economy is highly dependent of the lifeline ferry services in order to transport a significant proportion of the Island's freight and passenger demands.

As will be outlined below, the presence of the Mona windfarm site will have adverse effects to the existing Douglas to Liverpool route, highly reduce the ability to weather route in adverse weather, and impose increased operational costs as a direct result of deviating from existing routes.

To outline the likely effects to Isle of Man Steam Packet Operations the ship examples referred to are;
Ben my Chree, a conventional passenger ferry for passengers, vehicles and freight (average speed is 17kts with max 618 passengers)
Manannan, a high speed passenger craft for passengers and vehicles (average speed of 32kts with 890 passengers). Operates multiple trips per day between Douglas and Liverpool during the months March to October

The Isle of Man Steam Packet Company also operates weekend day trips between Douglas and Liverpool during the months November to March using the conventional vessel Manxman. Manxman has an average speed of 17kts and a higher fuel consumption compared to Ben my Chree due to the ship being much larger in size.

Mona Proposed development in Isolation
The current berth to berth distance from Douglas to Liverpool is 71nm. For conventional ferries sailing at 17kts this takes 4h 11m. For high speed craft sailing at 29kts this takes 2h 27m.

New route distances as a result of the proposed Mona windfarm site will be;
Douglas - Liverpool (north of Mona WF) is 72nm – at 17kts takes 4h 14m (an increase of 1nm and 3 minutes sailing time)
Douglas - Liverpool (north of Mona WF) is 72nm – at 29kts takes 2h 29m (an increase of 1nm and 2 minutes sailing time)

Douglas - Liverpool (west and south of Mona WF) is 84nm – at 17kts takes 4h 56m (an increase of 13nm and 42 minutes sailing time)
Douglas - Liverpool (west and south of Mona WF) is 84nm – at 29kts takes 2h 54m (an increase of 13nm and 27 minutes sailing time)

Using Ben my Chree (BMC) as an example,
Per trip Fuel Oil -tonnes, Lubrication Oil – litres and CO2 emissions;

PROPOSED WINDFARM ROUTING		BMC per trip				
		0.081 t/nm	1.13 l/nm	£795/t	£3.20/l	0.27 t/nm
Route	Berth to Berth Distance nm	FO t	LO l	FO Cost	LO Cost	CO2 t
Douglas - Liverpool 2019	71	5.75	80.23	£4,572	£257	19.17
Douglas - Liverpool (between Morgan Mona WF)	72	5.83	81.36	£4,636	£260	19.44
Douglas - Liverpool (west & south of Mona WF)	84	6.80	94.92	£5,409	£304	22.68

Number of voyages between Douglas and Liverpool is approximately 52 per year
Assuming Ben my Chree sails 95% Short and 5% long routes
Annual dist short 3557nm
Annual dist long 218nm
Total Annual Dist 3775nm
Current annual dist 3692nm
Therefore annual distance increase to current distance is 83nm

Increase to fuel oil, lubrication oil, CO2 emissions and associated costs are as follows;

	BMC Liverpool difference based on new route increase				
	FO t	LO l	FO Cost	LO Cost	CO2 t
95% & 5% dist	305.8	4266.0	£243,104.0	£13,651.1	1019.3
2019 dist	299.1	4172.0	£237,746.3	£13,350.3	996.8
Difference	**6.7**	**94.0**	**£5,357.7**	**£300.9**	**22.5**
2019 % diff	2.20%	2.20%	2.20%	2.20%	2.20%

Using Manannan (MAN) as an example,
Voyages between Douglas and Liverpool is approximately 630 per year

PROPOSED WINDFARM ROUTING		MAN per trip				
		0.14t/nm	0.7 l/nm	£795/t	£3.00/l	0.453 t/nm
Route	Berth to Berth Distance nm	FO t	LO l	FO Cost	LO Cost	CO2 t
Douglas - Liverpool 2019	71	9.94	49.70	£7,902.30	£149.10	32.16
Douglas - Liverpool (between Morgan Mona WF)	72	10.08	50.40	£8,013.60	£151.20	32.62
Douglas - Liverpool (west & south of Mona WF)	84	11.76	58.80	£9,349.20	£176.40	38.05

Assuming Manannan sails 95% Short and 5% long routes
630 voyages Douglas Liverpool route
Annual dist short 43092nm
Annual dist long 2646nm
Total Annual Dist 45738nm
Current annual dist 44730nm
Therefore annual distance increase to current distance is 1008nm

Increase to fuel oil, lubrication oil, CO2 emissions and associated costs are as follows;

	MAN Liverpool difference based on new route increase				
	FO t	LO l	FO Cost	LO Cost	CO2 t
95% & 5% dist	6403.32	32016.60	£5,090,639.40	£96,049.80	20719.31
2019 dist	6262.20	31311.00	£4,978,449.00	£93,933.00	20262.69
Difference	**141.12**	**705.60**	**£112,190.40**	**£2,116.80**	**456.62**
2019 % diff	2.20%	2.20%	2.20%	2.20%	2.20%

Ben My Chree cost example used FO Cost £795/t and LO Cost £3.20/l.
Manannan cost example used FO Cost £795/t and LO Cost £3.00/l.

The Isle of Man Steam Packet accepts the cost of fuel fluctuates according to market conditions and is currently (as of January 2025) less than the cost used in the examples but is currently on an upward cost trend. It is conceivable in future the cost of fuel may be more expensive than that used in the examples.

National implementation in the United Kingdom and Isle of Man Merchant Shipping (Prevention of Air Pollution from Ships) Regulations regulate heavily on the amount of CO2 emissions. An increase in CO2 emissions also make compliance with the existing regulations more onerous and incur extra costs to achieve the required compliance. In addition there will be an added burden to comply with the United Kingdom's Emissions Trading Scheme (UK ETS) requirements.

Any significant increase in a ship's voyage time between ports also has implications to a ship's ability to keep to a scheduled service and impacts on the time available to conduct safe port operations. The IOM Steam Packet would be opposed to speed up operations at the expense of ship and shore worker's safety. Time in port could be extended to accommodate delayed arrivals but this would result in a delayed service departure inconveniencing passengers and freight.

The Mona windfarm site directly affects all of Isle of Man Steam Packet's fleet to 'weather route' between the Isle of Man and Liverpool. Weather routeing involves the Master continually adjusting the vessel's speed and heading according to the prevailing weather and se conditions, in effect 'feeling' one's way across the available sea room.

In addition to the prospect of extra sailing distance and time as outlined in the examples above, where adverse weather conditions are forecasted for the Douglas Liverpool route the likelihood of the Captain cancelling a sailing may increase where the option to 'weather route' (ie sailing a more comfortable course and speed reacting to the sea conditions for passenger and cargo safety) has diminished due to the presence of the Mona windfarm site. Windfarm corridors will force to ships to navigate particular courses. Should the windfarm course be particularly uncomfortable according to the prevailing adverse weather conditions, and thus unsafe for the carriage of passenger and freight, the likelihood is the Captain will cancel the sailing on grounds of safety.

Cancelled sailings, delayed departures or departing without booked passengers or freight are highly detrimental to the operation of a lifeline passenger service vital to the Isle of Man's economy. The number of sailings undertaken are also monitored by the Isle of Man Government under the commitment to the Strategic Sea Services Agreement to undertake a minimum number of sailings per annum. Each sailing not undertaken is detrimental to the Isle of Man Steam Packet Company's obligations and reputation as a whole as a reliable ferry operator and adversely affects the company's reputation in national media reporting.

Mona, Morgan, and Morecambe windfarm sites cumulatively
In combination with other windfarm sites, corridors are created to the north of Mona between the Mona and Morgan sites and to the east of Mona between the Mona and Morecambe sites. In compliance with the Isle of Man and United Kingdom Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations (COLREGS) all ships are obliged to comply with the COLREGS by either adjusting their speed and/or course where risk of collision exists depending on the circumstances and conditions of the case.

To maintain a safe passing distance from other ships, pleasure craft, fishing vessels etc and the windfarms themselves it may be necessary for the ship to slow down. Sea-room to alter course is restricted by the presence of the windfarm sites and any action to reduce speed would impacts upon the vessel's scheduled service. This circumstance would also be exacerbated by adverse weather or poor visibility which could necessitate further reduction in the ship's speed to comply with the COLREGS. Significant delays can take days to recover which ultimately negatively affects the service delivery for passengers and freight vital to the Isle of Man's economy.

It should be noted any emergency action to avoid collision within a windfarm corridor could put the vessel further at risk of collision with another vessel or risk allision with a wind turbine. For a passenger ship with around 1000 persons on board this could potentially turn into a mass casualty event.

Discussions with the Mona Developers
The Isle of Man Steam Packet Company would also like to note as a point of record the company is currently negotiating a "Ferry Mitigation Agreement" as part of a Statement of Common Ground with the Mona developers addressing adverse operational costs likely to be incurred as a direct result of deviating from existing routes.

Thank you for your consideration into the above points. If you require any further information then please do not hesitate to contact myself directly.

Kind regards,
Robert Hunter

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