

From: Cowie, Andrew [REDACTED]
Sent: 17 June 2019 10:36
To: Peter Whiteway
Subject: FW: Ramsey Flood Meeting - 2nd July
Attachments: IoM Flood - national-strategy-evidence-report-summary-060616.pdf

Importance: High

FYI

From: Robin Bromley-Martin [REDACTED]
Sent: 17 June 2019 10:31
To: Robinson, Jeffrey; Cowin, Tim (DOI); Caine, Neil; Boyd, Christina
Cc: 'David Dorricott'; 'Peter Greenlees'; 'Gordon Rankine'; [REDACTED] Johnson, Pauline; Kenyon, Mark; Reynolds, Ann; Corlett, Bill; Lole, Richard; Toher, Gemma; Allinson, Alex (MHK); Hooper, Lawrie (MHK); Cowie, Andrew (DOI); Dobbins, Adrian
Subject: Ramsey Flood Meeting - 2nd July
Importance: High

All,

I recognise that I sent out the invitation to this meeting during TT, so I thought I would just nudge people who had not responded. But at the same time explain what we seeking to achieve from this meeting for everyone's benefit. This meeting's agenda does NOT include what we might have to do in respect of the planning requirements of building the residential and commercial units.

In June 2016, DEFA published a report by JBA (Summary attached – for ease of reference) regarding flood prevention on the Island. Arising from that report, we, as promoters of the Ramsey Marina, would have the following observations:

- Ramsey is clearly the most endangered conurbation on the Island.
- The marina could protect some 40% of the current waterfront of the total waterfront needing protection in Ramsey.
- Our proposed breakwater will be designed to reduce any wave action inside the breakwater to as near zero as we can get it
 - To protect the expensive boats at their moorings
 - But it will also prevent waves breaking over the Queen's Promenade as they were on Saturday.
- We will be reclaiming some 500m of the beach in front of the Queen's Promenade, and have yet to define what will be our grade level.
 - The grade level could be raised to a level to provide a "barrier" to rising water levels, because of the climate change issue.
- So, we are offering to discuss this with you as we are keen to help the Ramsey community in a practical way.

I am a civil engineer myself, and therefore could lead the discussion in this meeting if DoI and MUA do not yet have detailed proposals on how to respond to the flooding threat. We could discuss broad principles.

If, however, there are detailed proposals, we would be happy to ask Beckett Rankine, our technical advisors, to attend the meeting, so we can optimise the design and layout of the marina within these parameters. So we can book flights etc, we would much appreciate early feedback you may have collectively.

I look forward to hearing from you.

Regards

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,



Phone: [REDACTED]

Website: www.ramseymarina.com

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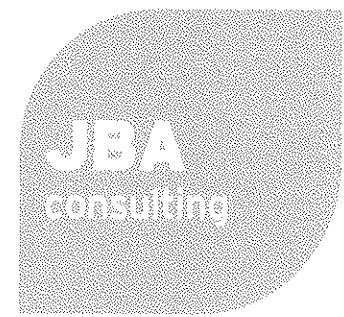
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RAAJE: S'preevaadjagh yn chaghteragh post-I shoh chammah's coadany erbee currit marish as ta shoh coadit ec y leigh. Cha nhegin diu coipal ny cur eh da peiagh erbee elley ny ymmydey yn chooid t'ayn er aghit erbee dyn kied leayr veih'n choyrtagh. Mannagh nee shiu yn enmyssagh kiarit jeh'n phost-I shoh, doll-shiu magh eh, my sailliu, as cur-shiu fys da'n choyrtagh cha leah as oddys shiu.

Cha nel kied currit da failleydagh ny jantagh erbee conaant y yannoo rish peiagh ny possan erbee lesh post-I er son Rheyynn ny Boayrd Slattyssagh erbee jeh Reiltys Eilan Mannin dyn co-niaqaghey scrut leayr veih Reireyder y Rheyynn ny Boayrd Slattyssagh t'eh bentyn rish.



National Strategy on Sea Defences, Flooding and Coastal Erosion: Evidence Report

Summary

06 June 2016





Context

The Isle of Man Government is producing a National Strategy on Sea Defences, Flooding and Coastal Erosion in order to contribute to the economic, environmental and social resilience of the Isle of Man to current and future climate risks. The Strategy Evidence Report assesses three sources of flooding – from rivers, the sea and surface water together with coastal erosion - and identifies those areas at risk now, and in the future. The analysis has been carried out at a 1km grid scale with a consistent, scientific approach across the whole island. The grid squares with the most properties, community and public service assets, road and rail infrastructure and sites with environmental designations at risk of flooding and/or coastal erosion have then been prioritised. The final task was to help identify potential adaptation responses and provide indicative costs for developing and implementing these solutions.

The climate, geography and physical characteristics of the Isle of Man mean that it is prone to flooding as shown by recent events such as the coastal flooding of the Island's towns in the storms of early 2014, and the Island-wide flooding in December 2015. The Evidence Report has taken these events into account and lessons learned from them. The Evidence Report also complies with and should assist in the delivery of key policy imperatives related to climate change, planning policy, biodiversity, drainage and sewage management.

The Evidence Report's development was overseen by a Steering Group consisting of representatives from the Department of Environment, Food and Agriculture (DEFA), the Department of Infrastructure (DoI) and Manx Utilities. The Cabinet Office and Treasury also provided key inputs and Members of the House of Keys (MHKs), Government Ministers and other interested stakeholders were consulted at various stages in the development of the Evidence Report.

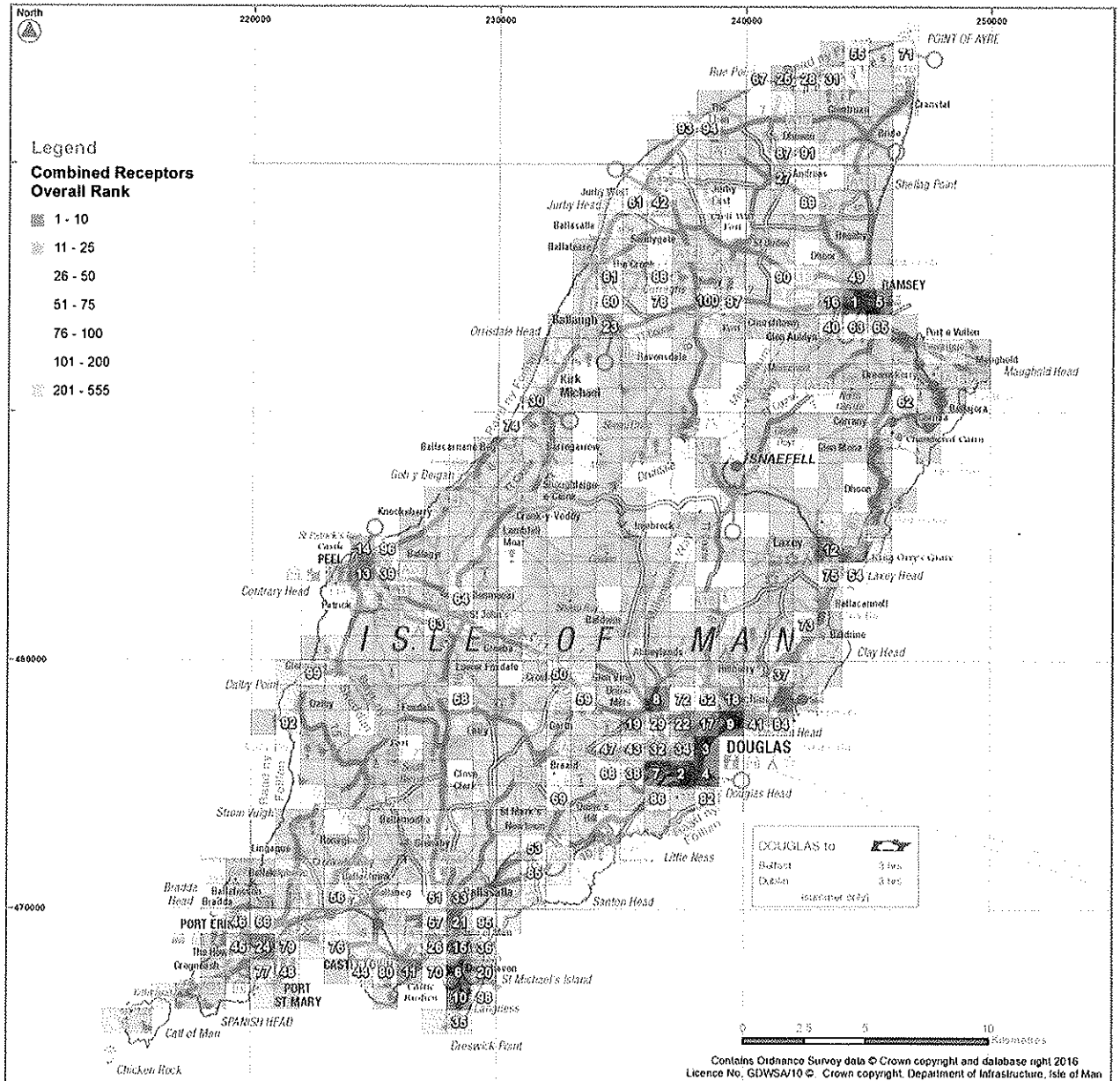
A high level approach has been taken to assessing risk that largely relies on existing modelling and data. Therefore, the results presented are not sufficiently detailed to be applied at the individual property level scale; further detailed studies are required for the areas identified at highest risk. In most cases, UK flood and coastal erosion risk management industry standards have been adopted to inform the assessment, although these have been customised to the Isle of Man context wherever possible. The detailed methodology, presented in Appendix A of the final Report, provides explicit references to the assumptions built into the risk assessment and Evidence Report development to ensure clarity regarding data and modelling certainty and confidence. It is essential that these assumptions are fully understood by those utilising the results of the risk assessment to ensure that future investment in adaptation responses is appropriate.

Risk Assessment

The Evidence Report is based on a comprehensive Risk Assessment that has assessed the potential impacts of coastal, river and surface water flooding and coastal erosion on key economic, infrastructure, social and environmental assets. The methodology employed placed an additional weight on impacts for residential properties and vulnerable critical assets, such as hospitals and schools, due to the paramount importance of minimising risk to life. The approach taken was to divide the Island into a grid of 676 1 km squares and then identify a ranking relating to the severity of potential impact for each source of risk and each asset for each square. These were then combined to produce a comparative cumulative assessment of risk with the highest scoring grid squares (the top 100) identified as 'Hotspots' for further analysis.

The map overleaf shows the cumulative risk Hotspots: the darkest red areas are those at most risk, whilst the yellow and green are at lower risk, but still within the top 100. The squares that are not coloured represent areas for which no flood risk modelling information was available.

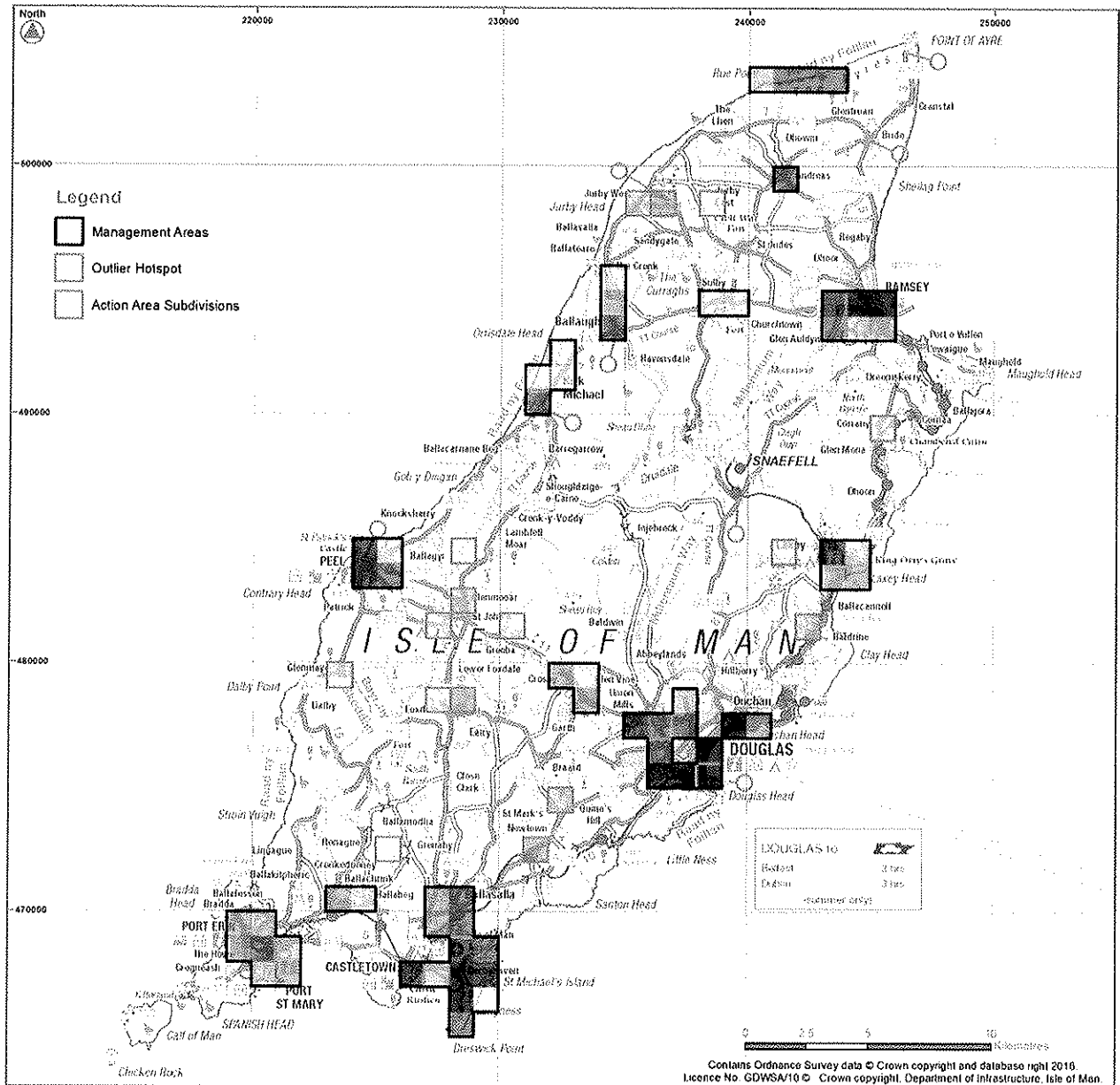
Cumulative Assessment of Risk



The next step in the Evidence Report development process was to identify clusters of Hotspots to highlight where the key risk locations were situated. Clusters of three or more Hotspots were identified as Management Areas and additional analysis was undertaken within these areas. Management Areas were further sub-divided into Action Areas where there were multiple risk locations. Those Hotspots that sit outside the Action Areas were also assessed in detail.

The diagram overleaf shows the location of priority risk areas:

Location of Priority Risk Areas



Risk Assessment Results

The risk assessment revealed that for the priority locations at risk, shown in the map above, the following assets are at potential risk of flooding and/or coastal erosion, both now and increasingly, in the future as a result of climate change:

- 180 critical assets - 63 identified as highly vulnerable (e.g. schools and GP surgeries)
- 4,000 residential properties
- 32km Major (A and B) roads, 39 km Minor Roads and 6 km railway
- £900m economic costs over 100 years associated with the potential damage to residential and non-residential properties.

The Evidence Report identified 24 locations as being at high risk now and in the future. All of these locations require further consideration and potential intervention to manage the evident risk. 13 of the 24 priority locations were identified as being priorities for intervention in the near future (within the next 10 years); these are listed below (in alphabetical not priority order):

- Castletown
- Douglas (Douglas Bay; Douglas Harbour; Glass, Douglas, Dhoo, Middle River Confluence; River Glass; Upper Dhoo)
- Laxey
- Peel
- Port St Mary
- Ramsey (East and Coastal, and West)
- Sulby
- The Ayres.

The remaining 11 priority locations that require further investigation and intervention in the future are as follows:

- Andreas
- Ballasalla
- Ballaugh
- Castletown Bay
- Colby
- Glen Vine and Crosby
- Kirk Michael (Coastal, North, and South and Glen Wyllin)
- Langness Peninsula
- Port Erin.

Potential Adaptation Responses

Recommendations were made for each of the above priority risk locations to help manage the identified risk. These range from ongoing monitoring to community resilience (awareness and property level protection) programmes, further investigations and potential schemes.

A high level, indicative assessment of the potential costs of further studies and flood and coastal erosion risk management schemes has identified that around £5.5m could be required for studies and £53.3m for schemes over the next 30 – 50 years. The Isle of Man Government and Manx Utilities are already developing schemes for a number of the areas at most risk. However, public sector resources should be focused on those areas at highest risk and where communities are least able to protect themselves. Ultimately, property owners are responsible for their own assets and risk cannot be completely eradicated in all locations. Where only a few properties are at risk, or risk levels are low, householders and businesses should consider resourcing smaller schemes to provide the required level of protection to ensure their own resilience.

Next Steps

This Evidence Report represents the best use of the existing data to prioritise areas at risk, both individually and cumulatively, from coastal, river and surface water flooding and coastal erosion on a whole Island basis. As such, the ensuing Strategy will be of relevance to various departments in Government and Manx Utilities as well as interested economic, environmental and social stakeholders. The Strategy should be used to inform future investment and planning decisions at all scales. Planning policy in relation to flood and coastal erosion risk management may need to be re-visited and the evidence on which the Strategy is based should be used in making recommendations and decisions for planning permission.



This Evidence Report has been developed by a multi-partner Steering Group that has enabled holistic thinking across a range of agendas involving different government entities. It is important that the development of an Action Plan and ongoing development and implementation of the Strategy and Action Plan continues to be delivered through a cross-departmental approach.

The potential schemes that could be developed following this analysis may exceed the resources available to Government and therefore further prioritisation is required. An Action Plan should be produced identifying the key actions that need to be taken and Government departments should develop further policy guidance in relation to funding criteria, potentially linked to Return on Investment. It may also be appropriate for the Isle of Man Government to consider developing a funding approach in which external contributions are required to supplement Government investment in flood and coastal erosion risk management similar to the Partnership Funding Flood and Coastal Resilience approach in England.

The detailed analysis was undertaken on a Management and then Action Area basis in order to capture flood mechanisms related to wider river catchment processes. The intention was to identify holistic and strategic responses to strategic challenges as flood risk at specific locations cannot be investigated and addressed in isolation, up and down stream processes must be taken into consideration and addressed coherently. The Isle of Man Government and Manx Utilities should continue to develop, promote and implement catchment wide management approaches to maximise the impact of any interventions.

Once the analysis of Action Areas and Outliers has been finalised and an Action Plan is developed, it is recommended that a programme of community awareness raising and resilience is developed and implemented. This should help communities and businesses better understand their level of flood risk and the low cost solutions available that they can adopt themselves to improve their standard of protection within a short timescale rather than waiting for large structural defence schemes that may not be deemed appropriate to the location and cannot be justifiably funded from the public purse.

Recommendations

The Evidence Report's recommendations are as follows:

- 1) The Strategy will be of relevance to various departments in the Isle of Man Government and Manx Utilities as well as interested economic, environmental and social stakeholders and should be used **to inform future investment and planning decisions at all scales**. Recommendations are provided for planning policy in relation to requiring sustainable drainage measures in all developments over a certain size, ensuring that flood risk is not increased elsewhere as a result of drainage and ensuring that areas subject to coastal erosion are not developed.
- 2) DEFA, DoI and Manx Utilities should take forward the analysis of prioritised risk locations (Action Areas and Outliers) and **develop an Action Plan for public consultation**. The key actions proposed are: ongoing monitoring, community resilience and awareness-raising, further studies and investigations and potential schemes.
- 3) **A Working Group should be set up with representation from various Government departments and Manx Utilities** to manage the Action Plan development and Strategy and Action Plan implementation ensuring that this is undertaken in an integrated and holistic manner aiming to achieve economic, environmental and social objectives.



- 4) Due to the significant challenge of surface water flood risk in many locations across the Island, Manx Utilities **should take account of the Strategy in discharging its drainage authority duties and implementing the Regional Sewage Treatment Strategy.**
- 5) The Action Plan and responses developed to manage the evident risks should be undertaken **through a catchment management approach** avoiding piecemeal intervention and ensuring that the management of risk in one location does not increase risk elsewhere.
- 6) **Low cost solutions working with nature through natural flood management measures should be adopted wherever possible** as these have the potential to reduce flood risk elsewhere and can achieve biodiversity and carbon benefits as well as helping to adapt to climate change.
- 7) The potential schemes that could be developed following this analysis are likely to exceed the resources available to Government and therefore further prioritisation is required. **An Investment Planning Tool has been developed to assist Government and Manx Utilities in deciding where public money is best invested.** DEFA, DoI and Manx Utilities, working with the Cabinet Office and Treasury, should develop policy guidance and funding criteria including a required Return on Investment; break-even (i.e. 1:1) is generally considered as the absolute minimum.
- 8) Once the analysis of Action Areas and Outliers has been completed and an Action Plan is developed, it is recommended that a **programme of community awareness raising and resilience is developed and implemented.** This will need to be managed sensitively to avoid creating unnecessary concerns regarding impacts on house prices and property insurance costs, but should assist communities in understanding the 'real' risk of flooding and coastal erosion to their properties and putting in place measures themselves to increase their resilience to this risk, now and in the future.
- 9) **The Risk Assessment that underpins the Evidence Report should be sustained as a 'living' database and updated on a regular basis** bringing in more robust datasets as these are generated. A number of detailed recommendations concerning the updating of datasets are set out in the full Evidence Report.
- 10) As the costs required to manage the Island's flood and coastal erosion challenges, now and in the future, are likely to exceed the resources available to the Isle of Man Government and Manx Utilities, it would be beneficial to **consider developing an approach in which Government investment for flood and coastal erosion risk management can be supplemented by contributions from other partners.** The Flood and Coastal Erosion Resilience Partnership Funding Policy in England provides an example of this type of initiative.



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t:+44(0)1756 799919

e:info@jbaconsulting.com

Jeremy Benn Associates Ltd

Registered in England

3246693



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Steven Bevan

From: Peter Whiteway
Sent: 08 August 2019 06:34
To: Robin Bromley-Martin
Subject: Re: Freedom of Information

Hi Robin, I am in office all morning if you wish to drop by.

Peter

Sent from my iPhone

On 6 Aug 2019, at 22:02, Robin Bromley-Martin [REDACTED] wrote:

Or I could pop in en route to airport on Thursday circa 11?

But thank you, sailing for me is more than a passion, as you have probably gathered!

In haste...

Robin

Robin Bromley-Martin

On 6 Aug 2019, at 21:43, Peter Whiteway [REDACTED] wrote:

Hi Robin

Really sorry out of office all tomorrow, but glad to hear news that treasury has signed of on EoI process. I hope that the time provided in this process fits within your sailing commitments.

I doubt that the EoI will have progressed much in the next 4 weeks, thereafter any EoI process would I expect involve interviewing and assessment against predetermined criteria.

Coincidentally one of our members has sought an update on progress for our meeting in 2 weeks. At this stage I can only report that an EoI process is anticipated, and that any information provided through that procedure would be commercially sensitive. Of course this report will appear as a public minute. As it happens there is no contractual link between RTC and the EoI so that RTC should not need to see the submissions, sufficient only to know the outcome. Effectively operating on a need to know basis.

I hope the sailing goes well. If you need to discuss any urgent matter I am on [REDACTED]
[REDACTED]

Very best wishes

Peter

Sent from my iPhone

On 6 Aug 2019, at 20:35, Robin Bromley-Martin [REDACTED] wrote:

Peter,

Just don't start me on the EoI process. A complete and utter shambles! DoI should be glad my name is not Kim Darroch, because I would be using expressions like "inept" and "dysfunctional"!!

I would need to buy you a very large drink to keep you going while I relayed the shambles to you, as it would take so long. But essentially they are trying to force a round peg (long lease) into a square hole (financial regs on procurement).

Two months ago I suggested, being a newcomer to IOM financial regs, that they apply for a waiver from Alf C. They refused to consider it but last Friday the waiver was granted!!!

You can only take a horse to water....

Let me check on the circulation question...

Any chance I could pop in tomorrow? Am off on Thursday for 4 weeks sailing..... just the EoI might eventually issued. Sod's Law!

Robin

Robin Bromley-Martin

On 6 Aug 2019, at 20:16, Peter Whiteway [REDACTED] wrote:

Hi Robin

Thank I for the email, I would be happy to meet as required and understand completely your concerns regarding confidentiality during the EoI process. I am surprised that this process still hasn't gone forward as yet.

In regard to your email from 27 June I am afraid I don't have any record of receiving such, can you confirm if I was on the circulation list.

Kind regards

Peter

Sent from my iPhone

On 2 Aug 2019, at 09:44,

[REDACTED] wrote:

Gentlemen and Lady,

Further to my email on 27th June – to which we have yet to receive a reply – may we please propose a meeting between the four entities represented on this circulation and the directors of RML? This is to agree a common approach, which will provide for better public relations as we hopefully proceed further into a public consultation stage.

As we stated in our June email, there seemed to a significant disparity in the way that you individually responded to the FoI requests from a certain lady in Ramsey.

If, as we anticipate, the anticipated EoI request asks for us to provide a significant level of financial and commercial – and thus commercially sensitive – information, then we need to have an understanding of what will enter the public domain – be at the time of submission, announcement of the result, and or at some later stage. Unless we can agree this prior to our submission, then clearly we will err on the side of caution.

We believe that, as the information will be marked “Commercial in Confidence”, this will qualify under the code of practice (<https://www.gov.im/about-the-government/freedom-of-information/guidance-for-public-authorities/>) as being except from any public interest releases.

However, we are not naïve enough to suggest that the public need not be kept informed. Thus in this meeting, inter alia, we would agree what would be released into the public domain, while maintaining the confidentiality required of

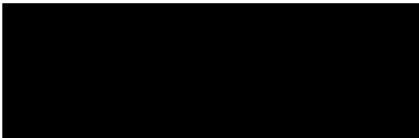
normal commercial interaction
between your organisations and
RML.

We look forward to your responses.

Regards

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,



Website: www.ramseymarina.com

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and commercially confidential
information, and should be treated
as such. It should not be passed on
to third parties without express
written permission from Ramsey
Marina Limited.

Steven Bevan

From: Peter Whiteway
Sent: 08 August 2019 09:42
To: 'Black, Nick'
Cc: [REDACTED]
Subject: RE: Freedom of Information - CONFIDENTIAL

Hi Nick,

Thanks for the email, I think it would be useful for Steven Bevan who deals with our FOI to attend if that could be arranged. I've cc'd him in so an invite can be extended if that is acceptable.

Clearly at present RTC are not party to the EoI process, and we would not therefore be in receipt of any of the information presented under that process.

Hope your well

Best wishes

Peter

From: Black, Nick [REDACTED]
Sent: 07 August 2019 11:19
To: Peter Whiteway
Subject: FW: Freedom of Information - CONFIDENTIAL

Dear Peter

I hope that you are well.

If you would like me to, I am happy to ask if your FOI person can attend the FOI meeting planned I think for Monday. I didn't want to reply on your behalf though, hence my drafting below.

Nick

From: Black, Nick
Sent: 07 August 2019 11:17
To: [REDACTED]; Dobbins, Adrian
Cc: Reynolds, Ann; Harrison, Frank; Tallach, Steven; Walker, Anthony; 'David Dorricott'; Griffiths, Hannah; 'Peter Greenlees'; Westcott, Karen; Lole, Richard; Lewin, Mark; 'Peter Whiteway'; Allinson, Alex (MHK)
Subject: RE: Freedom of Information - CONFIDENTIAL

Dear Robin

I am not the person to advise on the detail of FOI legislation but fortunately each public body is assisted by a co-ordinator with the relevant knowledge and skills.

I am aware that the co-ordinators of the various Government bodies will meet early next week to prepare the sort of co-ordinated response that you are looking for. I would hope that you can therefore receive a substantive response later next week, perhaps in the form of either a joint or "standard" letter.

I should perhaps note at this stage that labelling information "commercial in confidence" may not be enough to secure an exemption- though I appreciate the sensitivity of your financial and commercial planning being released when a procurement process is imminent.

Nick

From: [REDACTED]

Sent: 06 August 2019 17:52

To: Dobbins, Adrian

Cc: Reynolds, Ann; Harrison, Frank; Tallach, Steven; Walker, Anthony; 'David Dorricott'; Griffiths, Hannah; 'Peter Greenlees'; Westcott, Karen; Black, Nick; Lole, Richard; Lewin, Mark; 'Peter Whiteway'; Allinson, Alex (MHK)

Subject: Freedom of Information - CONFIDENTIAL

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

Adrian,

Further to my exchange of emails with Alex Allinson, I am writing, at his suggestion, to set out what we are proposing in terms of agreeing a "modus operandi" with respect to FoI and the marina via email rather than a "mass meeting" per my earlier emails.

I first emailed the three departments (as copied here) and RTC over a months ago (26th June) and have not even had an acknowledgement of that email (one just received from DfE! And while re-reading this another one from Do!). I forwarded you and Alex a copy of the follow up email sent on 2nd August.

We have become concerned at the wide disparity in responses between the 5 "public authorities" in addition to a very "grey" answer from the AGC's as to the confidentiality of information that we may provide any one of the five bodies as we go through the various stages of consultation and permitting. Our desire is therefore to have some "joined up" thinking because otherwise we will end up with an unholy mess with one department being more generous with our information than another. We are thus proposing that we agree some guidelines for those personnel who are responsible for responding to FoI requests in these organisations in as much as it relates to the marina.

We have two broad categories of information – that marked by us as confidential and what has not been marked as confidential.

Non Confidential Information

It would appear that the 2015 Act (as amended) provides us, as Ramsey Marina Limited, with very little protection, if, in someone's infinite wisdom, the release of any information or correspondence, which has NOT been marked as confidential, is deemed to be in the public interest. While a NIMBY can raise a complaint and take it all the way to the Information Commissioner, we have no such right of appeal, short of seeking a court injunction to stop you.

So let me make 3 points:

- We wish to keep commercially sensitive information confidential and out of the public domain (for obvious commercial reasons) for the foreseeable future. It would be wrong if, for example, all our forward financial projections were to be ever released into the public domain. But clearly our annual return and historical accounts – to the extent required by law, at least – would be released. No argument.
- At the same time, we need to be able to propose and discuss aspects of the project, as we develop the marina concept into a full blown design, with, inter alia, your 5 organisations, without that being released to the public, at least until we have agreed that particular aspect or issue. An example might be how we could work together in addressing the flood risk in Ramsey – which might be considered as "discussing policy"?
- Yet we are not so naïve as to expect a 100% retention of all information to do with the marina. It would not, from a PR point of view, be in our best interests either.

It would appear, therefore, that marking ALL our correspondence and information would be in our best interests. Does anyone dissent?

Information or Correspondence Marked as Confidential

Turning to the Act itself, Article 26 (a) states, inter alia, that “Information is *absolutely exempt* if it was obtained by the public authority from another person” and 26 (b) goes on to state that it is also *absolutely exempt* if “the disclosure of the information to the public by the public authority holding it would constitute a breach of confidence actionable by that or any other person.” (My Italics). There would appear to be no “public interest” test in Part 3 of the Act – unless, of course, we have misinterpreted the Act. For the *qualified exempt*, we would concede that there is a public interest test.

However, we were concerned to get an email, in response to a request for clarification on these issues, with respect to the EoI process, which quoted the AGC as saying:

“Yes the process and all returns are confidential, we will not release any information relating to a live procurement (considered live until agreement is signed). There is however the caveat that ultimately it would be the Information Commissioner who would decide what would be released in response to an FoI request.”

This would appear to be at odds with Article 26, and worries us considerably. It seems that they have disregarded Article 26. We are not allowed to contact the AGC’s directly, and therefore we cannot raise this issue with them, or we would have done.

Time Sensitivity of Information

We fully recognise that a lot of information can, in the fullness of time, be released to the benefit of the marina project, and therefore time has to be another function to be considered in this discussion. For example, once we have agreed how the marina might provide a flood prevention solution for at least part of Ramsey, it would be in our joint interests to publicise it. There are other examples, such as the EIA.

Joint PR Activity

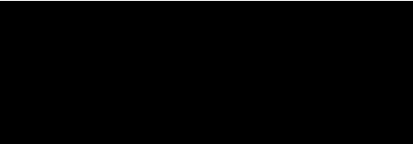
With a project of this nature and size, the Island should be able to benefit from huge publicity as a result of the marina. While it may not be of immediate concern, it will be in our joint interests to maximise such publicity and we should plan accordingly.

Adrian, I hope this breaks down a complex subject into “bite sized” chunks, which will allow us to continue this discussion to a mutually agreeable conclusion. But, as always, we are very happy to discuss this at your convenience.

Regards

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,


Website: www.ramseymarina.com

[REDACTED]

From: [REDACTED]
Sent: 15 August 2019 20:14
To: 'Black, Nick'; 'Dobbins, Adrian'
Cc: 'Reynolds, Ann'; 'Harrison, Frank'; 'Tallach, Steven'; 'Walker, Anthony'; 'David Dorricott'; 'Griffiths, Hannah'; 'Peter Greenlees'; 'Westcott, Karen'; 'Lole, Richard'; 'Lewin, Mark'; Peter Whiteway; 'Allinson, Alex (MHK)'
Subject: RE: Freedom of Information - CONFIDENTIAL

Nick,

Given the release of the EoI advert, we would wondering if the FOI meeting had happened – I think you said it was on last Tuesday?

In which case, may we have some feedback, please?

Clearly the response will dictate the level of detail our submission can include. Hence our keen interest to agree a modus operandi with the relevant organisations prior to any submission we make.

Regards

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,



Website: www.ramseymarina.com

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Sent: 07 August 2019 11:17
To: [REDACTED]; Dobbins, Adrian [REDACTED]
Cc: Reynolds, Ann [REDACTED]; Harrison, Frank [REDACTED]; Tallach, Steven [REDACTED]; Walker, Anthony [REDACTED]; 'David Dorricott' [REDACTED]; Griffiths, Hannah [REDACTED]; 'Peter Greenlees' [REDACTED]; Westcott, Karen [REDACTED]; Lole, Richard [REDACTED]; Lewin, Mark [REDACTED]; 'Peter Whiteway' [REDACTED]; Allinson, Alex (MHK) [REDACTED]
Subject: RE: Freedom of Information - CONFIDENTIAL

Dear Robin

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I should perhaps note at this stage that labelling information "commercial in confidence" may not be enough to secure an exemption- though I appreciate the sensitivity of your financial and commercial planning being released when a procurement process is imminent.

Nick

From: [REDACTED]
Sent: 06 August 2019 17:52
To: Dobbins, Adrian
Cc: Reynolds, Ann; Harrison, Frank; Tallach, Steven; Walker, Anthony; 'David Dorricott'; Griffiths, Hannah; 'Peter Greenlees'; Westcott, Karen; Black, Nick; Lole, Richard; Lewin, Mark; 'Peter Whiteway'; Allinson, Alex (MHK)
Subject: Freedom of Information - CONFIDENTIAL

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Adrian,

Further to my exchange of emails with Alex Allinson, I am writing, at his suggestion, to set out what we are proposing in terms of agreeing a "modus operandi" with respect to FoI and the marina via email rather than a "mass meeting" per my earlier emails.

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Non Confidential Information

It would appear that the 2015 Act (as amended) provides us, as Ramsey Marina Limited, with very little protection, if, in someone's infinite wisdom, the release of any information or correspondence, which has NOT been marked as confidential, is deemed to be in the public interest. While a NIMBY can raise a complaint and take it all the way to the Information Commissioner, we have no such right of appeal, short of seeking a court injunction to stop you.

So let me make 3 points:

- We wish to keep commercially sensitive information confidential and out of the public domain (for obvious commercial reasons) for the foreseeable future. It would be wrong if, for example, all our forward financial projections were to be ever released into the public domain. But clearly our annual return and historical accounts – to the extent required by law, at least – would be released. No argument.

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It would appear, therefore, that marking ALL our correspondence and information would be in our best interests. Does anyone dissent?

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Turning to the Act itself, Article 26 (a) states, inter alia, that “Information is *absolutely exempt* if it was obtained by the public authority from another person” and 26 (b) goes on to state that it is also *absolutely exempt* if “the disclosure of the information to the public by the public authority holding it would constitute a breach of confidence actionable by that or any other person.” (My Italics). There would appear to be no “public interest” test in Part 3 of the Act – unless, of course, we have misinterpreted the Act. For the *qualified exempt*, we would concede that there is a public interest test.

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“Yes the process and all returns are confidential, we will not release any information relating to a live procurement (considered live until agreement is signed). There is however the caveat that ultimately it would be the Information Commissioner who would decide what would be released in response to an FoI request.”

This would appear to be at odds with Article 26, and worries us considerably. It seems that they have disregarded Article 26. We are not allowed to contact the AGC’s directly, and therefore we cannot raise this issue with them, or we would have done.

Time Sensitivity of Information

We fully recognise that a lot of information can, in the fullness of time, be released to the benefit of the marina project, and therefore time has to be another function to be considered in this discussion. For example, once we have agreed how the marina might provide a flood prevention solution for at least part of Ramsey, it would be in our joint interests to publicise it. There are other examples, such as the EIA.

Joint PR Activity

With a project of this nature and size, the Island should be able to benefit from huge publicity as a result of the marina. While it may not be of immediate concern, it will be in our joint interests to maximise such publicity and we should plan accordingly.

Adrian, I hope this breaks down a complex subject into “bite sized” chunks, which will allow us to continue this discussion to a mutually agreeable conclusion. But, as always, we are very happy to discuss this at your convenience.

Regards

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,

From: Dobbins, Adrian [REDACTED]
Sent: 20 August 2019 16:47
To: 'Robin Bromley-Martin'
Cc: Black, Nick; Lewin, Mark; Lole, Richard; Allinson, Alex (MHK); Griffiths, Hannah; Reynolds, Ann; Peter Whiteway
Subject: RE: Freedom of Information - CONFIDENTIAL
Attachments: 201908 FOI Advisory Note.pdf

Importance: High

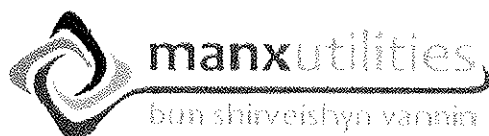
Dear Robin,

Further to our recent correspondence & following a meeting of the Freedom of Information (FOI) Coordinators across the various Government bodies, the attached advisory note has been prepared for you to assist in the interpretation of the Act with reference to responses issued to requests for information held in relation to the Ramsey Marina proposal.

I trust you will find this information of use. Should you require any further information; it can be found on the Information Commissioner's Website at <https://www.inforights.im/>

Yours sincerely

Adrian Dobbins
Executive Director



Delivering Life's Essential Services for our Island

w: www.manxutilities.im

PO Box 177
Douglas
Isle of Man
IM99 1PS



24-hour
customer
support:

687687

From: Robin Bromley-Martin [REDACTED]
Sent: 16 August 2019 16:47
To: Dobbins, Adrian
Cc: Black, Nick
Subject: Re: Freedom of Information - CONFIDENTIAL

Caution: **This email is from an external sender. Please take care before opening any attachments or following any links.**

Adrian,

Many thanks indeed for that update.

Yours, from a very windy and wet Cowes Week!

Have a good weekend!

Robin

Robin Bromley-Martin

On 16 Aug 2019, at 16:43, Dobbins, Adrian [REDACTED] wrote:

Dear Robin

I apologise that we've not got back to you sooner. I can confirm that the meeting has taken place but our co-ordinated response needs to go through a few clearance gates before we can issue it. I am hopeful that this will be early next week.

Regards

Adrian Dobbins
Executive Director

<image011.png>

Delivering Life's Essential Services for our Island



w: www.manxutilities.im

PO Box 177
Douglas
Isle of Man
IM99 1PS

<image012.png>
<image013.png>
<image014.png>
<image015.jpg>

24-hour
customer
support:

687687

From: [REDACTED]
Sent: 15 August 2019 20:14
To: Black, Nick; Dobbins, Adrian
Cc: Reynolds, Ann; Harrison, Frank; Tallach, Steven; Walker, Anthony; 'David Dorricott'; Griffiths, Hannah; 'Peter Greenlees'; Westcott, Karen; Lole, Richard; Lewin, Mark; 'Peter Whiteway'; Allinson, Alex (MHK)
Subject: RE: Freedom of Information - CONFIDENTIAL

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Nick,

Given the release of the EoI advert, we would be wondering if the FoI meeting had happened – I think you said it was on last Tuesday?

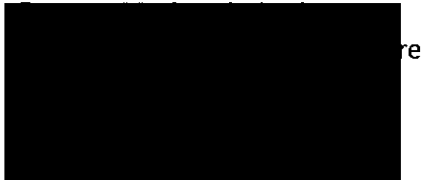
In which case, may we have some feedback, please?

Clearly the response will dictate the level of detail our submission can include. Hence our keen interest to agree a modus operandi with the relevant organisations prior to any submission we make.

Regards

Robin

Robin Bromley-Martin
Director



Website: www.ramseymarina.com

Note: this email contains private and commercially confidential information, and should be treated as such. It should not be passed on to third parties without express written permission from Ramsey Marina Limited.

From: Black, Nick [redacted]
Sent: 07 August 2019 11:17
To: [redacted]; Dobbins, Adrian [redacted] >
Cc: Reynolds, Ann [redacted]; Harrison, Frank [redacted]; Tallach, Steven [redacted]; Walker, Anthony [redacted]; 'David Dorricott' [redacted]; Griffiths, Hannah [redacted]; 'Peter Greenlees' [redacted]; Westcott, Karen [redacted]; Lole, Richard [redacted]; Lewin, Mark [redacted]; 'Peter Whiteway' [redacted]; Allinson, Alex (MHK) [redacted] >
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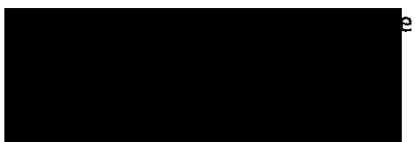
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Website: www.ramseymarina.com

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Advisory Note following communication with Public Authorities in relation to responses issued under the Freedom of Information Act

(Ramsey Marina Proposal)

While it may appear that there has been disparity in the way each Authority has dealt with and responded to recent FOI requests, the Freedom of Information Act and Code of Practice themselves provide consistency when applied by each department. It should be borne in mind that identical requests will inevitably produce different 'information held' from one department to another. Inevitably, while the application of the FOI Act has been consistent, there are bound to be minor differences in methods, particularly as the Code of Practice encourages Authorities to be flexible in their approach.

Departments and their FOI Co-ordinators are experienced in identifying and assessing 'information held' and in the correct application of exemptions where required.

Each Authority is its own legal entity and is required to assess and respond to each request independently, on its own merits and without influence. As expected this can result in differences as the treatment of each request will often depend on a number of factors such as (but not limited to):

- the content and clarity of the request itself and the Authority's own interpretation
- the supply, reasoning or basis for holding the information
- the topic, volume, nature and content of the information itself
- the interaction/relationship with identified 3rd parties where appropriate

It is also an important point that it is best/recommended practice that all FOI requests are dealt with 'applicant blind' by, and even within each Authority as the identity does not (usually) hold relevance to any considerations of the request and this helps to avoid knowledge of the requester having any influence on the content or quality of the response. The FOI Code of Practice is clear when it states that such identity 'must not be revealed when consulting third parties' unless consented to, or it is necessary for the response.

The legislation applies only to information defined as 'held' by the Authority. For example, verbal discussions are not 'held' unless recorded in some way (CCTV, transcribed etc.). 'Held records' can cover many types and formats, and are from any stage, so notes, drafts, formal documents (e.g. agendas, minutes, action points, attendees own minutes, emails or recordings etc.). The information is often not the document, email or any other record in its entirety, but rather sentences or individual topics covered within.

The Act starts from the position that all information 'held' by an Authority should be considered for disclosure and therefore, only after it has been located through searches can any consideration be given to the application of appropriate exemptions. In addition, Absolute or Qualified exemptions may only be applied based on the content of the information on an individual basis; there can be no blanket approach to the whole document or all of the records. The Information Commissioner would not look kindly on the application of an exemption unless the Authority could demonstrate that searches have been carried out and the resulting information is recorded.

It is therefore extremely difficult to pre-assess what information will trigger an exemption in advance. It is necessary to consider which are the confidential or sensitive elements, what is the potential for prejudice (harm) and, when considering those exemptions which qualify, formal public interest/prejudice tests may need to be carried out and recorded.

When considering the application of an exemption Authorities are obliged, as part of the Public Interest test, to factor in transparency and accountability **in favour** of disclosure for example; the use of public funds, to prevent any suspicion of wrongdoing, safeguarding and demonstrating good decision making.

It can be helpful when documents are pre-identified as being commercially sensitive or confidential and sometimes this can be assumed; for example as part of the Procurement process. However it is important to be clear that labelling documents or information as 'confidential' or 'commercially sensitive' cannot be relied upon as a reason to withhold information. This in itself is insufficient within the parameters of the Act to prevent disclosure if the information does not pass the tests for the exemptions being considered.

The nature of the information is all that can trigger the consideration of an exemption.

Section 26 - Information provided in confidence

In order to engage Qualified Exemption - **Section 26**, the following criteria must be fulfilled:

- a) the authority must have obtained the information from another person; **and**
- b) its disclosure must constitute a breach of confidence actionable by an individual

Please note that s26 cannot be engaged to cover mutually negotiated and agreed terms of a contract.

The key is the ability and likelihood of the supplier of the information to bring an action for a breach of confidence.

The information should be worthy of protection in the sense that someone has a genuine interest in the contents remaining confidential. It does not have to be highly sensitive, but nor should it be trivial. If the information is otherwise accessible, or if it is already in the public domain, it will not possess the necessary quality of confidence.

In order to engage s26(b) the supplier must attach explicit conditions to any subsequent use or disclosure of information, or restrictions on use must be obvious or implicit from the circumstances (ie: doctor/patient relationship). A Non-Disclosure Agreement would be a good example of evidence in support of confidentiality/commercial sensitivity vis a vis a particular document. This would support the fact that disclosure may be actionable and would likely inform the prejudice (harm) which would occur if the disclosure were to occur.

Section 26 therefore has a fairly limited application, but there are other exemptions that can be considered, for example **Section 30 Economy and commercial interests**; this includes trade secrets.

Authorities would not purposely disclose commercially sensitive or confidential material where that material falls into an exemption after testing, especially where disclosure would or would be likely to prejudice (harm) the commercial interests of that party (e.g. their ability to compete in a commercial activity or market). However blanket exemptions can never be applied to a whole record or subject where the factors in favour of withholding have insufficient weight on testing and the Authority must have evidence that this does in fact represent the concerns of that third party. It is not sufficient for the Authority to speculate on the prejudice which may be caused and consultation on such concerns would be expected. We have a standard form that is regularly used to seek the views of stakeholders/interested parties. This would be used to support any tests that are carried out and would be retained to support any decisions. This form can be used pro-actively when supplying information in the future if that would be helpful and is attached.

There is a greater likelihood of the Section 30 exemption being appropriate in the early stages of any project/contract/negotiations. Where a contract has been in place for a number of years, where costs may have changed so prices are no longer as relevant/sensitive, the tests in favour of withholding would weaken over time.

Timing

There is another qualified exemption, specifically **section 41 - Information for future publications**; however there are expectations that all the information requested is indeed intended to be published in its entirety, and that there is a future plan to support this publication (for example Planning or Public hearings are a public process).

Conclusion

Considering the FOI requests received to date and the information located in response we, collectively, do not believe that s26 or s30 could have been successfully applied (to the information released thus far) as any tests would not reflect the need for withholding. We also note that one request has successfully challenged non-disclosure as part of an Internal Review. As Authorities it would not be our intention to compromise the commercial position of any organisation. Our Officers are well versed in following the legislation and Code of Practice and we will always seek to engage with stakeholders where we identify a real concern.

Regarding several references to 'joint interests', please note that as individual Authorities (Departments, Boards or Offices) we do not view this as a joint activity or that we have joint interests at this early stage, though we would have a common desire to achieve the best balanced outcome for the Isle of Man community, environment and economy. While we have great respect for all stakeholder views and are always open to early discussions with organisations, we must be clear that there have been no agreements made, no Procurement or Planning process started, and Expressions of Interest for a Marina development has only very recently opened; any and all information supplied to us has been purely on the basis of early, pre-emptive discussions. We understand that much of the Commercial detail supplied to us has been already made known at the public hearing.

It is hoped that the foregoing provides reassurance that, as we continue, as Authorities, to interact with all organisations, we will continue to apply all appropriate measures to achieve the correct balance of protection and transparency which the legislation demands of us and both commercial companies and taxpayers have a right to expect.

[REDACTED]

From: [REDACTED]
Sent: 21 August 2019 11:40
To: 'Dobbins, Adrian'
Cc: 'Black, Nick'; 'Lewin, Mark'; 'Lole, Richard'; 'Allinson, Alex (MHK)'; 'Griffiths, Hannah'; 'Reynolds, Ann'; Peter Whiteway
Subject: RE: Freedom of Information - CONFIDENTIAL

Adrian,

Just to acknowledge safe receipt of this document. We will study in detail and come back to you.

Many thanks for orchestrating this.

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,

[REDACTED]
Website: www.ramseymarina.com

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From: Dobbins, Adrian [REDACTED]
Sent: 20 August 2019 16:47
To: 'Robin Bromley-Martin' [REDACTED]
Cc: Black, Nick [REDACTED]; Lewin, Mark [REDACTED]; Lole, Richard [REDACTED]; Allinson, Alex (MHK) [REDACTED]; Griffiths, Hannah [REDACTED]; Reynolds, Ann [REDACTED]; [REDACTED]; peter [REDACTED]
Subject: RE: Freedom of Information - CONFIDENTIAL
Importance: High

Dear Robin,

Further to our recent correspondence & following a meeting of the Freedom of Information (FOI) Coordinators across the various Government bodies, the attached advisory note has been prepared for you to assist in the interpretation of the Act with reference to responses issued to requests for information held in relation to the Ramsey Marina proposal.

I trust you will find this information of use. Should you require any further information; it can be found on the Information Commissioner's Website at <https://www.inforights.im/>

Yours sincerely

Adrian Dobbins
Executive Director

[REDACTED]

From: [REDACTED]
Sent: 04 October 2019 14:12
To: 'Robinson, Jeffrey'
Cc: 'Haynes, Wendy (DOI)'
Subject: RE: Ramsey Harbour

Jeff,

Further to Wendy's email below, and prompted by the storm this week, I was wondering if the JBA Report on Ramsey was now available?

Regards

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,
Mountain View Innovation Centre
Jurby Road, Lezayre, Ramsey
ISLE OF MAN, IM7 2DZ
Phone: +44 (0) 7785 331100
Website: www.ramseymarina.com

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From: Haynes, Wendy (DOI) [REDACTED]
Sent: 17 July 2019 14:16
To: [REDACTED]
Cc: Robinson, Jeffrey [REDACTED]
Subject: RE: Ramsey Harbour

Dear Robin

Following our telephone conversation earlier today I wish to advise you that Jeff agreed to forward to you the JBA report once it has been received and would appreciate if, in the interim, you do not contact JBA directly.

Kind regards

Wendy

[REDACTED] es
Sea Terminal Building
Douglas
Isle of Man
IM1 2RF

[REDACTED]




infrastructure

highway.co.uk

bun-troggalys - shirveishyn raaiddey

DOI Values: Communication; Respect; Teamwork; Recognition; Trust; Customer Service

 **Please consider the environment. Do not print off this e-mail unless absolutely necessary - thank you.**

WARNING If you are not the intended addressee of this e-mail, you must not copy or deliver it to anyone else or use it in any unauthorised manner.

From: [REDACTED]
Sent: 11 July 2019 15:56
To: Robinson, Jeffrey
Cc: Haynes, Wendy (DOI); 'Gordon Rankine'; [REDACTED] Lole, Richard; Reynolds, Ann
Subject: RE: Ramsey Harbour

Jeff,

Thank you for coming to our meeting. I hope that it provided some "food for thought" as you develop your thoughts for the flood prevention in Ramsey.

In that respect, it would be most useful if we and our technical advisors, copied here, if we could have a chat with your consultants, JBA to see how we could work together (or not, as the case may be!)

Could you be very kind and introduce us by email to the correct person in their organisation?

Many thanks.

Robin

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Mountain View Innovation Centre
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From: Haynes, Wendy (DOI) [REDACTED]
Sent: 08 July 2019 16:21
To: Robin Bromley-Martin [REDACTED]
Subject: Ramsey Harbour

Dear Mr Bromley-Martin

Thank you for your time last week; your project looks very exciting and I hope that it comes to fruition.

There may be areas of synergy during the construction stage with projects that we are planning so it will be good to stay in contact.

In the meantime, when we have the JBA study for the South Promenade I will let you have a copy.

Best regards

Jeff

Jeffrey F Robinson BEng(H), PgDip, MIMECHE, CEng, MBA
Director of Highway Services

<http://www.gov.im> :
www.reportaproblem.im

Isle of Man. Giving you freedom to flourish

WARNING: This email message and any files transmitted with it are confidential and may be subject to legal privilege. You must not copy or deliver it to any other person or use the contents in any unauthorised manner without the express permission of the sender. If you are not the intended addressee of this e-mail, please delete it and notify the sender as soon as possible.

No employee or agent is authorised to conclude any binding agreement on behalf of any of the Departments or Statutory Boards of the Isle of Man Government with any party by e-mail without express written confirmation by a Manager of the relevant Department or Statutory Board.


RAAUE: S'preevaadjagh yn chaghteraght post-I shoh chammah's coadany'n erbee currit marish as ta shoh coadit ec y leigh. Cha nhegin diu copal ny cur eh da peiagh erbee elley ny ymmydey yn chooid f'ayn er aghl erbee dyn kied leayr veih'n choyrtagh. Mannagh nee shiu yn enmyssagh kiarit jeh'n phost-I shoh, doli-shiu magh eh, ny sailliu, as cur-shiu fys da'n choyrtagh cha leah as oddys shiu.

Cha nel kied currit da failleydagh ny jantagh erbee conaant y yannoo rish peiagh ny possan erbee lesh post-I er son Rheyynn ny Boayrd Slattyssagh erbee jeh Reiltys Eilan Vannin dyn co-niartaghey scrut leayr veih Reireyder y Rheyne ny Boayrd Slattyssagh t'eh bentyn rish.



infrastructure

bun-troggalys

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[REDACTED]

From: Peter Whiteway
Sent: 08 November 2019 11:55
To: Robin Bromley-Martin [REDACTED]
Subject: RE: Ramsey

Hi Robin, your marina email address bounced as being full.

Best wishes

Peter

From: Peter Whiteway
Sent: 08 November 2019 10:19
To: [REDACTED]
Subject: RE: Ramsey

Hi Robin, the Island has a pace of life, sometimes decisions catch up with it, but I find its best not to expect rapid changes.

I'm writing to DoI about the flooding issue and will see if we can get the JBA report out of them.

Best wishes

Peter

From: [REDACTED]
Sent: 07 November 2019 16:33
To: Peter Whiteway
Subject: RE: Ramsey

Peter,

Many thanks for letting me have this stuff. Marlene had mentioned the 19th but I hadn't seen the recommendations. Must admit, I am slightly surprised by Recommendation No 1 as the Committee were appalled at the lack of preparation work for the Douglas Harbour works. But perhaps the word "maintenance" is meant in the context of preventing the quays falling in, as opposed to all the £80m "nice to do" stuff.

Certainly Marlene, in asking me to give evidence, felt that the marina was a fundamental part of the Harbours Strategy (or should be!).

Anyway I thought I would go and listen.

FYI – re: that 2 pager that I sent you on how the marina might be able to assist in the flood prevention works. We have submitted it to the same committee in their call for evidence on the flooding issue. I also emailed Jeff Robinson to ask if JBA had published their "Ramsey-only" flooding report, which should have been completed by September. But no reply to even a chasing email. Not very professional but there we are!

We understand from a number of sources that we are the only "rational" submission to be received as part of the EoI process, and are now asking for us to make a presentation (as if we haven't done enough already!). So the process drags on! This is in spite of promises that, were we to be the only submission, they would immediately stop the process to save public money and time

How on earth have you survived in this environment for 30 (?) years?!!!! I am getting close to blowing my proverbial brains out – and that is only 2 years!

Robin

Robin Bromley-Martin
Director
Ramsey Marina Limited,

Website: www.ramseymarina.com

Note: this email contains private and commercially confidential information, and should be treated as such. It should not be passed on to third parties without express written permission from Ramsey Marina Limited.

From: Peter Whiteway [REDACTED]
Sent: 07 November 2019 15:25
To: Robin Bromley-Martin [REDACTED]
Subject: Ramsey

Hi Robin,

This item is on the agenda for this month's Tynwald sitting.

6. Environment and Infrastructure Policy Review Committee

The interim Chairman of the Environment and Infrastructure Policy Review Committee (Mrs Maska) to move – That the First Report of the Environment and Infrastructure Policy Review Committee for the Session 2018-2019: Harbours Strategy [PP No 2019/0102(1)] [PP No 2019/0102(2)] be received and the following recommendations be approved:

Recommendation 1 That the Department of Infrastructure should focus on progressing maintenance works for Douglas Harbour as a matter of urgency.

Recommendation 2 That the Council of Ministers should appoint a body to conduct a strategic review of the Island's harbours and options for future development, adhering to the principle set out in the National Infrastructure Strategy that there should be 'integrated, reliable, secure and resilient provision of Island-wide infrastructure that meets the social and economic needs of the Island up to 2050', and report back to Tynwald.

[GD No 2019/0076] is relevant to this item.

Links to all the documents are on the agenda web page at <http://www.tynwald.org.im/business/opqp/opqp/2019-PP-0144.pdf>

I'm not really sure whether this impacts on your work so far, or whether the marina proposals are a separate process outside the harbours strategy.

Regards

Peter

T. P Whiteway
Town Clerk & Chief Executive,

[REDACTED]

From: Peter Whiteway
Sent: 31 December 2019 11:20
To: 'Robin Bromley-Martin'
Subject: RE: Seaside Towns

Hi Robin, that sounds like positive news for the project.

Very best wishes for the new year

Peter

-----Original Message-----

From: Robin Bromley-Martin [REDACTED]
Sent: 31 December 2019 10:35
To: Peter Whiteway
Subject: Seaside Towns

Peter,

Hope you have Xmassed well.

I am a fairly avid listener to R4, and I found this programme very interesting, especially the reference to the pier.

<https://www.bbc.co.uk/sounds/play/m000cq0c>

Looks like we have completed the Eol process successfully. But I suggested to DoI to delay any announcement till after my trial on Monday/Tuesday.

But meeting DEFA et al on Ramsey flood prevention on Friday week. Courtesy of Richard Lole.

Happy New Year!

Robin

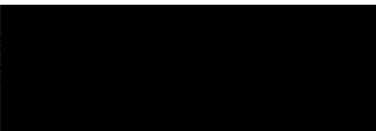
Robin Bromley-Martin

Steven Bevan

From: Peter Whiteway
Sent: 15 January 2020 11:30
To: 'Robin Bromley-Martin'
Attachments: Ramsey Piers.jpg

T. P Whiteway
Town Clerk & Chief Executive,
Commissioner for Oaths & Civil Registrar
Ramsey Town Commissioners
Town Hall
Parliament Square
Ramsey
ISLE OF MAN
IM8 1RT

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www.ramsey.gov.im

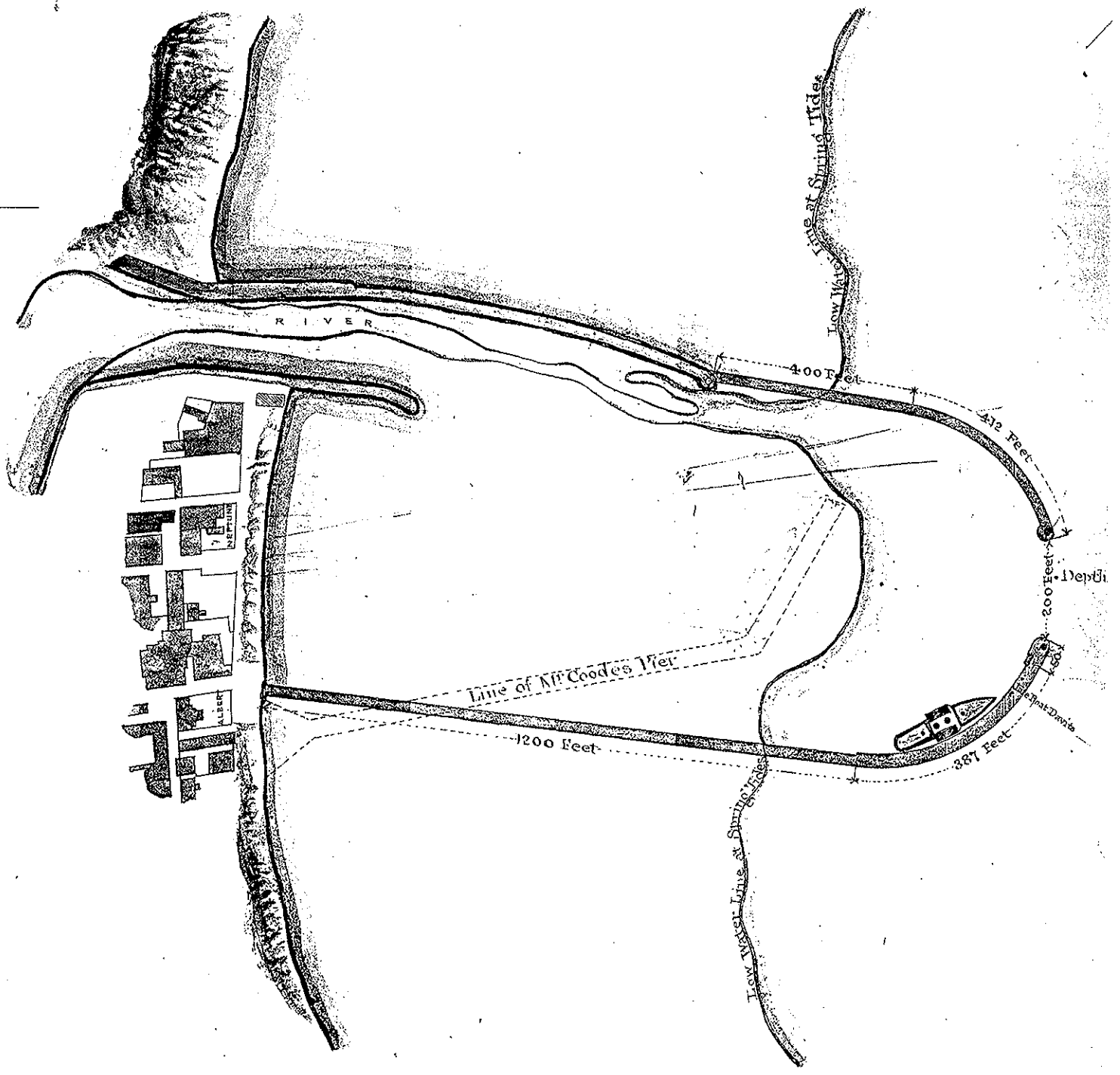
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Plan of proposed water works & deep water landing pier

BY DAN: CREGEEN, C.E., AND JOHN CRAINE JUNR.

Civil Engineers Nov: 1869.



SCALE OF PLAN
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