



Isle of Man
Government

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Area Plan for the East: Draft Plan
Preliminary Publicity consultation
Summary of responses received
by the Cabinet Office
25th May 2018

Initial Consultation Period:
24th February 2017 to 26th May 2017
Supplementary Consultation Period (for 35 additional sites)
26th January 2018 to 9th March 2018

Evidence Paper No. DP EP7

Cabinet Office

Purpose

To summarise the main issues identified in response to the Preliminary Publicity. This preliminary stage was about individual potential development sites, not an overall draft plan or statement of policy. Comments about sites have been very important in informing how these may or may not be taken forward in an overall Draft Area Plan. What follows is a summation of the issues raised.

1 Introduction

- 1.1 The Preliminary Publicity consultation stage for the Area Plan was a public notification of the potential development sites which had been put forward following an earlier stage, the Call for Sites. This consultation inspired considerable interest in the plan process and resulted in comments from a variety of respondents including members of the public, Government Departments, politicians, local authorities, developers, agents, land owners, and many other organisations. The general level of response to this consultation was significant, with many detailed and carefully considered comments being made.
- 1.2 The Department has analysed these comments and now presents a summary of the issues raised. As the comments are in response to a consultation about potential development sites, some comments received were very specific about individual parcels of land and their history of planning proposals. As an Area Plan must apply to a large number of sites in an overall region, we have gathered the issues together in 'issues families' to show the holistic interconnections between them. Individually site specific comments have helped to determine what potential development sites may or may not proceed but those are not repeated here. What is presented here is a summary of the types of issues raised.

2 Respondents to the Preliminary Publicity

(including the additional consultation January 2018 to March 2018)

2.1 Who responded?

- 2.1.1 We received comments from over 270 respondents. This included a cross-section of the public, individuals who own sites, neighbours and motivated citizens. Also interest groups in areas such as wildlife, heritage, business and sport and recreation provided detailed comments. Finally a series of government departments and statutory boards also responded and gave their input.

- 2.2.2 These responses were in both written form and also on the Department's consultation website.

2.3 A note about privacy

- 2.3.1 The Preliminary Publicity stage was about potential development sites. In many comments references were made to historical events, ownership and even identifying potential legal issues such as covenants and leases. As these could be used to identify individuals it is not appropriate to publish such identifying information publicly.

3 Issues Families – themes of comments from the Preliminary Publicity

- 3.1 Responses are summarised into themes, and these themes go broadly together in family groups; for example, flooding and drainage are grouped.

- 3.2 In each issues family we summarise *what we heard you say* from all the submissions to the consultation in total. We do not produce individual responses here, but bring out the issues so that they can be given the proper attention in the draft plan. The issues families are:

3.2.1 **Land supply and demand, distribution of development and ownership issues**

Includes the implications for land requirements given the latest population projections. Comments focused on preferred locations for new development activity, ownership difficulties and the merits of the settlement hierarchy.

3.2.2 **The Natural Environment, Landscape Values**

Includes views, natural environmental values and wildlife.

3.2.3 **Infrastructure – Transport and Utilities**

Includes the state of road network, traffic, public transport and access.

3.2.4 **Infrastructure - Flooding and Drainage**

Includes areas of concern and the effect of new activity on existing problems.

3.2.5 **Infrastructure - Social and Green**

Includes schools, hospitals, open space, recreation and sports grounds, etc.

3.2.6 **Land uses - Industrial Land and Offices, Retail**

Includes shops, town centre uses and leisure uses.

3.2.7 **Where to develop?**

Particularly in the context of development opportunities presented by brownfield sites (use first, renew derelict sites) versus those on greenfield sites (rationale for development) open and green space.

3.2.8 Housing

Includes affordable housing, sheltered housing and vacancy rates of existing housing.

Issue Family 1 - Land supply, distribution and ownership <i>What we heard</i>	How this informs the Draft Plan
<p>Ownership of land can come with obligations, and some respondents pointed out these and how they might affect several proposed sites. The issues included:-</p> <ul style="list-style-type: none"> • Land ownership challenges (e.g. covenants, continuing conditions from planning approvals, estates, rights-of-way, mapping errors, etc.) • Breaks in-between town areas, commonly given the term of a 'green gap', are emotionally valued by a lot of respondents. • On some sites, there needs to be the ability for natural expansion over time i.e. not developing the whole site in one go. <p>Many respondents tell us that they think the development of greenfield sites is unjustified and this links to their views about the value of the countryside.</p> <p>Some respondents said that boundaries of settlements should be amended to include recent development on the edge, with Cooil Road as an example.</p> <p>Some respondents said that Douglas should be the focus for housing and other uses, looking towards growth.</p> <p>Some site respondents were critical of the state of Douglas – concerned about a failure to regenerate and make the town feel vibrant.</p> <p>Many respondents said that they do not have a clear understanding of the drivers for housing development.</p>	<p>Site burdens and ownership comments are noted and added to the site assessments.</p> <p>Drivers for development, the need and capacity will be clearly explained.</p>
Issue Family 2 - Infrastructure <i>What we heard</i>	How this informs the Draft Plan
<p>Open space is very important for a number of respondents. They mentioned issues about:</p> <ul style="list-style-type: none"> • recreation reserves (and continuing existing ones as-is) • some settlements do not have recreation grounds or open space in a useable format. • Some passive recreation reserves have a good purpose for parking on busy days for nearby halls and churches. <p>Schools are an important issue for many respondents; primary schools operate on catchments, and secondary on refined catchments from those primary schools. There was concern that concentration of residential uses within one or the other catchment</p>	<p>Open space and recreation needs will be provided for.</p> <p>Suggested sites which are already being used for open space or recreation will remain so.</p>

<p>may cause misbalances and discordant enrolments.</p>	
<p>Issue Family 3 - Flooding and drainage <i>What we heard</i></p>	<p>How this informs the Draft Plan</p>
<p>Flooding and drainage is a very important issue for respondents. This was both in relation to individual sites and also for areas and the road network. This included:-</p> <ul style="list-style-type: none"> • Some sites are not maintained with care, and overland drainage becomes a problem for neighbours. • Access roads need to be all-weather and not subject to flooding or overflow. Added demand on a road which has drainage problems is not wise. • Sloping sites need to be developed suitably with excavation, drainage and services installed to make the best use of a site, not merely placed atop the existing land levels without thought. • Watercourses, both permanent and seasonal, are important elements of any landscape. These should be integrated into landscaping and managed drainage schemes. 	<p>Flooding and drainage is acknowledged as an on-going challenge.</p> <p>For issues such as flooding, those can be dealt with very well on sites which are changing quickly with new development, but much harder to resolve on sites where there is little or no development taking place.</p>
<p>Issue Family 4 - Greenfield sites <i>What we heard</i></p>	<p>How this informs the Draft Plan</p>
<p>Greenfields are those sites where a built development (e.g. housing or commercial uses) is not there at present. Many respondents have strong views about using these greenfield sites. Their comments included:</p> <ul style="list-style-type: none"> • Greenfield sites should be prioritised lower than brownfield ones where the site is either vacant or no longer needed for the previous purpose. • Some greenfield sites are currently in productive use while others are not in use for any purpose. • Remove the advantage of greenfield sites in favour of brownfield. • Many people favour living in good quality urban surroundings with nearby in-town shops and stores which means that they can enjoy and be proud of their surroundings and walk to work and the shops rather than be held up on the arterial roads • Increased population density enables larger scale waste disposal systems and larger scale public transport. 	<p>Several suggested sites are greenfields, and will be considered in accordance with the Isle of Man Strategic Plan 2016. This is existing government policy.</p> <p>Population changes, and household size changes and will be explained as drivers for development.</p>
<p>Issue Family 5 - Brownfield sites <i>What we heard</i></p>	<p>How this informs the Draft Plan</p>
<p>Brownfield sites are those where a previous use is being phased out and there's an opportunity for a new one. A good example is a</p>	<p>Several suggested sites are what are</p>

<p>former factory site being re-purposed for a residential use. This was a significant focus for many respondents, and the themes they raised include:</p> <ul style="list-style-type: none"> • Use of sites in towns, either vacant or no longer needed, should be given a preference or incentive. • Favour the redevelopment, redeployment or regeneration of brownfield or existing sites before any new greenfield. • Using brownfield or re-development sites to help in addressing the state of Douglas. • Perceived glut of empty or little-utilised dwellings and buildings. • Employment sites should be located within existing settlements. Brownfield sites and old, under-utilised buildings could be used for this purpose. • Use brownfield sites in preference to greenfield, and make an effort to preserve the character of the Island's rural settlements. • Create financial disincentives to leave sites undeveloped. 	<p>termed brownfields.</p> <p>These will be considered in accordance with the Isle of Man Strategic Plan 2016.</p>
<p>Issue Family 6 - Housing <i>What we heard</i></p>	<p>How this informs the Draft Plan</p>
<p>Provision of housing is important, and attracted a lot of comment from respondents. The issues they brought to us include:-</p> <ul style="list-style-type: none"> • Douglas should be the focus for housing growth. • Areas outside Douglas should take some additional housing. • Existing dwellings are being under-used or left to decay. • Materials and finishes, together with innovative design, are important. Not just copies of existing dwellings. • Incentives for affordable housing schemes. • Development of dwellings requires financial backing. Small developments on small sites may not be suitable for loans. • Dwellings on elevated positions may suffer from unsuitable wind conditions. • Forecast demand/growth is not always correct. • Sites need to have roads, service areas and landscaping subtracted before a development yield of dwellings can be calculated. • Supply of able-to-be-developed land is not always viable for finance and commercial scale of development. 	<p>Household size is decreasing, and this is an important driver for diverse forms of housing over time.</p> <p>Rules which do not stifle the ability to finance new development but which still achieve good results are what we strive for.</p>
<p>Issue Family 7 - The natural environment and landscape values <i>What we heard</i></p>	<p>How this informs the Draft Plan</p>
<p>The Manx landscape, setting and character are very highly valued by respondents. They gave us a lot of comments, including:</p> <ul style="list-style-type: none"> • Concerns that the variety of landscapes and features are 	<p>There is no right to a view – views are part of a wider concept of amenity.</p>

<p>generalised and not thoroughly understood.</p> <ul style="list-style-type: none"> • Perceptions of a view being part of property entitlement and/or amenity. • Perception of buildings intruding into the landscape, even where that landscape is mostly privately owned and not accessible to the public. • Perceptions of inappropriate development, but this is mostly is statements of personal opinion about design and materials. • Concepts of where settlements start and finish: blunt edges or gradual transitions? • Watercourses and the sea are important features to the public domain and forming a setting. • Enhancement of small reserves for wildlife habitat, with come use of watercourses and un-made lanes for wildlife corridors. 	<p>Designs, materials and colours can be very sympathetic to a natural setting – encouraging these without creating undue cost or burden is important.</p> <p>Some sites will simply be unsuitable for development activity.</p>
<p>Issue Family 8 - Transport <i>What we heard</i></p>	<p>How this informs the Draft Plan</p>
<p>Transport includes the roads, private vehicle use and public transport. We heard a lot about these, including:-</p> <ul style="list-style-type: none"> • Use of rights-of-way and implied access over parcels of land – these cannot be relied upon to form access to more intense use or development. Formalisation of road reserves will be necessary. • Need a good transport network, efficient servicing and a supply of car parking to meet the needs of commuters and business and leisure visitors to the capital. • The existing road network is not suitable for added concentrations of vehicle traffic. • Public transport must be able to service any new concentrations of housing and commercial properties. • Enhance the road and public transport network; do not assume it will simply cope with added demand. • Provide a cycle pathway which goes somewhere – the existing is disjointed. 	<p>The existing road network is essential to support movement across the island.</p> <p>Public transport must be provided for.</p> <p>Cycleways and walking paths must be considered.</p>

3.3 Next steps- Issues informing the Draft Area Plan

We have identified what can be taken forward; in the Area Plan we are responding to sites changing from one use to another and also incremental change (the normal gradual pace of change over time). For issues such as flooding, those can be dealt with very well on sites which are changing quickly with new development, but are much harder to resolve on sites where there is little or no development taking place.

In presenting a Draft Area Plan, we continue to invite public input so that not only can the individual issues can be discussed, but so can those issues can be managed in relation to the whole scale of development on the Isle of Man both now and into the future.



The information in this leaflet can be provided in large print or audio

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