

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTX7-Z	M	32	<p>The Board's main concerns remain as follows:</p> <ol style="list-style-type: none"> <li>1. The inadequate provision of a green gap between the built up areas of douglas and braddan. There appears to be inconsistency in how the policy is being applied to different areas and the size of the gaps.</li> <li>2. The contradictory approach to coalescence and sustainable urban extensions.</li> <li>3. Incursion/elimination of open countryside between Douglas and Braddan and the inconsistent approach being adopted in deciding why it is acceptable for one area of open, productive countryside to be zoned and not another. 4. The zoning of greenfield sites for immediate release, which will discourage what we thought was the primary objective of the Strategic Plan- i.e. sustainable development and, in this area plan, prioritising redevelopment in the towns.</li> </ol> <p>In addition, the board is still also at a loss to understand why the CO is still reluctant to consider rezoning sections of the development on Peel Road as residential, and part of the site on the lower part of Vicarage Road as industrial or at least mixed use.</p>	<p><b>CO has defined all of the Greep Gaps by following field boundaries. In addition there are two additional green gaps between the settlements of Union Mills, Strang and Douglas.</b></p> <p><b>The extent of all of the gaps has been reviewed. The only change since the Modifications is the Laxey and Baldrine Green Gap which has been reduced in size in response to comments on scale.</b></p> <p><b>CO does consider that there has been an inconsistent approach.</b></p> <p><b>CO accepts the findings of the Inspector that even allowing for a high proportion of the units to come from existing sites within the settlements, some other opportunities are still required.</b></p> <p><b>CO is content with the extent of the zonings on land south of Vicarage Road and bordering Peel Road.</b></p>
BHLF-AAMW-WTX7-Z	M	65	The change to allow the potential release of reserve sites before 2026 is not supported.	<p><b>Noted.</b></p> <p><b>Please see Strategic Reserve Site Release Mechanism - para 12.19.</b></p>
BHLF-AAMW-WTX7-Z	R	5	Chapter 4 – Landscape. The Commissioners support the recommendation of the inspector that an element of the old landscape assessment should be preserved to enable greater weighting to be given to protecting a site that has more landscape value than another. This does not seem to be reflected in the proposed modified area plan document and as such we consider this an omission by the CO and that it should be corrected. The previous wording was a more accurate description of what is actually planned	<p><b>The AHLVCS areas and other variants do not have clear and precise boundaries nor an available original evidence base as the Inspector has recommended and it would not be possible to reflect this in the Modified plan as the Inspector intended.</b></p> <p><b>Cabinet Office will therefore follow the landscape 'types' and 'areas' using the Landscape Character Assessment study only - as was followed in the extant Area Plan for the South.</b></p>
BHLF-AAMW-WTX7-Z	M	3	M3/4 Support	<b>Noted.</b>
BHLF-AAMW-WTX7-Z	M	4	Wildlife sites: para 5.11.4 It is suggested that there is the possibility to create a wildlife area alongside the River Dhoo between Braddan Bridge and Snugborough.	<b>Cabinet Office support the creation of new wildlife sites and the principle of biodiversity net gain. The Table 6 of the written statement will be updated to reflect this suggestion.</b>
BHLF-AAMW-WTX7-Z	M	4	Addition proposal 4 para 5.15.6 Green Gap: Support However the proposal is not being properly implemented by the failure to designate the area between Port-e-chee meadow and Ballafletcher Rd. as a green gap	<b>Cabinet Office understands the concern expressed but this area is to be retained as predominantly residential.</b>
BHLF-AAMW-WTX7-Z	M	5	M5 Support	<b>Noted.</b>
BHLF-AAMW-WTX7-Z	M	11	M11: Partial Support/Objection – Street lighting is a local authority responsibility and it is for the authority to determine if it is appropriate to install lighting in some of the areas listed. In the final bullet point, "Public Lighting should be provided" needs to be changed to: "It is recommended Public Lighting is provided .....	<p><b>Cabinet Office accepts this minor amendment</b></p> <p><b>"It is recommended Public Lighting is provided .....Utilities Proposal 2</b></p>
BHLF-AAMW-WTX7-Z	C	Comment not specific to a modification.	Table 9 para 8.9.5: The Commissioners would prefer the industrial estate in Union Mills (old Marown Engineering works) to be mixed use including residential/office use. It is suggested the site could be suitable for a retirement/nursing home neither of which currently exist in Braddan.	<b>Noted. However, the time for consideration of the merits or otherwise of this suggestion has now passed.</b>
BHLF-AAMW-WTX7-Z	M	17	M17: Partial objection- The Commissioners believe the early release of the land south of the Cooil Road will deter redevelopment of brownfield or underutilized commercial sites elsewhere on the island and this are should be held back to a later date.	<b>The development of land to the south of Cooil Road, needs to be carefully master planned.</b>

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BHLF-AAMW-WTX7-Z	M	19	M19/M20: Support. In addition the Commissioners would be content for some of the land to be used for other unneighbourly activities, such as concrete product production and similar that may use some of the recycled aggregate/other material.	<b>Noted. The descriptions will however remain as set out in the modifications.</b>
BHLF-AAMW-WTX7-Z	M	29	M29: Support but Braddan does have a youth club, which is an omission in the table, and also some indoor sports facilities.	<b>Table 10 only contains outdoor pitches and play parks.</b>
BHLF-AAMW-WTX7-Z	M	25	M25: Object The commissioners contend this will result in a over provision of housing, most likely on green field sites, contrary to the principles of urban regeneration.	<b>Prior to the Inquiry Cabinet Office sought to temper the provision made in the draft plan in light of the census findings. The Inspector has reviewed all the evidence and place further sites into strategic Reserve or removed entirely from the plan. Cabinet Office accepts these figures in relation to M25.</b>

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BHLF-AAMW-WTX7-Z	M	27	M27: No objection although given the possibility of a change in way office employees work in future, there may be an overcapacity in office space in towns that could be redeveloped as residential.	<p>Recent events will of course influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed and this includes looking at the implications for office supply and demand and how we move forward.</p> <p>Additional research and monitoring will no doubt be needed.</p>
BHLF-AAMW-WTX7-Z	M	26	M26: Object – The previously identified 'reserve sites' should not be able to be brought forward on a speculative basis and determined purely on their merits. They should not be released at any time in the near future. Site BH030 and DBH002, if included in the adopted plan should be a reserve site. If reserve sites are to be released then they should be on the basis of land falling within the existing town boundaries should be released prior to sites outside those boundaries. Site BM006 should be reallocated as mixed use to allow part of the site nearest the existing Kirby trading estate to become an extension to the estate. This is a more sustainable site for business use as it is outside the TT course. It would also go hand in glove with changing the designation of employment land between Braddan Bridge and the Snugborough Trading estate on the Peel Road, but now not a good neighbour to the river corridor or the adjacent residential areas, to predominately residential (inc open space/nature/wildlife/amenity area).	<p>Please see Strategic Reserve Site Release Mechanism - para 12.19.</p> <p>Sites BH030 and DBH002 are to remain as general allocated sites in line with the Inspector's Report.</p> <p>Cabinet Office will monitor the extent to which sites are being delivered and where these sites are.</p> <p>In terms of considering sites for other purposes, the time for doing so has now passed.</p>
BHLF-AAMW-WTX7-Z	M	28	M28: The commissioners remain disappointed by this outcome	Noted.
BHLF-AAMW-WTX7-Z	C	Comment not specific to a modification.	The Commissioners would support a delay in publishing the plan to allow for the additional census data etc. to be factored into the plan. If not perhaps an interim plan would suffice pending a further review as part of the preparation of the other area plans.	<p>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</p> <p>An interim plan would still have to go through the formal procedure as set out in the Act. Any other plan wouldn't be a statutory plan.</p>
BHLF-AAMW-WTX7-Z	M	30	The CO seem to use settlement and development boundaries as interchangeable terms, which is clearly not the correct. The development boundaries continue in places to be inconsistent and do not properly reflect the actual land which is included within the incoherently drawn boundaries. Areas which are wholly unsuitable/not deemed suitable for development such as flood risk areas, playing fields/golf courses/farmland/open space. The plan should be redrawn to show only areas that are suitable for built development.	<p>Cabinet Office understands that the term settlement boundary has proved difficult to understand for many parties but CO has been consistent in its application of the term for planning purposes.</p> <p>Identified early in the plan process, the boundary 'line' included main massing of development. In some cases this would cross Local Authority boundaries and differ from addresses.</p> <p>The identification of a Settlement Boundary is for a development plan purpose.</p> <p>The Inspector recommended in the Inquiry Report that Cabinet Office should be working to a settlement boundary that encompasses all proposed development sites that are to be released as general allocations.</p>
BHLF-AAMW-WTX7-Z	M	31	Generally supportive but as stated previously certain manufacturing processes that could utilise waste products, such as concrete mixing, glass/plastic reprocessing should also be allowed.	Noted

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BHLF-AAMW-WTX7-Z	M	33	The commissioners contend the whole of sites BH030 and DBH002 should be included as a green gap between Douglas and the built up areas of Union Mills/Strang. When considering, by comparison the much larger green gap proposed between Laxey and Lonan, then it seems illogical to allow such a small green gap between the largest conurbation on the island and the rural villages. By the loss of the fields on the Ballafletcher Road there will be no countryside left between Douglas and the built up area of Braddan turning effectively the whole area into one continuous development. The only concession the commissioners are willing to consider, and this is under duress, is for a small extension to the Tromode Woods estate to the rear of the properties on the Ballafletcher Road adjacent to Tromode Woods. The only other alternative the commissioners may not object to is if part of the site is used for a replacement for Braddan School, although a preference would be for a new school to be built nearer to Union Mills	<b>Most of these issues were discussed at the Inquiry. CO does not agree to split up proposed sites at this late stage as there is no justification to do so.</b>  <b>CO has reviewed the size of the Green Gap between Baldrine and Laxey and it was been reduced in size.</b>
BHLF-AAMW-WTX7-Z	M	41	These sites should be brought forward only when other sites within the town boundary have been exhausted and prior to any other greenfield sites outside Douglas/Onchan are developed.	<b>Cabinet Office is hopeful that urban renewal will take place but will continue to monitor the situation.</b>
BHLF-AAMW-WTXN-Q	M	7	The Council is disappointed with this modified written statement. The Council agreed with the previous proposal which stated that contemporary styles in conservation areas 'will' be appropriate rather than the modified 'may' be appropriate. The Council is concerned the new proposal will deter potential developers in terms of modern office or residential accommodation.	<b>Cabinet Office throughout the plan has tried to support Douglas Town Centre and while the original proposal may have been preferable to DBC it should be noted that the new proposal recommended by the Inspector does not preclude innovative design but more consideration should be given to the setting and character of the area.</b>
BHLF-AAMW-WTXN-Q	M	17	The Council welcomes the proposed new wording of Employment Proposal 4 and the restrictions imposed on retail and office developments but is disappointed that sites BE002b and BE006 will be released immediately for development, and therefore with the modified written statement. The Council is very concerned that the requirements of Strategic Plan Business Policy 7 will not be strictly adhered to which will allow office (other than corporate headquarters) developments out of town and thereby adversely affect the Island's Capital. There has never been a clear definition of what constitutes a corporate headquarters and the Cabinet Office is asked to produce such a definition as part of the Area Plan for the East. The current term is being used by organisations who have a base on the Isle of Man which is not their main corporate headquarters, only their local office and this needs urgent clarification.	<b>BE002b and BE006 are to be released as a general allocation but the full site is unlikely to be developed out at the same time. A master plan is required and there will need to be a phased release.</b>  <b>See please the Development Brief in the Written Statement.</b>
BHLF-AAMW-WTXN-Q	M	19	The Council welcomes this modified written statement.	<b>Comments are noted.</b>
BHLF-AAMW-WTXN-Q	M	21	The Council very much welcomes this modified written statement. However, an updated map showing the extent of the Town Centre boundary has not been uploaded by the Cabinet Office and should be provided to ensure clarity.	<b>The final Maps (Map 5) sets out the town centre boundary as set out in the Modification documents.</b>
BHLF-AAMW-WTXN-Q	M	22	The Council supports the modified written statement but is still very strongly of the view that site DM002 would be suitable for edge of centre office accommodation, particularly in preference to office development at Cool Road.	<b>CO has considered the points raised regarding DM002 by both DBC and Dandara. In terms of its suitability for office uses, CO has taken into account the characteristics of this site: it is unoccupied and has been for some years, it could facilitate improved active travel linkages, it is next to the town centre, is of a size that could justify a proper masterplan requirement. CO supports the added flexibility in use that offices could provide which may make it more readily come forward for development. A real mix of uses could be achieved which would suit the character of the area next to the river, close to the town centre. CO supports the regeneration of this site which is very visual on the entrance to Douglas town centre from this direction.</b>
BHLF-AAMW-WTXN-Q	M	34	The Council welcomes this modified written statement.	<b>Comments in support are noted.</b>
BHLF-AAMW-WTXN-Q	M	36	The Council welcomes modification 36 to the proposal map.	<b>Comments in support are noted.</b>
BHLF-AAMW-WTXN-Q	M	38	The Council has no issues with the amended map showing Mixed use Areas 81, 8b and 8c. However, the Cabinet Office needs to update and upload a map showing the extent of the Town Centre boundary for absolute clarity.	<b>The town centre boundary has been updated - see Map 5.</b>
BHLF-AAMW-WTXN-Q	M	40	The Council welcomes this modification.	<b>Comments in support are noted.</b>

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BHLF-AAMW-WTXN-Q	M	66	The Council supports the wording of the development briefs especially in relation to site BE002a, BE002b, BE006, DH002, DH057 and DM00s (Johnny Watterson's Lane). The Council has no comment on other development briefs.	<b>Comments in support are noted.</b>
BHLF-AAMW-WTX9-2	R	50	I would welcome further comment from the Cabinet Office as to why they need to remove paragraph 12.22 (page 133) from the Written Statement relating to the "Low Density Housing" in parklands. Unfortunately, I can't give an opinion until I understand what the Cabinet Office is trying to achieve by removing this particular clause, but it does appear that the Cabinet Office is not supporting further development of housing that includes any large open spaces? Hopefully, the Cabinet Office will publish additional information in due course.	<b>Paragraph 244 of the Inspector's Report describes that there is no particular justification for retaining the LDHP designation in the development plan. CO accepts Recommendation (R50) and all references in the Area Plan have been removed.</b>
BHLF-AAMW-WTX9-2	M	11	Transport Proposal 2 - I fully support the amendment being proposed on page 69 to co-ordinate the development of all transport modes to provide a comprehensive transport system centred on Douglas and the East. However, both the Inspector and the Cabinet Office have now confirmed that the majority of new homes in the future will be built in Douglas and Onchan. Therefore that particular paragraph should read "Douglas, Onchan and the East".  I am sure that my Constituents in Onchan would also like to have sight of any Traffic Management Plans, Designs and Bus Routes many months ahead of the Cabinet Office releasing Site OH 011 (Land at Ballachrink, Onchan) for potential development.	<b>Comments are noted but CO makes no change to 'Douglas and the East' ref.</b> <b>Release of Strategic Reserve Site OH11 will be a staged process in the future.</b> <b>See Development Brief in the Written Statement Chapter 12.</b>
BHLF-AAMW-WTX9-2	M	11	Utilities Proposal 2 - On page 71 of the Written Statement, the Cabinet is proposing to amend the Report with the following statement "ensure that planning for water supply, sewerage and drainage works receives high priority in the early planning stage for any new development".  In my previous correspondence, I mentioned the unique landscape of Onchan, which runs down from the Mountain to the Port Jack area and that Onchan has grown significantly since the 1970's with the development of Lakeside, Ballachurry, Manor Park and Birch Hill etc. I also highlighted that parts of Onchan are currently unable to cope with general rainfall and surface water during periods of heavy rainfall, which would have previously soaked into the natural landscape. I also brought to the attention of the Cabinet Office and the Inspector that raw sewage is still coming out of the sewerage network and going into certain properties during prolonged periods of heavy rainfall, and this is despite the MUA carrying out some urgent works recently in and around Ashley Park, Onchan.  Onchan's current and future water supply, sewerage and drainage network needs to be fully investigated over the next couple of years, and definitely before any potential development on Site 01-111 (Land at Ballachrink, Onchan).	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>  <b>CO makes no further change to UP 2.</b>
BHLF-AAMW-WTX9-2	M	11	Utilities Proposal 5 - In addition to the comments that I have just made, I welcome the Cabinet Office publishing a full policy statement on Utilities for the East of the island, but again this needs to be published as soon as possible and for any recommendations to be carried out many months in advance of any Strategic Reserve site being released.	<b>To clarify, CO does not intend to publish a further 'policy statement' on Utilities for the East of the Island outside the Area Plan for the East.</b>
BHLF-AAMW-WTX9-2	M	24	Tourism proposal 9 – I fully support the amendment being proposed by the Cabinet Office on page 104, which protects the environment of the Read ny Foillan footpath from unsympathetic development.	<b>Comments in support are noted.</b>

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BHLF-AAMW-WTX9-2	M	25	<p>I thank the Cabinet Office for amending the findings outlined at the bottom of page 116 and on page 117. However, given the amended information being submitted, I am surprised that the Cabinet Office have not also taken the opportunity to amend Housing Policy 1 (and Strategic Policy 11) and Housing Policy 3 (Page 113) of the Written Statement.</p> <p>If I am reading reading Section viii (page 117) of the Written Statement correctly, you are now making a provision of 1,500 additional dwellings in the East during this period, and not the 2,400 as quoted in the Isle of Man Strategic Plan 2016.</p> <p>Can you possibly confirm that the 1,500 additional dwellings are as outlined and recommended by the Inspector in Table 2 - Summary of the Recommended Residential Land Provision (page 112) of his Report into the Area Plan for the East? The household sizes and the number of private households on the island remain two of the key measurements when trying to forecast further housing need.</p> <p>It is very clear that the average household size on the island has fallen from 2.65 back in 1971 to 2.38 in 1996 and 2.28 according to the 2016 Census, which indicates that additional dwellings are required even if the island's population stayed the same over a period of time.</p> <p>However, we also know that according to the 2011 Census Report that 83,026 residents were living in 35,599 private households and if we move forward five years to 2016 we had 81,680 residents living in 35,763 private households.</p> <p>This is clear evidence that the island's population fell during that particular period and that there is still some capacity within the island's housing market to support further growth in our overall population.</p> <p>I still believe the Cabinet Office's projection of 38,075 private houses in 2025 and 40,484 private households by 2026 is still far too high.</p>	<p><b>CO cannot, through the East Plan, amend the wording of the Policies as set out in the Isle of Man Strategic Plan.</b></p> <p><b>The East Plan makes provision for 2,400 dwellings if the Strategic Reserves are taken into account.</b></p> <p><b>Table 18 in the Written Statement sets out in table form a breakdown of how 2,440 will be reached. Sources A, B, C, D equal 1,565, reflecting the need for '1500' new homes referred to in para 12.14.2 viii of the Plan.</b></p> <p><b>CO takes this into account, yes.</b></p> <p><b>CO relies on its internal population projections, yes.</b></p> <p><b>CO makes no changes to its approach as a result of this comment.</b></p>
BHLF-AAMW-WTX9-2	M	26	<p>I still have to seriously question why the Cabinet Office is proposing to remove Section 12.20.1 (page 122) of the Written Statement, which includes the statement "Such sites are normally only released for development if there is a compelling justification to do so".</p> <p>The removal of this particular paragraph concerns me greatly as an MHK on behalf of my Constituents in Onchan. The Cabinet Office in my opinion has an overriding duty to fully justify the overall "National Need", and for that statement to be made in public before they release any Strategic Reserve Site, especially when that development could result in the further erosion of the Manx Countryside.</p> <p>I echo the comments of my Tynwald colleague, Bill Shimmins, MI-IK when he says that whilst the Inspector is happy to leave the release of Strategic Reserve sites to the Cabinet Office, I am unconvinced that this is the correct approach.</p> <p>The precedent has been set whereby it is proposed that National Policy Directives on planning should be presented to Tynwald for approval.</p> <p>It certainly should not be left to one Minister, who may come under significant pressure from developers and residents, to make this determination.</p>	<p><b>Policies' and 'Proposals' tend to carry more weight than the supporting text in development plan documents.</b></p> <p><b>The matters of how Strategic Reserves are released and who should be responsible were discussed at length during the Inquiry.</b></p> <p><b>The release mechanism is not harmed by the removal of paragraph 12.20.1. and Written Statement has been update in full as one document.</b></p> <p><b>No precedent has been set by the Town and Country Planning Act now having a mechanism to bring forward National Policy Directives.</b></p> <p><b>There is a duty in the Act for CO to take into account any NPD made under section 2A of the Act when a development plan is being prepared or revised. There are no extant NPDs as at August 2020.</b></p>
BHLF-AAMW-WTX9-2	M	63	<p>If you are using Table 2, then I note that you have accounted for 270 dwellings completed or started since January 2011, but it doesn't mention anything about the 660 potential vacant properties reported on our island?</p>	<p><b>A vacancy factor was integrated into the Island wide figure for housing need.</b></p> <p><b>Vacancy rates were debated and evidence exchanged on the subject during the Inquiry process and earlier.</b></p> <p><b>No additions in respect of 'vacant' dwellings are needed in Table 2 as drafted.</b></p>

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BHLF-AAMW-WTX9-2	M	65	<p>..... the recommendations made by Mr Hurley in his final report were easy to read, especially around "Strategic Reserve Sites", which I was able to communicate back to my Constituents in Onchan.</p> <p>The Inspector was very clear when he said that "Strategic Reserve Sites that may be suitable for residential development should be held in "reserve" until the need of such development has been established, and the Isle of Man's population has exceeded 89,000".</p> <p>It is a simple statement and easy to communicate, but I also acknowledge that a resident population based trigger does not factor in several other elements including number of households and household size etc.</p> <p>If I am reading the Draft Area Plan for the East - Paper 5 (14th February 2020) correctly, then none of the Strategic Reserve Sites should be released until the island's population has reached 89,000, and the first opportunity to look again at the island's population will be in 2021.</p> <p>I hope the Cabinet Office will confirm that my understanding is correct on that particular point, and that based on current projections and recommendations etc., it is unlikely that any of the Strategic Reserve Sites will actually be released until at least April 2025.</p> <p>Can the Cabinet Office also outline the timeframe for central Government to publish their "Master Plan", to improve the island's road network, sewerage network and infrastructure etc. over the next five years, in order to fully prepare this island for any potential increase in its population, especially in relation to the extra 140 dwellings currently being proposed at Ballachrink, Onchan at some point after 2025.</p>	<p><b>In terms of Strategic Reserve Site release, CO attempted in the Modifications to introduce a second factor of measurement i.e. overall household numbers which is key to determining housing need.</b></p> <p><b>Considerable comment has been submitted on this second measure. There would however, still need to be official figures/survey data via the next Census before any release. And of course the Island reaching 89,000 wouldn't be the end of the decision making process. Following the original instruction referring to 89,000 only, there would still need to be an assessment of what the implications are for the East.</b></p> <p><b>Based on the 2016 Census, the Island's population is expected to reach 89,000 in 2031 if net migration was consistently 500 pa. A net migration of 1000 pa would result in 89,000 by 2022.</b></p> <p><b>By having more flexibility in terms of Reserve Site release this may even reduce speculative development in the form of applications.</b></p> <p><b>It is worth noting that any mechanism for release will in the end be a decision for Cabinet Office.</b></p> <p><b>Cabinet Office makes no comments at this point on the Department of Infrastructure plans to publish or consult on its master plan, however, the DoI and MUA are both aware of the scale of development contained within the plan and the figures contained with the strategic plan.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>
BHLF-AAMW-WTX6-Y	M	41	<p>Since the report has been published the Island has experienced the devastating Corona Virus. Quite clearly this will have very serious effect on the Island's economy as a whole, not least on the amount of strategic land needed. If businesses survive it is likely that many will streamline by closing offices and making the employees work from home. That coupled with the fact that it is probable the population numbers will stagnate, will mean that there will probably be a lot of new brownfield sites available as a result.</p> <p>Before any decisions are made it is vital that the Government understands the full implications of what is likely to happen. Once this green belt area is zoned there will be no turning back. In my opinion to get a good understanding of what is happening to our population one should wait and use the information from the 2021 census. I say that because the 2016 Census is so far out of date and that the cabinet office original estimates numbers were in dispute.</p>	<p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p>
BHLF-AAMW-WTX6-Y	M	45	Support, sewerage and flooding problems likely to occur.	<b>CO notes support.</b>
BHLF-AAMW-WTX6-Y	M	46	Support, sewerage and flooding problems likely to occur.	<b>CO notes support.</b>
BHLF-AAMW-WTX6-Y	M	47	Support, sewerage and flooding problems likely to occur.	<b>CO notes support.</b>
BHLF-AAMW-WTX6-Y	M	59	No Development should be allowed until Laxey sewerage disposal has been resolved. In addition a stipulation should be put on the developer to put comprehensive flood attenuation scheme in place prior to any building commencing.	<b>CO proposes limited development in Laxey - please see Map 7.</b>

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BHLF-AAMW-WTX6-Y	M	49	This should not be included. The access across the railway line is a big risk factor. The sewerage system is overloaded and until the system is connected into the iris system no development should be allowed. In the public inquiry the developer stated that a school, shop and public house would be built. It should be stipulated that no development should be considered unless these amenities are built first.	<b>The IRIS System is no longer being pursued by the MUA. A new waste treatment facility is being considered and developments can include their own treatment works as part of a scheme in some circumstances.</b>
ANON-AAMW-WTMC-1	M	65	The Inspector states that it is unlikely that the development of the Strategic Reserve Sites would be required before 2026. He also proposes that the sites should not be released before the population increases above 89,000. The Cabinet Office has amended this to 38,000 households. I understand the rationale, given that households are a better measure of housing unit demand than population.  However, both approaches are incorrect. Designating Strategic Reserve Sites at this stage ahead of the 2021 Census is not warranted. There is no evidence that these sites will be required before 2026, well after the Census results are available.  The importance of the Census is enshrined in the statutory Strategic Plan as part of the plan, monitor and manage approach. It was the agreement of the 2015 Strategic Plan allocations ahead of the 2016 census which caused the large and growing disconnect between plan and reality, which has dogged the Eastern Area Plan process since 2018. Given that we are now very close to the 2021 census, it would be sensible to await the results prior to agreeing any Strategic Reserve Sites.	<b>CO understand the suggestion and even the temptation to wait a year until 2021 Census but it has to be recognised that to wait - even for new Census data - means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b>  <b>CO maintains that there is merit in including Strategic Reserve Sites in the Plan.</b>
ANON-AAMW-WTMC-1	M	65	The outcomes of allocating a Strategic Reserve Site now include increasing the value of the land, which in turn becomes a tradeable asset for investors. This action also creates stress for local residents, blighting their homes, which may decrease in value. For the landowner, the value of farmland currently zoned as agricultural land can be multiplied by a factor of 5 to 7 times when it is zoned for residential development in the Eastern region. For the existing homeowner living adjacent to an approved Strategic Reserve Site, they will suffer years of concern whilst their property may decline in value and become more difficult to sell.	<b>The Plan process brought to the fore a long list of sites which might have potential for development.</b> <b>This process has seen sites be identified in the draft plan, changed again ahead of Inquiry and again through the Inspector's report and CO Modifications. There can never be any guarantee for those that live alongside vacant sites or in 'edge of settlement' locations that land close to them will not one day be brought forward for development or indeed suggested for development even if it doesn't end up in a final plan.</b>  <b>CO recognises the emotive nature of development planning but also the benefits of transparency, openness and having a proper framework in place for those sites which have merit, are considered sustainable but which are not required just yet.</b>
ANON-AAMW-WTMC-1	M	65	I also strongly oppose the proposal that the release of the Strategic Reserve Sites sits with the Cabinet Office. The precedent has been set whereby National Policy Directives on planning should be presented to Tynwald for approval. Government Ministers will come under significant pressure from developers to approve the release of Strategic Reserve Sites. There are very large sums of money at stake and development can become litigious. It is a highly emotive issue for residents. Who will decide in what order Strategic Reserve Sites are released? The plan is completely silent on this aspect. There is also a risk that rather than build on brownfield sites, developers will simply redouble their efforts to obtain full planning approval on greenfield strategic reserve sites.  On this basis no Strategic Reserve Sites should be allocated at this time.  If any Strategic Reserve Sites are regrettably allocated in the plan, it should be Tynwald Court which approves their release. This would provide a more balanced process, consistent with that in place for National Policy Directives and it would also provide protection against legal disputes from disgruntled parties.	<b>In terms of the Strategic Release mechanism - see Written Statement para 12.19.</b>  <b>There is a duty in the Town and Country Planning Act for CO to take into account any NPD made under section 2A of the Act when a development plan is being prepared or revised. There are currently no extant NPDs as at August 2020.</b>  <b>Cabinet Office does not support the power to release Strategic Reserves being passed to Tynwald.</b>  <b>Tynwald has legal power under the Act to approve the Plan.</b> <b>CO has the ability to undertake assessment of the suitability of Strategic Site Release against approved policy.</b>



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ANON-AAMW-WTMC-1	M	65	<p>The Isle of Man has never allocated Strategic Reserve Sites at this level before. A handful of Strategic Reserve Sites were previously agreed close to the airport. The airport is a strategic site; the ones proposed in this plan are not.</p> <p>Their continued insertion is politically driven to meet the original flawed Strategic Plan allocations. These allocations were based on population projections which have now been proven to be hopelessly over optimistic. The continued attempt to work back to this number is fundamentally flawed and undermines the credibility of the plan. The Cabinet Office must follow an evidenced-based approach and it is clear there is no need for any of the Strategic Reserve Sites until at least 2026. This is 5 years after the next Census, which will provide the data essential to guide our Strategic and Area plans.</p> <p>It is wholly inappropriate to maintain this charade at this time when the economic outlook is uncertain and concerning.</p>	<p><b>CO notes the comments but it not 'maintaining a charade' to forward plan for the sustainable development of the East of the Island. This Inspector admitted that projections are "necessarily crude and imprecise" so there must be flexibility in the plan.</b></p> <p><b>There is always a time lag between Census dates and the availability of statistics and projections. Different plans may have different numbers or sizes of Strategic Reserves but the East of the Island was always going to have a the highest proportion of development - Douglas is the Main Centre as identified in the strategic plan.</b></p> <p><b>It is accepted that there is considerable uncertainty at the moment on many matters but CO maintains that land still needs to be identified in the manner adopted at the modifications stage, for Strategic Reserves may also be suitable for uses other than housing.</b></p> <p><b>Reducing flexibility in the plan is not ideal at this point.</b></p>
ANON-AAMW-WTM7-N	M	65	<p>I have concern that the process for specifying and releasing Strategic Reserve Sites (SRS) is not well enough defined. And I believe this process should be suspended at this time for the following reasons:</p> <p>While households are arguably a better indicator of housing need I do not agree any SRS should be designated ahead of the next census in 2021, and probably for many years after that given the Inspector's prediction is that none would be required before 2026.</p> <p>Given the economic disruption likely to result from the current Coronavirus pandemic, who could possibly predict with any accuracy the likely impact on the island's population, also the potential change in lifestyle and housing requirements? It is surely essential to defer a decision on SRS until after the next Census has been completed and published.</p> <p>The Strategic Plan states the reserve sites are not for immediate release but (8.6.1) one 'to monitor...to ensure there are sufficient opportunities for housing'. This I feel would be better looked at in the round, a whole island picture, awaiting the north and west area plans outcomes. Given recent significant housing developments have been approved during this process, who can say what is the current need. It does not seem to be evidence-led but instead developer-led.</p> <p>I fear designating SRS in the area plan for the East would enable - even encourage - a developer speculatively to put in planning applications and for consideration potentially to be given to those plans, with all the resultant impact on the community.</p> <p>As population growth has not fulfilled predictions and because of the current economic uncertainty, there does not seem to be a pressing need for strategic reserve sites to be designated at this time. The issue of the large vacancy rate in IoM properties at the last census also needs to be considered ahead of any SRS being released.</p> <p>During the public consultation there was discussion of a prioritisation system being included for releasing the various SRS and that would be welcome in terms of sites, again with Tynwald approval. Also, there needs to be more emphasis on SRS not being developed until brownfield development land has been exhausted and this point does not seem to be given any weight in the designation or release of SRS.</p> <p>I would suggest there is no benefit to the community for these SRS to be set in stone at this time, and ahead of the rest of the island's area plans being concluded.</p>	<p><b>CO judges that there is merit in having Strategic Reserve sites in the Area Plan for the East.</b></p> <p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p> <p><b>The Inspector recognised during the Inquiry that developers can put in applications at any time. Applications can be even be approved if there are material considerations to warrant a setting aside of the development plan land allocation.</b></p> <p><b>See Section on Strategic Reserve Site release mechanism - para 12.19.</b></p>

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ANON-AAMW-WTM7-N	M	65	<p>One other aspect of concern is Cabinet Office having responsibility to release the SRS. I can appreciate the view that it should be an objective process away from political influence but planning developments are always subjective and surely Tynwald approval being required would enable better oversight of this critical point. Otherwise it could lead to allegations of undue influence on a small number of officers/politicians; it would be the opposite of open government.</p>	<p><b>Cabinet Office does not support the power to release Strategic Reserves being passed to Tynwald.</b></p> <p><b>Tynwald has legal power under the Act to approve the Plan. CO has the ability to undertake assessment of the suitability of Strategic Site Release against approved policy.</b></p> <p><b>There is a duty in the Town and Country Planning Act for CO to take into account any NPD made under section 2A of the Act when a development plan is being prepared or revised. There are currently no extant NPDs as at August 2020.</b></p>
BHLF-AAMW-WTXB-B	M	65	<p>The Inquiry heard a great deal of evidence regarding demographics and housing need and the Inspector's view in the light of that is "the allocation and release of land to meet the requirement of Housing Policy 3 of the Strategic Plan would be likely to result in a serious over-provision of housing." (paragraph 213). He highlighted the danger of greenfield development proceeding ahead of brownfield development and that such a consequence would be contrary to Strategic Policy 1. Thus he considered that the release of development land "should be managed to reflect current demographic circumstances".</p> <p>The demographic evidence before the inquiry led to the Inspector seriously revising downwards the number of additional households in the East that would be needed during the Plan period to 2026 and the Cabinet Office has accepted the Inspector's recommended modification to paragraph 12.9.2 of the draft Area Plan.</p> <p>Subsequently the Island has been hit by the impact of Covid-19, a factor which has already affected the Island's border and economy and which seems very likely to seriously influence our demographic circumstances for the foreseeable future, including the assumed net inward migration figure of 500 people per year. Given this, the upcoming 2021 census, the 2021 review of the Strategic Plan and the work now underway on the Area Plan for the North and West, the opportunity to obtain up to date demographic data and data on housing provision island wide should now be taken before allocating unnecessarily land in the East for future residential development through Strategic Reserve sites.</p>	<p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p>
BHLF-AAMW-WTXB-B	M	65	<p>The Inspector is clear that a material consideration is "whether there is a sufficient need for additional housing to justify a departure from development plan policy."</p> <p>And that test of need for additional housing must be tied to clear and objective criteria that is based on up to date data. The Inspector has suggested this be the overall population exceeding 89,000 and comments that "the assumed rate of net inward migration is likely to have a more significant impact than changes in household size on housing need up to 2026."(paragraph 202)</p> <p>The Cabinet Office's proposed modification detracts from the Inspector's recommendation as it introduces scope for speculation as to the likely number of households in the future and states that "consideration will be given to their [Strategic Reserve sites ] release..." This moves away from an objective trigger and instead empowers the Cabinet Office to make the determination based on its interpretation of available data and the balance between that and any other guidance set out in the Plan. The reference here to "the Plan" seems to mean the Area Plan for the East and not the Strategic Plan. However, there are numerous relevant and important factors in the Strategic Plan which is part of overall development plan policy and highly material to any decisions regarding housing need, where houses should be developed etc.</p> <p>This modification waters down the Inspector's recommendation of an objective trigger and leaves the decision-making in the hands of the Cabinet Office with no mechanism for Tynwald oversight, which is highly unsatisfactory. To ensure transparency, and create confidence in all parties in the mechanism for release, the trigger must be kept to an objective one that can be readily understood by all parties and will not allow for speculative residential planning applications on Strategic Reserve sites, prior to there being a clearly established need that has not been met by the development of existing brownfield sites and all other allocated development sites.</p>	<p><b>In terms of Strategic Reserve Site release, CO attempted in the Modifications to introduce a second factor of measurement i.e. overall household numbers which is key to determining housing need.</b></p> <p><b>Considerable comment has been submitted on this second measure. It is agreed that the measure introduces more 'scope' but was not speculative as such. There would still need to be official figures/survey data via the next Census.</b></p> <p><b>By having more flexibility in terms of Reserve Site release may even reduce speculative development in the form of applications.</b></p> <p><b>It is worth noting that any mechanism for release will in the end be a decision for Cabinet Office.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>

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BHLF-AAMW-WTXB-B	M	65	<p>If any such sites are still to be included in the Area Plan for the East it is essential that there be an objective mechanism to control the release of Strategic Reserve sites. This in line with both the Inspector's Report and the motion in Tynwald in October 2019 which received unanimous support and which should also be reflected in the approach to the content of the draft Plan.</p> <p>The Inspector states (paragraph 219) that the release of a Strategic Reserve Site for residential development should be contingent on some objective criterion. The importance of objectivity cannot be overstated if everyone is to be able to have confidence in any decision to release such a site.</p> <p>It is also important given the issue the Inspector highlights at paragraphs 221 and 222; namely that a developer could at any time make a planning application in respect of a Strategic Reserve site. In determining such an application the relevant decision maker is obliged to have regard to the provisions of the Development Plan so far as material to the application (see s 10(4) (a) Town and Country Planning Act 1999).</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p> <p><b>CO has considered all of the comments which have stressed the need for objectivity.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>1. Access to the site is REAL concern - the department of infrastructure at the inquiry advised that they are unable to comment re the suitability of 1 access point for a housing estate of this size being feasible and could only comment once a planning application has been submitted - If they feel it is not sufficient they could stop the development - surely a thorough review of the implications of the plans proposed at the inquiry should be performed before a rezone for this housing at this scale is agreed. The proposed entrance to the estate is just down from Braddan School - in order to achieve this the existing large retaining wall down to the Oak tree roundabout would need to be rebuilt further back - that in itself would cause considerable chaos and loss of mature registered trees!</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>2. Traffic congestion - Again a thorough study needs to be performed as to the impact of an additional 350 plus cars to the oak tree junction and the impacts on Quarter bridge, Braddan bridge, commuter traffic from the West, Tromode Road, Ballafletcher Road, access to the hospital and impact on TT access road - The Inspector believes the infrastructure can handle the influx.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>3. Traffic pollution - Bill Shimmins has already conducted a study which shows that air quality at the Quarter bridge / oak tree / Braddan bridge areas is currently above acceptable European levels.</p>	<p><b>It is Cabinet Office's understanding that Bill Shimmins MHK, Ralph Peake MHK and Bill Henderson MLC, paid for 6 tests to be carried out around Douglas to demonstrate the potential for air pollution. The scientific basis for this study is unknown. It was not submitted as evidence nor was it examined at Public Inquiry. Cabinet Office therefore has no other comments to make.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>4. Environmental impacts - in the absence of an agreed policy on how the Island is going to tackle issues of climate change - surely a development of this scale contradicts any steps to protect the planet - the removal of large green open spaces and mature REGISTERED trees with the replacement of concrete. Added heat and noise pollution to the area, the loss of wildlife and destruction of their habitats.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>5. Loss of Open Spaces - the development of these fields will create a continuous belt of development, with no open / green spaces left from Union Mills through to Port-e-Shee from a birds eye view. It will also mean the coalescence of settlements which the Eastern Plan criteria stated would avoid.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Additional Green Gaps were added as part of the modifications and the open space/sports pitches south east of the Hospital are now clearly shown on the Maps.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>6. Change of appearance and character of the area. The Inspector believes that this site is well contained and will not be visible to those outside of the immediate boundary. These fields can be seen from numerous surrounding points, including, Vagabonds Rugby grounds and club house, IOM, hospice, Ballanard Road, Tromode estate, Quarterbridge Road, Selbourne Drive etc..</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage.</b></p>
ANON-AAMW-WTMR-G	R	51	<p>7. This site is nearer to Noble's Hospital and Hospice. Additional 300 plus dwellings will cause noise, air and environmental pollution which is not good for patients at Noble's and palliative care patients at the Hospice towards their end of life care!</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage.</b></p>

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ANON-AAMW-WTM3-H	R	51	<p>We are hugely concerned with regards to the largest proposed site for development (refs DBH002 and BH030). Despite much opposition from residents and Braddan Commissions and the potential conflicts with many aspects of the Strategic Plan, they remain unchanged.</p> <p>The arguments made at the Inquiry made it very clear that in order to maintain and support a development of this scale, further in depth reviews are required, particularly in respect of the existing highways issues and also the ability of the educational and health services to support a development of this size. The funds that would need to be allocated by other Government departments to support this should be included in this review. Reviews should also be undertaken in respect of climate change impacts, including pollution within this area, the value and grading of the agricultural land that will be lost by the development and the impacts to the landscape. The recent Covid crisis has reinforced the importance of the islands ability to remain self sufficient. Agricultural land grading should be enforced before consideration is given to re-zone that area, to understand it's future importance and ability to provide food for the island. Land grading has not been performed on these two sites. It has been said that some of the best agricultural land on the island is now the site of Nobles hospital. Please plan for our future requirements and ensure all Greenfields under consideration are graded and the outcome is factored in.</p>	<p><b>In terms of this site(s), arguments for and against were set out throughout the plan process and the Inquiry itself both in oral and written evidence. Although not binding, the Inspector's report is valued and respected and the recommendation for the development of the site continues to be supported by CO. There is always a balance needed between development requirements and the impact on environmental, community and social infrastructure.</b></p> <p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p>
ANON-AAMW-WTM3-H	R	51	<p>During the inquiry for sites DBH002 and BH030 the Government representation for the Highways confirmed that it would be preferable to have two exits to the site. It was recognised that the real impact that such a large development would have to congestion and services in and around the area could not really be determined until the more detailed planning stages. Highways were unable to confirm that they would not stop the proposed development, yet still it remains on the plan!</p> <p>By the planning stage, the land has already been rezoned and its true value to housing density figures for the Eastern plan planning purposes can't truly be quantified. Surely this defeats the object of the exercise? The Cabinet Office should have enforcing that these facts are confirmed by the experts and costs quantified to determine how feasible these proposals are, to ensure that more time and money is not wasted in determining them at a later date.</p>	<p><b>It is the role of the Planning Inspector to weigh up all of the arguments put forward and to make recommendations where appropriate setting out the reasoning for doing so.</b></p> <p><b>A Development Brief for this land is now included in the Written Statement.</b></p> <p><b>Once approved by Tynwald and once in operation, the plan is the statutory development plan for the east and forms part of the Island Development Plan along the Strategic Plan and any other area plans (and extant local plans).</b></p> <p><b>The total number of dwellings and overall density of development will not be known until planning approval is granted. Specific details of any design and layout do not need to be part of the development plan. The principles are however and these have influenced not only the recommendation to support the site being allocated but also the development brief.</b></p> <p><b>A development plan allocation and development brief have been known to reduce controversy and delay at the planning application stage.</b></p>
ANON-AAMW-WTM3-H	R	51	<p>Regular highway users of the area include local residents of Tromode, hospital workers and commuters from Onchan, Laxey and Ramsey. Of those users that have been approached, there is agreement that the impacts of such a large development would change the ease of travel around this area and the country feel of these smaller settlements. Tromode Road / Braddan Road, Braddan Bridge, Quaterbridge are already at capacity and continue to be impacted by large developments being put up in Peel, and elsewhere.</p> <p>When considered in conjunction with other proposed developments in and around the area on the plan, there will be further impacts in respect of congestion and pollution levels at Quarterbridge and Oakwood areas (where the inspector agreed there is little that can be considered for improvement). The traffic analysis commissioned by the department of Infrastructure highlighted there would be severe travel congestion if the plan was developed. Housing numbers for sites DBH002 and BH030 as part of that study were for a much reduced figure than the number properties discussed in the inquiry and suggest further studies should be conducted to reflect what is now being considered and their impacts.</p>	<p><b>The DOI provided evidence to the Inquiry orally and in written form.</b></p> <p><b>Figures within the Systra Report do not match the exact figure of individual sites as not all sites will be built out during the plan period. Cabinet Office has monitored take up rates of residential approvals year by year since 2001 and included these in site projections. CO therefore makes no change to the inclusion of this site in the final plan.</b></p>
ANON-AAMW-WTM3-H	R	51	<p>Further studies should also include a view of all island developments being constructed and in the pipeline, as well as Eastern plan proposals to map the impacts expected to congestion to highlight and feasibly consider sites that would not further aggravate the already saturated pressure points.</p>	<p><b>There is no justification to delay the adoption of the area plan and undertake further studies.</b></p>

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ANON-AAMW-WTM3-H	R	51	With regards to Green spaces these two sites provide a green space view to numerous island residents in Douglas, Braddan and further afield i.e. Selbourne Drive, Quarterbridge Road, Ballanard Road, Bray Hill. I urge you to stand on the elevated field site DBH002 to determine the extent of how 'concealed' such a development would be. We believe it's elevation will impose a substantial impact to the landscape! The inspector and defending parties at the inquiry stated such a development will be concealed. We do not believe this is the case. Views of it would be wide reaching.	<b>Landscape impact arguments were discussed at the Inquiry. The Inspector's report balanced all of the evidence. Landscape impact was not at a level sufficient enough for the site not to be recommended for inclusion as a development site.</b>
ANON-AAMW-WTMF-4	R	51	I am particularly concerned re the development of DBH002. The proposed number of houses at 300 would make living in this area untenable due to the traffic congestion and associated pollution. This particular area is already blighted by over congestion. It feels unpleasant to reside in Tromode Woods or the surrounding locality. There is coalescence between Douglas and Braddan. Site access to the proposed estate is difficult. There is a lack of appropriate children's schooling. The proposal of 300 homes is very ambitious. Finally the visual aspect of such a large estate would be very damaging to the area. I feel smaller housing estates would be more in keeping with the IOM rather than large sprawls of housing. This is a worrying time for present residents and in the long term it will be detrimental to all of the residents of Douglas and Braddan.	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations/objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>  <b>In addition, the 300 figure was an estimate for land supply statistics only.</b>
ANON-AAMW-WTME-3	R	51	We are hugely concerned about the largest proposed site for development with refs DBH002 and BH030. Despite much opposition from residents and Braddan Commissions, and the fact that the sites conflict with many aspects of what the Strategic Plan sets out to achieve, they remain unchanged in any way. The arguments at the Inquiry made it very clear that in order to maintain and support a development of this scale further in depth reviews are required, particularly in respect of the ability of the existing highways, educational and health services, to support a development of this size and to explore the funds that would need to be allocated by other Government departments to support this. The impacts to the climate and pollution within this area, the value and grading of the agricultural land that will be lost by the development and the impacts to the landscape should also be considered. The recent Covid crisis has reinforced the importance of the island's ability to remain self-sufficient. Agricultural land grading should be enforced before being considered for re-zoning, to understand it's future importance and ability to provide food for the island. Land grading has not been performed on these two sites. It has been said that some of the best agricultural land on the island is now the site of Nobles hospital. Please plan for our future requirements and ensure all Greenfields under consideration are graded and the outcome is factored in.	<b>In terms of this site(s), arguments for and against were set out throughout the plan process and the Inquiry itself both in oral and written evidence. Although not binding, the Inspector's report is valued and respected and the recommendation for the development of the site continues to be supported by CO. There is always a balance needed between development requirements and the impact on environmental, community and social infrastructure.</b>  <b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>

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ANON-AAMW-WTME-3	R	51	<p>During the inquiry for sites DBH002 and BH030 the Government representation for the Highways confirmed that it would be preferable to have 2 exits to the site, of which there are not, and that the real impact that such a large development would have to congestion and services in and around the area could not really be determined until the more detailed planning stage, so a defined confirmation that the highways would not stop the proposed development could not be given, yet still it remains on the plan!</p>	<p><b>It is the role of the Planning Inspector to weigh up all of the arguments put forward and to make recommendations where appropriate setting out the reasoning for doing so.</b></p> <p><b>A Development Brief for this land is now included in the Written Statement.</b></p> <p><b>Once approved by Tynwald and once in operation, the plan is the statutory development plan for the east and forms part of the Island Development Plan along the Strategic Plan and any other area plans (and extant local plans).</b></p> <p><b>The total number of dwellings and overall density of development will not be known until planning approval is granted. Specific details of any design and layout do not need to be part of the development plan. The principles are however and these have influenced not only the recommendation to support the site being allocated but also the development brief.</b></p> <p><b>A development plan allocation and development brief have been known to reduce controversy and delay at the planning application stage.</b></p>
ANON-AAMW-WTME-3	R	51	<p>By the planning stage, the land has already been rezoned and its true value to housing density figures for the Eastern plan planning purposes can't truly be quantified. Surely this defeats the object of the exercise? The Cabinet Office should be enforcing that these facts are confirmed by the experts and costs quantified to determine how feasible these proposals are, to ensure that more time and money is not wasted in determining them at a later date.</p> <p>Regular highway users of the area include local residents of Tromode, hospital workers and commuters from Onchan, Laxey and Ramsey. Of those users that have been approached, there is agreement that the impacts of such a large development would change the ease of travel around this area and the country feel of these smaller settlements. Tromode Road / Braddan Road, Braddan Bridge, Quaterbridge are already at capacity and continue to be impacted by large developments being put up in Peel, and elsewhere.</p> <p>When considered in conjunction with other proposed developments in and around the area on the plan, there will be further impacts in respect of congestion and pollution levels at Quarterbridge and Oakwood areas (where the inspector agreed there is little that can be considered for improvement). The traffic analysis commissioned by the department of Infrastructure highlighted there would be severe travel congestion if the plan was developed. Housing numbers for sites DBH002 and BH030 as part of that study were for a much reduced figure than the number properties discussed in the inquiry and suggest further studies should be conducted to reflect what is now being considered and their impacts.</p> <p>(note - response appears to be duplicated)</p>	<p><b>The DOI provided evidence to the Inquiry orally and in written form.</b></p> <p><b>Figures within the Systra Report do not match the exact figure of individual sites as not all sites will be built out during the plan period. Cabinet Office has monitored take up rates of residential approvals year by year since 2001 and included these in site projections. CO therefore makes no change to the inclusion of this site in the final plan.</b></p>
ANON-AAMW-WTME-3	R	51	<p>Further studies should also include a view of all island developments being constructed and in the pipeline, as well as Eastern plan proposals to map the impacts expected to congestion to highlight and feasibly consider sites that would not further aggravate the already saturated pressure points.</p> <p>(note - response appears to be duplicated)</p>	<p><b>There is no justification to delay the adoption of the area plan and undertake further studies.</b></p>
ANON-AAMW-WTME-3	R	51	<p>With regards to Green spaces these two sites provide a green space view to numerous island residents in Douglas, Braddan and further afield i.e. Selbourne Drive, Quarterbridge Road, Ballanard Road, Bray Hill. I urge you to stand on the elevated field site DBH002 to determine the extent of how 'concealed' such a development would be. We believe it's elevation will impose a substantial impact to the landscape! The inspector and defending parties at the inquiry stated such a development will be concealed. We do not believe this is the case. Views of it would be wide reaching.</p> <p>(note - response appears to be duplicated)</p>	<p><b>Landscape impact arguments were discussed at the Inquiry.</b></p> <p><b>The Inspector's report balanced the evidence. Landscape impact was not at a level sufficient enough for the site not to be recommended for inclusion as a development site.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTX1-T	R	51	We continue to object to the designation of the agricultural sites DBH002 and BH030 as 'predominantly residential'.	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations/objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>
BHLF-AAMW-WTX1-T	R	51	<p>The modifications ignore a critical constraint (Environment Policy 14 of the Strategic Plan 2016) that is likely to apply to site BH030 and, in the opinion of soil experts, site DBH002 due to its proximity. Like Camlork, the sites are in the area of high-quality agricultural land. If they were tested, they would be likely to show to have Class 2 agricultural land.</p> <p>Contrary to the inspector's interpretation of the Agricultural Land Use Capability Map as all inclusive, it is not comprehensive. Many agricultural sites are not represented on it, only because they have not been tested. This is currently the only reason for sites DBH002 and BH030 not being on that map. Two residents around sites DBH002 and BH030 interviewed the author of the source quoted as authoritative in the Strategic Plan 2016 - Agricultural Soils of the Isle of Man, Harris et al, (Centre for Manx Studies) 2001. Mr. Harris confirmed on two different occasions that the work was an academic exercise on the subject and not a comprehensive study.</p> <p>Representatives of 326 residents around sites DBH002 and BH030 informed the inspector during the enquiry and in their closing submissions that they were going to combine efforts and funding with Braddan Commissioners, who also objected to the rezoning proposal, to commission a soil test of site BH030 by a DEFA-approved soil expert. Due to the proximity and landscape of the sites, in the expert's opinion, the test would also give a reasonably accurate indication of the soil class on site DBH002. Unfortunately, soon after the inspector's report and the Cabinet Office's responses were published, COVID19 restrictions precluded the expert from travelling to the island to conduct the test in time for the results to be considered at the next stage.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage.</b></p> <p><b>Sites DBH002 and BH030 lie with the Urban Classification on the 'soil capability map'. The surrounding lands are class 3 and 3/2.</b></p> <p><b>Cabinet Office has had regard to the representations/objections set out in this comment but makes no change to its approach/the Plan as a result.</b></p>
BHLF-AAMW-WTX1-T	R	51	<p>It is unsatisfactory of the Inspector and the Cabinet Office to simply ignore the objection based on a critical constraint of Environmental Policy 14, which becomes particularly important at the time when the island has to be ready to be self-sufficient in food production and agriculture. Reliance on the Agricultural Land Use Capability Map is unjustified when its authority and completeness are known to be limited. If the developer and the Cabinet Office followed due process, they should have commissioned the soil test and disclosed the result. It is not credible to avoid the issue, against the persistent challenge that the results of the soil test, if proved to be as expected, would be a reliable basis for the withdrawal of the designation of the agricultural sites for housing development.</p> <p>Travel restrictions will eventually be lifted. The soil expert will test the site. For reasons set out above, there is no rational reason to rush the Area Plan through when the change in circumstances warrants a comprehensive review of its fundamentals.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage.</b></p> <p><b>Environment Policy 14 is intended to protect important and versatile agricultural land. The Inquiry discussed the Study and associated document and Map and the comprehensiveness of that Map. This site does not appear on the classification map - and the Inspector acknowledged that there was no technical evidence that the land was especially versatile farmland.</b></p>
BHLF-AAMW-WTX1-T	R	51	<p>Furthermore, the only reason for the lack of expert evidence on the level of pollution due to excessive traffic on Braddan Road and Ballafletcher Road is that we did not expect a nearly irrational dismissal by the inspector of the Friends of the Earth's report on above-the-norm pollution levels on Quarterbridge, the main road next to site DBH002. Braddan Road and Ballafletcher Road have not been tested yet during congestion times (in other words, when road users are normally out on the roads). If they were, they would be shown to be as bad as Quarterbridge, particularly if the sites next to them were developed as currently proposed.</p> <p>It is contrary to evidence already available to dismiss the results of traffic pollution testing done by the Friends of the Earth at Quarterbridge as irrelevant to the sites. The finding of Quarterbridge being too remote to affect pollution levels on Braddan Road is inconsistent with the geographic evidence, local knowledge and the health and lifestyle concerns. The inspector regards central Douglas as being close enough to cycle and walk to from the sites, but ignores the reality that the cycling and walking routes would go mainly via the heavily polluted Quarterbridge, which is closer than central Douglas. The Cabinet Office should reject his conclusions on this aspect and take the evidence of pollution seriously. If they need an expert report on the level of pollution on Braddan Road and Ballafletcher Road, the tests can be done when normal traffic resumes.</p>	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations/objections set out in this comment but makes no change to its approach/the Plan as a result.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTX1-T	R	51	<p>During a meeting of Tynwald on Wednesday 20th February 1991, the following relevant comments were made on an equivalent proposal to rezone the Drinkwater land, now site DBH002, for housing development (stated on page 39 of the Hansard report): -</p> <p>'If I may first deal with the land at Ballafletcher, this proved both an easy and a difficult problem to solve. On the one hand the land in question is owned by Government, can be serviced, was zoned in part for industrial development in the 1982 Development Plan and, following investigation by the department, it was considered that a substantial residential development based on a hamlet type development would go a considerable way towards meeting a need apparent to all and quantified in the department's Housing Report. Against this, the proposed use of the residential purposes was unrelated to any existing residential development and would have the effect of cognisance of settlements in Union Mills, Strang, Cronkbourne Village and Douglas. Building across the brow of the hill would constitute skyline development creating a significant visual impact. The decision to remove the designation was not only helped by the merits of the arguments against the proposals but also the strength and conviction behind the arguments advanced by the general public and the local commissioners. It should be noted that in amending the designation from residential to open space in agricultural use owned by Government, we have not simply followed the 1982 Development Plan.' [emph. added].</p> <p>The Draft Area Plan for the East does not have a solid basis for overturning the earlier development plan. Its current housing need projections are obsolete. The Cabinet Office needs to listen to the arguments made by the people that would be affected by its proposals most: the public and the local commissioners. The development of the green gap between Tromode Woods &amp; Braddan Hills will in effect create coalescence between Union Mills (Braddan) &amp; Douglas via the various developments running through the Braddan Valley. The new Area Plan needs to take the above arguments into account.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage.</b></p> <p><b>Cabinet Office has had regard to the representations/objections set out in this comment but makes no change to its approach/the Plan as a result.</b></p>
BHLF-AAMW-WTXH-H	R	51	<p>Object ....it is the responsibility of Government to ensure that in accordance with the Island Strategic Plan that no development be permitted on agricultural land Grade 1/2. .... As far as we are aware these sites have never been subject to a soil test and yet we also have it on good authority that the swarth of land grade 1/2 which forms part of the Camlork site also extends to the Ballafletcher Rugby pitches. It is, therefore, possible that the highly graded land could extend across Ballafletcher Road and to the sites in question.</p> <p>There are many new housing developments in the South, North &amp; West of the Island currently in 'mothball' which will take time to feed through into the property chain and reach completion.</p> <p>Despite the many and at times heated debates in Tynwald regarding the prioritisation of brownfield sites for development the Planning Committee, with the support of the Planning Authority, have continued to approve greenfield sites for development. Why when Government policy has been clearly established?</p> <p>Taken together all the above we believe are sound argument to reverse the decision to approve the development of sites DBH002 &amp; BH030.</p>	<p><b>There is no single class 1 or class 2 soil type in the eastern plan area.</b></p> <p><b>Site DBH002 does not fall within class 1/2 on the ALUC Map, Env Policy 14(a).</b></p> <p><b>Site DBH002 does not fall within class 2/3 or 3/2 on the ALUC Map Env Policy 14(b).</b></p> <p><b>It is in an 'urban' classification.</b></p> <p><b>CO is content with the assessment of the site and supports the site's inclusion as a housing site subject to an appropriate development brief (see Written Statement).</b></p>



Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTX8-1	R	57	<p>Link Road ..... the planning applications following the zoning in the 1982 Island Development Plan incorporated the infrastructure which will enable ..... connectivity. Whilst this site is already zoned for development the proposed change in zoning will affect the form and layout of the resultant development significantly. .... traffic and visual impact matters will require re-assessment by the developer in that the original principles for residential development will be superseded. The most significant issue in this reassessment is traffic.</p> <p>At present the site entrance – the only means of access – is designed for a LDHP designation. It is a 5M wide access with footpath provision only to one side that terminates a few metres into the site. The position of the access point is fixed due to the visibility splay requirements and it is difficult to widen the road and/or provide footpaths due to the proximity of the adjacent property. The entrance and internal estate roads are private and not to adoptable standards. Consequently, whilst this entrance is appropriate for Low Density Housing in Parkland it is, in our view, inappropriate for a major housing scheme.</p> <p>The undeveloped area of this site is approximately 18/19 acres. At medium density this will in theory allow a development of over 100 dwellings. Whilst Manx Roads 2 is not prescriptive in numbers for single access development clearly this sort of traffic generation would not be acceptable either for a single restricted access or traffic generation along Ballanard road which has on road parking and a single footpath of insufficient width in the vicinity of the site entrance.</p> <p>The introduction of a link road between Hightonwood Hill and Castleward Green running through Ballanard Woods would alleviate these issues and allow connectivity between settlements. The further benefits of active travel via cycleways, pedestrian thoroughfares and public transport routes would also flow from this this link road along with better access for emergency services. The implementation of this connectivity would also complete a road network consistent with, and having had proper regard to, policies which provide for future development proposals or future area plan proposals such as areas DH010; DH003; DH057.</p>	<p><b>Co is content that final numbers and design and layout can be addressed at the planning application stage. It is appropriate to allocate the site as a general housing state and it is not necessary to be reliant on an access through the residential estate to the south.</b></p> <p><b>Cabinet Office notes Dandara is not opposed to such a link.</b></p> <p><b>CO - in light of comments - has added text above the Development Brief in Chapter 12.</b></p>
BHLF-AAMW-WTX8-1	R	57	<p>The Strategic Policies of the 2016 Strategic Plan and Active Travel directives should be applied to any zoning, or reassessment of that zoning in this Area Plan Process, even if the original LDHP designation in the 1982 Island Development Plan is reconfirmed. All of these policies are contained in Manx Roads 2 and the IOM Strategic plan... (and) would apply to .... a Brief:-</p> <ol style="list-style-type: none"> <li>1) In respect of General Policy 2 the Brief should have regard to section (k) does not prejudice the use of adjoining land in accordance with the appropriate plan;</li> <li>2) The Brief should have regard to; Transport Policy 2: The layout of development should, make provision for new bus, pedestrian and cycle routes, including linking into existing systems.</li> <li>3) The Brief should have regard to; Transport Policy 5: Any improvements to the islands highway network, including the provision of new roads, footpaths and cycle routes should be undertaken in accordance with the environmental objectives of this plan.</li> </ol>	<p><b>Consideration of the site took place during the Inquiry and the Inspector's Report explained the reasoning behind the recommendation. A clear process has been followed (see also response to above comment).</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTX8-1	R	57	<p>In Section 11 of Paper 7 of the Cabinet Office Schedule of modifications a Development Brief is now suggested. ....the Brief fails to seek the inclusion of a link road between Castleward Green and Hightonwood Hill which would provide proper access to Ballanard Woods or the provision of a Masterplan for same in the manner of the concept plan above. The Site Development Brief should also have included Active Travel directives where connectivity of highway networks reduces travel time and encourages cycling/walking. A through road that connects Castleward Green would open up a network where public transport could service the whole surrounding area. The principal of a through road would have the support of the Highway Directorate as established by informal dialogue with the DOI Network Planning Officer at the Inquiry. In summary we believe that any development brief should have contained:-</p> <ul style="list-style-type: none"> <li>a. A full Traffic Assessment</li> <li>b. Either a requirement for, or consideration of, the provision of a link road from Castleward Green to Hightonwood Hill to allow connectivity of existing settlements and provide a proper means of access for Ballanard Woods</li> <li>c. An Environmental Impact Assessment</li> <li>d. The production of a Masterplan which would contain the following considerations;</li> <li>e. Consideration of the restriction of the LDHP zoning to the already developed area of four houses plus its immediate surrounds, with the remainder of the site being served by the aforementioned link road.</li> <li>f. The inclusion of a .... likely housing layout and mix flowing from same</li> </ul> <p>.....the Cabinet Office are now strongly encouraged to amend their proposed development brief for DH011 to incorporate a link road as described and illustrated which will allow the considerable benefits outlined in this document including the immediate housing capabilities of sites DH009 and DH011 – both sites being within the active travel zone. In addition, this road will allow access to Douglas without impeding the traffic junctions under pressure e.g. Braddan Bridge, Quarter Bridge, Onchan and Governors Bridge Roundabouts.</p>	<p><b>Consideration of the site took place during the Inquiry and the Inspector's Report explained the reasoning behind the recommendation. A clear process has been followed (see also response to above two comments).</b></p> <p><b>CO has reviewed the merits of adding to the development brief and supports the inclusion of a reference to: a potential link road, but not necessarily a requirement for it.</b></p> <p><b>All development briefs will be checked for appropriate references to active travel provision.</b></p>
BHLF-AAMW-WTX8-1	R	57	<p>In addition to the above matters the site is steeply sloping from north to south and is visible from distance. The imposition of an Environmental impact assessment to any development brief would safeguard the density and visual impact issues which may surround its more intensive development.</p> <p>DH009 and DH011 are sites immediately deliverable in the short term. In the event that deliverable sites cannot be brought forward immediately then it is our Clients view that the Modified Plan be delayed to remove the proposed allocation of brownfield sites that clearly cannot be delivered or their delivery is a long term aspiration.</p>	<p><b>CO does not support any undue delay to the adoption and approval of the plan and supports the balance of sites proposed.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXC-C	R	77	<p>We refer to site BH042 Ballafletcher Cottage. This site was not included in modifications M1-29 however, we believe the Inspector has mis-directed himself in his conclusion ref. para. 429.</p> <p>The Inspector states that BH042 is not within, or immediately adjacent to, any of the defined settlements listed in Spatial Policies 1 to 4 of the Strategic Plan. The site however sits within a group of houses and two churches, adjacent to Braddan Bridge, opposite a major housing estate in Hightonwood Hill and adjacent to the residential Joey Dunlop Centre. Clearly therefore this site is in the middle of a residential area..... this is a fact.</p> <p>The Inspector then refers to the site as an 'isolated parcel' - we fail to understand why on the basis of the above? The site itself is already zoned residential as it is part of the amenity area for Ballafletcher Cottage. The proposal to subdivide this plot is not harmful nor visually intrusive. Indeed, we believe it would make an appropriate planning submission in isolation of the Area Plan - however my client has been consistently told by the Planning Department that any such application is premature to the Area Plan conclusion.</p> <p>If the conclusion of the Inspector is that this site is not in a residential area and is isolated from same, we strongly suggest he should have visited the site as he appears to have misdirected himself as to its location and his subsequent conclusion.</p> <p>The planning history of this site has been outlined in our submission to the Area Plan process on behalf of my client and for that reason will not be repeated here. However, the fact remains that this site was once considered as suitable for a development of multiple dwellings by the Planning Authority (not the one dwelling now sought) and nothing has changed.</p> <p>To omit this site from modification is wholly unjust to my client who has followed due process in good faith and at each stage his representations have been dismissed. As such, my client is presently considering legal recourse to the Area Plan process and will be making separate representation to the Cabinet Office. This is a representation that represents common sense and it is common sense to improve the visual amenity at Braddan Bridge with a well tended and maintained quality development. We would urge the Cabinet Office to re-consider its considerable merits.</p>	<p><b>CO supports the Inspector's recommendation on this site. In any case, the issues raised that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage.</b></p> <p><b>Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations/objections set out in this comment but makes no change to its approach/the Plan as a result.</b></p>
BHLF-AAMW-WTXM-P	M	1	M1 states "Land not yet released from the Strategic Reserve Sites should be subject to General Policy 3". How can land not yet released be subject to any policy?	<b>General Policy 3 in the Isle of Man Strategic Plan covers 'land outside of areas zoned for development.' Reference to GP 3 is appropriate.</b>
BHLF-AAMW-WTXK-M	M	1	M1 – We support regular plan reviews to ensure that the Area Plan is kept up to date.	<b>Comments noted</b>
BHLF-AAMW-WTXJ-K	M	1	We fully support the proposal for regular plan reviews to ensure that the Area Plan is kept up to date.	<b>Comments noted</b>
BHLF-AAMW-WTX3-V	M	1	We support regular plan reviews to ensure that the Area Plan is kept up to date.	<b>Comments noted</b>
BHLF-AAMW-WTXG-G	M	1	The requirement to formulate a masterplan for the Strategic Reserve sites off Johnny Waterson's lane needs to be co-ordinated with the development brief to allow infrastructure enabling work to take place prior to the reserve sites being developed. This should allow the construction of access arrangements to these sites to enable services to be located and therefore facilitate a masterplan to be followed in due course.	<b>The Master Plan requirement forms part of the Development Brief.</b>
ANON-AAMW-WTMT-J	M	1	<p>I do not believe that sites DM001 and DH057 should be considered for any development, whether now or in the future.</p> <p>The decision about future residential development to be based upon independent review and statistical analysis, particularly in relation to population projections. The statement "should this be required" concerns me as it gives no measure of what "requirement" is based upon.</p>	<b>Please see the Strategic Reserve Release Mechanism section in the Written Statement and Development Brief which does require any future development to be coordinated.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTMT-J	M	2	<p><i>In reference to the quote: "Provision of new homes is essential to support the population growth needed to underpin long-term economic growth and provide for residents' needs and aspirations."</i></p> <p>I understand this but the population projections thus far determined can be called in to question and cannot be considered reliable:</p> <p><i>'12.9.2 ...housing need calculations in the Strategic Plan are based on a projected Island-wide population, living in private households, of 91,898 by 2026. This assumed net inward migration of 500 people a year between 2011 and 2026... A more recent projection based on the results of the 2016 Census, and assuming net inward migration of 500 people a year between 2016 and 2026, shows that by the end of that period, there would be an Island-wide population of 85,671 living in private households...'</i></p> <p>Indeed, the Island's population fell between 2011 and 2018.</p> <p>Population projections are so important for many reasons and my primary interest is in their future impact upon strategic reserve sites. They might at least be independently prepared and based upon fact, rather than aspiration.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
ANON-AAMW-WTM8-P	M	2	<p>"Provision of new homes is essential to support the population growth needed to underpin long-term economic growth and provide for residents' needs and aspirations."</p> <p>I understand this but the population projections thus far determined can be called in to question and cannot be considered reliable :</p> <p><i>'12.9.2 ...housing need calculations in the Strategic Plan are based on a projected Island-wide population, living in private households, of 91,898 by 2026. This assumed net inward migration of 500 people a year between 2011 and 2026... A more recent projection based on the results of the 2016 Census, and assuming net inward migration of 500 people a year between 2016 and 2026, shows that by the end of that period, there would be an Island-wide population of 85,671 living in private households...'</i></p> <p>Indeed, the Island's population fell between 2011 and 2018.</p> <p>Population projections are so important for many reasons and my primary interest is in their future impact upon strategic reserve sites. They might at least be independently prepared and based upon fact, rather than aspiration.</p> <p>(note - response appears to be duplicated)</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
ANON-AAMW-WTMW-N	M	2	<p>This paragraph states that the majority of new homes will be in Douglas and Onchan and implies this is via brownfield sites and those within ESB existing settlement boundaries, 'making the best use of existing urban areas and previously developed land', coupled with 'sustainable extensions' to those settlements.</p> <p>This is misleading as it ignores the high level of development earmarked for Braddan, presumably considering Braddan as merely an extension of Douglas.</p> <p>It is extremely unfortunate that Cabinet Office has not provided totals from the All Sites lists to demonstrate how the selection supports the strategy. It is also misleading, given the quantity of housing still proposed to be outside settlement boundaries on greenfield sites, as the Inspector only identified 249 of the new dwellings as within ESB (existing settlement boundaries).</p>	<p><b>The paragraph which is taken from the Inspector's report, is referring to settlements rather than local authority areas. CO does not agree that the paragraph is misleading.</b></p> <p><b>The All-sites list identifies estimates for all sites based on a series of universal assumptions. This is not a guaranteed unit number that will delivered. For the purposes of identifying housing supply and ultimately establishing housing need, it is a useful method.</b></p> <p><b>Table 2 - the summary of the recommended residential land provision - which is set out in the Written Statement clearly states the supply over the 15 year plan period, much of which is within the urban areas as they would be recognised now.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTX5-X	M	2	The focus has been deliberately moved towards expanding the larger settlements, areas of which already suffer from a lack of connection to their town centres. The chance of growth of the smaller villages has been diluted and rather being seen as a driver in the first document it now appears to secondary.	<b>The number and location of sites proposed for development in the final plan are different from the 'Draft Plan' - i.e. there are less greenfield sites proposed. This is a result of evidence (some of which was only available after the Draft was published) being examined in detail by way of Public Inquiry. The Inspector's report was clear about where development should be focused - recommendations to change to the Draft Plan are permitted by the process - and the CO agrees with the majority of these.</b>
BHLF-AAMW-WTXM-P	M	2	The paragraph before M2 states "The provision of new houses is essential to support the population growth". I realise that a growth in population is a Government policy, but there is no guarantee that population growth will actually occur.  I do, however, support the policy that new houses, if there are any, should be located in the Douglas/Onchan area. I also consider that redevelopment and upgrading of older property should be supported and encouraged.	<b>Comments noted. The plan recognises the balance needed of new development in sustainable urban extensions and within established urban areas.</b>
BHLF-AAMW-WTXY-2	M	2	The Spatial Vision Statement for the East  The updated version of the Draft Area Plan for the East 2018 addresses new accommodation requirements as follows:  <i>"3.4.5: The majority of these new homes will be located in Douglas and Onchan (making the best use of existing urban areas and previously developed land) and in sustainable extensions to those settlements. ... The existing character of the smaller settlements around Douglas and Onchan will largely be retained."</i>  It goes on to state on page 45 that:  <i>"Between the settlements of Union Mills and Strang and Douglas, development which would erode the separation and detract from the openness between the settlements is unlikely to be supported."</i>  The above are sensible requirements. They fit in with Mr Hurley the Inspector's recommendations regarding a Green Gap between Union Mills and the Strang (see below). But, whilst seeming to accept the Inspector's recommendation in this modification, the Cabinet Office then goes against it in its wish to use just one small field of Camlork Farm, 521522, as the Green Gap (see maps below). This would do very little to help preserve "the openness between the settlements". We recommend that this field, along with fields 521518, 521519 and 524239 of site BH031, part of this important farm in the east of the Island, should continue to collectively prevent the coalescence of and form the Green Gap between Union Mills and the Strang as they have for countless decades.  See Map 8: Union Mills and Strang.  See Map showing Green Gap Boundaries.	<b>The Report of the Inquiry recommended that one field at Camlork be included as a Strategic Reserve. The CO has accepted his recommendation and identified a green gap in this area, all in line with the Inspector's findings.</b>
BHLF-AAMW-WTXG-G	M	2	The lack of provision for elderly persons housing and Nursing Home or sheltered housing in Crosby and Glen Vine does not accord with the Strategic Plan. The lack of available sites will be to the detriment of these communities. The centre and heart of Crosby is Old Church Road leading down to the Heritage Trail and the land that affronts Old Church Road. This land should all be washed over as part of the existing settlement boundary including Close Jairg, Close Jairg Beg and the Memorial Playing Fields down to the Old railway Line / Heritage Trail.	<b>Much of this comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage.</b>  <b>In terms of the settlement boundary around the area of Old Church Road, this has been revised to take in the residential curtilages of two existing properties, the open space and new housing development.</b>
BHLF-AAMW-WTX9-2	M	2	With reference to page 18 (3.4.5) of the Written Statement, the Inspector advised that the majority of new homes will be built in Douglas and Onchan and that settlements such as Baldrine, Crosby, Union Mills and Strang in particular will have opportunities in the short term and the long term through Strategic Reserves for more services and an improved sense of Community.  Therefore, I have to question why the Cabinet Office felt it necessary to remove the reference to Baldrine, Crosby, Union Mills and Strang, especially when this is meant to be the draft Area Plan for the East, and not just an Area Plan for Douglas and Onchan.	<b>Paragraph 3.4.5 has been changed in line with the Inspector's Report. The text reference 'removed' follows that recommended to be removed by the Inspector for it describes the CO's case going into Inquiry.</b>  <b>Retaining the reference in the final plan would not make sense.</b>

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ANON-AAMW-WTMW-N	M	6	Urban Environment Proposals 4, 5 and 6 should be reinstated. These are important points to serve as guidance.	<b>The Plan is not weakened in any way by the deletion of/amendment of these Proposals. They are deemed to repeat strategic policy already in place to protect urban heritage.</b>
ANON-AAMW-WTMW-N	M	8	Urban Environment Proposals 4, 5 and 6 should be reinstated. These are important points to serve as guidance.	<b>These policies were removed prior to the Inquiry and was accepted by the Inspector.</b>
ANON-AAMW-WTMW-N	M	11	The Consultation is flawed in its structure. Not all modifications have been assigned a number to be thus open to comment. There are three different sections identified as Modification 11. There are other aspects of the Inspector's report which the Cabinet Office has not modified which should be commented on.	<b>The Inspector recommended Transport Proposal 2, Utilities Proposals 2 and 3 to be in bold text. This is why the reference M11 was noted in the 3 sections.</b>  <b>Other modifications can be attributed to minor edits, spelling, grammar, formatting and some changes set out in documents ahead of Inquiry (PIP 5 - Schedule of Proposed Changes) some of which were not discussed at Inquiry. These are highlighted in red text in the track changes version. It has always been recognised that the final plan will have to be in the right context and make sense and changes have been made to ensure the format of the document does make sense.</b>
ANON-AAMW-WTMW-N	M	11	(TP2 p.69). Traffic strategies should be reflected in the final Development Briefs and this reference should not be taken out.	<b>This sentence has been taken out because at the time of its insertion, development briefs had not been drafted. This reflects a change in the context and is a normal editing improvement.</b>
ANON-AAMW-WTMW-N	M	11	(UP2 p.71) Utilities (electricity, water and sewerage) should be reflected in the final Development Briefs and this reference should not be taken out if the aim is truly to 'ensure planning for water supply, sewerage and drainage works received high priority in early planning for new developments'. It should also be stipulated that public lighting should also be designed to minimize light pollution.	<b>This sentence has been taken out because at the time of its insertion, development briefs had not been drafted. This reflects a change in the context and is a normal editing improvement.</b>  <b>The Inspector recognised that there is no need to repeat Strategic Plan policy.</b>
ANON-AAMW-WTMW-N	M	11	(UP5 7.14) The strategies defined do not adequately meet the policy statement to 'protect the natural environment'. There is no cross-reference to the dangers of additional water supply flagged in Section 5.18.4. The infrastructure for the provision of water supply needs to be provided without damaging the environment.	<b>A cross-reference is not needed. There is supporting text of which paragraph 5.18.4 can be said to relate and then there is a Proposal.</b>

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ANON-AAMW-WTMW-N	M	11	(UP6 p.72) This should be included in the final Development Briefs to establish feasibility at an early stage of planning.	<b>CO proposes no change.</b>
BHLF-AAMW-WTXM-P	M	11	I agree that there should be a comprehensive transport system centred in Douglas and the East which should include facilities for passengers and cyclists but this should not have any adverse environmental effects. For example, by routing public transport through green fields or other environmentally sensitive areas.  I do not agree with the second part of M11 which focuses on land being released for development and the subsequent installation of services and infrastructure. Allocating new land for development goes against the original statement that "Development should be concentrated in the Douglas/Onchan area". I also feel that if other areas outside of this stated area are developed, street lighting should not be installed as this would lead to inevitable and intrusive light pollution. I do however agree that strategies should be introduced to reduce the risk of flooding.	<b>CO proposes no change as a result of the comments raised. Where there is mention of there being a contradiction, CO does not agree. Broad requirements for lighting are set out in Utilities Proposal 3. Specific requirements tend to be at the detailed application stage and even then public safety remains part of the issue when it comes to light design.</b>
BHLF-AAMW-WTX1-T	M	11	Last two bullet points are too weak to protect populated areas from surface water flooding from new developments due to tarmacked driveways and foundations ('Include measures', 'assist' treatment of stormwater and 'enhance' flood protection is too weak a language to require robust measures that would obliterate the problem of surface water flooding). These bullet-pointed sentences should be replaced or preceded by a clear requirement, such as 'Development shall not be permitted when the developer fails to show by a robust and scrutinised feasibility study that the development would not result in water run-off (surface water flooding) that would damage the wildlife sites and/or the populated areas surrounding the site'.	<b>The language used is appropriate in the context of this section and this being a Proposal. Final judgement will come at the planning application stage, taking into account both strategic policy and more locally-based plan proposals.</b>
ANON-AAMW-WTMW-N	M	12	The safeguards on offshore developments which have been struck out must be reinstated.	<b>Para 5.19.1 as amended is more appropriate to the context of the Area Plan and the marine environment is no less protected.</b>
BHLF-AAMW-WTXM-P	M	12	I agree that the health and biodiversity of the Marine Environment should be protected, but the potential of onshore, or offshore wind farms and tidal power should be investigated as they are clean sources of energy.	<b>Comments noted but CO proposes no change.</b>
BHLF-AAMW-WTX1-T	M	12	M12 proposes to delete useful wording, which - contrary to the inspector's view - does not preclude the construction of wind farms, tidal energy and other renewable energy generation facilities. Rather, the deleted wording requires that subsequent effect on coastal areas (including marine pollution) must be considered. Why should these factors not be considered? The island will not benefit from a lack of consideration of marine pollution, a well-known existing problem here. The location of a renewable energy plant must be chosen carefully, taking account of all these factors.  The wording in question is not a regurgitation of an existing policy of the Strategic Plan. It is therefore not redundant.	<b>The wording as originally proposed refers to an Island-wide issue and is too general. It is simply unnecessary and the CO agrees with the Inspector on this.</b>

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BHLF-AAMW-WTXJ-K	M	13	We support the merger of Employment Proposals 1 and 2, but feel that the current draft wording of the new Employment Proposal 1 is not clear as it could be read as though this Proposal only applies to the sites listed in the associated table. The wording needs to be clearer to reflect the fact that this Proposal now relates to both existing industrial land as well as the sites listed in the accompanying table. This is clearly the intention of the Inspector's recommendations and care needs to be taken to ensure that the Proposal is clear and does not cause any confusion.	<b>Employment Proposal 1 (in the final plan) has been checked to ensure there is no ambiguity and that it clearly states that the proposal refers to existing industrial land as well as the sites listed in the table - as was the original intention. The Fire Station on Peel Road was included in earlier versions of Table 12 however the site reference has been removed as it now forms part of Mixed Use Area 8c.</b>  <b>Additional clarification has been added to the preceding paragraph.</b>
BHLF-AAMW-WTXR-U	M	13	Peel agree with the Inspectors recommendation to merge Employment Proposals 1 and 2 and therefore support Modification 13.	<b>Comment in support noted.</b>
ANON-AAMW-WTMT-J	M	14	<i>"iii. that the proposals will not have any unacceptable environmental impacts (including any significant landscape impacts)".</i> This is critical, but I am interested to understand who will determine what is "unacceptable" and using what bases and measures?	<b>DEFA determine planning applications and thus weigh up the evidence.</b>
ANON-AAMW-WTM8-P	M	14	<i>"iii. that the proposals will not have any unacceptable environmental impacts (including any significant landscape impacts)".</i> This is critical, but I am interested to understand who will determine what is "unacceptable" and using what bases and measures?  Were DM001 and DH057 ever to be developed with the number of potential houses, there would absolutely be a significant environmental and landscape impact. As such this should not be designated for consideration at this scale (note - similar comments made in line 50)	<b>DEFA determine planning applications and thus weigh up the evidence.</b>  <b>In respect of comments on DM001 and DH057, issues relating the potential development of the sites west of Johnny Wattersons Lane been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it. In this case, the final plan reflects the Inspector's report.</b>
BHLF-AAMW-WTXM-P	M	14	States that "predominantly residential sites will only be brought forward if there is no unacceptable environmental impact. I would suggest that any new residential site is bound to have a detrimental environmental impact.	<b>Comments noted but CO makes no change.</b>



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BHLF-AAMW-WTXJ-K	M	15	<p>This Modification is supported but requires some clarification to ensure the eventual plan is clear. The additions and deletions to the text are presently confusing. It is accepted that the Inspector recommended that Employment Proposal 3 should be replaced with the proposed new Development Brief for BE002a. We fully support this but we would ask for the following to be noted:</p> <p>First, it is not currently clear from this Proposed Modification how the Employment Proposals will be set out and numbered. The heading of Employment Proposal 3 is shown as deleted but no replacement heading is added. It seems clear to us that the heading 'Employment Proposal 3' should be replaced with the heading 'Employment Proposal 2' (to reflect the fact that Proposals 1 and 2 have been merged under Modification M13). The Proposal then requires a short introductory text akin the introductory text for Employment Proposal 4 and then the full text of the Development Brief should presumably be included thereafter.</p> <p>Second, the text above the table at Paragraph 8.11 about retail uses being excluded should be deleted as this text is already contained in the Development Brief for BE002a (para 6) so is repetitive and therefore unnecessary.</p> <p>Third, the reference to the Table at Paragraph 8.11 being merged with the following table at Paragraph 8.12 appears to us to be an error. If Sites BE002a and BE002b/BE006 are to remain as separate Proposals rather than merged (which appears to be the intention) then the respective Tables should not be merged.</p> <p>It would be very helpful to see the full and amended wording of the new text and tables prior to the publication of the final plan.H176</p> <p>Please also see comments under Modification M66 regarding the Proposal numbering in the Development Brief.</p>	<p><b>CO understands the points raised and acknowledges that the changes in Chapter 6 are relatively complex.</b></p> <p><b>The final wording and layout of Chapter 6 has been checked to ensure is in line with the accepted recommendations, published modifications, matters brought to the CO's attention which have merit and picking up on all formatting and consistency queries.</b></p> <p><b>The paragraph, originally at 8.11, starting "in light of..." has been shortened in light of the comments made.</b></p> <p><b>CO agrees with the observation.</b></p>
BHLF-AAMW-WTXR-U	M	15	<p>Peel support the deletion of Employment Proposal 3 and its replacement with Employment Proposal 4. Proposal 4 provides appropriate wording that accords with the Inspector's recommendations.</p>	<p><b>Comments noted.</b></p>
BHLF-AAMW-WTXJ-K	M	17	<p>M17 – Following the merger of Employment Proposals 1 and 2 under Modification M13, the heading of this Proposal should read Employment Proposal 3 not Employment Proposal 4 as stated in the modified Written Statement (see page 86).</p>	<p><b>CO welcomes this comment. The numbering of the Employment Proposals has been checked accordingly and corrected in the final Written Statement.</b></p>
BHLF-AAMW-WTXR-U	M	17	<p>Peel strongly supports the Inspector's conclusion that there would be benefit in allocating sufficient land to ensure a continuous supply of sites for employment development up to and beyond 2026 and that the allocation of Site BE006 would help address the critical problems that have recently arisen from the shortage of sites for industrial development in the East, due to the absence of up to date land allocations in the Development Plan.</p> <p>Notwithstanding the above, Peel do have some minor comments on the Modifications proposed to be implemented by the Cabinet Office.</p>	<p><b>Comments are noted.</b></p>
BHLF-AAMW-WTXR-U	M	17	<p>Overall, Peel supports the Modified Written Statement (M17) and the deletion of paragraph 8.11. However, Peel note that criterion 2 of both the Inspectors and Cabinet Offices' recommended Development Brief for the site states that development will not be permitted on these sites if it could reasonably and acceptably be located on the site referred to in Employment Proposal 3. However, M15 which details the modifications proposed, is clear that Employment Proposal 3 is to be deleted. This error needs to be resolved and the Development Brief updated.</p> <p>Should the Cabinet Office amend the policy wording of Employment Proposal 4, in accordance with the details above, then Peel reserve the right to comment further on this matter as the change would directly affect their land interests/ownership.</p>	<p><b>Comments are noted and the text has been checked for consistency and accuracy.</b></p>

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BHLF-AAMW-WTXM-P	M	18	More facilities to encourage the public to re-cycle their waste should be encouraged and supported.	Comments are noted.
BHLF-AAMW-WTXM-P	M	21	I agree that this area could present an opportunity to evolve as a retail and residential area, but I can't understand why it should be necessary to re-position the highway as this might lead to a detrimental environmental impact. However, I do believe that measures to facilitate and encourage cyclists and pedestrians to access this area should be put in place.	Comments are noted.
BHLF-AAMW-WTXM-P	M	23	I agree that this area could present an opportunity to evolve as a retail and residential area, but I can't understand why it should be necessary to re-position the highway as this might lead to a detrimental environmental impact. However, I do believe that measures to facilitate and encourage cyclists and pedestrians to access this area should be put in place.	Comments are noted.
ANON-AAMW-WTD4-9	M	25	Housing needs based upon actual, rather than projected, population growth fails to take into account existing housing stock. If existing housing stock is not adequate for actual population growth, why has no explanation been provided to explain why such a large proportion of existing housing stock for sale has, over several years, failed to sell.	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>
ANON-AAMW-WTMW-N	M	25	(12.9.2) This section does at least use 2016 figures as a starting point, reducing the number of dwellings considered as needed in the East from 2440 to 1385, which the inspector rounded up by 10% to 1500). The Plan should take into account the level of construction outside of the East to reassess how many dwellings have been built in total.	<b>The annual RLAS survey updates record this Island-wide data. Extracts for the East Plan have been included where appropriate.</b>  <b>No additional references are necessary.</b>
ANON-AAMW-WTX5-X	M	25	Population forecasts are now showing net migration to the Island of 500 pa however further consideration should be given to factoring the numbers of non-returning students of Manx families rather than simply basing the numbers on past history.  Too much emphasis has been placed on the historical numbers. Now that Covid19 has demonstrated to many business that their work can be done from home offices the future need for offices blocks, and by extension the numbers of workers in them will drop without a major rebirth of one of the financial services industries.	<b>CO supports the population modelling currently undertaken and presented in evidence.</b>  <b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>
BHLF-AAMW-WTXM-P	M	25	Assumes net inward migration of 500 people per year. I fail to see how this figure can be relied upon. The Isle of Man population has, in fact, decreased since the 2011 census. It might be Government Policy to encourage and speculate that there might be an increase of 500 new residents per year, but there is absolutely no evidence of this actually occurring. Just an aspiration that may never happen.	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>

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BHLF-AAMW-WTXP-S	M	25	I agree with the analysis outlined under heading Modification 25 and the methodology is admissible from an evidence-based perspective. The starting point for the revision is the 2016 Census which may be inaccurate to some degree but not so much as to make a large difference. The immigration figure of 500 has been used in calculations for many years and has worked reasonably well; and the resulting requirement of 1,358 additional households if immigration is 500 for the period 2011-2026 is accurate. Even the uplift to 1500 could be seen as a reasonable contingency.	<b>CO notes the comments in respect of the 2016 Census and migration figures.</b>
BHLF-AAMW-WTXW-Z	M	25	Yes. We agree with the analysis set down under heading Modification 25 and the entire methodology makes absolute sense from an evidence based perspective. The starting point for the revision is Census 2016 which may be inaccurate to some degree but not so much as to make a large difference. Accordingly, the inward migration figure of 500 has been used in calculations for many years and from an 'average' perspective over the years has worked reasonably satisfactorily, and the resulting requirement of 1358 additional households if migration in is 500 for the period 2011-2026 is clear in its make-up. Even the uplift to 1500 could be seen as a reasonable contingency. We can't see the justification for a further 900 homes when there is no past or current evidence to support the proposition. We appreciate that these would be accommodated on Strategic Reserve Sites but it may be better to wait a year and obtain up-to date evidence on population growth rather than including broad estimates.	<b>CO notes the comments in respect of the 2016 Census and migration figures.</b> <b>CO understand the temptation to 'wait a year' but it has to be recognised that to wait - even for new Census data - means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b>
BHLF-AAMW-WTXY-2	M	25	Projections based on the 2016 Census and 12.9 implications for Housing Need  We note the proposal of the Inspector that there should be an objective trigger mechanism for the release of Strategic Reserve Sites, suggesting a population which must exceed 89,000 by the 2021 Census(see Inspector's report, paragraph 219, page 50), just a year away with the current population figure still stagnating at about 84,000 as it has since 2011. We would put it strongly that 89,000 is yet another figure that has no satisfactory explanation, simply being a halfway number between an actual one and a wishful thinking one.  The Cabinet Office puts forward an additional trigger mechanism for the release of Strategic Reserve Sites, suggesting an all-Island total households figure of 38,000 to be another option, again using a halfway number between an actual one and a wishful thinking one which the Cabinet Office aspires to by using Government statistics of an annual net migration of 500. It is claimed that the statistics point to the figure of 38,000 households likely being reached by 2025. SAVE CAMLORK has previously referred to the sad state the Isle of Man's capital has been in for decades. We are aware that there are many current urban sites in the town of Douglas either being built upon or capable of being built upon. They are where the majority of any new dwellings should be built to accommodate any future increase in households in the east.  On 31 July 2018 we responded to the Cabinet Office's "Supplementary Evidence Paper on Statistics relating to Brownfield Sites and Greenfield Sites" which policy planners considered were able to accommodate 658 housing units made up of a variety of types. We believed then, and still do now, that better use could be made of a small number of these sites, and they, together with further ones we identified, 649 in all, would raise the possible housing units to above 1,300. Included on our brownfield sites list but not on the Cabinet Office's list were the former Elite Motors showrooms in Peel Road (66 apartments), the former bakery in Grosvenor Road (4 houses), the former KFC in Duke Street (11 apartments) and, what is now proposed to be, a new nursing home in Woodbourne Road. These sites have all now been granted planning permission and, along with others, can be added onto a growing list of new accommodation units available in Douglas.	<b>The comments set out on the CO's approach are noted.</b>  <b>The Inspector's Report set out a straightforward recommendation for the release of the Strategic Reserve sites for housing after considering a significant amount of contradictory evidence.</b>  <b>CO accepted the recommendation but did recognise the importance of household size and household numbers at the Modifications stage (Modification 65 in the documents published Feb 2020). Since 2007, the number of households has been a key measure used in the Island Development Plan in determining housing need.</b>  <b>The final plan does reflect consideration of all of the comments received on release of the Reserve sites. Any release will be based on statistical evidence on total resident population, on the number of residents living in private households or on housing delivery in the plan area. See Chapter 12 in the Written Statement.</b>
BHLF-AAMW-WTXY-2	M	25	Last year, Government's own statistics showed that the need for housing for first time buyers was falling. Back in August 2015 there were 255 applicants (of which 194 would prefer to live in Douglas and the east) on the first time buyers' waiting list register, but there were just 94 applicants who were ready to purchase. A more up-to-date document DP EP3 showed that in June 2019 there were 110 applicants (of which 90 would prefer to live in Douglas and the east) on the register, but there were just 28 applicants who were ready to purchase. When compared like-for-like, those three lots of data in August 2015 and then June 2019 showed an amazing fall in demand of 57%, 54% and 70% respectively in less than four years.  Again, further government statistics showed that since 2009/10 the numbers of hopeful tenants on the following three public housing lists had fallen. Douglas saw an amazing fall in demand of 69%, Onchan 36% and Braddan 49%; giving an overall fall of 63%.  Refer to table in original response form.  The above official figures speak volumes about the decreasing demand for first time buyers and public sector housing. A need does not exist for any housing estates to be built in the beautiful but fragile countryside of the east of the Island.	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>

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BHLF-AAMW-WTXH-H	M	25	<p>.... there are further considerations as a result of the coronavirus outbreak and the impact that this will have on the future wellbeing of the Island that need to be factored into the debate regarding future housing needs. As we exit the pandemic the businesses on the Island and the way we do business will not be the same. Companies are having to work with reduced staffing levels, from remote working places and having to adapt to more efficient processes that are less people dependant. All this adds up to potentially higher unemployment, more redundant commercial property and for Government less revenue. The demand for additional housing will inevitably fall.</p> <p>Finally we will shortly be embarking upon another Island Census and that in itself should be a time to stop and pause before marching ahead with policies that will be proven to be no longer fit for purpose, as we emerge from our current difficulties.</p>	<p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p>
BHLF-AAMW-WTX1-T	M	25	<p>The COVID19 epidemic has made obsolete not only the original population and household number growth projections, but also the modified ones, even assuming that they did take proper account of the 2016 Census results. With the next Census – 2021 – being so close, the numbers have to be revised again. This would not be a breach of general conformity of the Area Plan to the Strategic Plan, as confirmed by the Attorney General's legal opinion in 2019.</p> <p>The rapid spread of the COVID19 virus, the absence of an effective vaccine for at least the next 12/18 months, the still increasing death numbers and further necessary restrictions on immigration will undoubtedly lead to a further and now much more significant drop in population and household numbers than that revealed in 2016. This will affect all age groups, as it has been the case elsewhere.</p> <p>If the Cabinet Office finds itself unable to wait until the results of the 2021 Census, it must now withdraw the Area Plan altogether.</p> <p>Development on the scale it envisaged is now clearly unsustainable and unjustified in the current global healthcare and economic climate. This crisis is not short-term: economists around the world agree that the global economy will take at least several years to recover from a deep recession. The island is not immune to it.</p> <p>Work on the next Strategic Plan will have to wait for the results of the 2021 Census.</p>	<p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p> <p><b>CO does not support any view to abandon the Area Plan for the East.</b></p>
ANON-AAMW-WTMT-J	M	26	<p>"Such sites are normally only released for development if there is compelling justification to do so." This has been removed. "Compelling justification" is an absolute must and this should be re-instated.</p>	<p>This paragraph has been removed but a Proposal on the release of Strategic Reserves is considered sufficiently strong.</p> <p>Development briefs also form part of the plan.</p>
ANON-AAMW-WTM8-P	M	26	<p>"Such sites are normally only released for development if there is compelling justification to do so." This has been removed. "Compelling justification" is an absolute must and this should be re-instated. (note - duplicated in line 51).</p>	<p>This paragraph has been removed but a Proposal on the release of Strategic Reserves is considered sufficiently strong.</p> <p>Development briefs also form part of the plan.</p>
ANON-AAMW-WTMW-N	M	26	<p>M26 deletes the definition of Strategic Reserve sites. It should be retained with the definition of the objective release criterion of population growth as defined by the Inspector. It is unfortunate the relevant tables have not been updated before the consultation.</p>	<p><b>This paragraph has been removed but there is now a Strategic Reserve Release Mechanism (Written Statement para 12.19) and a number of Development Briefs which are considered to be sufficiently strong.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXG-G	M	26	<p>There is no provision of homes for an ageing population outside of Douglas and this is in the main provided for in the Johnny Waterson's Strategic Reserve Land.</p> <p>The lack of provision of land outside Douglas is to the detriment of these outlying settlements with no social housing allocation or Nursing Home provision.</p> <p>It should be noted that Elderly persons housing does not rely on an active travel plan with the exception of access to local amenities. It is more beneficial for this type of housing to be located in a local community where a person has grown up or is near family. This is a serious flaw in the plan.</p>	<p><b>Arguments for and against the justification for land release to house the ageing population were presented at Inquiry.</b></p> <p><b>Much of this comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
BHLF-AAMW-WTX1-T	M	27	<p>The COVID19 epidemic has made obsolete not only the original population and household number growth projections, but also the modified ones, even assuming that they did take proper account of the 2016 Census results. With the next Census – 2021 – being so close, the numbers have to be revised again. This would not be a breach of general conformity of the Area Plan to the Strategic Plan, as confirmed by the Attorney General's legal opinion in 2019.</p> <p>The rapid spread of the COVID19 virus, the absence of an effective vaccine for at least the next 12/18 months, the still increasing death numbers and further necessary restrictions on immigration will undoubtedly lead to a further and now much more significant drop in population and household numbers than that revealed in 2016. This will affect all age groups, as it has been the case elsewhere.</p> <p>If the Cabinet Office finds itself unable to wait until the results of the 2021 Census, it must now withdraw the Area Plan altogether.</p> <p>Development on the scale it envisaged is now clearly unsustainable and unjustified in the current global healthcare and economic climate. This crisis is not short-term: economists around the world agree that the global economy will take at least several years to recover from a deep recession. The island is not immune to it.</p> <p>Work on the next Strategic Plan will have to wait for the results of the 2021 Census.</p>	<p><b>Repeat of earlier rep:</b></p> <p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p> <p><b>CO does not support any view to abandon the Area Plan for the East.</b></p>
ANON-AAMW-WTMW-N	M	27	<p>M27 (12.8) unhelpfully crosses out the obsolete housing need figures but does not replace them with the new calculations in a clear summary.</p>	<p><b>A clear summary is now provided in Chapter 12.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTMW-N	M	27	<p>M27 (12.10) Urban Capacity Findings. Although this calculates that 601 additional dwellings can be provided, there is no stated basis for the 'average take-up rate of 73%'. It would make more sense to be consistent and use the 10% used by the Inspector in 12.9.2 vii. of rounding up from 1358 households to 1500 dwellings 'In order to provide some flexibility and allow for the possibility that some allocated sites might not be brought forward for development'. The inspector considers this percentage reasonable as 'a number of the allocated sites are controlled by their prospective developers, and are said to be immediately available for development'. That would mean that some 868 new dwellings would be needed over the next six years rather than the 899.</p> <p>However, this section is still flawed as there is no reference to property vacancy figures which should have been properly studied and incorporating in this planning. The 2016 Census vacancy rate for the Area Plan for the East was quoted as 3,408 properties or 16%. The Vacant Property Review Aug 2019 is full of inconsistencies and used a flawed methodology which understated empty properties by:</p> <ol style="list-style-type: none"> <li>1. excluding 831 properties from analysis, but treated them as occupied in conclusions and</li> <li>2. by treating properties empty on census night which subsequently used electricity as occupied but not including properties occupied on census night which subsequently became empty. 4.5 p. 11 stated 'Further investigation is being undertaken on how electricity consumption has varied for properties that were occupied on census night, which should provide an indicator of whether occupied properties have since become unoccupied.' This seems never to have been done.</li> </ol> <p>The Inspector seems to have been misled by the Forward of Chris Thomas quoting 664 empty properties Island-wide, which is not supported by the body of the report. Even using this absolute minimum number of vacant properties with no meter or electricity consumption for the 27 months measured, there would be 338 dwellings empty in the East. The body of the report suggests a minimum of 5% of properties in the East to be considered as empty, which would equate to 1,065. This is significantly more than the number of additional dwellings defined as needed in the Area Plan. Although the Inspector notes there is no direct mechanism to utilize them, this phenomenon needs further investigation to better utilize these housing assets and avoid the negative impact of empty properties.</p>	<p><b>There is no need to change the figures; behind which sits a considerable amount of data analysis. CO accepts the method the Inspector has applied to the CO's statistics.</b></p> <p><b>The Inspector recognises that calculations of housing need are necessarily crude and imprecise (para 214).</b></p> <p><b>The property vacancy figures did form part of the evidence before the Inspector as they were raised by a number of parties as part of the Inquiry. It is not necessary to add additional Proposals relating to vacancy rates or re-examine the issue again.</b></p>
ANON-AAMW-WTX5-X	M	27	Seizing vacated property for public auction with pre-agreed planning terms is essential to tidying up our towns and providing more homes	<b>This suggestion is not for inclusion in a development plan.</b>
BHLF-AAMW-WTXM-P	M	27	M27 states that an average of 601 dwellings could be created from 3 stated sources. If so, surely this is another reason to reduce the number of proposed dwellings in other areas.	<b>This figure needs to be viewed in the context of the full data set.</b>
BHLF-AAMW-WTXM-P	M	28	<p>I am pleased to note that "An assessment has been made of groups of houses in the countryside, but no such group is identified in the Area Plan as having potential for further residential development".</p> <p>Facilities such as play, and recreational spaces are important. I feel that retaining open spaces is also important and essential to enhance the population's well being.</p>	<b>Comments are noted.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXY-2	M	28	<p>Residential Development in the Countryside</p> <p>"12.21: In accordance with Section 8.8 of the Strategic Plan 2016, an assessment has been made of groups of houses in the countryside, but no such group is identified in the Area Plan as having potential for further residential development."</p> <p>The Inspector's suggestion that Camlork Farm field 521518 should become a Strategic Reserve Site for a group of 50 dwellings (see below) goes against the above. Any such amount of extra dwellings would form an extended group between the existing dwellings on Trollaby Lane, the Main Road of Union Mills and the lower part of Strang Road. We strongly believe that this field should not be developed to accord with the above modification. It and the other three fields 521519, 521522 and 524239 of site BH031 should continue to form the existing natural Green Gap between the existing settlement boundaries of the village of Union Mills and the hamlet of the Strang in order to avoid their coalescence.</p> <p>Rather than building 50 unnecessary houses on a beautiful greenfield site on field 521518, 50 urban ones could be used to encourage development on the many old and derelict public and private sites in poor old Douglas. The focus of Government's planning policy should be to accommodate most of any population increases and housing aspirations into empty properties and new builds on brownfield sites crying out to be used for development. It should not use good quality greenfield sites simply because speculators made chancy decisions years ago to buy farmland zoned as "Agricultural and Open Space", hoping for any opportunity to have them rezoned for development and then to cash in on their risky investments.</p>	<p><b>The Groups of Houses in the Countryside work is a discreet area of work that feeds into the development plan process.</b></p> <p><b>The context is different to the work done to identify sustainable urban extensions to identified settlements.</b></p> <p><b>CO accepts the findings of the Inspector that even allowing for a high proportion of the units to come from existing sites within the settlements, some other opportunities are still required.</b></p>
BHLF-AAMW-WTXG-G	M	29	<p>The lack of Community, Sports and recreation facilities in Marown and Lonan is contrary to the objectives of the strategic plan and land should be allocated for these uses. Marown has an under provision and the Inspector agreed that this is the case. Field numbers 324324 and 324321 adjacent the Memorial Playing fields should be allocated for community facilities in accordance with the inspector's report. The Inspector referred to enabling works to facilitate these facilities which went beyond his remit in this regard. Other ways exist to fund these community facilities. MMOOI.</p> <p>Inspectors report:</p> <p>402 'I acknowledge that there is a deficiency in the provision of recreational open land (including sports pitches) in Marown. However, the proposed sports pitches on Site MMOOI would not be provided without a substantial amount of enabling residential development, which in my view, would be inappropriate. '</p> <p>We believe it is possible to fund new sports facilities in other ways as opposed to enabling residential development and therefore this land should be zoned accordingly for sports pitches as there is clearly a deficiency acknowledged by the Inspector.</p> <p>Baldrine (Lonan) also has an under provision of Community, Sports and leisure facilities and in accordance with the allocation of fields 614733 and 614729 as Educational Use, these fields should also be allocated and zoned for such facilities which would complement the Educational Use in time. GMOOI.</p>	<p><b>The overall conclusion for MM001 by the Inspector was that it was not suitable for allocation either for immediate development or as a strategic reserve.</b></p> <p><b>Regardless of the suggestion now that new sports facilities could be funded in other ways (without associated housing) and an area could be in effect excised from the full site examined as a whole throughout the plan process, it would be inappropriate now for the CO to support this route. It would mean the examination of new evidence, and the merits or otherwise of that evidence is unknown. The same arguments exist for Baldrine.</b></p>
ANON-AAMW-WTMR-G	M	30	<p>My objection only relates to the Ballafletcher Road plan west of Tromode Woods estate. I do not think it is a good idea to plan for 300 plus dwellings near a cemetery, hospital and hospice site.</p>	<p><b>CO notes the comments but makes no change to its approach for this site(s) south of Ballafletcher Road.</b></p>
ANON-AAMW-WTMT-J	M	30	<p>Strategic Reserve Sites should absolutely not be captured within development boundary maps. Their use should be no more "in plan" than any other green / agricultural site.</p> <p>The expectation should be that Strategic Reserve Sites will not be used for development at all, unless compelling evidence for their use comes to light.</p>	<p><b>Strategic Reserve sites will remain outside of Settlement Boundaries until released for development.</b></p>
ANON-AAMW-WTM8-P	M	30	<p>Strategic Reserve Sites should absolutely not be captured within development boundary maps. Their use should be no more "in plan" than any other green / agricultural site. The expectation should be that Strategic Reserve Sites will not be used for development at all, unless compelling evidence for their use comes to light. (note - duplicated in line 52).</p>	<p><b>Strategic Reserve sites will remain outside of Settlement Boundaries until released for development.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTMW-N	M	30	There is no reason why this was not done much earlier in this Planning process. It certainly should have been made available as part of this consultation. It reflects badly on the process that this is not a well-publicised part of the information pack.	<b>CO has clearly set out its Modifications in the order of the Planning Inspector's recommendations. It maintains this was logical and the best approach given the amount of information to make public.</b>
BHLF-AAMW-WTXM-P	M	30	It is important that the development boundaries should be redrawn in order to exclude strategic reserve sites, as recommended by the independent Inspector.  My particular interest lies in sites DM001 and DH057 which have been re-designated as strategic reserve sites. These areas consist of open green space and agriculture land which high landscape value and scenic significance. I consider that any development in this area would be visually intrusive. I therefore feel that they should be excluded from any development now or in the future.	<b>Strategic Reserve sites will remain outside of Settlement Boundaries until released for development.</b>  <b>These sites DM001 and DH057 are to remain as Strategic Reserves.</b>
BHLF-AAMW-WTX1-T	M	30	The settlement boundaries have to be clear first. Had they been published with the Strategic Plan, the development boundaries might not have been so unclear and controversial. The development boundaries were not published together with the Draft Area Plan at the public consultation stage, which contributed to the controversy. The settlement boundaries had to be established and debated much earlier, at the same time as clarifying the significance of Appendix 3 of the Strategic Plan to Tynwald and the public. This was not done.	<b>Draft Settlement Boundaries were published during the summer of 2016 at the Call for Sites Stage. Subsequently carried forward to the Preliminary Publicity and Draft Plan. Settlement Boundaries at the time of drafting were always intended to show a settlement 'as it is now' rather than what land may be included in the future. CO has been consistent up to now on this point. The SBs now will change to accommodate those areas to be allocated for development but not the Strategic Reserves.</b>
BHLF-AAMW-WTXK-M	M	30	We agree with the Inspector that sustainable urban extensions within the Plan should be shown inside development boundaries as these are clear commitments for the plan period.	<b>Comments noted. CO supports this.</b>
BHLF-AAMW-WTXJ-K	M	30	We fully agree with the modification which complies with the Inspector's recommendation that allocations within the Plan should be shown inside development boundaries.	<b>Comments noted. CO supports this.</b>
BHLF-AAMW-WTX3-V	M	30	We agree with the Inspector that sustainable urban extensions within the Plan should be shown inside development boundaries as these are clear commitments for the plan period.	<b>Comments noted. CO supports this.</b>
BHLF-AAMW-WTXY-2	M	30	Chapter 4 of the Strategic Plan goes on to state:  "4.3.3 Each of our towns and villages has an individual character arising not only from its geographical position and existing fabric, but also from its historical, cultural, and social background. This character should be protected and enhanced. Accordingly:  Strategic Policy 3: Proposals for development must ensure that the individual character of our towns and villages is protected or enhanced by:  (a) avoiding coalescence and maintaining adequate physical separation between settlements."  Any size of housing estate built on any of the four fields of Camlork Farm BH031 (see maps above) would lead to the beginnings of coalescence and the eventual loss of the physical separation between the two settlements of Union Mills and the Strang.	<b>Cabinet Office has outlined a Green Gap between Strang and Union Mills - See Chapter 5.</b>
BHLF-AAMW-WTXR-U	M	30	Peel supports the Area Plan Proposals Map and Inset Maps.	<b>Comments are noted.</b>



Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXG-G	M	30	<p>The settlement boundary of Crosby should include Old Church Road the buildings and land affronting it. This should include the Memorial Playing Fields, Close jaigr and Close Beg down to the Heritage Trail.</p> <p>The site of Close Jaigr Beg was submitted for the Eastern plan and included the existing house as well as the adjacent field no's 324318, 320912 and 324316. The settlement boundary of Crosby on the Area Plan for the East Draft Map 10 Crosby and Glen Vine indicated that the Memorial Playing Fields and Close Jaigr were included as part of the settlement boundary of the Village with a purple line.</p> <p>The Inspector in his report did not comment on the settlement boundaries in Crosby and yet the extent of the settlement boundary of the village has been modified on the latest plan. The proposals for Close Jaigr Beg included the open field to the East but also included land that is existing residential; part of Close Jaigr Beg and as this was originally included as part of allocated development land we did not comment on the extent of the settlement boundary.</p> <p>Close Jaigr Beg should be included in the settlement boundary as historically it has been at the heart of the village. It was not commented on previously as it formed part of a bigger site. The oldest part of the Village of Crosby is Old Church Road and historically the Railway station was located at the bottom of Old Church Road at Close Jaigr Beg and there exists a former railway shelter at this location.</p> <p>The existing stone walls and buildings built adjacent the footpath are an important feature of Old Church Road and this road was historically considered the centre of the village. The Marown Commissioners offices are located part way down this road. It is not right to not include this area in the existing settlement boundary due to its historical reference and obvious importance to the area.</p> <p>The attached plan shows the extent of the purple line which we are proposing is shown which includes the existing builds on Old Church Road and the Memorial Playing Fields. The heritage Trail is the natural boundary to the settlement of Crosby.</p> <p>Please see attached plan CFS-18-03 C.</p>	<p><b>The Settlement Boundary of Crosby has been amended to include the recreational area and the residential estate under development.</b></p> <p><b>Co agrees that there is merit in including the two properties on the east of Old Church Road within the settlement boundary (See Map 10).</b></p>
ANON-AAMW-WTDF-U	M	30	Documents and plans not made clearly available to residents.	<b>CO set out its Modifications in the order of the Planning Inspector's recommendations. This was judged to be the most logical and the best approach given the amount of information to make public. A limited number of Maps were published at the Modifications Stage in an attempt to avoid confusion.</b>
ANON-AAMW-WTMW-N	M	32	It is important that meaningful Green Gaps are defined and not left vague.	<b>Green Gaps have been defined.</b>
BHLF-AAMW-WTX1-T	M	32	<p>The proposed green gaps are inadequate to meet the policy objectives of the Strategic Plan to provide a separation of settlements and retain visual amenity for the existing residents (Spatial Policy 7 and General Policy 2).</p> <p>In particular, there isn't a green gap at all between the settlements of Braddan Hills and Tromode Woods on the map published.</p> <p>As we argued above, to be recognised as a settlement, a village does not have to be listed in paragraph A.3.6 of Appendix 3 of the Strategic Plan. It is sufficient for it to have a distinctive character and a separate location.</p>	<p><b>No changes are proposed to the Green Gaps as a result of this comment. They have now been clearly defined and supplemented following the Inquiry Report.</b></p> <p><b>In any case, the comment relating to what is or is not an identified settlement has been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
BHLF-AAMW-WTXK-M	M	32	We agree with the Inspector that the precise boundaries of the Green Gaps should be shown on the Area Plan Proposals Map and Inset Maps as this provides clarity on the extent of the green gap areas. We agree with the Maps as drafted.	<b>Comments in support are noted.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXJ-K	M	32	We agree with the Inspector that the precise boundaries of the Green Gaps should be shown on the Area Plan Proposals Map and Inset Maps as this provides clarity on the extent of the green gap areas.	Comments in support are noted.
BHLF-AAMW-WTX3-V	M	32	We agree with the Inspector that the precise boundaries of the Green Gaps should be shown on the Area Plan Proposals Map and Inset Maps as this provides clarity on the extent of the green gap areas. We agree with the Maps as drafted.	Comments in support are noted.
ANON-AAMW-WTMW-N	M	32	Natural Environment Proposal 4 (Green Gap) has been added but there is no modification number. The introduction of a defined Green Gap between Union Mills and Strang and Strang and Douglas is an important principle. Unfortunately, the gap has been poorly defined and not reflected in the site selection, thus undermining the principle.	<b>Paper 4 - shown as Modification number 33. A Map was also published at this stage in February 2020.</b>
BHLF-AAMW-WTX1-T	M	32	To continue our responses to questions 4 and 5 (Modifications 32 and 33):  The development of either site would fill the green gap between Braddan Hills and Tromode Woods. They are entitled to a green gap between them, because they are in fact distinct settlements, contrary to the restrictive interpretation by Inspector Hurley.  The Inspector appears to believe that the list of 29 settlements in paragraph A.3.6 of Appendix 3 is a definition of a settlement in the Strategic Plan 2016. In his logic, if a village is not on the list in paragraph A.3.6, it is not a settlement and is therefore not entitled to a green gap separating it from another settlement.  In fact, the list is not a definition. If it were an attempt at a definition, it would be wrong, because it omits notable old villages, such as Cronkbourne Village, recognised and registered as one of the last remaining industrial villages for its historic character.	<b>No changes are proposed to the Green Gaps as a result of this comment. They have now been clearly defined and supplemented following the Inquiry Report.</b>  <b>In any case, the comment relating to what is or is not an identified settlement has been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>
BHLF-AAMW-WTX1-T	M	32	Paragraph A.3.6 of Appendix 3 of the Strategic Plan 2016 also omitted Maughold from the list of 'settlements', as the Cabinet Office previously attempted to characterise it as a 'group of buildings in the countryside', but eventually recognised it as a village in paragraph A.3.7, immediately below the list (in the same Appendix 3). Paragraph A.3.7 shows that the list in paragraph A.3.6 is not a closed list. There are other settlements on the island.  Tromode Woods is a village that has been designed to have its own distinct architectural character, albeit more recently than Cronkbourne Village.  Braddan Hills is another village with a different, distinct character, located separately from Tromode Woods and other settlements. Tromode Woods and Braddan Hills are entitled to a green gap between them contributing to the sense of leaving one space and entering another. Sites DBH002 and BH030 together represent such a gap.  The development proposal of Hartford Homes does not leave a real green gap contributing to the sense of leaving one space and entering another: the proposed houses would be too close to the existing buildings of both villages.  If these villages are not settlements, what are they?  'Estates', a term used by Inspector Hurley, is not a term of the Strategic Plan 2016.  Nor are they 'groups of buildings in the countryside' (none are identified in the Area Plan, as the Cabinet Office has agreed).  It is clear from the Strategic Policy 2 of the Strategic Plan 2016 that 'settlements' is a generic term for 'towns and villages'. Had the Cabinet Office presented to Tynwald (or the public at a consultation stage) that the Strategic Plan 2016 meant to fill green gaps between villages not listed in paragraph A.3.6 of Appendix 3, the MHKs would not have passed it. A plan having such a meaning would not have represented the views of their constituents. The significant public opposition to the rezoning proposals of the draft Area Plan for the East is a testament to that. The removal of the green gaps would deprive many island residents of their quality of life. The loss of the countryside character of settlements outside the Manx towns would also disappoint new residents. Lifestyle is the primary attraction of the island advertised at locate.im.	<b>CO does not agree with the comment made.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTMZ-R	M	32	Historically when planning permission is granted for 50 houses it invariably leads to many more as time goes by. The Cabinet office's wish to use just one of Camlork farm fields, 521522, would not help preserve "the openness between the settlements" as recommended by Mr Hurley. This field along with fields 52158, 52159 and 524239 should form the green gap between Strang and Union Mills as they have for decades.	<b>CO has accepted the recommendation of the Inspector by identifying the field as a Strategic Reserve and defining the green gap.</b>
BHLF-AAMW-WTX3-V	M	33	We agree with the Inspector that the precise boundaries of the Green Gaps should be shown on the Area Plan Proposals Map and Inset Maps as this provides clarity on the extent of the green gap areas. We agree with the Maps as drafted.	<b>Comment in support noted.</b>
ANON-AAMW-WTMW-N	M	33	Natural Environment Proposal 4 (Green Gap) has been added but there is no modification number. The introduction of a defined Green Gap between Union Mills and Strang and Strang and Douglas is an important principle. Unfortunately, the gap has been poorly defined and not reflected in the site selection, thus undermining the principle.	<b>Paper 4 of the documents published on 14th February 2020 - shown as Modification Number 33. A Map was also published at this stage.</b>
BHLF-AAMW-WTX1-T	M	33	To continue our responses to questions 4 and 5 (Modifications 32 and 33):  The development of either site would fill the green gap between Braddan Hills and Tromode Woods. They are entitled to a green gap between them, because they are in fact distinct settlements, contrary to the restrictive interpretation by Inspector Hurley.  The Inspector appears to believe that the list of 29 settlements in paragraph A.3.6 of Appendix 3 is a definition of a settlement in the Strategic Plan 2016. In his logic, if a village is not on the list in paragraph A.3.6, it is not a settlement and is therefore not entitled to a green gap separating it from another settlement.  In fact, the list is not a definition. If it were an attempt at a definition, it would be wrong, because it omits notable old villages, such as Cronkbourne Village, recognised and registered as one of the last remaining industrial villages for its historic character.	<b>Identified settlements are set out in the spatial hierarchy in the Strategic Plan. Cronkbourne - while a village by name - is not a Village under the planning definitions set out in the Strategic Plan. It has merged, as the Inspector called it into the greater Douglas Area, irrespective of whether it physically lies within the Braddan or Douglas boundaries.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTX1-T	M	33	<p>Paragraph A.3.6 of Appendix 3 of the Strategic Plan 2016 also omitted Maughold from the list of 'settlements', as the Cabinet Office previously attempted to characterise it as a 'group of buildings in the countryside', but eventually recognised it as a village in paragraph A.3.7, immediately below the list (in the same Appendix 3). Paragraph A.3.7 shows that the list in paragraph A.3.6 is not a closed list. There are other settlements on the island.</p> <p>Tromode Woods is a village that has been designed to have its own distinct architectural character, albeit more recently than Cronkbourne Village.</p> <p>Braddan Hills is another village with a different, distinct character, located separately from Tromode Woods and other settlements. Tromode Woods and Braddan Hills are entitled to a green gap between them contributing to the sense of leaving one space and entering another. Sites DBH002 and BH030 together represent such a gap.</p> <p>The development proposal of Hartford Homes does not leave a real green gap contributing to the sense of leaving one space and entering another: the proposed houses would be too close to the existing buildings of both villages.</p> <p>If these villages are not settlements, what are they?  'Estates', a term used by Inspector Hurley, is not a term of the Strategic Plan 2016.  Nor are they 'groups of buildings in the countryside' (none are identified in the Area Plan, as the Cabinet Office has agreed). It is clear from the Strategic Policy 2 of the Strategic Plan 2016 that 'settlements' is a generic term for 'towns and villages'. Had the Cabinet Office presented to Tynwald (or the public at a consultation stage) that the Strategic Plan 2016 meant to fill green gaps between villages not listed in paragraph A.3.6 of Appendix 3, the MHKs would not have passed it. A plan having such a meaning would not have represented the views of their constituents. The significant public opposition to the rezoning proposals of the draft Area Plan for the East is a testament to that. The removal of the green gaps would deprive many island residents of their quality of life. The loss of the countryside character of settlements outside the Manx towns would also disappoint new residents. Lifestyle is the primary attraction of the island advertised at locate.im.</p>	<p><b>The comment relating to what is or is not an 'identified settlement' has been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
ANON-AAMW-WTMZ-R	M	33	<p>Historically when planning permission is granted for 50 houses it invariably leads to many more as time goes by. The Cabinet office's wish to use just one of Camlorck farm fields, 521522, would not help preserve "the openness between the settlements" as recommended by Mr Hurley. This field along with fields 52158, 52159 and 524239 should form the green gap between Strang and Union Mills as they have for decades.</p>	<p><b>CO has accepted the recommendation of the Inspector by identifying the field as a Strategic Reserve and defining the green gap.</b></p>
ANON-AAMW-WTDF-U	M	33	<p>Not clear about proposed modifications</p>	<p><b>No changes are proposed to the Green Gaps as a result of this comment. They have now been clearly defined and supplemented following the Inquiry Report.</b></p>
ANON-AAMW-WTM3-H	M	33	<p>There are no green gaps being established from Union Mills extending all the way through into Douglas. The existing settlements of Union Mills, Braddan and Douglas as distinct settlements will not be maintained. There will be the coalescence of settlements, which goes against the plan's Strategic goals.</p> <p>I believe that part of the proposed Green Gap being defined beneath the hospital round about is being proposed for modifications to the TT Access road. As such this should not be stated as a Green Gap for illustration purposes on this plan. Other areas should be defined to ensure sufficient gaps are included.</p> <p>There is also a concern that should the large level of development that is being proposed to the Braddan area be allowed there will be the need for additional services such as a primary school, shop and public house. Such services will need to be contained within the proposed developments if these green areas are to be retained which is questionable given the extent of development being proposed.</p>	<p><b>No changes are proposed to the Green Gaps as a result of this comment. They have now been clearly defined and supplemented following the Inquiry Report.</b></p> <p><b>Much of this comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
ANON-AAMW-WTMW-N	M	33	<p>Meaningful Green Gaps should be defined for this crucial area. The Areas mapped are inadequate and inappropriate. It is not realistic to treat the BM003 Hospital site as a Green Gap. There is very likely to be pressure to expand both the sporting facilities and hospital car park or facilities in the future. The fields comprising DBH002 are the only realistic Green Gap, forming the boundary of Douglas. The green fields linking the floodplain of Port-e-Chee with the cemetery form a logical break in settlement. The current Plan proposal would result in the coalescence of Braddan Hills, Tromode Woods and Douglas and is contrary to the policy of settlement separation set out in the Strategic Plan.</p>	<p><b>No changes are proposed to the Green Gaps as a result of this comment. They have now been clearly defined and supplemented following the Inquiry Report.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXP-S	M	33	Site BH031 should remain undeveloped in order to maintain the green gap between Union Mills and Strang as referenced in part in paragraph 288 of the Inspector's Report.	<b>Paragraph 288 of the Inspector's Report recommended a limited urban extension of Union Mills, if this should become necessary in the future. CO accepts this.</b>
BHLF-AAMW-WTXW-Z	M	33	The entire area of Camlork (Reference: Site BH031) should remain undeveloped in order to assist in clearly maintaining the Green Gap between Union Mills and Strang, as referred in paragraph 288 of the Inspector's Report. Further details are set out in the H269.	<b>Paragraph 288 of the Inspector's Report recommended a limited urban extension of Union Mills, if this should become necessary in the future. CO accepts this.</b>
BHLF-AAMW-WTX1-T	M	33	There is only one 'Map showing Proposed Green Gap Boundaries' published at <a href="https://consult.gov.im/cabinet-office/modifications-to-the-draft-area-plan-for-the-east/">https://consult.gov.im/cabinet-office/modifications-to-the-draft-area-plan-for-the-east/</a> . The same comments as above apply: The proposed green gaps are inadequate to meet the policy objectives of the Strategic Plan to provide a separation of settlements and retain visual amenity for the existing residents (Spatial Policy 7 and General Policy 2).  In particular, there should be a green gap between the settlements of Braddan Hills and Tromode Woods. Sites DBH002 and BH030 provide the last remaining green gap between them.	<b>No changes are proposed to the Green Gaps as a result of this comment. They have now been clearly defined and the list of Green Gaps supplemented following the Inquiry Report.</b>  <b>In terms of DBH002 and BH030, CO accepts the recommendation to allocate these sites.</b>
BHLF-AAMW-WTXY-2	M	33	Whilst SAVE CAMLORK supports a Green Gap to avoid coalescence between the built-up areas of Union Mills and the Strang, it objects to the modified Green Gap which the Cabinet Office wishes to restrict to just one small field 521522. (see maps above)  Consequently, SAVE CAMLORK refers to the following in the Inspector's Report: "PAPER 4 – MODIFICATIONS" "R9 47: I recommend that the Draft Area Plan be modified to show Green Gaps to avoid coalescence between the built-up areas of Douglas, Union Mills and Strang. (R9)"  "Accept, Yes"  The Cabinet Office says "Accept, Yes" to the Inspector's recommendation that the Draft Area Plan should be modified to show a Green Gap to avoid coalescence between the boundaries of the current built-up area of Union Mills and the current built-up area of the Strang. But it then ignores these boundaries and narrows them down to just one field width distance on the north-eastern and south-western hedge lines of field 521522, thereby putting at risk the very areas that need to be protected (see maps above).  "PAPER 9 - INSPECTOR'S REPORT"  "41: I recommend that the precise boundaries be defined for the proposed Green Gaps shown on the draft Area Plan Proposals Maps. R8"  "42: A large number of objectors argued that Green Gaps should be established between the settlements of Douglas, Union Mills and Strang, and I agree. These three settlements are in close proximity to one another. They are probably at greater and more immediate risk of coalescence than Laxey and Baldrine, or Crosby and Glen Vine. They are separately identified in the Strategic Plan's settlement hierarchy; and they each have a distinctive function and character."	<b>At its narrowest point both Strang and Union Mills settlement boundaries meet at field 521522 and the green gap proposed is as the Inspector intended. Any additional development outside of what the Plan has proposed still would not place Union Mills and Strang any closer together than they already are.</b>

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			<p>"Inspector's Conclusions"</p> <p>"279: "I have previously concluded, in paragraphs 42 to 47 above, that the Area Plan should make provision for a green gap between Union Mills and Strang, and that this should include the whole of Field 521522 at Camlork. I do not consider that a narrower corridor of open space would be sufficient to ensure the maintenance of the separate identities of Strang and Union Mills. For this reason, I consider that the allocation of Field 521522 for housing would be unacceptable."</p> <p>Mr Hurley does not agree with the Cabinet Office's argument that there is no need to identify Green Gaps in the Area Plan, nor does he agree with its argument, "somewhat inconsistently", that a very small part of field 521522 should be left open in the midst of its once proposed but now abandoned Camlork Farm development. He does not consider that such a narrow open space "would be sufficient to ensure the maintenance of the separate identities" of the two settlements whose only link with each other is Strang Road. He states that the village and the hamlet "are separately identified in the Strategic Plan's settlement hierarchy; and they each have a distinctive function and character". He considers "that the Green Gap between Union Mills and Strang should be defined by the existing settlement boundaries of these villages".</p> <p>It is very important to note that Mr Hurley states twice above that a Green Gap between the two communities should "include" field 521522, not restrict it to "only" this field. He also states that the Green Gap should be defined by the existing settlement boundaries as described above. The small Green Gap now suggested by the Cabinet Office of about 230 yards between two sod hedges of this field in the midst of 50 acres of prime farmland does not comply with Mr Hurley's recommendations or relate in any way to the existing boundaries. So, the Cabinet Office for some unknown reason is promoting its Green Gap not to the existing boundaries of Union Mills and the Strang but to the hedges of just one isolated field. The true boundaries of the two settlements are at their closest from the southwestern edge of Camlork Close at the Strang to the north-eastern edge of Corlett Sons &amp; Cowley agricultural merchant's site adjoining Maitland Terrace Lane, Union Mills, a distance of about 710 yards (see maps above). Tynwald Court should support the retention of the current Green Gap.</p>	<p>See Response above.</p>
ANON-AAMW-WTDF-U	M	34	Small businesses may not be able to afford this.	This requirement will be proportionate to the development proposed taking all material considerations into account.
BHLF-AAMW-WTX1-T	M	34	<p>The production of a travel plan for active travel on its own will not help areas designated for further development in the built-up locations, such as sites DBH002 and BH030. The reality is that practically all the residents will use cars. 326 residents of areas surrounding these two sites have represented to the enquiry that active travel for a vast majority of them is not an option: they are mostly too old and frail, and any children prepared to cycle or walk are too young and inexperienced to be safe on the road.</p> <p>Active travel plans will be of limited value and will not solve the problem of traffic congestion.</p> <p>Development could only be sustainable in areas, where the roads needed for access already suffering from congestion can be widened, without unacceptable environmental damage (such as pollution exceeding EU norms) due to the increased traffic.</p>	<p>CO supports the inclusion of requiring new development proposals, particularly on allocated sites, to prepare Travel Plans and consider active travel as part of their design.</p> <p>Much of this comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</p>
BHLF-AAMW-WTXJ-K	M	34	Whilst we fully support the principle of the provision of cycle parking, changing facilities and production of Travel Plans for employment developments, this requirement should only be required for major developments. It is not viable for small scale employment developments to provide changing facilities as small scale development usually does not have sufficient levels of employment to make a Travel Plan liable. We therefore request that this requirement be made relevant only to larger premises over 1,000 sq. m.	Cabinet Office maintains its position on requiring such a travel plan as part of the development brief and does not accept any differentiation on size of premises. Defining how travel plans are implemented will be a matter for the planning application stage.

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BHLF-AAMW-WTXR-U	M	34	Peel supports the Inspector's recommendation of the of the provision of cycle parking and changing facilities, and the production of a Travel Plan, for employment developments.  Specifically, Peel supports Criterion 8 of the Development Brief for Sites BE002b and BE006- Cooil Road which requires that a Travel Plan must be submitted as part of any planning application, which sets out a strategy for the delivery of sustainable transport objectives and demonstrates how these are to be achieved and updated over time.	<b>Comment in support noted.</b>
ANON-AAMW-WTDF-U	M	36	Not clear about proposed modifications	<b>Comment noted. A Map was provided for Site BE010 when the Modifications were published.</b>
BHLF-AAMW-WTXV-Y	M	36	There has not been a proper assessment of the perceived benefit of locating any proposed recycling industry on greenfield land here versus in proximity to other industrial businesses / land on the Island.	<b>Comments are noted but CO makes no change to the proposed allocation. An assessment of alternative sites was not necessary.</b>
ANON-AAMW-WTMW-N	M	37	There is no need to set up a new category for this zone when there is already one in use as identified by the Inspector as a 'Major Accident Hazard site'.	<b>There is specific guidance for these sites and the necessary advice was sought. CO is content to leave the reference as proposed.</b>
BHLF-AAMW-WTXJ-K	M	37	We support the proposed Waste Infrastructure Consultation Zone and the inclusion of Employment Proposal 7 which has a presumption against development for purposes in which vulnerable members of the public would be present including housing, educational and medical establishments.  The Inspectors report is clear that within the Waste Infrastructure Consultation Zone there should be no such presumption against industrial, storage or waste management uses, on land allocated for those purposes.	<b>Comments and comments in support are noted.</b>
BHLF-AAMW-WTXR-U	M	37	Peel supports Modification 37, specifically the radius detailed on the Infrastructure Constraints Map of the Area Plan (Map 1b) which is both appropriate and justified. Upon review of Map 1b, the 300m exclusion zone does not impinge at all upon site BE006 which is located on the opposite side of New Castletown Road and this is considered appropriate. This modification should be supported. Further, or alternatively, it should be recorded that there is no presumption against industrial, storage or waste management uses on land allocated for those purposes within the 300m buffer zone. Peel supports the clarification of the extent of the buffer zone.	<b>Comments in support are noted.</b> <b>A 'no presumption against' proposal is not considered necessary.</b>
ANON-AAMW-WTDF-U	M	38	Not sure about the purpose of the modifications.	<b>The town centre boundary has been updated - see Map 5.</b>
ANON-AAMW-WTMT-J	M	41	I note paragraph 303, in the Inspector's Report, under the section about DH002, DM001 and DH057, as follows:- " I recommend that the whole of Sites DH002, DH057 and DM002 should be shown as a Strategic Reserve Site in the Area Plan."  Should this be DM001, rather than DM002? I think DM001 and DM002 may have become confused here.  Whilst I do not feel that DH002, DM001 and DH057 should be considered anything other than agricultural or open space, I am more supportive of their zoning as Strategic Reserve Sites, than their zoning for development.	<b>CO welcomes this comment, which has already been noted. The reference should be DM001.</b>

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ANON-AAMW-WTM8-P	M	41	<p>M1 - For the reasons that I set out in my submission of Aug 2018, I do not believe that sites DM001 and DH057 should be considered for any development, whether now or in the future. There would be a significant environmental and biosphere impact of such a large development if, as a strategic reserve, it was ever to be released for development. As such I believe it should not be available for development even as strategic reserve.</p> <p>With regret, I acknowledge the inspector's recommendation to reclassify them as Strategic Reserve Sites, as I firmly believe that they should not be developed upon in any circumstances.</p>	<b>CO retains this area as a Strategic Reserve.</b>
ANON-AAMW-WTM8-P	M	41	<p>I note paragraph 303, in the Inspector's Report, under the section about DH002, DM001 and DH057, as follows:- " I recommend that the whole of Sites DH002, DH057 and DM002 should be shown as a Strategic Reserve Site in the Area Plan."</p> <p>Whilst I do not feel that DH002, DM001 and DH057 should be considered anything other than agricultural or open space owing to the significant environmental and landscape impact such a large development (if released) would drive, I am more supportive of their zoning as Strategic Reserve Sites than their zoning for development. However, I remain adamant that it should neither be available in the future. Hence should not even be zoned for strategic reserve.</p> <p>I do not agree with the attachment of DH057 to DH002 and DM001. Together, the scale of development of a strategic reserve would be catastrophic.</p> <p>Historic accuracy of population projections puts the release of strategic reserves very much more likely to be prematurely developed.</p> <p>Should this be DM001, rather than DM002? I think DM001 and DM002 may have become confused here. Administrative error in referencing should make the availability of those sites DH057 to DH002 and DM001 reduced as proper consultation not followed.</p>	<p><b>The error in the ref DM002 which should have been DM001 in the Report has been noticed and corrected. Nevertheless, the point is welcomed. CO does not share the view that this number error equates to proper consultation process not being followed.</b></p> <p><b>CO recognises that many of the points raised were discussed at Inquiry.</b></p> <p><b>CO retains this area as a whole as a Strategic Reserve and measures are contained within the Plan to guard against being 'prematurely developed.'</b></p>
ANON-AAMW-WTMW-N	M	41	<p>This combined site is far too large. Only a small area of this Greenfield site should be designated as Strategic Reserve and the rest deleted from the Area Plan as a proposed allocation for residential development.</p>	<b>The area is retained as a Strategic Reserve. It is to be master planned in any case and may be needed for uses other than pure residential in the future.</b>
BHLF-AAMW-WTXM-P	M	41	<p>DH002 and DH057 have been recommended as Strategic Reserve Sites. These areas consist of open greenfield space and provide a scenic and welcome relief from the adjacent and nearby built up areas. I feel therefore that they should be designated as open space now and in the future.</p>	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>
BHLF-AAMW-WTXV-Y	M	41	<p>There is no forecast need. The Strategic Reserve land as allocated is a severe over-allocation compared with the uncertainty present in population / household forecasts. There is an absence of housing need for this development over the long-term (over a decade away) according to Government projections (Scenario D, 500 migration). Key strategic considerations may have substantially changed in the 2030s, when this land would be needed as currently projected. Allocation of this land early before need, as defined, deprives decision-makers and the public being able to decide on issues that affect them, constrained by poor decision-making as long as a decade or more earlier.</p> <p>The location is visible from a substantial proportion of the Island's landscape and seascape, meaning that the cumulative impact on scenery will be substantial.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage.</b></p> <p><b>Part of the value of a Strategic Reserve is to identify the need to master-plan an area and ensure that there is coordination across areas of land in different ownership - which is certainly the case here. The brief included in the Plan helps to ensure that land isn't released in an ad-hoc manner - this is when opportunities can easily be lost.</b></p>



Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXZ-3	M	41	Site DH002 – Johnny Watterson’s Lane, Douglas Object to DH002 being changed from Predominantly Residential in Draft Plan to Strategic Reserve Site. DH002 should be re-considered as an infill site suitable for immediately available Residential Use. The following submission requests the designation of the above site, planning reference DH002 (“the site”), to be allocated for Predominantly Residential use.	<b>CO notes the objection, however accepts the findings of the Inspector in that there is no need to release the site now. It should be brought forward as part of a master planned approach taking into account other land round about in order to represent part of a sustainable urban extension, not just a residential estate designed in isolation from other land to the west of Johnny Watterson’s Lane.</b>
BHLF-AAMW-WTXZ-3	M	41	Whilst it is acknowledged that the Inspector’s report recommends that the Site be downgraded to reserve status, it is requested that this recommendation be reconsidered for the following reasons:-  a) Cabinet should carefully take into consideration the fact that not all of the sites recommended for Predominantly Residential use in the draft Area Plan will be readily available immediately. Whilst declarations on the various forms may have ‘confirmed’ that sites are readily available for development, in reality this may not be the case, for example where land in third party ownership is required for access. b) We understand that part of the extended Reserve Site that includes the Site is not readily available. This has been indicated to our clients by the owner of part of Site DH057 and would make land assembly and subsequent proposals unrealistic. c) It is considered that, whilst the number of sites designated for Predominantly Residential use have been reduced as a result of a revised assessment of future need relative to population and household projections, the reduced number also materially reduces the options available for future residential development. The designation of the Site for Predominantly Residential use would provide additional choice in an appropriate location. d) The development of the Site on a ‘standalone’ basis is justified as it is an “infill site” with established development to the north east, the east and the south as clearly illustrated on the accompanying plan. Once developed, it will improve the streetscape of the western side of Johnny Wattersons Lane, compliment existing post war and more recent residential developments that front onto the road this road, which is already an arterial route to Douglas town centre. e) Immediate development of the Site would provide an opportunity to plan and establish a first phase of the development of the larger Reserve Site providing future access to adjoining Reserve Sites to the immediate north, west and south. f) The Local Authority housing estate, located off the south east side of Jonny Wattersons Lane, is currently undergoing structural and environmental improvements; the scheme has approximately another five years to run. The availability of Site DH002 for immediate development would enable a more holistic approach to be taken to the overall improvement of this estate, affording the Local Authority the opportunity to replace dwellings considered uneconomic to refurbish with minimum disruption to tenants as they would continue to reside in the vicinity.	<b>CO notes the objection, however accepts the findings of the Inspector in that there is no need to release the site now. It should be brought forward as part of a master planned approach taking into account other land roundabout in order to represent a sustainable urban extension, not just a residential estate designed in isolation from other land to the west of Johnny Watterson’s Lane.</b>  <b>CO commits to continue the monitoring of site delivery and planning approvals and completions through the RLAS Survey which is updated annually.</b>
BHLF-AAMW-WTXK-M	M	41	It is noted that there is a typo in the question above. The question refers to Site ‘DM002’ which should be referred to as DM001.  Sites DH002, DH057 and DM001 should not be retained as a Strategic Reserve Sites ahead of Site DH009 Ballanard Road which is a more sustainable location for new housing.	<b>The error in the ref DM002 which should have been DM001 in the Report has been noticed and corrected. Nevertheless, the point is welcomed. CO does not share the view that this number error equates to proper consultation process not being followed.</b>  <b>CO recognises that many of the points raised were discussed at Inquiry.</b>  <b>CO retains this area as a whole as a Strategic Reserve and measures are contained within the Plan to guard against being ‘prematurely developed.’</b>
BHLF-AAMW-WTXG-G	M	41	M1 and M41 - The requirement to formulate a masterplan for the Strategic Reserve sites off Johnny Waterson’s lane needs to be co-ordinated with the development brief to allow infrastructure enabling work to take place prior to the reserve sites being developed. This should allow the construction of access arrangements to these sites to enable services to be located and therefore facilitate a masterplan to be followed in due course.  Community Facilities and Social Housing provision should be for immediate development and not held as Strategic Reserve. We are prepared to undertake a masterplan of the area in conjunction and with the agreement of the landowners. However, unless some work arises out of this to commence the masterplan it will inevitably not be co-ordinated. Whilst we have everyone’s agreement it needs to move forward. This would at the least entail implementation of access points into the site allowing for a planning application to be made immediately.	<b>CO acknowledges the points highlighting the challenges in preparing a master plan where more than one site owner is involved. Co-ordination of such will need some careful forethought and this includes a responsibility on Cabinet Office at the point of formal release. Some element of ‘on plan’ work may be possible but no ‘on site’ works will be permitted ahead of formal release and related approvals.</b>  <b>There is no immediate requirement to identify sites for community facilities and social housing outside of the master plan stage. Releasing such land as a general allocation might in the long run risk being in the ‘wrong place’ for want of a little forethought and proper planning even if this takes effort and time by all parties. Guidance is provided at 12.18.2 under SRRM - Supporting Statement.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXA-A	M	41	The Inspector's report concluded that the scale of the potential development of these sites would be excessive in relation to the immediate need for additional housing, so the Inspector recommended that they be shown in the Area Plan as strategic reserve sites. This has been reflected in the revised draft of the plan, for which I am grateful. However, the proposals for the treatment of strategic reserve sites in the revised plan make this change almost meaningless, so most of my submission focuses in the revised proposal for the release of strategic reserve sites. Please see response below for M65.	<b>Comments noted. See responses to M65 further on in the document and Para 12.19 in the Written Statement.</b>
BHLF-AAMW-WTXK-M	M	42	<p>We object to the removal of Site DH009 Ballanard Road. The site is approximately 7.5 hectares and has capacity for 60 – 70 dwellings. As we demonstrated during the Examination into the Plan, the site has considerable merit and it should be retained as an allocation, or at the very least it should be included as a Strategic Reserve Site in the final version of the Area Plan.</p> <p>It is noted that the Inspector's conclusions on the site were that 'on balance' he did not find the site suitable. It was clearly a finely balanced position and he did not find the site wholly unsuitable.</p> <p>We also consider that some of the Inspectors conclusions on the site do not concur with the evidence that was submitted. For example, the Inspector notes that development of the site would "plainly have a visual impact, making this area at the edge of the countryside more urban in character". However, this is the case for any urban edge greenfield site and is not unique to this site. In our submission to the Inquiry we demonstrated that the visual impact of a residential development on this site was actually quite low. This is because of the topography of the site, its boundary banks and woodlands which preclude most views into the site from the surrounding area. There is also limited visibility from the west over Cronkbourne and Nobles Hospital; and the existing woodlands and escarpment provide a soft edge to the development. We think the Inspector has not properly reflected this.</p>	<p><b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p> <p><b>CO makes no change to this status of this site and it remains unallocated.</b></p>
BHLF-AAMW-WTXK-M	M	42	<p>Furthermore, the visual impacts would be much lower than the development of Sites DH002, DH057 and DM001, and yet these sites were retained as Strategic Reserves. These sites have a combined gross area of approximately 58 hectares with capacity for approximately 600 dwellings.</p> <p>The Inspectors conclusions on these sites notes that the scale of their potential development would probably be excessive in relation to the immediate need for additional housing and he recommends these sites are included as Strategic Reserve Sites. In terms of visual impact, the Inspector notes that "there are fine views across the allocated land from Johnny Watterson's Lane; and residential development here would clearly entail a regrettable loss of open countryside." It is therefore clear that residential development on Site DH009 would have much lower visual impacts than Sites DH002, DH057 and DM001.</p>	<b>Cabinet Office agrees that while the development would have a visual impact, this is not the only consideration in deciding between sites and comparing one with another.</b>
BHLF-AAMW-WTXK-M	M	42	<p>In regard to sustainability, the Inspector considered that Site DH009 is not particularly close to existing services and prospective residents would probably be highly reliant on car transport. However, the Inspector also accepted that the site is within the Active Travel Investment Plan Area and a residential development could be linked to a proposed footpath route which is planned to run into Tromode, alongside the River Glass.</p> <p>In our submission to the Area Plan Inquiry it was demonstrated that the site does provides a sustainable location for new housing as it is a ten minute walk from bus stops and also within a reasonable proximity to a school and other local services.</p>	<b>The comments demonstrate that the recommendation was finely balanced. CO maintains that the site shall remain unallocated.</b>
BHLF-AAMW-WTXK-M	M	42	Furthermore, during the Inquiry, Moreland Limited (the landowner of Site DH009 and part of the Mill Baldwin Group of Companies) provided evidence regarding a possible link road though the residential allocation at Site DH011 through to Tromode Road. It is considered that this was not properly taken on board by the Inspector and it is noted that this is not mentioned at all in his findings on DH009. The through access route would enhance the sustainability of Site DH009 and could help ease congestion at the junction of Ballanard Road and Johnny Watterson's Lane. It would also assist with the delivery of Site DH011 which may otherwise be limited to lesser numbers. As the landowner of the access strip is the same as DH009, this option is fully deliverable.	<b>The possibility of linking DH009 through DH011 to Tromode Road is not sufficient to overcome the objections to this site as concluded in the Inquiry Report.</b>
BHLF-AAMW-WTXK-M	M	42	In terms of other impacts, it is noted that the Inspector was satisfied that the site is outside the fluvial flood zone associated with the River Glass. The Inspector was also satisfied that development of the site would not have a significant adverse ecological effect on the designated wildlife site along the River Glass.	<b>The comments demonstrate that the recommendation was finely balanced. CO maintains that the site shall remain unallocated.</b>

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BHLF-AAMW-WTXK-M	M	42	It should also be noted that Site DH009 has all the required infrastructure in place, is in single ownership and has a developer led scheme so it is highly deliverable. This is not the case for Sites DH002, DH057 and DM001 which would require a large amount of land assembly and infrastructure to make them deliverable. The Inspector's Report states that it is important that these three sites should be developed together, in accordance with a single masterplan. However, he notes that the sites are currently in multiple ownerships and this may take some time to negotiate.	<b>Comments are noted.</b>
BHLF-AAMW-WTXK-M	M	42	Finally, allocation of DH009 would make sense as it would bring the settlement boundary commensurate with the town administrative boundary.  Overall, it is therefore considered that Site DH009 should be retained in the final version of the Area Plan as an allocation or at the very least as a Strategic Reserve Site. As demonstrated above, the site offers a more sustainable location for residential development than Sites DH002, DH057 and DM001 and would have a lower visual impact.	<b>CO maintains that the site shall remain unallocated.</b>
BHLF-AAMW-WTXT-W	M	42	We consider that our client has been prejudiced as a result of the following:- 1. The decision of the Inspector to accept submissions from Morland only after the production of the site development brief for Site DH011; 2. The failure to produce the site development brief for site DH011 prior to the close of the Inquiry; 3. The failure by the Inspector to take account of Morland's submissions in producing the report, despite the Inspector's agreement to take them into account and the provision of the Submissions to the Cabinet Office within the timescale provided to do so. We ask that the Cabinet Office intervene and not apply the Inspector's decision blindly but instead to consider the originally supported development brief for the Property (being for 40 houses, not the 60/7- houses referred to in paragraph 305 of the Report.	<b>Cabinet Office has reviewed the site in light of the comments received and notes that the matter has been the subject of separate correspondence.</b>
ANON-AAMW-WTMS-H	M	43	I would like to register my objections to the Isle of Man Governments proposed changes to the Eastern Area Plan particularly Site OH O11. No consideration has been given to Infrastructure, scenic value and Reserve Status given by the Inspectors report. It beggars belief that the Government goes to the great expense of hiring an Expert Inspector to then go against his highly valued recommendations. It is quite obvious that none of this extreme waste of everyone's time and money (attending meetings writing letters etc.) was necessary, when the Cabinet Office has or thinks it has someone in house who is better informed and more highly qualified than Mr Michael Hurley the Independent inspector.	<b>CO has accepted the recommendation of the Inspector by identifying the site (OH011) as a Strategic Reserve Site. CO has not gone against the Inspector's recommendations in respect of this site.</b>  <b>See Strategic Site Release Mechanism in Written Statement (para 12.19).</b>
ANON-AAMW-WTMH-6	M	43	What was the point of months of meetings to get the Inspectors Report and then to completely disregard his comments and so once again causing alarm and distress to residents of Birch Hill. Is there not one person with any sense!	<b>CO has accepted the recommendation of the Inspector by identifying the site (OH011) as a Strategic Reserve Site. CO has not gone against the Inspector's recommendations in respect of this site.</b>  <b>See Strategic Site Release Mechanism in Written Statement (para 12.19).</b>
ANON-AAMW-WTX5-X	M	43	Object - The area is of high landscape value and scenic significance as stated in the Onchan Local Plan 2000 and the original planning agreements for Birch Hill.	<b>CO has accepted the recommendation of the Inspector by identifying the site (OH011) as a Strategic Reserve Site. CO has not gone against the Inspector's recommendations in respect of this site.</b>  <b>See Strategic Site Release Mechanism in Written Statement (para 12.19).</b>
BHLF-AAMW-WTXV-Y	M	43	There will be an impact on views valued by the Island's tourism industry (e.g. from Creg-ny-Baa and TT Course). High visibility of location to significant proportion of Island landscape and seascape compared to other lowland and sheltered locations.  Loss of natural capital stock that have not been quantified.  No forecast housing need for Strategic Reserve. Decision on use of this land should be taken by decision-makers and public consultation at a date in 2030s when land is more likely to be required to meet housing need.	<b>CO has accepted the recommendation of the Inspector by identifying the site (OH011) as a Strategic Reserve Site. CO has not gone against the Inspector's recommendations in respect of this site.</b>  <b>See Strategic Site Release Mechanism in Written Statement (para 12.19).</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXP-S	M	44	I support this deletion. The whole of Camlork Farm should remain as a working farm due in part to the quality of its agricultural land (see below), and the demonstrable (taking the present crisis into account) need for the Isle of Man to have a sustainable agricultural industry.	<b>Comment noted.</b>
BHLF-AAMW-WTXW-Z	M	44	I support the deletion. The whole of Camlork Farm should remain as a working farm due in part to its quality land, its farm family status, its sustainable position less than 1 mile from the IOM Meat Plant off Ballafletcher Road and immediately adjacent to the Corlett Sons and Cowley Grain Drying Facility on the Industrial Yard on the Main Road in Union Mills.	<b>Comment noted.</b>
BHLF-AAMW-WTXY-2	M	44	SAVE CAMLORK fully agrees with the Inspector's Conclusions 346, 347 and 348 not to allow these two fields of Camlork Farm to be developed. The soil grade and the capability of these very good agricultural fields are amongst the highest quality in the Isle of Man.  No doubt Dandara will disagree with the opinion of residents, Save Camlork, the Inspector and the Cabinet Office on this and seek to have the site zoned for development or, at the least, zoned as a Strategic Reserve Site. Tynwald Court should reject such claims.	<b>The Inspector spent time at the Inquiry and in drafting his Report considering soil quality. He considered the likelihood of there being good quality soil on the development sites under discussion and the implications for agriculture if such land was to be developed. Soil quality and the potential loss of good grade agricultural land was not however the only consideration which led to the majority of the Camlork fields being recommended for removal from the Draft Plan. Other arguments which can 'tip the scales' against a site's release rest also on 'need' - in this case – a lack of future housing need.</b>
BHLF-AAMW-WTXD-D	M	47	We understand that following the inspectors report, it was recommended that the site should not be considered for immediate residential development or as a reserve site. However, we understand that this may still be under consideration. Therefore, we attach our own personal objections as to why we believe this site is inappropriate for development.  1. Owing to the high volume of water run-off, large amounts of rain water cascade down Ballacollister road and diverts onto this site, therefore flooding issues are a threat. Drainage at Rencell Hill was modified by the local authority around 2017/18 following severe flooding. During the 2019 Laxey flood there was a significant amount of flooding from Ballacollister Road down through the proposed site, which created flooding to Axnfell lane and to our basement. It would seem that any development to the site would reduce the amount a natural drainage, creating an increased risk to the already struggling drainage system on Rencell Hill. 2. The site falls under the status CCQ.3 RAMSAR Area of Special Protection. The previous owner set aside this land to provide a sanctuary for wildlife. It is important to local residents that this natural diversity of wildlife is protected. 3. Motor access to the surrounding roads is single track and would be dangerous to enter/exit the site safely. These roads provide access during times when the Mountain Road is closed and traffic on Rencell Hill and Ballacollister road is already at high capacity for a single-track road and poorly maintained, with much pot holing. 4. It should be noted that Axnfell Lane is an unadopted road and can only be described as a track in very poor condition. 5. The visual impact of the development of the 2 – 3 houses would be detrimental. There would be overlooking issues to our property and adjacent properties. This would encroach on our general benefit of privacy currently enjoyed. 6. Very steep land fall is problematic to develop and make viable and likely not to provide enough amenity value to the site occupants. 7. There is a small electrical substation on the corner of the site by Rencell Hill and Axnfell Lane which is not an ideal position regarding potential hazards for people that live on the plot. 8. I fail to see the need for more family-based housing in this part of Laxey as predominantly farming/rural. There has also been a lot of development in other parts of Laxey which are providing for current and future demand.	<b>CO makes no change to the status of GH038 and it remains unallocated in the Plan after the Modifications Stage.</b>
ANON-AAMW-WTD4-9	M	48	There are serious infrastructure concerns relating to this proposed development, especially as regards sewage treatment facilities.	<b>CO makes no change to the status of GH013 and it remains a Strategic Reserve in the Plan after the Modifications Stage.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXG-G	M	48	<p>Support and Object.</p> <p>Field GH013 has planning approval for an access road serving an extant approval for housing in the adjacent field no. 612728. At the enquiry all parties agreed that it was sensible to allow this field to be developed immediately to allow a co-ordinated approach to services.</p> <p>It does not make sense to access through an open field with a very expensive road and not be able to develop housing on it particularly as it is zoned for development. This is a waste of resources and will disrupt the subsequent housing in future to the detriment of the occupiers.</p>	<p><b>The Inspector throughout the Inquiry listened to all of the parties and would have noted where they agreed on a point or disagreed. At no part of the Inquiry did the Inspector confirm what he was going to conclude on this or any other site. The recommendations and reasoning for them is clearly set out in his Report.</b></p> <p><b>CO has reviewed its decision at the Modifications stage and remains supportive of its stated view to agree with the Inspector and allocate GH013 as a Strategic Reserve.</b></p> <p><b>Map 9 indicates the approved access road through GH013.</b></p>
BHLF-AAMW-WTXG-G	M	49	<p>Baldrine (Lonan) has an under provision of Community, Sports and leisure facilities and in accordance with the allocation of fields 614733 and 614729 as Educational Use, these fields should also be allocated and zoned for such facilities which would complement and be part of the Educational Use in time.</p> <p>This could be implemented as part of the development brief for the site.</p> <p>The area of land adjacent Baldrine Road between houses 'Broadclyst and Cummel Cheh' should be shown washed over as part of the settlement boundary of Baldrine. This area of land has planning approval for a house.</p>	<p><b>Cabinet Office acknowledges the need for outdoor recreation space in Lonan that could be provided long term through delivery of the site for a school. There is no need to say this specifically as part of the allocation.</b></p> <p><b>The Settlement Boundary has been altered to reflect the proposed school site. See also Open Space and Community Proposal 6 in the Written Statement.</b></p>
BHLF-AAMW-WTXG-G	M	51	<p>Close Jaigr Beg is an existing residential site and should be washed over as part of the settlement boundary of Crosby. The residential use is both defined and established as part of the Village. This area historically was part of Crosby Railway Station, part of which the shelter on the Heritage Trail still exists.</p> <p>There should be a distinction made between Close Jaigr Beg and Field Numbers 324316, 324318 and 320912. These fields are an undesignated use, but the existing house and garden is residential.</p> <p>Please see attached plan CFS-18-03C.</p>	<p><b>CO supports an amendment to the settlement boundary - see Map 10.</b></p>
BHLF-AAMW-WTX3-V	M	52	<p>We support the modification for Site MH023 to be washed over as part of a predominantly residential area. It is noted that Hartford Homes has submitted a full application for seven dwellings on the site (application reference: 19/01396/B).</p>	<p><b>Comment in support noted.</b></p>
BHLF-AAMW-WTXG-G	M	53	<p>Marown has an under provision of Community, Sports and Leisure facilities and the Inspector agreed that this is the case. Field numbers 324324 and 324321 adjacent the Memorial Playing fields should be allocated for community facilities in accordance with the inspector's report.</p> <p>The Inspector referred to enabling works to facilitate these facilities which went beyond his remit in this regard. Other ways exist to fund these community facilities.</p> <p>Extract from Inspectors report:</p> <p>402</p> <p>'I acknowledge that there is a deficiency in the provision of recreational open land (including sports pitches) in Marown. However, the proposed sports pitches on Site MMOOI would not be provided without a substantial amount of enabling residential development, which in my view, would be inappropriate.'</p>	<p><b>How and where community, sports and leisure sites are located, used and provided needs to be better understood - this was highlighted in part by the Inspector.</b></p> <p><b>The issue of a deficit of land per head of population may not be solved by necessary proposing more land. For now, Cabinet Office maintains its position with regards to plan.</b></p>
ANON-AAMW-WTX5-X	M	54	<p>Object - This site should be removed as it boundaries areas of high landscape value and scenic significance.</p>	<p><b>CO has accepted the recommendation of the Inspector by removing the site (OH004) as a Strategic Reserve Site.</b></p> <p><b>OH004 is not allocated for development in the adopted Plan.</b></p>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
BHLF-AAMW-WTXP-S	M	56	Support. This site is in the northern section of a field incorporating the extension to site BH031. The access into site BH031 is shown to be the south eastern portion of this field which would be developed to provide a roadway junction with the A1 with an access road routing across the field, across Trollaby Lane, over Trollaby River and on into an agricultural field (Field No 521218). As noted by the Inspector in paragraph 423, the site should not be developed in any way as it is outside the existing settlement and is in an area part of the identified AHLVSS. I would agree with the Inspector's recommendation.	<b>Support noted. BH001 is not to be allocated in the final plan.</b>
BHLF-AAMW-WTXW-Z	M	56	This site is in the same field as the easternmost part of the BH031 site. The access into site BH031 is shown as an irregularly shaped parcel which would be developed to provide a roadway junction with the A1 and then a road leading across the field, across Trollaby Lane and on into agricultural field 521218. As noted by the Inspector in paragraph 423 with specific reference to the proposal for dwellings, the site should not be developed in any way as it is outside the existing settlement and is in an area part of the identified AHLVSS. None of the specified exceptional circumstances apply to the construction of such a roadway with long visibility splays which will decimate the banks and boundary hedges alongside the A1. Any intrusion into an area of countryside outside settlement boundaries does not accord with the relevant policies of the Strategic Plan, and there can be no doubt that creating a large highway access with large visibility splays and the major impact on the landscape of the works would permanently harm the character and quality of the landscape. The development is not essential and therefore does not comply with EP2.	<b>Support noted. BH001 is not to be allocated in the final plan.</b>
BHLF-AAMW-WTXY-Z	M	56	As with the western field 521518 of BH031 Camlork Farm, this land on the other side of Trollaby Lane should not be built upon and should be zoned as "Agricultural and Open Space".	<b>Support noted. BH001 is not to be allocated in the final plan.</b>
BHLF-AAMW-WTXG-G	M	56	More likely to relate to M58 not M56 i.e. Ellenbrook - Site DH008  It is within walking distance of the Sea Terminal and more sustainable than any other development site in the Eastern Plan. The proximity to the Quay, Tesco's, Athol Street, Cool Road and the Sea Terminal makes this site the best site in the Eastern Plan.  Support and Object.  If the whole site is not entirely brought forward the area of land between the existing Ellenbrook Estate and the railway land should be marked for immediate development at the very least. It is already served by all infrastructure required and will have minimum impact on the area. The development of Bungalows off the existing road network would fulfil an immediate requirement.  Please see attached plan CFS-02-01 A showing the land referred to for immediate development.	<b>CO does not support the suggestion to bring forward part of the site as a general allocation. DH008 is to be identified as a Strategic Reserve in the final plan.</b>
ANON-AAMW-WTMB-Z	M	57	Site BH015 is already in residential use with an established access & egress to the adopted highway with services and a number of existing structures within its curtilage.  Given that there is a natural boundary between these two sites it is possible for one to be appropriately phased prior to the other, with phasing having already been suggested by the Inspector. In this way, it is also possible to maintain an aggregate of 15 total dwellings over the two sites per the Inspector's and CO's recommendation.  Allowing that the particulars of any detailed planning application would be subject to the usual scrutiny and safeguards as required by the Strategic Plan, and in the current uncertain local and global economic environment, it is argued that there should be flexibility to develop a proportional amount of dwellings on BH015 independently of BH019. The land is already included in the draft plan, which implies an acceptance that it will be developed, and has an existing means of access to the highway.  Allowing its independent development should not be seen as harmful but in fact as potentially beneficial. Flexibility and adaptability across all areas may never be more critical than in the immediate future as the Island attempts to recover from the impact of the Covid 19 pandemic. Sites that are deemed as suitable for development and available for immediate delivery should be given the support and approval needed for this to be done.	<b>The CO supports the Inspector's recommendation in respect of the sites being developed together. BH015 and BH019 are to be shown as a Strategic Reserve in the final plan.</b>  <b>The Inspector considered the sites contiguous and was not convinced otherwise. Should these site be released and be for general allocation in the future, and it is evident that the sites remain in separate ownership, this doesn't necessary prevent the site overall being developed and coordinated through the Planning Application process.</b>
ANON-AAMW-WTMB-Z	M	57	'Notwithstanding the previous comments, given the long established residential use of this site and the adjacent sites of Copper Beeches and Ballacregga, which predate the majority of the development of Farmhill, Woodstock & Fairways should be classified as 'wash' for residential purposes.'	<b>The site is to be a Strategic Reserve.</b>

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BHLF-AAMW-WTXG-G	M	57	<p>Support and Object</p> <p>The enabling work for the site BH019 was undertaken by the Department of Infrastructure several years ago including the stone wall that was constructed to the boundary of the site.</p> <p>The previous buildings on the site were demolished as part of the compulsory purchase order and part site acquisition. The site is and remains a brownfield Development Site which was acknowledged and accepted by the Inspector.</p> <p>The neighbouring and adjoining site BH015 is an existing residential site with two bungalows and a workshop on the land which is in need of redevelopment.</p> <p>This neighbouring site is under separate ownership with an established access lane serving the site.</p> <p>Given there is a natural landscaped boundary between these two sites it is possible for them to be developed separately.</p> <p>The flexibility to develop BH015 independently of BH019 should be allowed in the final Area Plan for the East.</p> <p>These sites are the closest sites to the Cooil Road employment area and are within the Active Travel Zone for Douglas. Given that they are both Brownfield sites; they fall within the criteria for immediate development and not Strategic Reserve.</p> <p>The existing bungalows and workshop on BH015 are in need of redevelopment immediately not in several years time.</p> <p>This is a small site and would not affect the numbers significantly and is ideally placed for immediate development.</p>	<p>The CO supports the Inspector's recommendation in respect of the sites being developed together. BH015 and BH019 are to be shown as a Strategic Reserve in the final plan.</p> <p>The Inspector considered the sites contiguous and was not convinced otherwise. Should these site be released and be for general allocation in the future, and it is evident that the sites remain in separate ownership, this doesn't necessary prevent the site overall being developed and coordinated through the Planning Application process.</p>
ANON-AAMW-WTMW-N	M	58	Object. This could support a viable small development.	The CO supports the Inspector's recommendation in respect of the sites being developed together. BH015 and BH019 are to be shown as a Strategic Reserve in the final plan.
ANON-AAMW-WTX5-X	M	59	Although neutral on this site, I feel it would improve the visual impact of Laxey village if this are were to be tastefully developed.	Comments in support of development on this site - GH023 - are noted.
ANON-AAMW-WTDF-U	M	61	Not sure about the purpose of the modifications.	CO agrees with the Inspector and Site 'late 2' is to be shown within the settlement boundary of Newtown.
ANON-AAMW-WTDF-U	M	63	Documents and plans not made clearly available to residents.	CO tried to present its response to the Inspector's report in the most logical way possible and linked each Modification the Recommendations in the Inspector's Report where this was possible.
ANON-AAMW-WTMT-J	M	63	Please be sure to correctly designate DM001 as Strategic Reserve as I fear that DM001 may have become confused with DM002 in the Inspector's Report (parag 303).	This error has been noted and references checked in the final plan.
ANON-AAMW-WTM8-P	M	63	Please be sure to correctly designate DM001 as Strategic Reserve as I fear that DM001 may have become confused with DM002 in the Inspector's Report (para. 303). Unless they are to be unallocated.	This error has been noted and references checked in the final plan.

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTX5-X	M	63	Unable to locate table 2.	<p>CO tried to present its response to the Inspector's report in the most logical way possible and linked each Modification to the Recommendations in the Inspector's Report where this was possible.</p> <p>Paper 4 - 'The Schedule of Modifications and the Department's Proposed modifications' set out the Recommendations in the order they appeared in the Report and linked them to a Modification.</p> <p>CO accepts that there was a requirement to view a number of documents when responding to the questions.</p>
BHLF-AAMW-WTXM-P	M	63	<p>Cabinet Office have agreed with the Inspector's Report to designate areas DH057 and DM001 as strategic reserves. These areas consist of open green fields and agricultural land. They are areas of high landscape value and scenic significance. They provide welcome open space for passers-by and for those living opposite. Any development would be visually intrusive and would have an ecological impact. There is also a lack of local services and public transport and would create traffic congestion.</p> <p>I believe that these areas should not be allocated in the Eastern Area Plan for any residential development or reserve site now or in the future.</p>	<p>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</p> <p>Sites are to be identified as Strategic Reserves.</p>
BHLF-AAMW-WTXP-S	M	63	The whole of Site BH031 should be excluded from and protected against any future residential development. I believe that the Inspector's recommendation that Field 521518 is suitable (even as a Strategic Site) for development is based on inadequate information as outlined in the letter accompanying Mr Woods' submission.	Cabinet Office makes no change the proposed Strategic Reserve on part of BH031.
BHLF-AAMW-WTXW-Z	M	63	The whole of site BH031 should be excluded from and protected against any future residential development and in particular, the Inspector's recommendation for the westernmost of the four fields at Camlork to be shown as a Strategic Reserve Site should not be accepted for the reasons set out in the attached letter justifying the above recommendation.	Cabinet Office makes no change the proposed Strategic Reserve on part of BH031.
BHLF-AAMW-WTXZ-3	M	63	Site DH002 should be included in any revised table setting out Predominantly Residential Sites.	Cabinet Office makes no change the proposed Strategic Reserve on DH002.
BHLF-AAMW-WTXF-F	M	63	<p>The Inspector appears to have placed considerable reliance, without any justifiable evidence base, on deliverability and has made residential recommendations on the misplaced assumption that these sites will immediately yield units by simply indicating notional numbers of dwellings on each site, and coming to an eventual unrealistic deliverable figure of 524 units. This collection of sites identified by the Inspector as Table 2, are in fact the most unlikely sites which could deliver immediate housing units, if at all.</p> <p>The Inspectors assumption,... that restricting the amount of green field land will automatically encourage urban regeneration is difficult to understand, and not justifiable. Zoned urban sites generally lie vacant for a reason, and de zoning green field sites allocated under the Draft plan for immediate development on the outskirts of Douglas, Braddan, and Onchan will not have the slightest impact upon the potential for short term development problematic vacant urban sites. Town centre sites are expensive to develop and thus require a maximisation of the number of units – usually by the provision of apartments. The private market in this context has all but vanished due to a lack of demand. Suburban sites are rare of any size and will generally yield but a few units each.</p> <p>..... our Client respectfully asks that the Planning Policy Group .....remove any sites from Table 2 which cannot demonstrate an ability or intention to immediately deliver housing units.</p>	<p>Outside of the plan process, several arms of government are looking into ways of bringing forward brownfield sites following the Select Committee Report on the development of Unoccupied Urban Sites and subsequent work-streams.</p> <p>The Inquiry Report recognised the need to use and regenerate sites within the urban fabric as much as possible before releasing additional greenfield land.</p> <p>Even so, the Inspector - and CO - supports the need to identify some land on the edge some settlements.</p> <p>Table 2 in the Report extracted data from evidence from the Inquiry Stage and the estimates of housing yield initially prepared by CO using certain assumptions was a way of avoiding a situation of an oversupply in the final plan.</p> <p>Cabinet Office will monitor delivery. See also Written Statement para 12.19.</p>
ANON-AAMW-WTMF-4	M	64	The TT Access Road is totally inadequate for its intended use. It is dangerous and not fit for purpose. It requires widening to allow two lane traffic.	The final plan includes a proposal on the TT Access Road as set out in Modification 64 published on 14th February 2020. See Written Statement Transport Proposal 3.



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ANON-AAMW-WTMW-N	M	64	Recommendation 16- Paragraph 60 'I recommend that a bullet point be added to Transport Proposal 2 as follows: - Improve the TT Access Road to provide for a traffic lane in either direction by 2022.' The Modification 64 is too open-ended and vague. There needs to be a commitment that no development will be approved inside of the TT Course until the construction of a substantial improvement in the Access Road has been completed.	<b>CO amended Transport Proposal 3 in light of comments and added to the supporting text.</b>
BHLF-AAMW-WTX1-T	M	64	It would be safer to widen the TT Access Road so as to add lanes to both carriageways, irrespective of sites DBH002 and BH030 (which, we argued, would be landlocked during public road closures).  The proposed deadline of 2022 is obsolete anyway, due to the fundamental change posed by the COVID19, unknown at the time of the inspector's writing his report.  However, what is the planning mechanism for widening the road on the slope leading to the TT Access Road from Braddan Road? Compulsory purchase of the houses on both sides of that road?	<b>CO amended Transport Proposal 3 in light of comments and added to the supporting text.</b>
ANON-AAMW-WTMQ-F	M	64	What a waste of time and money to ignore good advice from a professional inspector.	<b>Comment noted. CO is content with the Proposal set out in the Modifications which is to be carried forward to the final plan.</b>
ANON-AAMW-WTM3-H	M	65	Designating such a large number of strategic reserve sites ahead of the next census (2021) should not be supported. Based on current trends which indicate a decreasing population, the Eastern plan is being driven by inflated and unrealistic figures as argued by those with the island's best interests at heart and ignored on numerous occasions.  The need to determine and react to the real requirements, is further evident as we await to understand the currently unknown impact that the current COVID crisis will have on the island's economy, current population and efforts to encourage new workers to the island.  These effects need to be considered to produce an island wide plan once a census has been completed that will truly reflect expected future housing needs and the real need for all these strategic reserve sites.	<b>CO supports the population modelling currently undertaken and presented in evidence.</b>  <b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>  <b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b>

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ANON-AAMW-WTM3-H	M	65	Further to the mapping as a whole we remain concerned about the projected population figures being used and urge you to utilise the 2021 census figures that will shortly become available to ensure they remain correct. Based on the current COVID crisis, housing demands are likely to fall as the economy falls and job losses become apparent and population decreases. Time is on your side.	<p><b>CO supports the population modelling currently undertaken and presented in evidence.</b></p> <p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p>
ANON-AAMW-WTMT-J	M	65	Cabinet Office should not be entitled to reject The Independent Inspector's recommendations. The Inspector's recommendations made in direct response to actual (rather than projected) population growth are based upon independent analysis and fact. The rejection of these recommendations by those with a desire to grow the population is a serious conflict of interest. Independent assessment must be invited, valued and not overridden.	<p><b>The Inspector's Report is not binding but it is valued and respected.</b></p> <p><b>Paper 4 of the 'Modifications' documents published on 14th February 2020 demonstrates that CO has accepted nearly all of the Inspector's Recommendations. Where CO judged the need to amend or reject, the reasons were set out in Paper 5.</b></p>
ANON-AAMW-WTME-3	M	65	Designating such a large number of strategic reserve sites ahead of the next census (2021) should not be supported. Based on current trends which indicate a decreasing population, the Eastern plan is being driven by inflated and unrealistic figures as argued by those with the island's best interests at heart and ignored on numerous occasions. The need to determine and react to the realistic requirements is further evident as we await to understand the currently unknown impact that the current COVID crisis will have on the island's economy, current population and efforts to encourage new workers to the island. These effects need to be considered to produce an island wide plan once a census has been completed that will truly reflect expected future housing needs and the realistic need for all these strategic reserve sites.	<p><b>CO supports the population modelling currently undertaken and presented in evidence.</b></p> <p><b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b></p> <p><b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b></p>
ANON-AAMW-WTME-3	M	65	Further to the mapping as a whole we remain concerned about the projected population figures being used and urge you to utilise the 2021 census figures that will shortly become available to ensure they remain correct. Based on the current COVID crisis, housing demands are likely to fall as the economy falls and job losses become apparent and population decreases. Time is on your side.	<p><b>Please see CO response to comment immediately above.</b></p>

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ANON-AAMW-WTM8-P	M	65	I would like the decision about future residential development to be based upon independent review and statistical analysis, particularly in relation to population projection. The statement "should this be required" concerns me as it gives no measure of what "requirement" is based upon. Additionally, historic estimates of Island population have always been overstated and as such will likely result in premature release of strategic reserves and lack incentive to develop brownfield sites.	<b>CO supports the population modelling currently undertaken and presented in evidence.</b> <b>Mod 65 does not refer to the exact wording as quoted in the comment.</b>
ANON-AAMW-WTM8-P	M	65	Cabinet Office should not be entitled to reject The Independent Inspector's recommendations. The Inspector's recommendations made in direct response to actual (rather than projected) population growth are based upon independent analysis and fact. The rejection of these recommendations by those with a desire to grow the population is a serious conflict of interest. Independent assessment must be invited, valued and not overridden.	<b>The Inspector's report is not binding but it is valued and respected.</b> <b>Paper 4 of the 'Modifications' documents published on 14th February 2020 demonstrates that CO has accepted nearly all of the Inspector's Recommendations. Where CO judged the need to amend or reject, the reasons were set out in Paper 5.</b>
ANON-AAMW-WTMW-N	M	65	Object - The 7 large Greenfield Strategic Reserve sites defined propose almost as many dwellings (875) as those allocated (934) in the plan. It is thus very important that the release of these Strategic Sites is transparent and based on objective criteria, not Cabinet Office 'flexibility'.  The Inspector set out a simple framework for this. The proposed modifications negate the principle of a strategic reserve. The plan itself is geared to provide allocated sites to meet the needs of 38,317 households in 2026. If the 2021 census suggests the number of private households is likely to reach 38,000 in 2026 it means the plan has been accurately estimated. That point should not be a trigger point for releasing more land. Reserve sites should only be released when needs are identified that exceed the population estimates of the plan. If Cabinet Office wishes to work from households rather than population, the relevant trigger point should be at least 39,000. The lack of an objective criterion for reserve sites in the South (3.2.2) is no reason not to introduce this good practice for the future.  Finally, if 'the Island Development Plan will be undergoing a full Review after the 2021 Census' as noted in point 3.3.4, why not defer this Area Plan until after that point when there will be greater clarity?	<b>CO does not agree with the comment made suggesting that the additions to Recommendation 46 negate the principle of a Strategic Reserve.</b> <b>CO's reasons for the additional text to Rec 46 shown in Mod 65 were set out in Paper 5 published on 14th February 2020. See Strategic Reserve Release Mechanism in Written Statement para 12.19.</b> <b>CO understand the suggestion and even the temptation to wait a year until 2021 Census but it has to be recognised that to wait - even for new Census data - means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census. This would be an unnecessary delay to the whole plan.</b>
ANON-AAMW-WTX5-X	M	65	I do not support a population trigger basis of release even it is to be consistently applied to all the Draft Area Plans. Each site should be considered [in all of the final plans] based on the upcoming need of the nearest township in question. Should it be purely be based on numbers then government will come under unnecessary pressure from larger developers to release land banks for development in areas not appropriate to immediate need.	<b>Pressure exists in all forms at all stages in the planning process. The way to respond is to have clear development plan proposals, open decision making and clear reasoning for that decision making, an ability to comment and at appropriate points the ability to challenge that evidence.</b> <b>The Isle of Man planning system has all of the above checks in place.</b>
BHLF-AAMW-WTXM-P	M	65	I see little point in employing an independent Inspector to make recommendations if the Cabinet Office proposes to reject or amend those recommendations. The report states that the population has not increased by 500 per year since 2016, as predicted, and there is no evidence to support the wish that it will. The Inspector states that "it is therefore unrealistic to believe that by 2022 resident population will be nearing 89,000". The Inspector also considers the release mechanism is redundant because, in reality any developer can submit a planning application for development on a strategic reserve site. Taking into consideration the Inspector's comments, it seems unrealistic and ecologically and environmentally damaging to spoil our countryside by unnecessarily developing our precious green fields.	<b>The Inspector's report is not binding but it is valued and respected. Ahead of each Recommendations, the report set out a summary of the viewpoints and a final 'Inspector' view.</b> <b>Paper 4 of the 'Modifications' documents published on 14th February 2020 demonstrates that CO has accepted nearly all of the Inspector's Recommendations. Where CO judged the need to a reject or amend a proposal the reasoning, this was set out in Paper 5.</b>
BHLF-AAMW-WTXV-Y	M	65	I support the wording as set out by the Inspector, but do not support the Cabinet Office's amendment. I submit that the following text should be removed: "If the 2021 Census reveals that the number of private households is likely to reach 38,000 or more by 2026, consideration will be given to their release 12 months before the end of the plan period, which is 1st April 2025 in line with any other guidance set out in this Plan".  Problem  The release mechanism inserted by the Cabinet Office (number of households) does not comply with requirements and constraints set out in the Isle of Man Strategic Plan 2016 for four key reasons:	<b>See responses to 1-4 below:</b>

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BHLF-AAMW-WTXV-Y	M	65	1. Sequencing. The target of 38,000 households give no requirement that the land zoned as predominantly residential both within and out of current settlement boundaries in the East is utilised before the release of strategic reserves. The Strategic Plan in Section 5.27 mandates that area plans are prepared such that land within existing settlements or on previously developed land is used to meet housing need; only after this is exhausted will greenfield sites be brought forward. To comply with Section 5.27, any trigger must require that the majority of allocated brownfield land is used, followed by greenfield designated as residential, lastly followed by strategic reserve land.	<p><b>As a point of clarification, Section 5.27 is supporting text to the Spatial Policies which follow.</b></p> <p><b>The Area Plan for the East process has in any case followed an approach of looking at land supply - what has been approved, built, what is expected such as conversions, vacant land, extant land already allocated and then looked to what other sites may be needed outside of existing settlements.</b></p> <p><b>See Section in Written Statement for release mechanism for Strategic Reserves - para 12.19.</b></p>
BHLF-AAMW-WTXV-Y	M	65	2. Overprovision. The proposed mechanism based on number of households enables all reserve land to be consumed at once following the trigger; for reference, reserve land provisions for 940 dwellings. The strategic reserves, given this proportionality, would meet projected housing need estimates for 2,989 additional people (as 48% of an island total of 6,227). Section 5.21 of the Strategic Plan sets out area-specific proportions of housing need for the lifetime of the plan. This mandates that 48% of housing need is met in the East, as in Housing Policy 3. To comply with Section 5.21, the release of individual reserve sites must be responsive to immediate housing need in the East, and not overprovision on a whole-island basis.	<p><b>See Section in Written Statement for release mechanism for Strategic Reserves - para 12.19</b></p>
BHLF-AAMW-WTXV-Y	M	65	3. Arbitrariness. The 38,000 target is both arbitrary and based on out-of-date housing projections (which are accepted to be incorrect); the target is thus effectively the mid-point of a meaningless range. The Strategic Plan makes no reference a 'mid-figure' for the purposes of releasing land. There is no evidence base to support the 38,000 target in terms of housing need or site provision. The phased release of land must rather be based on sound demonstration of immediate housing need.	<p><b>it is accepted that there does need to be as practical a way as possible to demonstrate housing need before sie release.</b></p> <p><b>Even the Inspector noted in his report that "the release of a Strategic Reserve Site for residential development should be contingent on some objective criterion, such as the Island's resident population having increased to at least 89,000 by the time of the 2021 Census".</b></p> <p><b>CO accepts that the population of the Island will increase over time. Migration is the biggest influencer on this growth. Having looked at all of the data and the conclusions of the Inspector, CO proposes a clear but expanded basis upon which to assess the timing of the release of some identified greenfield sites (Reserves) in the plan area.</b></p> <p><b>See Section in Written Statement for release mechanism for Strategic Reserves para 12.19.</b></p>
BHLF-AAMW-WTXV-Y	M	65	4. Conflicting Targets. The 38,000 household trigger makes the Inspector's threshold of 89,000 irrelevant, as the household target of 38,000 may be reached with a population of only 84,500 - 87,000 Island population (with the range representing the Government's various housing scenarios with 500 net immigration per year); inclusion of both the Inspector's 89,000 target and the Cabinet Office's 38,000 household target as construed is misleading due to this conflict.	<p><b>CO has reviewed the wording of Modification 65.</b></p> <p><b>See Section on release mechanism for Strategic Reserves - para 12.19 in Written Statement.</b></p> <p><b>The population projections in the strategic plan were formulated using household numbers and household size. By including this as a criteria the Cabinet Office will be better placed to respond to changes in housing trends.</b></p>

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BHLF-AAMW-WTXV-Y	M	65	<p>Solution</p> <p>The Strategic Reserve sites in the Area Plan require a substantial and robust release mechanism; the current included mechanism however is arbitrary and open to abuse. I suggest that the following conditions are required to make Strategic Reserves fit-for-purpose:</p> <p>WHEN provision of brownfield sites in the Area Plan for the East has been exhausted;  AND WHEN provision of (non-reserve) greenfield sites in the Area Plan for the East has been exhausted;  AND WHEN the additional housing stock has been utilised (i.e. 1,300 new households have formed in the East);  AND WHEN the Island total population has surpassed that originally used to allocate land in the Area Plan for the East  THEN reserve land can be considered for development up to the immediate housing need in the East based on the geographic proportions set out in the Strategic Plan, which for the East is 48% of the Island total need.</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>
BHLF-AAMW-WTXV-Y	M	65	<p>Proposed Change to Modification</p> <p>This text must be removed: If the 2021 Census reveals that the number of private households is likely to reach 38,000 or more by 2026, consideration will be given to their release 12 months before the end of the plan period, which is 1st April 2025 in line with any other guidance set out in this Plan.</p> <p>The following should be inserted in its place:</p> <p>Strategic reserve sites may only be considered for residential development when:</p> <p>A. Development of 509 additional dwellings has begun within existing settlement boundaries (i.e. brownfield); AND  B. Development of 309 additional dwellings has begun in already-allocated residential sites outside of existing settlement boundaries (i.e. greenfield); AND  C. At least 1,300 households have formed in the East over the plan period.</p> <p>In addition, strategic reserve land may only be released for development coincident with the proportion of immediate all-Island housing need required to be met in the East, which is defined in the Strategic Plan as 48% of the Island total. The number of Island-wide households must therefore have reached 38,317. This approach ensures that no more land than necessary is released on an all-Island basis.</p> <p>These triggers ensure that brownfield sites are developed before new greenfield sites are released, and the most suitable greenfield sites are used first, which conforms with the 'Plan, Monitor, Manage' approach of the Strategic Plan.</p> <p>When these conditions are not met, strategic reserve sites are subject to development control under Strategic Policy 3.</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>

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BHLF-AAMW-WTXV-Y	M	65	<p>Calculation</p> <p>The latest Government projections (2016 census) suggest that there may be an Island-wide increase of 2,718 households over the plan period (2011 - 2026). In this instance, the total Island population is forecast as 85,671. The Strategic Plan states that 48% of development during the plan period should occur in the East, as a proportion of the Island total; this equates to 1,358 using the latest 2016 census data. The housing allocation in the Area Plan for the East - 1,500 - includes the 1,358 estimated housing need plus an additional buffer of around 10% to account for delays and issues encountered with some development works.</p> <p>Strategic Reserve land has been allocated to anticipate uncertainty in the population projections. The planned uncertainty is for 940 additional households, which when combined with proposed residential land equates to provision for 2,440 households.</p> <p>Given the condition that Strategic Reserve land must only be released when there is housing need ('plan, monitor, manage'), this will only arise when land supply from existing sources has been exhausted. Only when the core housing need has been met (1,358 dwellings) would reserve land be required. There is no need to provision for take-up rate or the time taken for development, as this has already been provisioned for in a leeway through the allocation of 1,500 dwellings, 142 above forecast need.</p> <p>To ensure that housing need is met first by existing allocations of land, the forecast housing need should be met individually for both brownfield and (non-reserve) greenfield sites (i.e. 100% of the 110% allocated). Given that land for 560 dwellings has been allocated within existing settlement boundaries, and 340 outside of settlement boundaries, the housing need required to be met first is 509 for brownfield and 309 for greenfield.</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method para 12.19.</b></p>																																																																																								
BHLF-AAMW-WTXV-Y	M	65	<p>The timing of release should be controlled by immediate need to ensure that more land than necessary is not provisioned. The maximum number of dwellings permissible in reserve land is as follows:</p> $= \text{MAX} (0, (H - 38317) * 0.48)$ <p>Here, H = Island-wide number of households, and 38,317 is the number of Island-wide households provisioned for in the Area Plan for the East outside of reserve sites. For guidance, I calculated the predicted housing need in the East in Strategic Reserve sites with the key assumption that all land within settlement boundaries is utilised in line with the housing yields specified in the Area Plan. The projections are outlined in Table 1:</p> <p>Table 1. Projected land release from strategic reserves (cumulative) based on net migration of 500 persons per year:  Year All-Island Population Households (Scenario A) Release A (total dwellings) Households (Scenario B) Release B (total dwellings) Households (Scenario D) Release D (total dwellings)</p> <table border="1"> <tr><td>2020</td><td>83,415</td><td>36,552</td><td>0</td><td>37,174</td><td>0</td><td>36,832</td><td>0</td></tr> <tr><td>2021</td><td>83,810</td><td>36,696</td><td>0</td><td>37,517</td><td>0</td><td>37,086</td><td>0</td></tr> <tr><td>2022</td><td>84,203</td><td>36,868</td><td>0</td><td>37,862</td><td>0</td><td>37,339</td><td>0</td></tr> <tr><td>2023</td><td>84,584</td><td>37,034</td><td>0</td><td>38,205</td><td>0</td><td>37,588</td><td>0</td></tr> <tr><td>2024</td><td>84,962</td><td>37,200</td><td>0</td><td>38,550</td><td>112</td><td>37,836</td><td>0</td></tr> <tr><td>2025</td><td>85,314</td><td>37,354</td><td>0</td><td>38,887</td><td>274</td><td>38,075</td><td>0</td></tr> <tr><td>2026</td><td>85,671</td><td>37,511</td><td>0</td><td>39,228</td><td>437</td><td>38,317</td><td>0</td></tr> <tr><td>2027</td><td>86,002</td><td>37,655</td><td>0</td><td>39,561</td><td>597</td><td>38,547</td><td>110</td></tr> <tr><td>2028</td><td>86,332</td><td>37,800</td><td>0</td><td>39,896</td><td>758</td><td>38,779</td><td>222</td></tr> <tr><td>2029</td><td>86,633</td><td>37,932</td><td>0</td><td>40,221</td><td>914</td><td>38,998</td><td>327</td></tr> <tr><td>2030</td><td>86,908</td><td>38,052</td><td>0</td><td>40,537</td><td>1,066</td><td>39,206</td><td>427</td></tr> </table> <p>NB Land only released as in table when conditions for development of already-allocated brownfield and greenfield sites has begun.</p>	2020	83,415	36,552	0	37,174	0	36,832	0	2021	83,810	36,696	0	37,517	0	37,086	0	2022	84,203	36,868	0	37,862	0	37,339	0	2023	84,584	37,034	0	38,205	0	37,588	0	2024	84,962	37,200	0	38,550	112	37,836	0	2025	85,314	37,354	0	38,887	274	38,075	0	2026	85,671	37,511	0	39,228	437	38,317	0	2027	86,002	37,655	0	39,561	597	38,547	110	2028	86,332	37,800	0	39,896	758	38,779	222	2029	86,633	37,932	0	40,221	914	38,998	327	2030	86,908	38,052	0	40,537	1,066	39,206	427	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>
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BHLF-AAMW-WTXV-Y	M	65	<p>Table 1 should be included in the Area Plan to demonstrate the magnitude of land expected to be released under different future scenarios. When including reserve land, the Area Plan provisions for an Island-wide household count of 40,191 after accounting for the spatial distribution of development between North, South, East, and West. Table 2 shows how far ahead the proposed strategic reserves plan for against Government scenarios:</p> <p>Table 2. Government scenarios and the year after which land will not be available in the East given TAPE land zoning Migration 500 Migration 1000 Scenario A Beyond 2036 2027 Scenario B 2033 2024 Scenario D 2036 2025</p> <p>Given that migration has net migration has not reached 500 for a number of years and given a tenuous assumption that this trend will continue, land may have been allocated for requirements beyond 2036.</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19+H239.</b></p>
BHLF-AAMW-WTXW-Z	M	65	<p>We believe that the population increase to 89,000 should be the trigger to commence release of any Strategic Reserve Sites as it is more simply quantified from Census data than numbers of households. The household number varies according to interpretation and the disagreement from the recent past regarding voids in Island wide housing stock (but still stock) make certainty impossible.</p> <p>There is no apparent mechanism for the order of release of sites, how will this be decided? In view of the fact that land values will greatly increase when the relevant selected sites are announced would make it very difficult to avoid criticism and comments of perceived favouritism over one owner/developer or another. That could lead to very difficult situations with developers; it would be best to spread the decision making over as wide a group of decision makers as possible, such as Tynwald Court members who will consider all the options.</p>	<p><b>Both population and household size comes from the same data set and both were used in the calculation of the housing need figures within the Strategic Plan.</b></p> <p><b>Cabinet Office does not support the power to release Strategic Reserves being passed to Tynwald.</b></p> <p><b>Cabinet Office has a duty under the TCP Act 1999 to prepare the Island Development Plan. Tynwald has legal power under the Act to approve the Plan. CO has the ability to undertake assessment of the suitability of Strategic Site Release against approved policy.</b></p> <p><b>There is a duty in the Town and Country Planning Act for CO to take into account any NPD made under section 2A of the Act when a development plan is being prepared or revised. There are currently no extant NPDs as at August 2020.</b></p>
BHLF-AAMW-WTXY-2	M	65	<p>SAVE CAMLORK is concerned that the release mechanism of Strategic Reserve Sites is unfairly based on three differing factors, any of which could be used without reference to the others, all of which would create great uncertainty and confusion:</p> <ol style="list-style-type: none"> <li>1. Should the resident population number exceed 89,000.</li> <li>2. Should the number of private households reach 38,000 by 2026 as indicated by the 2021 Census and could even be released from 1 April 2025.</li> <li>3. Considered when the Isle of Man Strategic Plan is next reviewed.</li> </ol> <p>We believe that, rather than leaving the decision about the release of strategic land in the hands of a Minister or the Cabinet Office, such an important decision should rightly be in the domain of Tynwald Court as a whole and only released upon resolution of Tynwald. Otherwise individual Ministers and officers could be exposed to particular risk if they made decisions that were seen as adverse to the electorate, the good of the area and an even greater risk of being perceived as being in the pockets of developers. Any of these would run the risk of producing levels of outrage and questions as to trust in the whole system of government and its democratic accountability.</p> <p>With the palpable facts of leaving the European Union leading to the need for new trade deals, and the pandemic spread of coronavirus leading to countries closing down borders to help deal with loss of lives, the people of the Isle of Man need more certainty of local self-sufficient food and produce supplies. They and Manx farmers need to be protected from speculators and ventures now much more than ever before. Tynwald Court should support these very important points.</p>	<p><b>Both population and household size comes from the same data set and both were used in the calculation of the housing need figures within the Strategic Plan.</b></p> <p><b>Cabinet Office does not support the power to release Strategic Reserves being passed to Tynwald.</b></p> <p><b>Cabinet Office has a duty under the TCP Act 1999 to prepare the Island Development Plan. Tynwald has legal power under the Act to approve the Plan. CO has the ability to undertake assessment of the suitability of Strategic Site Release against approved policy.</b></p> <p><b>There is a duty in the Town and Country Planning Act for CO to take into account any NPD made under section 2A of the Act when a development plan is being prepared or revised. There are currently no extant NPDs as at August 2020.</b></p>

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BHLF-AAMW-WTXA-A	M	65	<p>The Inspector recommended that release of any strategic reserve site should be contingent on some objective criterion, which should be written into the Area Plan. The Inspector proposed the Island's resident population having increased to at least 89,000. That is clearly an objective criterion. There is no uncertainty, and the public could have confidence in the application of such a black-and-white test.</p> <p>The Cabinet Office accepts in "Paper 5: Recommendations in the Inspector's Report which Cabinet Office proposes to reject or amend" that the Island's population is unlikely to reach 89,000 for almost another 10 years (and that is even assuming steady net inward migration of 500 per year, which was always optimistic and must be seriously questioned in view of Covid-19, which I explore further below). The Cabinet Office's acceptance that the population figures will not reach that level for such a long period of time is telling in itself and should bring into sharp focus the irrationality of trying to build so many houses. It is important to re-emphasise here paragraph 213 of the Inspector's report, which warned in no uncertain terms of the risk of "serious over-provision" of housing.</p> <p>Unsurprisingly, the Cabinet Office did not accept the Inspector's recommendation to include a black-and-white population-based trigger. Instead, the Cabinet Office has proposed a trigger that falls way short of being objective. Under the Cabinet Office's proposal, the strategic reserve sites can be released on 1 April 2025 if the Cabinet Office's own forecasts of private household growth at the time of the 2021 Census show that the number of private households is likely to reach 38,000 or more by 2026. The Inspector's recommendation was to include an objective criterion. The whole point of an objective criterion is that it cannot be manipulated. It will either be satisfied or it will not. The nature of an objective criterion is that it should not matter who applies the test – the outcome should be the same no matter who applies the test. The population figure is an actual statistic that would be calculated in the census. The population would either have reached 89,000 or it would not. The number is very hard to manipulate. On the other hand, the Cabinet Office can manipulate its forecasts very easily by changing the assumptions on which the forecasts are based. For this reason, using a forecast as a trigger for the release of strategic reserve sites will undermine public trust in the process. We must not forget that a population projection prepared at the time of the 2011 Census informed the housing policy set out in the Strategic Plan 2016. That projection turned out to be wildly over-optimistic, which is one of the main reasons the Area Plan process has been so controversial.</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method para 12.19.</b></p>
BHLF-AAMW-WTXA-A	M	65	<p>Based on our recent experience of the gross inaccuracy of the Cabinet Office's 2011 population projections, the public would have no confidence in the trigger for the release of strategic reserve sites being based on the Cabinet Office's forecasts of private household number growth. I should stress at this juncture that I am not criticising the Cabinet Office or suggesting that the Cabinet Office is to blame for the inaccuracy of the 2011 projections – projecting is an inherently unspecific art, so the Cabinet Office cannot be blamed for its past projections having turned out to be seriously flawed. But this is precisely the point that I am making. The Inspector recommended that the trigger be based on an objective criterion for a very good reason, but the Cabinet Office's proposal falls way short of being objective.</p> <p>Modification 65 must be revised to include a truly objective criterion that that public could have confidence in. This is especially important if the decision to release strategic reserve sites will not rest with Tynwald, as Mr. Shimmins has repeatedly suggested, and which I discuss further below.</p> <p>Paragraph 12.20.1 of the draft Area Plan should also be revised to make it explicitly clear that strategic reserve sites (especially those on greenfield sites) can only be released after all brownfield sites, previously developed land and sites within existing settlements have been developed (as is required by paragraph 13.3 of the Strategic Plan 2016).</p>	<p><b>Taking account of household size and the number of households has always been part of the policy framework in identifying housing need. Cabinet Office recognises the importance of being objective - and widening the trigger mechanism to include more than total population - can still be objective as there will need to be underpinning facts and figures.</b></p> <p><b>The writer holds the view that Government's projections using the 2011 Census were grossly inaccurate and so there is an argument there that to look at a wider interpretation of triggers, would make sense.</b></p> <p><b>Some brownfield sites have failed to be developed in Douglas despite there being limited greenfield development land for several years. There are many reasons for this but it does need to be noted that not all brownfield sites will, when they come forward, be developed for 100% housing. Restricting Strategic Reserve sites until all the identified brownfield sites have been predominantly built out would not be appropriate but this doesn't mean to say effort and policy focus isn't needed to help facilitate such sites been taken up.</b></p>



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BHLF-AAMW-WTXA-A	M	65	<p>Who Decides When to Release Strategic Reserve Sites?</p> <p>In my view, reserving the decision to release strategic reserve sites to the Cabinet Office rather than Tynwald is fundamentally undemocratic, especially if that decision does not comply with the "plan, monitor and manager" approach set out in the Strategic Plan, which was approved by Tynwald, and which requires brownfield sites, previously developed sites in town and other land zoned for development in-town to be used before strategic reserve sites can be released. It also goes against the precedent that has been set in the context of NPDs.</p> <p>Even if the decision to release sites is reserved to the Cabinet Office in most cases, there are certain circumstances in which it would be even more important for the process to be independent. The sites near my house (DM001, DH057 and DH002) are a good example of this. It was confirmed during the public inquiry session on these sites that at least some of the sites are owned by the Department of Infrastructure and by Douglas Borough Council.</p> <p>As Mr. Shimmins has noted in his submission, the value of farmland currently zoned as agricultural land can be multiplied by a factor of 5 to 7 times when it is zoned for residential development in the Eastern region. As such, the IOM Government (and Douglas Borough Council) stand to make a significant sum of money from zoning these greenfield sites for development. As such, the Cabinet Office would have a significant conflict of interest in any decision to release these sites and could not possibly be an independent arbiter. Bearing in mind the serious conflict of interests, it would be unacceptable for the power to release those sites to rest with the Cabinet Office. To preserve public confidence in the process, Modification 65 must be revised to require any decision to release a strategic reserve site that is owned by any governmental or local authority body to be reserved to a truly independent arbiter.</p>	<p><b>It is agreed the mechanism needs to be robust but the matter is complicated as can be appreciated by the Inquiry discussions and the Report, CO's initial response at the Modifications Stage and variety of responses.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>
ANON-AAMW-WTDF-U	M	66	Documents and plans not made clearly available to residents.	<b>CO has clearly set out its Modifications in the order of the Planning Inspector's recommendations. It maintains this was logical and the best approach given the amount of information to make public.</b>
ANON-AAMW-WTMT-J	M	66	I believe that there is confusion between sites DM001 and DM002 (see my responses to M41 and M63 too). Sites DH057, DM001 and DH002 are sites within the same general area, but site DM002 is geographically separate.	<b>The references in the Written Statement and on the maps have been checked.</b>
ANON-AAMW-WTM8-P	M	66	I believe that there is confusion between sites DM001 and DM002 (see my responses to M41 and M63 too) DH057, DM001 and DH002 are sites within the same general area, but site DM002 is geographically separate. As such, I do not believe proper consultation has been had for sites DH057, DM001 and DH002 so they should remain unallocated.	<b>The references in the Written Statement and on the maps have been checked.</b>
ANON-AAMW-WTMW-N	M	66	<p>The Development Brief for BH030 / DBH002 is totally inadequate for the scale of development proposed and the many reservations brought up at the Inquiry. The serious issues of transport, the access road, infrastructure constraints of water supply and sewerage, as well as adequate electricity are not flagged. There is no recognition of the inability to adequately mitigate the loss of mature trees and wildlife habitat, as well as the impact of developing such a ridge of high ground creating visual intrusion by day and light pollution by night. There is no requirement specified for a soil grade test. There is no recognition of the need to insure there would be no impact on water levels as per Section 5.18.4 of the Plan 'Watercourses and Wetlands' which warns that additional housing in the East will likely impact the water levels of the four relevant reservoirs and 'consequently on the compensation flows within the downstream rivers. DEFA reports that in recent years there has been evidence of low summer flow below Injebreck reservoir in the River Glass. It is suggested that any reduction in flow in the River Glass could have consequences for the ecology of the river, including fish populations. DEFA has highlighted evidence that artificial light from new housing close to rivers may have a detrimental impact on migratory salmonids'.</p> <p>In the context of the reduced need for housing in the updated Plan, this huge development is particularly inappropriate. To have one-third of the designated new dwellings in the Plan to be in one development site, built by one developer is a major mistake. The scale of the development is inappropriate for our small island which should see small-scale sites, visually varied and with diverse architecture. Planning should encourage a diverse economy with smaller-scale developments supporting a wider range of businesses.</p>	<p><b>The Development Brief follows the recommendation of the Inspector following the Inquiry which discussed and examined these issues (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry and makes no change to the Brief as a result of this comment.</b></p> <p><b>See Written Statement for final development brief.</b></p>

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BHLF-AAMW-WTXM-P	M	66	<p>I think that there may be an error. Paper 7 Schedule of Development Briefs which refers to "Johnny Watterson's Lane. Sites DH002, DH057 and DM002". Site DM001 does not, in fact boarder Johnny Watterson's Lane. Site DM001 borders Johnny Watterson's Lane. Site DM002 is land at Lake Road.</p> <p>I agree with the Inspector's statement that "the scale of their potential development would probably be excessive in relation to the immediate need for additional housing". I do not agree with the Cabinet's submission that this area should be used as an urban extension to Douglas. Development in this area would invariably mean building expensive infrastructure to support it, such as sewage works and road widening to avoid traffic congestion which would lead to the destruction of hedgerows with the loss of wild flora and fauna. I believe that instead, efforts should be made to upgrade and improve the urban area of Douglas to accommodate the resident population there and to attract others as this remains the main employment and service area.</p>	<p><b>The site references in the Written Statement and on the maps have been checked.</b></p> <p><b>Much of this comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
BHLF-AAMW-WTXP-S	M	66	<p>As noted above and expanded below, I believe that the Inspector's recommendation that ..... Field No 521518, at the western end of this site, be shown as a Strategic Reserve Site, with capacity for about 50 dwellings in Section 9 of "Paper 7 : Development Briefs" is based on the Inspector being provided with inadequate information and should be deleted for the reasons set out in the attached letter. I am of the view that Field No 521518 should not be developed until a full assessment of the feasibility of providing safe access and egress and independent reviews of the environmental, visual, and amenity effects of such development are available. I remain opposed to the inclusion of this site.</p>	<p><b>The Inspector was clearly content that in principle the Strategic Reserve Site could be satisfactorily accessed. Any development scheme would need to demonstrate this through the planning application process. As such Cabinet Office maintains its position of the site being suitable as a Strategic Reserve.</b></p>
BHLF-AAMW-WTXV-Y	M	66	<p>The development Brief for Sites DH002, DH057 and DM002- Johnny Watterson's Lane should include a requirement for assessment of natural capital stocks and biodiversity with requirement for net biodiversity gain.</p>	<p><b>The issue of net biodiversity gain was discussed at the Inquiry. The strategic approach on Island is currently for no net loss. The Inspector was clear that the Area Plan should not repeat any policies that are already set out in the Strategic Plan unless there is justification for doing so.</b></p> <p><b>There is the intention to review future policy to require 'net biodiversity gain' whre appropriate.</b></p>
BHLF-AAMW-WTXW-Z	M	66	<p>All reference to the western end of Camlork in section 9 of "Paper 7: Development Briefs" should be deleted from the reasons set out in the attached letter. We are of the view that this site is not developable until a full assessment proves otherwise. We remain opposed to the inclusion of this site.</p> <p>Not withstanding the foregoing, whatever the future of this site, it is essential that field boundaries are fully retained, any development in the future must be connected to the mains fowl sewerage, design must reflect the sloping nature of the site and adjacent existing dwellings must be shielded with planted buffer zones.</p>	<p><b>Cabinet Office maintains that the site should remain a Strategic Reserve and that the development brief as set out is sufficient to guide the scheme design in the future for the detailed planning application stage (once released).</b></p>
BHLF-AAMW-WTXZ-3	M	66	<p>As referred to above and set out in attached letter, infill Site DH002 should be designated as Predominantly Residential with an accompanying Development Brief provided in the Area Plan.</p>	<p><b>DH002 is part of a larger Strategic Reserve site and must be master planned accordingly.</b></p>

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BHLF-AAMW-WTX1-T	M	66	<p>We object to both the proposal to develop site DBH002 and the development brief itself, as explained below.</p> <p>We object to the proposal to develop site DBH002, particularly if it is done in isolation from site BH030, which would be needed for access without the removal of registered trees.</p> <p>Against the climate change emergency acknowledged by the inspector, the repeated removal of registered trees would manifest an inconsistent and unacceptable approach. Inspector Hurley appears to be comfortable with perpetuating the vicious cycle of removing, replanting, and removing again registered trees, in the knowledge that the replanted trees do not compensate for the loss of mature registered trees even after 20 years. This approach is perverse. It defeats the purpose of the protective legislation. The Cabinet Office should reject such an approach.</p> <p>Furthermore, the Inspector and his modification (replicated by the Cabinet Office) ignore the established problem of surface water flooding pointed out on behalf of 326 residents. Surface water flooding problem is different to that in river flood plains acknowledged by the inspector. The objections on behalf of 326 residents pointed specifically to the findings of the Manx Utility Authority that the sites are in a surface water flood hotspot (p.25 of the closing remarks published at <a href="https://www.gov.im/media/1367452/residents-aof-braddan-road-ballafletcher-road-sitesdbh002-bh030-closing-statement.pdf">https://www.gov.im/media/1367452/residents-aof-braddan-road-ballafletcher-road-sitesdbh002-bh030-closing-statement.pdf</a>). They have been ignored. As explained above, sites DBH002 and BH030 are likely to contain valuable agricultural land, potentially Class 2 soil. Tests must be done in view of the specific objection and research presented to the inspector and the Cabinet Office on behalf of at least 326 residents. If the test results confirm the high grade of agricultural land, a critical constraint (Environment Policy 14 of the Strategic Plan 2016) should apply to the proposed development.</p>	<p><b>In terms of the proposal to develop DBH002, this was discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p> <p><b>CO supports the site and the development brief. Any application to develop the site must demonstrate satisfactory arrangements for surface water drainage.</b></p> <p><b>In terms of soil quality, the broad evidence document referred to during the Inquiry classes this area as 'urban'. Whilst soil quality is a consideration, housing need is also material to the decision to support housing development on this site.</b></p>
BHLF-AAMW-WTX1-T	M	66	<p>There are many other problems with the designation of sites DBH002 and BH030, which are highlighted in the above closing remarks on behalf of the residents and ignored by both the inspector and the Cabinet Office. In particular, they include the absence of adequate road and drainage infrastructure to make the proposed development sustainable or even safe. The establishment of such infrastructure has to be a pre-condition of the proposed development, providing the housing need has been proved in the first place.</p>	<p><b>See development brief for Site DBH002 and BH030.</b></p>
BHLF-AAMW-WTX1-T	M	66	<p>A local resident, adds other valid points:</p> <p>Not only do we object to the development, but the development brief itself is inadequate – for example, other briefs include phrases like (BE002b / BE006 &amp; BH031) 'There must be no net qualitative loss of biodiversity as a result of the development of this site', 'A Travel Plan must be submitted as part of any planning application which sets out a strategy for the delivery of sustainable transport objectives, and demonstrates how these are to be achieved and updated over time'. (BM006) 'The registered trees along the site's western boundary must be retained and protected during the course of development'</p> <p>Section 5.18.4 Watercourses and Wetlands warns that additional housing in the East will likely impact the water levels of the four relevant reservoirs and 'consequently on the compensation flows within the downstream rivers. DEFA reports that in recent years there has been evidence of low summer flow below Injebreck reservoir in the River Glass. It is suggested that any reduction in flow in the River Glass could have consequences for the ecology of the river, including fish populations. DEFA has highlighted evidence that artificial light from new housing close to rivers may have a detrimental impact on migratory salmonids.' I haven't seen anything as to the source of water supply proposed, but the brief should identify this and if relevant then refer to Natural Environment Proposal 6 'Proposals for new development in the Plan Area which intend a connection to the Injebreck Reservoir for its water supply must demonstrate that as a consequence of this new development, water levels will not be so affected as to have a detrimental effect on normal flows.</p> <p>Likewise, Natural Environmental Recommendation 2 'It is recommended that ahead of making any applications for development close to the reservoirs, watercourses and wetlands in the East, applicants must discuss such proposals with DEFA to establish the need for specific design elements to be taken into account. This may include: the impact of artificial light from the development on migratory fish species, buffer distances from the riverbank and visual amenity.' Although the proposed development is not immediately adjacent to any watercourse, its position on high ground makes the effect of light pollution more visible.</p>	<p><b>Cabinet Office has checked the Development Brief for consistency and has concluded it is not necessary to include every Proposal which may be relevant to a site in each development brief.</b></p> <p><b>Both DEFA and MUA are aware of the scale of the development proposed in the Area Plan for the East and neither have any immediate concerns over supply, flow or light pollution. The policies contained within the strategic plan and the area plan remain relevant when applications are being prepared and determined.</b></p>

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BHLF-AAMW-WTXK-M	M	66	<p>The Development Brief for Site DH011 should include the link road from the site to Tromode Road as proposed during the Inquiry.</p> <p>As set out in our response to Question 14, the proposed link road should extend to Site DH009 to support this being retained in the Area Plan as an allocation, or at the very least as a Strategic Reserve Site. It is considered that the proposed link road was not properly taken on board by the Inspector as this is not mentioned at all in his findings on DH009.</p> <p>Within the Inspectors conclusions on Site DH011, he noted that the through access route could help ease congestion at the junction of Ballanard Road and Johnny Watterson's Lane. It is considered that the link road would also assist with the delivery of Site DH011 which may otherwise be limited to less dwelling units. As the landowner of the access strip is the same as DH009, this option is fully deliverable.</p>	<p><b>CO makes no change to the status of DH009 and in terms of DH011, CO agrees with the Inspector in that not necessary to be reliant on an access to the Tromode Road through the residential estate to the south.</b></p> <p><b>CO has - in light of comments - has added text above the Development Brief in Chapter 12.</b></p>
BHLF-AAMW-WTXJ-K	M	66	<p>We fully support the development briefs for Sites BE002a and BE002b. These are in line with the Inspectors recommendations. It is noted that the development of Site BE002a may require some minor infrastructure works on Site BE002b and we therefore request that the development briefs for Site BE002a and Site BE002b are amended to be flexible in that regard.</p> <p>On an administrative point, the numbering references to the Employment Proposals throughout these Development Briefs needs to be updated for the final version of the Plan following the merge of Employment Proposals 1 and 2 under Modification M13. The changes are referenced below;</p> <p>Development Brief BE002a</p> <p>At Paragraph (2), reference to Employment Proposal 2 should read Employment Proposal 1.</p> <p>Development Brief BE002b/BE006</p> <p>This Development Brief should now appear under Employment Proposal 3 (not Proposal 4 as suggested at Paragraph 6.2 of the Development Briefs Paper and in the heading).</p> <p>At Paragraph (2), reference to Employment Proposal 3 should read Employment Proposal 2.</p>	<p><b>In terms of the suggestion that development of Site BE002a may require some minor infrastructure works on Site BE002b and therefore requests that the development briefs for Site BE002a and Site BE002b are amended to be flexible:</b></p> <p><b>CO believes this situation would be adequately covered by Point 1 in Employment Proposal 3.</b></p> <p><b>The following checks have taken place:</b></p> <p><b>BE002a - At Paragraph (2), reference to Employment Proposal 2 now reads Employment Proposal 1.</b></p> <p><b>BE002b/BE006 - This Development Brief now appears under Employment Proposal 3</b></p> <p><b>At Paragraph (2), reference to Employment Proposal 3 now reads Employment Proposal 2.</b></p>
BHLF-AAMW-WTX3-V	M	66	<p>We fully support the development brief for Sites BH030 and DBH002. It is fully in line with the Inspector's Report and the discussions held at the Inquiry.</p>	<p><b>Comments noted</b></p>
BHLF-AAMW-WTXR-U	M	66	<p>Peel Strongly supports the brief for sites BE002b and BE006 contained within Paper 7: Schedule of Development Briefs. Criterion 2 of both the Inspectors and Cabinet Offices' recommended Development Brief for the site states that development will not be permitted on these sites if it could reasonably and acceptably be located on the site referred to in Employment Proposal 3. However, within the table of suggested modifications (M15), it is clear that Employment Proposal 3 is to be deleted. This error needs to be resolved and the Development Brief updated. Should the Cabinet Office amend the policy wording of Employment Proposal 4, in accordance with the details above, then Peel reserve the right to comment further on this. Peel reserve the right to comment on any further modifications that the Cabinet Office may make to the draft plan.</p>	<p><b>CO acknowledges that the numbering has been complicated for this Chapter in particular.</b></p> <p><b>CO believes this has now been resolved in the final Plan.</b></p>
ANON-AAMW-WTDF-U	M	67	<p>Documents and plans not made clearly available to residents.</p>	<p><b>CO has clearly set out its Modifications in the order of the Planning Inspector's recommendations. It maintains this was logical and the best approach given the amount of information to make public.</b></p>

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ANON-AAMW-WTM3-H	M	67	<p>In the light of all the evidence displayed to the inspector, the inquiry highlighted instances where the Eastern plan has been conducted without in depth consideration to the wider, holistic view and other relevant factors, such as a) climate change, b) effects of Brexit on the island's population and workforce, c) current highways and travel congestion, d) future agricultural requirements, e) current available brown field sites, f) vacant properties and developments completed or approved since the Strategic plan. All of the above issues will substantially impact on the projected requirements.</p> <p>These wider issues have considerable impact, especially in relation to proposals for larger developments, but they are not being considered in any great detail. They should be considered, to support the rezoning of greenfield sites. Proposals for large sites, once developed, will greatly impact the local health, education, finance, environment, food and agriculture services in these areas. In-depth studies should be required to give justification that such proposals are actually feasible before any rezoning is agreed.</p>	<b>CO has undertaken the work necessary to produce the Area Plan for the East. The Plan has been examined at Public Inquiry. Some matters of course are outside the area plan process but a sustainable plan is possible within the framework set by the current Strategic Plan.</b>
BHLF-AAMW-WTXP-S	M	67	The entire area of Site BH031 should be shown as Open Space/Arable Land in the Map accompanying the Area Plan for the East.	<b>CO does not agree with this statement.</b>
BHLF-AAMW-WTXW-Z	M	67	The entire area of Site BH031 should be shown as Open Space/Arable Land in the Map accompanying the Area Plan for the East.	<b>CO does not agree with this statement.</b>
BHLF-AAMW-WTXZ-3	M	67	Site DH002 should be shown as a site designated Predominantly Residential.	<b>Cabinet Office understands the desire to progress this site separately however the site shall remain a Strategic Reserve, with a requirement to be masterplanned to ensure a sustainable urban extension in the long term.</b>
BHLF-AAMW-WTX1-T	M	67	Paper 6 gives only a list and not a map. The development plans have not been published alongside the proposed modifications. Please show the modifications on a new map (or, better, maps, separately for each site).	<b>To produce more maps at the time of the modifications carried the risk of being too confusing. Inevitably some of them would have needed changing again. This is why all modifications were set out in schedule form. The final set of documents includes the updated Maps.</b>
ANON-AAMW-WTMZ-R	M	68	Historically when planning permission is granted for 50 houses it invariably leads to many more as time goes by. The Cabinet office's wish to use just one of Camlork farm fields, 521522, would not help preserve "the openness between the settlements" as recommended by Mr Hurley. This field along with fields 52158, 52159 and 524239 should form the green gap between Strang and Union Mills as they have for decades.	<b>Cabinet Office is satisfied the area proposed is sufficient as a Green Gap.</b>
ANON-AAMW-WTDF-U	M	68	Not sure about the purpose of the modifications.	<b>Noted.</b>
ANON-AAMW-WTMZ-R	M	68	The villagers of Union Mills don't want the Camlork development of Camlork. If this goes ahead, the developer has more influence and power than the Government.	<b>The Plan has been drafted and examined in accordance with Primary Legislation.</b>
ANON-AAMW-WTMZ-R	M	68	We are the owners of Marygate, a property that will be affected more than any other if the plan goes ahead. We firmly believe that the narrow gap between our Southern boundary hedge and the northern back wall of Brookvale cottage, proposed as the access road to the new houses, is too narrow and would increase pollution and noise not only to Marygate but also to Fraggie Rock, South Winds and Shearwaters. If the plan to build these houses goes ahead there could be a greater risk of flooding to the existing houses on Trollaby Lane as we have seen in Sulby.	<p><b>CO makes no change as a result of this comment. Camlork was discussed at Inquiry and was reported on by the Inspector. CO is following the recommendation to include part of Camlork as a Strategic Reserve.</b></p> <p><b>Cabinet Office maintains that the site should remain a Strategic Reserve and that the development brief as set out is sufficient to guide the scheme design in the future for the detailed planning application stage (once released).</b></p>
BHLF-AAMW-WTXM-P	M	68	M68 would mean the loss of aesthetically pleasing green fields and open spaces.	<b>CO makes no change as a result of this comment. Camlork was discussed at Inquiry and was reported on by the Inspector. CO is following the recommendation to include part of Camlork as a Strategic Reserve.</b>

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BHLF-AAMW-WTXP-S	M	68	I submit that Field No 521518 be included with Site BH031 and should be deleted from the Area Plan.  In the document entitled "The Draft Area Plan for the East", Modifications to the Draft Plan following Public Enquiry, Paper 7: Development Briefs, Section 9.2 Cabinet Office proposes the Development Brief (below) as a Modification. I believe that the Modification requesting submission of a masterplan to accompany a planning application for a residential development in Field No 521518 is assuming that development of the site is possible despite the objections submitted by the residents and the Save Camlork Committee.	<b>CO makes no change as a result of this comment. Camlork was discussed at Inquiry and was reported on by the Inspector. CO is following the recommendation to include part of Camlork as a Strategic Reserve.</b>  <b>Cabinet Office maintains that the site should remain a Strategic Reserve and that the development brief as set out is sufficient to guide the scheme design in the future for the detailed planning application stage (once released).</b>
BHLF-AAMW-WTXP-S	M	68	It would appear that the objections to development of any or all of site BH031 have not been considered to have sufficient weight to prevent development, even though it has been demonstrated in section 9.2 of the document entitled "The Draft Area Plan for the East", Modifications to the Draft Plan following Public Enquiry, Paper 7: Development Briefs, that the Cabinet Office proposes the Development Brief (below) as a Modification. I believe that the Modification requesting submission of a masterplan to accompany a planning application for a residential development in Field No 521518 is assuming that development of the site is possible despite the objections submitted by the residents and the Save Camlork Committee.	<b>The role of the Inspector is to weigh up balancing arguments. He was fully aware of the objections made against the allocation of Camlork. He agreed in part to some objections but on balance, supported the long term release of part of the land to satisfy housing need.</b>
BHLF-AAMW-WTXP-S	M	68	It would appear that the objections to development of any or all of site BH031 have not been considered to have sufficient weight to prevent development even though it has been demonstrated that;  <ul style="list-style-type: none"> <li>• Access to the site through the gap between the back wall of Brookvale Cottage and the boundary of Marygate is insufficient to provide adequate screening between Brookvale cottage and the proposed access road.</li> <li>• The loss of amenity acknowledged by the Inspector to the residents at the western end of Main Road in Union Mills and deemed acceptable to him appears to be based solely on the conclusion that an access road with sufficient screening is possible. The Inspector appears to have accepted the assertion by the DOI Highways Division that such an access road is possible. However, no evidence was submitted regarding the methodology used by the DOI to arrive at this conclusion. Obviously, the residents will request sight of the information and calculations used by the DOI to arrive at this conclusion should this field be included as a Strategic Reserve Site.</li> </ul> <p>The loss of amenity alluded to by the Inspector will no doubt include not only noise, light and atmospheric pollution resulting from vehicular and pedestrian use of the proposed access road but also the impact of the loss of visual amenity particularly in relation to Brookvale Cottage, the back of which looks directly onto Field No 521518. It has been demonstrated that the noise levels experienced by Brookvale House and Riverside House are already beyond acceptable levels and I had hoped to engage the services of a specialist firm to quantify the possible increase in noise, light and pollution levels resulting from a proposed access road but, unfortunately due to the restrictions on travel, this is not possible prior to the closing date for submissions to the post amendments. I find it extraordinary that the Inspector found that such a level of loss of amenity acceptable and can only conclude that he based his findings on the verbal assurances of the DOI Highways Division in relation to the access road alone.</p>	<b>The Inspector was clearly content that in principle the Strategic Reserve Site could be satisfactorily accessed. Any development scheme would need to demonstrate this through the planning application process. As such Cabinet Office maintains its position of the site being suitable as a Strategic Reserve.</b>
BHLF-AAMW-WTXP-S	M	68	<ul style="list-style-type: none"> <li>• I also find it extraordinary that the loss of visual amenity is considered acceptable when it was noted in the Draft 2001 Braddan Parish Plan that: ".....any new access road running across Trollaby River would create a significant and potentially unacceptable visual impact." The loss of visual impact does not only involve the immediately adjacent residents but also on the Island residents as a whole as Field No 521518 is the largest of the three fields in Site BH031 and is visible in its entirety from Lhergy Cripperty. The site was consistently rejected as suitable for development since the 1980s and I fail to see what material changes have occurred since then to allow for its development.</li> </ul>	<b>The Inspector was aware of the contents of the Draft Braddan Plan and the report compiled by the Inspector of the time. The 2001 Draft Plan accepted that the views of Camlork were fine but not extraordinary or worth further protection and that Camlork Farm would be suitable for development in the long term.</b>  <b>The Area Plan for the East proposes less development and following the Inquiry includes provision for a defined Green Gap boundary between Strang and Union Mills in the most practical position possible.</b>
BHLF-AAMW-WTXP-S	M	68	<ul style="list-style-type: none"> <li>• The issue of the excellent water quality in Trollaby River which has been verified by the Government Laboratories and submitted to the Public Enquiry does not seem to have been taken into account by the Inspector in his selection of Field No 521518 as being suitable for development. Field No 521518 lies immediately adjacent to the Trollaby River and there is little doubt that any development in this field would have a deleterious effect on water quality.</li> </ul>	<b>The Inspector had sight of those test results.</b>  <b>He still found the principle of developing the site as a Strategic Reserve possible and CO agrees.</b>

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BHLF-AAMW-WTXP-S	M	68	<p>• I note that Point 5 of the Development Brief in the document referred to above states that: "There should be no net loss of biodiversity in the development of this site." The triangular portion of land immediately west of Trollaby Lane, bounded on the east by the Trollaby River has been demonstrated to be an area of unique biodiversity (see submission by the Save Camlork Committee). Constructing an access road through this area would result in the complete obliteration of this unique portion of land in direct contravention of Point 5.</p>	<p><b>Any future planning application would have to comply with the Development Brief for no net loss (at the very minimum).</b></p>
BHLF-AAMW-WTXP-S	M	68	<p>One of the points possibly taken into consideration by the Inspector is the perceived lack of quality of the agricultural land to the west of Camlork Farm. Although the area is used mainly for grazing at the moment it has been used in the recent past for crop growing indicating that the quality of the soil in Camlork Farm is of high quality throughout the area. I would suggest that prior to any inclusion of Field No 521518 for development a soil quality analysis be obtained to demonstrate the soil quality.</p>	<p><b>The principle of developing the site has been found acceptable. It is not necessary to include in the development brief requirements for soil testing. The matter and the broad evidence document 'Agricultural Soils' was discussed at length at the Inquiry and reported on in the Inquiry Report.</b></p>
BHLF-AAMW-WTXP-S	M	68	<p>Finally, past experience has shown that allowing the development of "about" 50 dwellings in this field would result in "creeping substitution" i.e. the piecemeal development of the adjacent land as has happened in developments elsewhere on the island.</p>	<p><b>Speculative development on unzoned land has been approved on the Island in the past and the risk is higher where development plans have been in operation for a long period of time. By having general allocations and Strategic Reserves the aim is to plan in early the next areas for expansion for when these are necessary. This provides developers, land owners and local communities (and others with a well considered plan with identified growth areas which add clarity to questions about where future development might happen and where it should not.</b></p>
BHLF-AAMW-WTXW-Z	M	68	<p>The allocation of the western part of Camlork (Site BH031) should be deleted from the Area Plan as well as the three eastern fields of Camlork and protected from any future development for the reasons referred to above, details of which are set out in the attached letters.</p>	<p><b>CO makes no change as a result of this comment. Camlork was discussed at Inquiry and was reported on by the Inspector. CO is following the recommendation to include part of Camlork as a Strategic Reserve.</b></p> <p><b>Cabinet Office maintains that the site should remain a Strategic Reserve and that the development brief as set out is sufficient to guide the scheme design in the future for the detailed planning application stage (once released).</b></p>
BHLF-AAMW-WTXY-2	M	68	<p>Inspector's Report</p> <p>"289: I recommend that the allocation of the eastern part of Site BH031 be deleted from the Area Plan; but that Field No 521518, at the western end of this site, be shown as a Strategic Reserve Site, with capacity for about 50 dwellings. R53"</p> <p>SAVE CAMLORK is delighted that Mr Hurley recommends that the existing "Agricultural and Open Space" zoning of the eastern three fields 521519, 521522 and 524239 of Camlork Farm should remain. This is only proper. The soil grade and the capability of parts of these very good fields are amongst the highest 4.8% of agricultural land quality in the whole of the Isle of Man. They are not allowed to be built upon.</p> <p>But we are puzzled that the Inspector recommends that the western field 521518 be zoned as a "Strategic Reserve Site". We do not see how this fits in with the lack of need for 50 houses to be built on part of the farm which he refers to as needing to be designated as a rural area of "High Landscape Value" (paragraph 282, page 64 of Mr Hurley's report). It, too, should remain zoned as "Agricultural and Open Space".</p> <p>Building 50 houses on one field of Camlork Farm would undoubtedly and eventually lead to 150 on three fields or 200 on four or 400 on six or 1,000+ on the whole of Camlork Farm (which stretches up from Union Mills to the Strang and on to Ballamilaghan and is owned by Bacarrat and Dandara). This would lead to the destruction forever of a precious part of Manx agricultural land, be detrimental to the character of the surrounding rural landscape and result in the eventual coalescence of Union Mills and the Strang.</p>	<p><b>CO makes no change as a result of this comment. Camlork was discussed at Inquiry and was reported on by the Inspector. CO is following the recommendation to include part of Camlork as a Strategic Reserve.</b></p> <p><b>Cabinet Office maintains that the site should remain a Strategic Reserve and that the development brief as set out is sufficient to guide the scheme design in the future for the detailed planning application stage (once released).</b></p> <p><b>Classification A soils on slate and shale make up 44% of all soils found on the Isle of Man. Class 3 soils make up 80% of all soils found on the Isle of Man. The land at Camlork farm has been proved to be highly unlikely to be Class 2 which is prevalent only over Limestone.</b></p> <p><b>Union Mills is an identified settlement in the Strategic Plan 2016 and as such does have the potential for future growth. The green gap - field 521522 - will protect the settlements of Union Mills and Strang from coalescence in the future.</b></p>
BHLF-AAMW-WTXY-2	M	68	<p>The current status of the Isle of Man as a UNESCO biosphere should be a major incentive to protect the rural environment, local wildlife, important habitats and watercourses. Any building of houses on Camlork Farm fields by Bacarrat and Dandara would require a road being broken through ancient sod banks and hedges and the destruction of ecologically valuable land. This includes the wetland in the triangular plot between Trollaby Lane and the Trollaby Stream.</p>	<p><b>The Island's Biosphere status was part of the evidence discussed at the Inquiry.</b></p>

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BHLF-AAMW-WTXY-2	M	68	As shown below, a development going across Trollaby Lane and on to field 521518 would leave the current houses on the north side of the Main Road on a traffic island with a major highway at their front gardens and an estate access road at their back gardens. Our belief is that the narrow gap between the southern boundary hedge of "Marygate", the nearest property on Trollaby Lane, and the northern back wall of the dwelling "Brookvale Cottage", the nearest property on Main Road, makes the inappropriate access plan a no deal.	<b>The Inspector was clearly content that in principle the Strategic Reserve Site could be satisfactorily accessed. Any development scheme would need to demonstrate this through the planning application process. As such Cabinet Office maintains its position of the site being suitable as a Strategic Reserve.</b>
BHLF-AAMW-WTXY-2	M	68	Ballahutchin Hill, Trollaby Lane, Union Mills and Spring We all know that the climate in the Isle of Man has changed over recent years, with increased rainfall and instances of flooding. A narrow road entrance between the two houses would lead to increased local flooding. The current surface water run-off from the fields behind the houses accumulates at the south-western corner of the field before emptying into the Trollaby Stream. During periods of heavy rain, egress of water is presently insufficient to prevent the flooding of nearby properties. We would suggest that any further extensive residential development in this area would result in the loss of natural rain water absorption, and the increased hard surface areas would expose some nearby properties to an increased risk of flooding. This would also lead to the degradation of the existing Class 1 quality water of the Trollaby Stream, with a resultant loss of invertebrate life.	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>  <b>The Inspector was clearly content that in principle the Strategic Reserve Site could be satisfactorily accessed. Any development scheme would need to demonstrate this through the planning application process. As such Cabinet Office maintains its position of the site being suitable as a Strategic Reserve.</b>
BHLF-AAMW-WTXY-2	M	68	We again draw your attention to the observations of Dr Larch Garrard, former curator for natural history at the Manx Museum and resident of Union Mills. She describes the countryside surrounding the village. "Herons feed there on brown trout. Moorhens, mallards and a pair of Mute swans sometimes meet. Frogs and dragonflies have now returned to breed in the ditches". She writes about hedgerow species and the unique inch-long Manx robber fly, eptriptus cowini, named after a prominent local naturalist, W. S. Cowin. She mentions wild buddleia, rusty-back fern, blue, great and longtailed tits, chaffinches, robins, wrens, blackbirds, and various kinds of thrushes, rooks, siskins, redpolls, as well as peacock butterflies, orange tips, small tortoiseshells, red admirals and the Manx holly blue. Dr Garrard also writes specifically about the small triangular plot of ecologically valuable wetland where Bacarrat and Dandara would drive a roadway from the Main Road on the edge of Union Mills right through Trollaby Lane and its hedges, over its stream, tear up its curragh and then squeeze through the narrowest of gaps into the field 521518 of Camlorck Farm (see above Google Earth photograph). Dr Garrard explains that "The curragh area of the Trollaby Stream bridge has been listed as an area of ecological importance on the [previous] Development Plan. This is because it has one of the few surviving large patches of bog myrtle in the central valley. It is accompanied by creeping willow and clumps of taller willows. They provide an important nesting and feeding area for the migrant grasshopper warbler which has a voice like a fisherman's reel in need of oil! Reed warblers may also be found here and curlews still try to nest".	<b>This comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b>  <b>The Inspector was clearly content that in principle the Strategic Reserve Site could be satisfactorily accessed. Any development scheme would need to demonstrate this through the planning application process. As such Cabinet Office maintains its position of the site being suitable as a Strategic Reserve.</b>



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BHLF-AAMW-WTXY-2	M	68	<p>Professor James Curran produced a report, "IMPACT, An Independent Report on Options for Targets and Actions to achieve Net-Zero Emissions by 2050", for the Government on 31 October 2019. In the report he points out the following facts, along with others, that relate to the possible agricultural, arboricultural and ecological future of Camlork Farm and the Trollaby wetlands:</p> <ol style="list-style-type: none"> <li>1. "Development, and particularly growing impacts on land use through the demand for more and more resources, is seriously damaging habitats, ecosystems and species. Ecosystems provide the human population with much of what is essential to life, including food, water, and fresh air" (page 8).</li> <li>2. "More ponds and wetlands. Habitats reconnected. More diversified agriculture, less livestock but more local fruit, vegetables and grains marketed locally" (page 12).</li> <li>3. "Reforestation, while being sensitive to location for planting, species, to biodiversity interests, and to disease resistance, along with peatland restoration and wetland creation, will considerably improve habitat diversity and, with good planning, the connectivity of existing natural and semi-natural habitats. This not only provides resilience for flora and fauna in the face of inevitable climate change impacts, but also further enhances broader carbon sequestration and other ecosystem services" (page 27).</li> <li>4. "Self-sufficiency of food is a key concept and can potentially reduce food miles and food waste, thereby contributing to reduced carbon emissions" (page 34).</li> <li>5. "Habitat conservation and restoration for ecological connectivity can be achieved by designating the most important areas of semi-natural habitats as Areas of Special Scientific Interest (ASSIs) or other statutory designations and making further provision for their ongoing monitoring and maintenance, taking measures to increase the quality of hedgerows and verges, working with the agricultural sector and wider public to improve protection and management of existing habitats, promoting the restoration of degraded habitats and by creating new habitats where appropriate" (page 74).</li> <li>6. "The Role of Manx Agriculture in the Transition to the Isle of Man's Net Zero Carbon Emissions Targets" (pages 96-97).</li> </ol>	<p><b>CO is fully aware of the Curran Report and the Action Plan and the other workstreams which are flowing from it.</b></p> <p><b>It's existence does not mean that the development plan framework for the Island or indeed this plan should stop being produced.</b></p> <p><b>The Area Plan is based on the principles of sustainable development.</b></p>
BHLF-AAMW-WTXY-2	M	68	<p>No doubt Bacarrat and Dandara will seek to have the Camlork Farm site zoned for development. Should this part of the fields of Camlork Farm be developed, it would only be a matter of time before the adjacent agricultural land would be put forward for rezoning, and development would creep north to the Strang and Ballamillaghan and even west to Glen Vine.</p> <p>Quality farm fields near to Douglas which are presently used for arable or grazing purposes and zoned "Agricultural and Open Space" could see their value increase an amazing 25 fold should they be rezoned for housing development now or sometime in the future. No wonder certain speculators have been buying up farms, mostly at relatively cheap prices and not having planning permission, then trying time and time again to get permission to build large and incongruous housing estates with the obvious intent of making eye-watering profits.</p> <p>Rural greenfield sites should be left to do what they do best: being farmed for local produce to help make the Island more self-sufficient and secure, so important at this time of the global public health crisis which is touching every person and sector of our Island. This cataclysmic emergency should act as a clarion call to people in authority to do what is best for our small country's population in the future.</p>	<p><b>The best way to avoid speculative development proposals on land that isn't zoned is to have an up to date development plan framework.</b></p>
BHLF-AAMW-WTXY-2	M	68	<p>Very importantly, the Cabinet Office needs to ensure that the forthcoming updated Area Plan for the East conforms with the Strategic Plan which is governed by legislation that has been approved by Tynwald Court and should not be played around with.</p> <p>Previous politicians, planners, planning committees, inspectors and Tynwald Courts have thwarted many attempts to rezone parts of Camlork Farm for housing development over many decades. Current Tynwald members should fight for the whole of the farm to remain zoned prime "Agricultural and Open Space", become the major part of the Green Gap between the two settlements of Union Mills and the Strang to help prevent their coalescence in any way and be designated as a rural area of "High Landscape Value" or an equivalent designation.</p>	<p><b>The Inspector asked and received legal advice on the definition of general conformity and in the end had two legal opinions to consider.</b></p> <p><b>The issue of general conformity, as far the CO is concerned, has been addressed.</b></p>

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BHLF-AAMW-WTXF-F	M	68	<p>In the Inspectors conclusion .....he states;            "I recommend that the allocation of the eastern part of site BH031 be deleted from the area plan but that Field no. 521518 at the western end of the site be shown as a Strategic Reserve Site with capacity for about 50 dwellings "</p> <p>The Inspector appears to raise serious doubts in his Report over soils classification and how this casts doubts over the suitability for development of site BH031. Not only was soils classification dismissed under cross examination at the Inquiry – mainly because it was based upon illegible and highly dubious data – but the Inspectors selective process in this context appears to only apply to the site he wished to delete. Indeed, if these same criteria had been applied to all allocated employment land to the south of Cooil Road by comparison, none of this land could have been deemed suitable for development.</p> <p>The deliverability obligations of an Area Plan are made clear in Clause 8.1.1 of the Isle of Man Strategic Plan in that they should ensure deliverability. Also, an Area Plan must deliver on a number of fronts including Strategic Policies, Governments Aims, Inward investment via development opportunities, Population Growth, Infrastructure and Employment Opportunities. Ideally all of these aims and objectives should be in a range of locations within the Area Plan.</p>	<p><b>This comment seems to suggest that the unallocated land at Camlork was only left out because of soil quality/potential loss of good quality agricultural land.</b></p> <p><b>The Inspector spent time at the Inquiry and in drafting his Report considering soil quality. He considered the likelihood of there being good quality soil on the development sites under discussion and the implications for agriculture if such land was to be developed. Soil quality and the potential loss of good grade agricultural land was not however the only consideration which led to the majority of the Camlork fields being recommended for removal from the Draft Plan. Other arguments which can 'tip the scales' for or against a site's release rest also on 'need' - in this case – there was a housing need for the release of only some of the Camlork site.</b></p> <p><b>The point about the classification being the same as that south of Cooil Road is accepted.</b></p>
BHLF-AAMW-WTXF-F	M	68	<p>There are no site ownership issues with the Camlork site and the following benefits accrue if it is designated for development</p> <p>a. Delivery of a wide carriageway link road from Peel Road to The Strang linking the Hospital and route to Ramsey and the North over the Mountain Road. This link will be provided at no cost to the taxpayer, is supported by Highways and not only formed a key part of the development brief for this site but its purpose was to redirect traffic away from the Quarter Bridge and Braddan Bridge junctions. The link road in particular would have been a significant gain to the highway network, creating a shorter route to the Hospital from the west and providing a safe public transport route. The road would be entirely funded by the development and therefore not burden the IOM Government capital programme at all. In addition, should site DBH002/BE030 Ballafletcher be zoned for development the link road will facilitate traffic flows to and from that development. Active travel objectives for the whole area clearly evidence that connectivity of road networks is an aim not just for the Area Plan but Island wide. A considerable amount of evidence was provided by consultants, supported by Highways, with an expectation from Highways Directorate that there would be a relief road completed within the Plan period from the west of Union Mills to the hospital and to complete a highways network offering alternative entry to Douglas from the west, This would alleviate the congestion of Braddan Bridge and Quarter Bridge, and improving the highway network so sites such as DBH002 could be included in a phased program.</p> <p>b. A potential site for a replacement Braddan Primary School – stated at the Inquiry by the DESC as being required once further residential development in the area takes place.</p> <p>c. The creation of 'desirable' housing units (in other words housing that people currently want to buy) at the NE and SW ends of the site whilst maintaining the green gap separating Union Mills and The Strang.</p> <p>d. The creation of a development with full vehicular, pedestrian and cycling accessibility in support of the Government's Active Travel Plan initiative.</p>	<p><b>Much of this comment covers issues that have been raised previously and discussed and examined (through evidence) at the Public Inquiry stage. Cabinet Office does not intend, nor is it required, to re-examine evidence already considered at Inquiry or respond to any new technical evidence submitted at this stage. Cabinet Office has had regard to the representations or objections set out in this comment but makes no change to its approach/the Plan as a result of it.</b></p>
BHLF-AAMW-WTXF-F	M	68	<p>It is noted that the Modified Development Brief has a requirement for a masterplan for the whole of the site identified as BH031 should the site identified as Strategic Reserve at the western end be brought forward for development. On the basis only a small site is now proposed for potential future development our Client is at a loss to understand why. The remaining land comprising BH031 will remain as farmland as the opportunity for a link road through development has been lost.</p>	<p><b>In his Report the Inspector did recommend a masterplan approach on a much smaller strategic reserve site that would deliver fewer homes e.g. BH015s and BH019s. CO does accept that in that case however, there is more than one landowner.</b></p> <p><b>CO does accept that other Strategic Reserve development briefs do not explicitly require masterplans such as OH011, DH008 and GH013. It is judged that the future determination of a planning application on BH031 and quality of a final scheme would not necessarily be reliant on the requirement in the development brief for a masterplan. The reference has been removed.</b></p>
ANON-AAMW-WTDF-U	M	32,	Not clear about proposed modifications	<b>Green Gaps now have precise boundaries that follow physical and tangible boundaries.</b>

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ANON-AAMW-WTMQ-F	M	M43	In respect of the Parcel of Land at Ballachrink Farm, Onchan (OH011), I wish to further make my objection to this site being developed. I would also like to point out what a waste of everyone's time and money for the Cabinet Office to then decide they know better than the professional inspector, and to ignore his valuable knowledge.	<b>Cabinet Office has accepted the Inspector's recommendation in respect OH011 to be shown as a Strategic Reserve Site.</b>
BHLF-AAMW-WTXX-1	M	M47	We cite Paragraphs 360 – 363 of the Inspector's Report, where the Inspector makes a recommendation that site GH038 should not be allocated for residential development nor as a strategic reserve.  We object to this recommendation. We think there is a unique opportunity for low density housing on site GH038, sympathetically designed to replicate the rural Manx vernacular style, incorporating isolated whitewashed squat two-storey, stone-built farmhouses with heavy stacks on both gables using traditional Manx building materials. We refer to Kate's Cottage as a good precedent example. Catriona Mackie writes that "Planning for new developments needs to be sensitive to the environmental and historic context. Recent years have seen the construction of large scale houses by high-net-worth individuals, many of which ignore the islands' traditional architectural forms".  We feel that a low intensity development of GH038 would be: <ul style="list-style-type: none"> <li>• Appropriate to local landscape character</li> <li>• Support local distinctiveness,</li> <li>• Respect heritage and historic landscapes.</li> <li>• Reinforce the edge between village and countryside. This characteristic is being lost as villages have developed in ways which create a hard edge, where they 'turn their backs' on the countryside.</li> </ul>	<b>Many sites in Laxey were rejected or removed from the area plan by the Inspector because of highways, drainage and other reasons. Cabinet Office maintains its position to exclude GH038.</b>
ANON-AAMW-WTMW-N	M	M8	There is no justification for the removal of this as that would dilute the message of protection of cultural assets.	<b>CO does not agree with this view and in any case, matters can be properly managed through the development control process.</b>
ANON-AAMW-WTDF-U	C	Comment not specific to a modification.	I can't agree with any modifications because the proposed modifications are not fully and clearly available on the internet. They should be made clearly available on the government website with clear and well redacted texts on the original status and the proposed modifications	<b>CO presented the modifications in the clearest way possible. All documents were on the Government Consultation Hub and paper copies of the response form were available.</b>
ANON-AAMW-WTMZ-R	C	Comment not specific to a modification.	Following the impacts of the Covid 19 virus, new development should be halted until population figures are reviewed. It may be that Covid 19 results in a population decrease, with subsequent economic impacts.	<b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>  <b>CO understand the temptation to wait until the next Census but it has to be recognised that to wait means waiting until at least Spring 2022 for release of figures/projection data associated with the 2021 Census.</b>  <b>CO does not support any view to halt the Area Plan for the East.</b>
ANON-AAMW-WTMZ-R	C	Comment not specific to a modification.	As you will see in the attached letter that we sent to Chief Minister Howard Quayle in December 2019 we believe that brown field sites should be used for new housing, if required. The green field sites should be left for Isle of Man residents to enjoy and agriculture and nature to thrive.	<b>Comments are noted. Such issues were discussed and addressed as part of the Inquiry and in the Inspector's Report.</b>

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ANON-AAMW-WTM4-J	C	Comment not specific to a modification.	No reference is made to existing housing stock in the evaluation or proposals of the Draft Area Plan. We have houses that have not sold because: a) we have a decreasing, rather than increasing, population; and b) we do not have the vibrant economy which seems to underpin the philosophy for allowing large scale property development. Why has the government failed to give consideration to existing housing stock and the current business climate when planning for the Island's actual housing needs?	<b>Many of the Evidence Papers published throughout the Plan's development were dedicated to population, and housing supply and housing need. There was considerable statistical analysis in the plan's development.</b>
ANON-AAMW-WTM3-H	C	Comment not specific to a modification.	We remain concerned about the large allocation of development proposed within large green field spaces in favour of available Brown sites. It is clear that Douglas town center is currently one mass of destruction. Surely we should focus our efforts on re-establishing a capital that we are proud of. Currently you would be hard pushed to find any 'proud' local resident. Development continues in green field sites in Peel, Crosby, Ballasalla, Castletown, Colby, Port Erin and Ramsey in favour of Brownfield sites. This should not be the policy you should follow within our Capital. All the funds being ploughed into the promenade redevelopment will be wasted if you can't get people into the center through the complete regeneration of these vacant, derelict sites.	<b>Several arms of government are looking into ways of bringing forward brownfield sites following the Select Committee Report on the development of Unoccupied Urban Sites. Even so, there remains a need to identify more land in a small number of sites at the edge of our urban areas. As part of the Inquiry Report the need to use and regenerate sites within the urban fabric was recognised by the Inspector.</b>
ANON-AAMW-WTM3-H	C	Comment not specific to a modification.	Covid 19 highlights the impacts we make daily to our environment through pollution and modern life. It is likely to change the world as we know it. Until the true effects it will have on the island's population, economy, businesses, projected growth realities, and housing market are known, decisions as important as these should be put on hold. We now have an opportunity to reflect and ensure green areas on the island are not sacrificed unnecessarily. Climate change initiatives need to drive and shape the developments being proposed to ensure they remain relevant and protect the island and it's residents to ensure that there is an island left to enjoy for our future and that of our children. We need to implement these changes yesterday and the cementing over Greenfields should therefore be retained for strategic reverses only..	<b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>  <b>CO is fully aware of the Curran Report on Climate Changes and the Action Plan and the other workstreams which are flowing from it.</b>  <b>It's existence does not mean that the development plan framework for the Island or indeed this plan should stop being produced. The Area Plan is based on the principles of sustainable development.</b>
ANON-AAMW-WTM3-H	C	Comment not specific to a modification.	Consideration for an ISLAND plan is urged, which would incorporate the hard work conducted within this eastern plan, and also take into consideration those developments that have been approved, started and completed island wide since the consultation was started and allow for reassessment.  We have an opportunity to devise an island plan that incorporates a holistic approach, including realistic population figures, climate change, highway developments and services, future budget requirements required for its development across all government departments and full impact assessments prepared so land is not zoned unnecessarily.	<b>CO is fully supportive of an Island Plan and getting there by way of a number of Area Plans in the first instance was considered the most appropriate way.</b>  <b>CO is currently reviewing the Island Development Plan timetable and project plan in light of a number of key studies and events. The Area Plan for the East is however to be completed.</b>
ANON-AAMW-WTME-3	C	Comment not specific to a modification.	In light of all the evidence displayed to the inspector, the inquiry highlighted instances where the Eastern plan has been conducted without in depth consideration to the wider, holistic view and the other factors such as climate change, effects of Brexit on the island's population and workforce, current highways and travel congestion, future agricultural requirements, current available brown field sites, vacant properties and developments completed or approved since the Strategic plan. All of which substantially impact projected requirements.  These wider issues have considerable impact in particular to those larger development's being proposed. They are not being considered in any great detail but should be required to support the rezone of such greenfield sites. There are large sites being proposed, where their development will greatly impact the local health, education, finance, environment, food and agriculture services in these areas. In-depth studies should be required to give justification that such proposals are actually feasible before they any rezone is agreed.	<b>CO considers that sufficient work has been undertaken to progress with this plan. The Inquiry provided the opportunity for evidence to be examined in depth. Arguments were balanced and the Inspector set out his judgement and the CO has proposed modifications as a result.</b>  <b>In its final form after having considered the representations made, the plan now provides a suitable framework for new development that is balanced with other needs and any applications can in due course be measured against it.</b>

Respondent Code	Rec / Mod or Comment	No.	Description of Representation or Objection	Cabinet Office Response
ANON-AAMW-WTME-3	C	Comment not specific to a modification.	We remain concerned about the large allocation of development proposed within large green field spaces in favour of available Brown sites. It is clear that Douglas town center is currently one mass of destruction. Surely we should focus our efforts on re-establishing a capital that we are proud of. Currently you would be hard pushed to find any 'proud' local resident. Development continues in green field sites in Peel, Crosby, Ballasalla, Castletown, Colby, Port Erin and Ramsey in favour of Brownfield sites. This should not be the policy you should follow within our Capital. All the funds being ploughed into the promenade redevelopment will be wasted if you can't get people into the centre through the complete regeneration of these vacant, derelict sites.	<b>Several arms of government are looking into ways of bringing forward brownfield sites following the Select Committee Report on the development of Unoccupied Urban Sites. Even so, there remains a need to identify more land in a small number of sites at the edge of our urban areas. As part of the Inquiry Report the need to use and regenerate sites within the urban fabric was recognised by the Inspector.</b>
ANON-AAMW-WTME-3	C	Comment not specific to a modification.	Covid 19 highlights the impacts we make daily to our environment through pollution and modern life. It is likely to change the world as we know it. Until the true effects it will have on the island's population, economy, businesses, projected growth realities, and housing market are known, decisions as important as these should be put on hold. We now have an opportunity to reflect and ensure green areas on the island are not sacrificed unnecessarily. Climate change initiatives need to drive and shape the developments being proposed to ensure they remain relevant and protect the island and it's residents to ensure that there is an island left to enjoy for our future and that of our children. We need to implement these changes yesterday and the cementing over Greenfields should therefore be retained for strategic reverses only..	<b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>
ANON-AAMW-WTME-3	C	Comment not specific to a modification.	Consideration for an ISLAND plan is urged, which would incorporate the hard work conducted within this eastern plan, and also take into consideration those developments that have been approved, started and completed island wide since the consultation was started and allow for reassessment.  We have an opportunity to devise an island plan that incorporates a holistic approach, including realistic population figures, climate change, highway developments and services, future budget requirements required for its development across all government departments and full impact assessments prepared so land is not zoned unnecessarily.	<b>CO is fully supportive of an Island Plan and getting there by way of a number of Area Plans in the first instance was considered the most appropriate way.</b>  <b>CO is currently reviewing the Island Development Plan timetable and project plan in light of a number of key studies and events. The Area Plan for the East is however to be completed.</b>
ANON-AAMW-WTMW-N	C	Comment not specific to a modification.	12.7.1 The Site Assessment Framework states that 'Site Assessment Reports (which currently remain in draft) have been produced for each site. How can they still be in draft form at this stage of consideration? The drafts were peppered with inaccuracies and were unreliable for site selection at the earliest stage of consideration. In particular, various critical constraints were omitted. Why have they still not been revisited and site selections reassessed?	<b>This issue was addressed as part of the Inquiry process and in any case those sites that were controversial were discussed at length and properly dealt with.</b>  <b>CO has nothing further to add on this point.</b>
BHLF-AAMW-WTXA-A	C	Comment not specific to a modification.	The Impact of Covid-19  The Cabinet Office accepted the Inspector's recommendation 45 (Modification 25) and amended paragraph 12.9.2 accordingly. Sub-paragraph iv. of that new paragraph assumed net inward migration of 500 people per year between 2016 and 2026. However, the revised draft report was released before the Isle of Man closed its borders to all new arrivals earlier this year in response to the Covid-19 pandemic.  Covid-19 is currently wreaking havoc on the entire world economy, and the Isle of Man is no exception to this. For the immediate future there will be no inward migration, and it is far too early to tell what impact Covid-19 will have on inward migration. However, the assumption of net inward migration of 500 per year must be revisited in light of recent developments. That figure is central to the Cabinet Office's proposal for the trigger for release of strategic reserve sites, and numerous references to that net inward migration figure are set out in paragraph 3 of "Paper 5: Recommendations in the Inspector's Report which Cabinet Office proposes to reject or amend". All of those references must be revisited in light of the impact Covid-19 is having on the Isle of Man's economy as a whole but also on likely medium- and long-term net inward migration.  Our own Chief Minister has described Covid-19 as the "gravest threat" the Isle of Man has faced in generations. It would be deeply unfortunate, and grossly irresponsible, for the Cabinet Office, the Council of Ministers and Tynwald as a whole to approve the Area Plan for the East in its current form before we have a clearer understanding of the true impact of Covid-19. As such, I wholeheartedly support Mr. Shimmins' proposal in response to Modification 67.	<b>Covid 19 (C-19) is of course likely to influence the way we - as an Island community - work, interact and go about our daily lives. The implications for the Island's planning system and ideas as to how, if at all, it needs to change in order to respond to the sustainable development needs of the Island, in response to the pandemic are only just emerging. New approaches may well be needed for the medium to long term. In the short term, there is no need to re-think the approach taken in the East Plan for new homes and new employment land and other proposals for they have at their heart - sustainability and a system of phased, conditional release. The East Plan has in-built flexibility to respond well in the short term and be a sound basis going forward in a world where adapting to C-19 and the threat it poses is part of our home and work lives in equal measure.</b>

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ANON-AAMW-WTMQ-F	M	65	What a waste of time and money to ignore good advice from a professional inspector.	<b>Site allocations are as per the Inspector's recommendations.</b>
BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	refocusing on the needs of the Town and Villages related to the Area Plans, which in the existing stock of property, in preference to "greenfield" development.	<b>The Area Plan for the East has concentrated development within or on the edge of Douglas and Onchan whilst the more rural areas will see little or no development opportunities other than within existing settlement boundaries.</b>
BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	The neglect by Government of residential property in the small towns and villages, particularly in Conservation Areas, which reflects the Islands heritage and a main attraction for Tourism, has recently been exposed and acknowledged.	<b>CO acknowledges that there is no 'heritage grant' assistance for properties within Conservation Areas.</b>  <b>Conservation Areas are addressed outside of the area plan process.</b>
BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	Maintaining their attractiveness as a place to live and socialise, unfortunately will come at a price, because of the additional cost of maintenance and difficulty, particularly for young people, in obtaining mortgage finance	<b>This is not directly relevant to the Area Plan for the East Modifications.</b>
BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	There is a need for Government to review its current policy, which is attracting young families out of the towns to the new estates, because of available mortgage finance and lower maintenance costs, which is fuelling the demand from developers for more land "Greenfields", to be rezoned for development in the strategic plan.	<b>This is not directly relevant to the Area Plan for the East Modifications.</b>
BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	I understand the Town and country planning act 1999 was based on the Isle of man government policy document "the development of a prosperous and caring society" - October 1987. in my opinion it is a very worth document, which sets out a vision at the time of the financial services boom and the need to protect the Island's heritage, Towns and Villages and Countryside and its way of life and control what was then necessary development. it was ahead of its time and still is and its principles still apply	<b>Comments noted.</b>
BHLF-AAMW-WTX2-U	M	25	it is clear there is Cabinet Office determination to meet the requirements set out in housing Policy 3 of the strategic plan 2016 and accordingly still intends that the area plan for the east should provide 2,240 additional dwellings, during the plan period, by topping up with Strategic reserves sites.	<b>CO has accepted the Inspector's recommendations in this respect.</b>

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BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	there is clearly no prospect of the population reaching 89000, by 2021 and due to the current economic crisis by 2026, when the strategic plan is scheduled for review.	Comments noted.
BHLF-AAMW-WTX2-U	C	Comment not specific to a modification.	of the remaining 1163 sites, 601 already have planning permission, leaving a balance of only 562 proposed additional source D. allocated sites within the existing settlement boundaries	601 figure includes conversion projections up to 2026 for applications not yet made or approved as well as completed units from 2011-2018 predating the 2016 strategic plan update.
BHLF-AAMW-WTXH-H	R	51	281 Environment Policy 14 of the Strategic Plan applies to Class 2 soils falling within areas annotated as Class 3/2 on the Agricultural Land Classification Map. It says that development which would result in the permanent loss of such versatile agricultural land will not be permitted, unless there is an overriding need for the development, and land of a lower quality is not available. In my view, that must tell against the development of the eastern part of the Camlork site. In view of the limited housing requirement discussed in paragraph 208 et seq above, and the availability of land of a lower agricultural potential elsewhere, I do not consider there to be an overriding need for the allocation of this land for development.'	The Inspector spent time at the Inquiry and in drafting his Report considering soil quality. He considered the likelihood of there being good quality soil on the development sites under discussion and the implications for agriculture if such land was to be developed. Soil quality and the potential loss of good grade agricultural land was not however the only consideration which led to the majority of the Camlork fields being recommended for removal from the Draft Plan. Other arguments which can 'tip the scales' for or against a site's release rest also on 'need' - in this case – there was a housing need for the release of some of the Camlork site.
BHLF-AAMW-WTXH-H	R	51	256 There is no technical evidence that indicates that the proposed housing site consists of especially versatile farmland – it is not shown on the Agricultural Land Classification Map, being enclosed by a largely urban area. Nor is there any evidence that this site is of particular ecological importance. Although local residents report having seen various types of wildlife here, the site is not the subject of any nature conservation designation. Mitigation measures may be required if protected species are found to be present on this land, if and when a planning application for its development is considered.' He relies almost completely on the absence of the sites in the Capability Land Map which is not a comprehensive land use document.	It was generally agreed at the Inquiry that the Agricultural Soils Study (Centre for Manx Studies) made broad and general classifications over large areas. It is however fair to state that true class 2 soils are only likely to be found in the south of the Island.
BHLF-AAMW-WTXH-H	R	51	the fact remains that in relation to the quality of soil there was no evidence to consider since no soil test has ever been taken on these two sites. The fact that the sites are not included in the Agricultural Land Use Capability Map and that DEFA appear to make a presumption that if a land plot is not on the Map, it is not of high agricultural value is in our opinion flawed. Quite simply there is no proof either way and yet Government appear to be prepared to allow rezoning without any test taking place	It was accepted at the Inquiry that samples taken in the AS Study were broad in the sense that each individual field was not been sampled in detail and a number of generalisations were made.  There always has to be a balance in weighing up the need for development against other environmental, social and economic factors.
BHLF-AAMW-WTXU-X	R	57	It would have been consistent of the Plan process to identify and stipulate opportunities which would improve the highway network. Such a provision of a through road link to Hightonwood Hill, Castleward Green and Ballanard Woods estates would create obvious benefits through connectivity. It should also not be forgotten that the planning applications following the zoning in the 1982 Island Development Plan incorporated the infrastructure which will enable such connectivity	See Development brief and supporting text for Site DH011.
BHLF-AAMW-WTXU-X	M	42	Whilst Site DH009 is recommended to be deleted from the Area Plan by the Inspector it will be made clear in this document that this recommendation was made by the Inspector without the benefit of a proposal to link Castleward Green and Hightonwood Hill via through Road proposal which is able to be facilitated by out Client	The Inspector found the prospect of a link road to be a bonus rather than a requirement. See Development Brief and supporting text for DH011.

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BHLF-AAMW-WTXU-X	M	42	Castleward Green and Ballanard Woods estates would create obvious benefits through connectivity. It should also not be forgotten that the planning applications following the zoning in the 1982 Island Development Plan incorporated the infrastructure which will enable such connectivity.	<b>The Inspector found the prospect of a link road to be a bonus rather than a requirement. See Development Brief and supporting text for DH011.</b>
BHLF-AAMW-WTXU-X	M	42	In Section 11 of Paper 7 of the Cabinet Office Schedule of modifications a Development Brief is now suggested. Despite assurances that a site development brief would be produced for comment and argument within the inquiry process, as all other compatibly sized sites, it was not. As a consequence of these failures the site development brief was compiled after the inquiry closed. The inspector, as the Cabinet Office have confirmed, have failed to get delivery of the Savage & Chadwick submission on behalf of after the Inquiry closed.	<b>The matter has been the subject of separate correspondence.</b>
BHLF-AAMW-WTXT-W	M	25	Modified Draft Plan incorporates almost all of the Inspector's recommendations, resulting in an MDP which is significantly different from the earlier Draft Plan. We have previously expressed our strong belief that the 2016 Census results are inaccurate and should not be relied upon as a basis for assessing future housing need and provision, and we have provided evidence from Stephen Carse to support this view. Whilst we do not wish to repeat these points unnecessarily, we believe that acceptance of the Inspector's recommendations in this regard, coupled with an unrealistic expectation in respect of the level of housing that can be delivered on previously developed sites, will result in severe difficulties in housing supply (including affordable housing). Put simply, the Modified Draft Plan is economically unambitious and is likely to be a significant threat to Government strategy and growth targets.	<p><b>Between the Draft Plan and the Public Inquiry, the 2016 Census findings and projections became available. The site number and proportion of allocated sites and strategic reserves did change but a significant amount of these changes took place ahead of the Inquiry.</b></p> <p><b>CO is content that there was opportunity for its Schedule of Proposed Changes and the status of all of the sites was sufficiently examined in evidence.</b></p> <p><b>The Plan does provide considerable opportunities on brownfield sites - unless the plan takes a firm stance on this then the reality of getting sites to come forward on previously developed land is substantially weakened by providing an oversupply of greenfield sites.</b></p> <p><b>CO will monitor the extent to which sites come forward.</b></p>
BHLF-AAMW-WTXT-W	M	65	Throughout the Plan process we have supported the principle of identifying Strategic Reserve sites for housing and we are pleased that the Inspector concurs with this, but we do not consider that a population-based trigger for the release of such sites is appropriate or necessary.	<b>Noted. The population based figure is more attractive to many respondents who have submitted comments. For its simplicity, CO does see the merit in having this sort of trigger. However, as set out in the Modifications, CO also sees the problems associated with moving away from household numbers.</b>
BHLF-AAMW-WTXT-W	M	25	the Inspector has recognised that population increase is likely to be driven more by immigration than change in household size. If, as is possible, allocated sites in the east prove to be incapable of delivering housing within the Plan period, the cost and availability of housing will be impacted. This will in turn have a negative effect upon in-migration that cannot be addressed because the population will not reach the level required to allow the release of alternative housing sites.	<p><b>Cabinet Office acknowledges the difficult issue of: <i>if there aren't enough houses, people potentially won't come so the population will have limited growth as well as there really isn't a need or demand to build more houses as the people aren't coming to the Island.</i></b></p> <p><b>The issue is much more complex than a simple statement but part of the solution is to monitor the sites identified and the policy mechanisms employed to bring forward urban sites as well as some greenfield sites for lower density development and houses as opposed to just apartments.</b></p> <p><b>CO supports the approach to review status of Strategic Reserves at Island wide level at the next opportunity.</b></p>
BHLF-AAMW-WTXT-W	M	25	The Inspector proposes for the release of housing land in the east to be dependent upon the population level of the Island as a whole. Similar to the point above, if housing supply is restricted in other areas of the Island (and there can be many reasons for this) then the overall population will not reach a level that allows the release of additional sites in the east to help meet housing need.	<p><b>CO acknowledges the trigger as set out by the Inspector is Island-wide and the implications of this. It accepts that the Island reaching 89,000 wouldn't be the end of the decision making process. There would still need to be an assessment of what the implications are for the East.</b></p> <p><b>See Strategic Reserve Release Mechanism for final method - para 12.19.</b></p>



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BHLF-AAMW-WTXT-W	M	65	Alternatively, even if allocated sites in the east are developed quickly in line with steady immigration then housing supply and choice in the east would become restricted well before the population reaches 89,000. It is estimated in paper 5 that the population will not reach that level until 2031 if it is assumed that net annual in-migration averages 500; as stated above, in-migration levels will be negatively affected by the cost and availability of housing if supply is restricted.	<b>Cabinet Office will monitor the delivery of sites in the East.</b>
BHLF-AAMW-WTXT-W	M	65	we consider that Modification 65 (Paper 5, 14th Feb 2020) should read; "A Strategic Reserve Site is land which may be suitable for development, but which will be held 'in reserve' until the need for such development has been established. The Reserve Sites identified in this Plan will be retained for Predominantly Residential use allowing for flexibility in land supply, should it be found that additional land is necessary. This accords with the 'plan, monitor and manage' approach identified in the Isle of Man Strategic Plan; and is necessary to ensure that the Plan can react to changing circumstances. Strategic Reserve Sites in this Plan will not be released for development until the resident population of the Isle of Man exceeds 89,000. The first opportunity to review the population will be the 2021 Census. If the 2021 Census reveals that the number of private households is likely to reach 38,000 or more by 2026, consideration will be given to their release 12 months before the end of the plan period, which is 1st April 2025 in line with any other guidance set out in this Plan. The status of Strategic Reserve Sites and mechanism/trigger for release of any Strategic Reserves set out in extant Area Plans will be reconsidered when the Isle of Man Strategic Plan is next reviewed."	<b>The Cabinet Office has reviewed the wording in light of all comments. Please see para 12.19 on the Strategic Reserve Release Mechanism.</b>
BHLF-AAMW-WTXT-W	M	22	in our view the Inspector's consideration of Lake Road was unduly influenced by the wider area rather than focusing on the site itself. This has unfortunately lead the Inspector to recommend that the Lake Road site should not accommodate office uses. We believe however that when the site is considered on its own merits its suitability as a potential location for a mix of uses, including offices, is clear; <ul style="list-style-type: none"> <li>The site is in a highly sustainable and accessible location - it is next to the bus and train stations, close to existing and proposed cycle routes, and is within walking distance of all existing town centre services and amenities.</li> <li>The site is suitable for a mix of uses which are compatible with one another, which could include residential and office uses.</li> <li>Further, the site's size, characteristics and location mean that it is suitable for development with uses for which other sites in the town centre are not suitable or available. In particular the site would be able to accommodate large scale office use, with large floor plates as required by some office uses and space to accommodate associated car parking.</li> <li>Without the availability of the Lake Road site these offices will, if other town centre sites are not available, be likely to locate to an out-of-town-centre business park.</li> <li>Importantly, Douglas Borough Council acknowledges that the site is suitable for office development if other sites are not available (as confirmed by para 159 of the Inspector's report).</li> </ul> Whilst we acknowledge that most of the wider Mixed Use Area 8 is not suitable for development with office uses, this is not the case for the land at Lake Road and we consider that the Plan should recognise the site as an exception.	<b>Cabinet office has considered the site further and concludes it would not be detrimental to allow office use on the site under particular circumstances given its position and potential.</b> <b>See Mixed Use Proposal 8a and preceding text.</b>
BHLF-AAMW-WTXT-W	M	22	Modifying the Plan further would be straightforward; the supporting text which refers to the whole of Mixed Use Area 8 at para 9.8.8 of the MDP could be modified further to read; "This area, adjacent to the town centre, presents an opportunity to accommodate changing and evolving leisure time pursuits. The continuation of existing uses would be supported in the short to medium term, with potential comprehensive development in the longer term for uses which may include residential, bulky retail, leisure activities and office uses where specified."	<b>See above</b>
BHLF-AAMW-WTXT-W	M	22	And Mixed Use Proposal 8a could be modified further to read; "There will be continued support for existing uses in the short-medium term. Consideration will be given to the comprehensive re-development of the area for leisure, retail warehouse (bulky goods), and residential uses. and, in respect of the area between Lake Road and the River Douglas (Site DM002), office development. These would be subject to a flood risk assessment and mitigation and a highway impact assessment which may require alternative access to the area including a bridge over the River Glass. Comparison goods retailing will not generally be supported"	<b>See above</b>

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BHLF-AAMW-WTXT-W	R	57	Ballanard Road would be suitable to access a development of around 50 dwellings. This has been accepted by DoI Highways and by the Inquiry Inspector. That said, the owner of land which adjoins our northern and southern site boundaries has made us aware of their plans for the wider area which includes the potential creation of additional access points and a through road, and we have been shown a concept drawing which has been prepared on their behalf by Savage and Chadwick (SC407). We recognise that the drawing illustrates only one of a number of potential access schemes for the wider area, and provided that any scheme does not prejudice the ability of Site DH011 to be developed as proposed in the MDP (i.e. solely through the existing access from Ballanard Road) then we would be supportive of incorporating additional access possibilities at the detailed design stage. This could benefit the wider area by providing further inter-connectivity between new development sites and the local highway network, thus creating additional access and travel options for residents and allowing the Ballanard Woods site to be used even more efficiently. This would help towards meeting the housing objectives of the Plan. Notwithstanding Dandara's support for the principle of a through road for the reasons outlined above, given that Site DH011 can be satisfactorily accessed by way of the existing entrance from Ballanard Road and its development is not dependent upon the creation of any further access points then we have no objection to the Development Brief proposed for the site (Section 11 of Paper 7, Development Briefs, 14th Feb 2020) and we consider that it does not require amendment.	Comments are noted. CO welcomes the views expressed on the concept plans. The Development Brief does not require a second access point or active travel link through to Tromode Road. Please see additional supporting text above the Brief in the Written Statement.
BHLF-AAMW-WTXF-F	M	2	At paragraph 281 of the Report, the Inspector inconsistently applied a soils quality grading issue as a development restraint and subsequently recommended that the Property is removed from consideration for zoning	The Inspector spent time at the Inquiry and in drafting his Report considering soil quality. He considered the likelihood of there being good quality soil on the development sites under discussion and the implications for agriculture if such land was to be developed. Soil quality and the potential loss of good grade agricultural land was not however the only consideration which led to the majority of the Camlork fields being recommended for removal from the Draft Plan. Other arguments which can 'tip the scales' against a site's release rest also on 'need' - in this case – a lack of future housing need.
BHLF-AAMW-WTXF-F	M	68	In the Inspectors conclusion however he states; "I recommend that the allocation of the eastern part of site BH031 be deleted from the area plan but that Field no. 521518 at the western end of the site be shown as a Strategic Reserve Site with capacity for about 50 dwellings " This effectively removes the significant advantage of a relief/link road and the potential for community facility provision at the Strang – which included the potential provision of a two form entry primary school – stated as being required by the Department of Education Sport and Culture at the Inquiry Hearing	Cabinet Office understands the arguments put forward and notes the original draft plan proposals for this area.  All such matters were examined during the Inquiry and the Inspector set out his reasoned recommendations in the Inquiry Report.  CO accepts the recommendations.
BHLF-AAMW-WTXF-F	M	2	Not only was soils classification dismissed under cross examination at the Inquiry – mainly because it was based upon illegible and highly dubious data – but the Inspectors selective process in this context appears to only apply to the site he wished to delete. Indeed, if these same criteria had been applied to all allocated employment land to the south of Cooil Road by comparison, none of this land could have been deemed suitable for development.	The Inspector spent time at the Inquiry and in drafting his Report considering soil quality. He considered the likelihood of there being good quality soil on the development sites under discussion and the implications for agriculture if such land was to be developed. Soil quality and the potential loss of good grade agricultural land was not however the only consideration which led to the majority of the Camlork fields being recommended for removal from the Draft Plan. Other arguments which can 'tip the scales' for or against a site's release rest also on 'need' - in this case – there was a housing need for the release of some of the Camlork site.  The point about the classification being the same as that south of Cooil Road is accepted. Matters taken into account on this land related to there being a need for additional employment land with suitable highways and infrastructure connections; these were determining factors for the Inspector in making his recommendations.

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BHLF-AAMW-WTXF-F	C	Comment not specific to a modification.	Best planning practice should use the most up to date available information and the Inspector should have been aware of the PWC Report whilst the Cabinet Office were in our view obliged to take cognisance of it within their Modifications considerations. This point is reinforced by the fact that the Council of Ministers have recently accepted the concept of an independent agency and have instructed that action be taken using the Summerland site as a test case.	<b>The PWC report was not published until the end November 2019 and so it was not possible for the Inspector to review in a Public Inquiry setting. Nor would it have been appropriate to give any weight to it in his deliberations. Cabinet Office (planning) is aware of the proposals for an agency type vehicle and the identification of the Summerland site as a trial case. The progression of the Area Plan remains unaffected and the 'Special Purpose Vehicle' approach and any outcomes will be monitored.</b>
BHLF-AAMW-WTXF-F	M	2	The consequences of the Inspectors Report in placing an unrealistic and false reliance on the anticipation of brown field site development which may never happen are that sites which were identified by the Cabinet Office in the Draft Area Plan and which could be immediately developed Sites that cannot achieve short term deliverability should then be moved to a separate structure via the Development Agency to assist in achieving their longer-term potential. They shouldn't be left as currently allocated to encumber the objectives of the Area Plan.	<b>As set out above the principle of a development agency type approach is taking shape. There remain opportunities to renew the urban fabric and the Plan has always acknowledged the need for some additional sites to satisfy need and provide choice. To provide for housing only in greenfield sites in effect ignoring the opportunities on PDL because they are simply difficult would not be in line with the objectives of the Plan. The achievements via the SPV approach will be monitored and will be material in development making in the future.</b>
BHLF-AAMW-WTXF-F	M	25	DBH002 - Whilst it is possible that these land ownership issues may commercially resolve themselves, it seems likely at this point that they will not. As such the deliverability of this site must be seriously in question, both in the short term where immediate delivery of required housing seems impossible and with significant doubts for longer term delivery also. The final plan must ensure by an evidential degree of certainty that deliverability is proven for all allocations.	<b>These comments refer to issues discussed at the Inquiry and reported on in the Report. Co does not need to comment on them further.</b> <b>Cabinet Office will continue to monitor the delivery of sites.</b>
BHLF-AAMW-WTXF-F	M	30	The key para however is 287 where he states that 'there is sufficient land to meet the need for residential development in the East on sites within existing settlement boundaries, or within sustainable urban extensions of Douglas'. If Site DBH002 is not deliverable and there are no sites of any size allocated for urban extensions of Douglas other than BM006, then this is a hollow statement that raises questions on his whole conclusion basis.	<b>Cabinet Office notes the comments but makes no changes as a result.</b>
BHLF-AAMW-WTXF-F	M	2	Much was made of the potential for the development of brownfield sites within Douglas at the Inquiry, mostly without basis or substantiation and the Inspector appears to have been blinded by such rhetoric. By contrast evidence was given on behalf of local estate agents which factually described that demand is not for regenerated town centre sites containing town houses or apartments but rather for 2/3 bedroom homes with a garden and easy access This advice seems to have been set aside in the Inspectors concluding Report. The commercial reality is that town centre sites are expensive to develop and thus require a maximisation of the number of units – usually by the provision of apartments. The private market in this context has all but vanished due to a lack of demand. Suburban sites are rare of any size and will generally yield but a few units each.	<b>Abandoning the town centre and urban sites because they may take longer to develop or have obstacles to overcome would be shortsighted. To, in effect, adopt this approach in a Development Plan would be unsustainable and potentially irretrievable. The approach is always about balance and using policy tools to lever, facilitate, encourage and retain life and vitality and renewal of our existing settlements.</b>

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BHLF-AAMW-WTQ5-Q	M	45	<p>We believe the Area Plan of 2005 Committee had made an incorrect decision from the google aerial photograph without visiting our site. As can be seen from the photograph (to follow by post) bracken (in full bloom) could easily and has been mistaken for woodland. In actual fact, not one tree was present on the garden at that time within the half of our garden that was zoned as woodland. However, directly next to our garden to the west is a small mature woodland which we believe was the cause of the confusion</p> <p>We therefore find it extremely frustrating as our garden has still been split completely down the centre, one half being proposed as "white land" and the other half as being residential. It is our understanding that surely our garden should be either one or the other, and not split 50/50 as it stands. Historically, up to the Area Plan of 2005 the whole of our garden was in fact residential, even though the bracken had taken over. We find it frustrating now that our children are able to use the garden that you as Area Planners, see fit to incorrectly re-zone the upper section of our garden yet again as white land, where it is clearly our garden and should therefore be reverted back to residential.</p> <p>On page 76 from paragraph 350 talks about our site GH015. We note that sites GH015 and GH011 have been considered together and this paragraph states that GH015 is contiguous with site GH011 to the north west, and would in fact seem that considerations are being made without actual visits to sites. In actual fact between the two sites there is an area of actual woodland with 60 foot high trees. This proves that the two sites do not have a common border that touches at all.</p> <p>We would like it to be noted that our garden has its own access to the south side where I park my work vehicles, and our driveway serves as access to our current house.</p>	<p><b>See Settlement Boundary on Map 7.</b></p> <p><b>Cabinet Office notes that notifications were sent to the Agent. CO does not have any other address for correspondence.</b></p>