
ISLE of MAN

Town and Country Planning Act 1999 Section 2 and Schedule 1

REPORT

to the Cabinet Office

on a

PUBLIC INQUIRY

into the

DRAFT AREA PLAN FOR THE NORTH AND WEST

Inquiry held: 16 to 26 July 2024

Inspector: Brian J Sims BSc (Hons) CEng MICE MRTPI

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Abbreviations

[PIP-x / CD-y / etc]	Document Library Reference
AG	Attorney General
AIAP	All-Island Area Plan
AMC	Additional Major Change
APE	Area Plan for the East
APNW/the Plan	Area Plan for the North and West
APS	Area Plan for the South
AEI	Area of Ecological Interest
BE	Built Environment
BNG	Biodiversity Net Gain
CABO	Cabinet Office Planning Policy Team
CCA21	Climate Change Act 2021
COD	Cabinet Office Document
CA	Conservation Area
DEFA	Department of Environment, Food and Agriculture
EIA	Environmental Impact Assessment
ELR17	Employment Land Review 2017
EP	Environment Policy
EVMC	Ellan Vannin Maritime Centre
HGV	Heavy Goods Vehicle
IMSP16	The Isle of Man Strategic Plan 2016
IMSPR	Isle of Man Strategic Plan Review
IoM	Isle of Man
IoP	Isle of Play
LCA	Landscape Character Assessment
MC	Major Change
MHK	Member of the House of Keys
MNR	Marine Nature Reserve
MU	Manx Utilities
MWT	Manx Wildlife Trust
NEP	Natural Environment Proposal
NIS	National Infrastructure Strategy
OSCP	Open Space and Community Proposal
PIP	Public Inquiry Paper
PDL	previously developed land
PS	Position Statement
RLAS	Residential Land Availability Study
RMC	Recommended Major Change
RSTW	Regional Sewage Treatment Works
SuDS	sustainable drainage system(s)
TCPA99	Town and Country Planning Act 1999
TP	Tourism Proposal
TUP	Transport and Utilities Proposal
UUSR	Unoccupied Urban Sites Register
WR	Written Representation

Introduction

Appointment

1. I have the honour to Report that I was appointed by His Excellency the Lieutenant Governor of the Isle of Man to conduct a Public Inquiry into the Draft Area Plan for the North and West (APNW – the Plan) in accordance with Section 2 and Schedule 1 of the Town and Country Planning Act 1999 (TCPA99).

Background and Legal Test

2. Following public consultation on the Draft Plan from June to September 2022, the Cabinet Office Planning Policy Team (CABO) published a series of Public Inquiry Papers (PIPs) including 58 proposed Major Changes (MCs) to the Plan text and its accompanying maps [PIP1.1].
3. In April 2024 I issued Notes for Guidance with arrangements for participation in the Inquiry process, together with a provisional schedule of Matters and Issues for discussion and a draft outline programme for the Inquiry.
4. The Notes for Guidance acknowledged that the APNW is legally required to be in general conformity with national policy, as set down by the Isle of Man Strategic Plan 2016 (IMSP16). The Notes also indicated that judgement as to whether the Draft APNW is in such general conformity would take into account legal advice on this matter provided on behalf of the Attorney General (AG) in 2019, in connection with the previous Inquiry into the Area Plan for the East (APE) [CD96].
5. The advice from the AG is essentially that the interpretation of the term ‘general conformity’ permits flexibility. Strict conformity is not an absolute requirement and the Inspector could recommend a decrease in the housing allocation where there is cogent justification. The fact that the Area Plan may be in conflict with one strategic policy in the Strategic Plan does not necessarily mean that the Area Plan is not in general conformity with the strategic policies as a whole. Ultimately, whether there is general conformity between the Strategic Plan and the Area Plan is a matter of planning judgment.
6. I take this legal advice as properly applicable equally to a potential increase in the numerical requirements of the IMSP16 as to a decrease.

The Inquiry and Matters and Issues for Consideration

7. This Report focuses primarily upon objections to the proposals and site allocations of the public consultation version of the Draft APNW of 24 June 2022, together with the post-consultation MCs, proposed by CABO in February 2024.
8. Accordingly, my starting point is to consider whether the provisions of the Draft Plan as originally published are in general conformity with the IMSP16 and then to consider whether the MCs subsequently proposed by CABO, or any different or additional changes, are necessary for the APNW to be judged as being in general conformity with current strategic policy.

9. Following registration to participate in the Inquiry process, the Inquiry heard oral representations on behalf of 48 individual Respondents and organisations and some 110 submitted Written Representations (WRs) are taken into account, alongside the responses to the original public consultation in 2022 and the MCs put forward by CABO.
10. The Inquiry comprised a series of round table sessions covering the main matters on which I consider the general conformity of the APNW depends and which are discussed in this Report. An additional evening session was held to accommodate several MHKs and members of the public who were unable to attend the daytime sessions. The entire Inquiry was open to the general public to observe.
11. It was agreed that MHKs appeared at the Inquiry as elected local representatives and not in any ministerial role and their evidence is treated on an equal basis to that of any other Respondent. Any question of the further involvement of any MHK in the post-Inquiry adoption process is for Manx Government protocols and not for this Report.
12. A list of Respondents who appeared in person at the Inquiry is attached at **Appendix B**.

Post-Inquiry documents

13. Consequent upon discussions during the Inquiry, CABO also put forward 29 suggested Additional Major Changes (AMCs) together, written evidence further to Inquiry discussions and rebuttals to the WRs [CODs1-34]. There were also certain written legal submissions regarding procedure [LS. All such post-Inquiry documentation was posted in the online Inquiry Document Library and final responses accepted from CABO and Respondents as appropriate.

Legal Submissions

14. I agreed to receive an exchange of legal submissions after the Inquiry on behalf of Baccarat Limited [LS1-4] to which CABO responded [COD30, 35-36]. These submissions are publicly available and I take them into account.
 15. To the extent that these submissions relate to the National Infrastructure Strategy (NIS), and transportation infrastructure in particular, they are matters of evidence subject to planning judgement and are considered below under the headings of both General Considerations and Transport.
 16. My response with respect to alleged procedural failings is as follows:
 - i. It is asserted by Baccarat that the Programme Officer (PO) failed to maintain independence and implement the requirements of the Inspector for fairness and natural justice. However, the PO is by definition an independent point of contact under the direction of the Inspector who therefore takes responsibility for their actions.
 - ii. When Baccarat submitted their Position Statement without having registered by the due date to appear, the PO correctly consulted with the Inspector as to whether the PS should be accepted and was asked to seek clarification as to which session or
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sessions Baccarat wished to attend. After some delay it was agreed, in fairness and flexibility, that their PS would be accepted and that they would, at their request, be represented at the opening session on General Considerations where the Agenda listed them to lead the discussion on Infrastructure. Unfortunately, the publication of the Baccarat PS was delayed due to an oversight but later accepted along with further written material.

- iii. It is also unfortunate, in the circumstances and with hindsight, that Baccarat did not also contribute to the Transport session on Day 2 which included traffic generation, among other local transport issues, albeit there is no record of their requesting to do so. In practice it was at that session that the essential concern of Baccarat, and others, regarding Island-wide traffic assessments was answered unambiguously by Dol Highways. Beyond that, the adequacy of the infrastructure evidence to the Inquiry is for planning judgement.
- iv. These legal submissions for Baccarat demonstrate a degree of misunderstanding of the Inquiry process and terms of reference. The prime opportunity for representations on the Draft Plan was the public consultation of 2022. This was followed by the opportunity to register to appear at or submit WRs to the Inquiry in July 2024. In the intervening period substantive proposed MCs had been put forward and consideration of these was clearly included in the Inquiry process.
- v. It is neither feasible nor accepted practice, on the Island or elsewhere, for the Inquiry to allow an open-ended, public consultation free-for-all. That would be the effect of the proposal submitted by Baccarat to invite a further round of public response to post-Inquiry documents at this stage. The post-Inquiry documentation is strictly limited to matters arising at the Inquiry requiring clarification and the only further response necessary is that derived from the natural right of final reply. The Respondents concerned were aware of this and no further email circular or public advertisement was necessary.
- vi. The proper opportunity for further public comment comes at the adoption stage, by which time CABO will have decided, taking account of this Report, which changes to the Draft APNW will in practice be put forward to Tynwald.
- vii. There was no procedural irregularity on the part of the Inquiry, save for a single oversight which is regretted but which was corrected before the last Inquiry session. By that time the evidence of concern regarding the NIS had been taken and no purpose would have been served by any further ad hoc appearance by Baccarat. That would have set an unwarranted precedent and been difficult to schedule in any event. Instead, it was agreed in fairness that these written legal submissions could be made.
- viii. Overall, the evidence to the Inquiry has been properly received and recorded and the purpose of the Inquiry was in no way put at risk as alleged. The quality of public consultation on the Plan is further discussed below, under the heading of General Considerations.

Site Visits

17. Before the Inquiry I undertook unaccompanied visits to every site subject to consideration in the Inquiry and in the Written Representations and after the Inquiry I returned to further view sites which had been the subject of concerns raised regarding potential development impact on heritage assets.

Report and Recommended Major Changes

18. This Report broadly follows the draft Plan in chapter order. CABO has agreed that I set out Recommended Major Changes (RMCs) necessary to achieve the requisite general conformity with the IMSP of 2016 and enable the APNW to be taken forward towards formal adoption by Tynwald.
19. The Report is focussed mainly upon the reasons why the RMCs are necessary. Within the Report text the RMCs are referenced in the form **RMC*** and are set out in full in single schedule at **Appendix A**.
20. The Report ends with an overall conclusion and recommendation on the general conformity of the Plan with strategic policy.
21. A significant number of Respondents sought to pursue matters relating to mainly Island-wide provisions for such as transport, education and health care infrastructure, sports pitches and marina facilities, which went beyond the strict role and scope of this time-limited Area Plan, as discussed below under General Considerations. However, it was strongly asserted that there had hitherto been no alternative public platform for these considerations. I accordingly agreed to hear these concerns and summarise them in this Report as a matter of record but I strictly refrain from reaching any conclusions or making any recommendations upon them, recognising that they may more appropriately be considerations for other Island-wide strategies, including the ongoing review of strategic planning policy.

Adoption Process

22. After consideration of the RMCs set out at Appendix A to this Report, it is for CABO to take the APNW forward to approval by Tynwald for formal adoption as part of the Isle of Man (IoM) Development Plan. That process will include further public consultation on any final changes that CABO ultimately proposes, which should be published alongside all post-Inquiry correspondence to provide a fair and proper opportunity for comment.

Acknowledgements

23. Programme Officers for the Inquiry were Mr Andy Johnstone, Mrs Lorna Milestone and Mr Andrew Joyce, assisted by Mr Will Clague. Their professional commitment and constant support were much appreciated.
24. The cooperation and assistance of the CABO Policy Team and the Respondents who took part was also key to the conduct of the Inquiry and to my obtaining the information I required for this Report.

General Considerations

Quality of public consultation

25. There was significant public concern regarding the quality of public consultation on the Draft APNW. This was mostly related to the extended time period between the initial consultation in mid-2022 and the Inquiry itself, over two years later. During that time CABO put forward 58 MCs to the Draft Plan, including the addition of several large-scale, greenfield housing site allocations.
26. It is evident and understandable that lay people, public representatives and professional consultants alike felt confused by the process and overwhelmed by the volume of evidence and new proposals, especially in the absence of any further round of public consultation on the MCs prior to the Inquiry, which was more narrowly focused on identified matters and issues
27. In connection with the initial public consultation in 2022, I am satisfied that CABO followed due process, providing appropriate opportunities for public engagement in the preparation of the Draft Plan. I also consider that the Inquiry process was properly set down, publicised and followed. The question for this Report is whether ultimately the information provided was complete and clear, with sufficient time for the public to respond
28. CABO published a Schedule of Proposed Changes to the Draft Plan in February 2024, as Public Inquiry Paper 1 [PIP1]. Later, for ease of reference, this was subdivided into two numbered lists of major and minor changes [PIP1.1], but without alteration to the content. Minor changes not affecting general conformity are of no further concern to this Report. Also, in February 2024, CABO published an All Sites List for the Inquiry [PIP5] tabulating every site which had been assessed for potential development from the outset, including all those which had become the additional allocations in the Plan by way of the proposed MCs.
29. The Notes for Guidance for the Inquiry of April 2024 made clear that the Inquiry would consider the proposed MCs, whilst the published procedure for registration to give oral or written evidence to the Inquiry provided for contributions on both the MCs and the original consultation Draft Plan. The latest date for registration was set at 17 May 2024 and the due date for submission of Position Statements or Written Representations was extended to 28 June 2024, still more than two weeks before the first Inquiry session.
30. I recognise that CABO had limited time to prepare the APNW so as to complete Area Plan coverage across the Island, pending Island-wide planning policy review, as referenced in the following section on the role and life of the Plan. On the other hand, the planning system is confusing to many people who are concerned about its implications for their living conditions and livelihoods and some of this concern might better have been allayed by a further pre-Inquiry round of public consultation, which would also have simplified both the Inquiry itself and this Report.
31. In practical terms however, it is evident that the MCs proposed for the Plan were in the public domain from February 2024, some five months in advance of the Inquiry, and it appears to me that reasonable publicity and opportunity were afforded to the public to consider and respond to them. In the event, much Inquiry time was taken up with discussion of the merits or demerits of the additionally proposed site allocations.

32. On balance, I am brought to the view that the Inquiry process itself ultimately provided a public forum sufficient to ensure that all points of view on the Draft Plan, the proposed MCs and a range of AMCs could be aired and taken into account, based on reasonably complete and clear information.
33. Moreover, it was confirmed by CABO at the opening session of the Inquiry that the adoption process for the Plan includes further public consultation on such final changes as CABO might choose to make to the Plan. It was also confirmed that all options for future action are available if necessary, including a further full public consultation or reopening the Inquiry or non-adoption of the Plan. To my mind, any lingering doubt as to openness, fairness and impartiality of the Inquiry process are suitably addressed by these assurances.
34. Therefore, given also my ruling above on legal representations regarding procedure, I conclude that CABO may safely take the draft APNW forward to adoption as part of the IoM development plan, on the basis of the recommendations of this Report.

Role and practical life of the APNW

Statutory role

35. It is the statutory role of the APNW to make planning proposals and allocate development sites within the North and West of the Island in general conformity the IMSP16 for the period 2011-2026.

Relationship to other plans

36. It is clear at section 1.8 of the consultation Draft Plan that, on adoption, the APNW will replace all existing development plan documents relating to the North and West of the Island, including remaining parts of the 1982 Development Plan and all individual, settlement-based Local Plans. The APNW will then sit alongside the already adopted Area Plans for the South and East (APS and APE), completing Area Plan coverage of the Island.
37. Meanwhile, there is an ongoing review of Island strategic policy aimed at replacing the currently adopted IMSP16.
38. Once the IMSPR is adopted, it is then intended to publish and adopt a projected All-Island Area Plan (AIAP) to implement the objectives and policies of the IMSPR at the local level, replacing the APS and APE as well as the APNW. However, the projected date for the publication and adoption of the AIAP is not yet defined.
39. The stated plan periods of the IMSP16 and the APNW both end in 2026, although they will continue in operation until replaced. It is currently apparent that the AIAP is unlikely to be adopted for several years after the APNW end date of 2026.
40. During the interval between the adoption of the IMSPR and the adoption of the AIAP, planning law states that, if there is inconsistency between the APNW and the subsequently adopted IMSPR, the most recent plan shall prevail.

Deferment of strategic issues

41. Given the legal test of general conformity with the current IMSP16, as set out in the Introduction above, it is plainly not for the APNW or this Report to anticipate, and certainly not to influence, the content, terms or policies of the emerging IMSPR or how it might or might not alter planning strategy across the Island for the future. Thus, whilst flexibility of judgement is applied in line with the advice of the AG summarised in the Introduction, where any question arises that the APNW should depart significantly from general conformity with the spatial strategy or policies of the IMSP16, it is necessary to defer such considerations to the IMSPR. This factor limited the remit of the Inquiry and equally defines the scope of this Report to recommend changes to the APNW.

Alleged prematurity

42. The foregoing circumstances have understandably led to public frustration and claims that to proceed with the APNW at this stage is premature and wasteful of resources. However, it is a legal requirement upon CABO to do so.
43. More significantly though, on consideration I take the view that to proceed with and adopt the APNW even at this late stage is the most desirable option for the proper development planning in the North and West of the Island, even accepting that this is stop-gap solution to the aim of full national Area Plan coverage. That is also accepting that the adopted APNW might, on occasion, be superseded by the later IMSPR in the determination of planning applications during the interval, of undefined duration, between the adoption of the IMSPR and the replacement AIAP.

Exclusion of reserve sites

44. Unlike the APS and the APE, the Draft APNW makes no provision for reserve sites to come forward when justified. On one hand the APNW has by definition a short life to 2026, implying that reserve sites are not necessary but, on the other hand, its practical life is likely to extend several years beyond that date, during which the availability of reserve sites might, in principle, be desirable to maintain adequate supplies of development land. This prospect was raised particularly in connection with housing site allocations and is further referenced below in that connection.

Overview of the role and practical life of the APNW

45. Many Respondents, including Inquiry participants, sought in good faith to put forward suggested modifications to the draft APNW, some with reference to potential alterations to national planning strategy known to be emerging from the ongoing IMSPR, others in the absence of an alternative forum to promote local or national projects of potential public interest.
46. However, the role of the APNW is limited to making proposals and site allocations capable of being judged to be in general conformity with the IMSP16 even though the practical life of the APNW is likely to extend substantially beyond the end of its stated plan period, when it might be superseded by a later IMSPR.
47. Plainly, it will be in the widest interests of certainty in Island planning for both the IMSPR and the AIAP to be adopted at the earliest opportunity. But with respect to my appointment, restricted to examining the draft APNW now before me, I make no

recommendation to postpone or delay its progress as a result of its limited role or short practical life.

National Strategies and Spatial Vision

48. Chapter 4 of the Plan sets out National Strategies relevant to the North and West, including the National Infrastructure Strategy (NIS) to meet Island-wide socio-economic needs, as well as Strategies for Harbours, Active Travel and Sea Defences, Flooding and Coastal Erosion.
49. I consider it appropriate, as agreed at the Inquiry, to add reference in Chapter 4 to the designation of the Island in 2016 as a UNESCO Biosphere and I propose **RMC1** accordingly, consistent with later reference in Chapter 7 on the Natural Environment.
50. Chapter 5 of the Draft APNW sets out its Spatial Vision. This is appropriately consistent with the settlement hierarchy of the IMSP16 with Ramsey and Peel as the main service centres for the North and West respectively, and a notable preponderance of service villages and villages in the northern sector and few in the West.
51. Urban Environment and Open Space and Community Recommendations 1 of the Plan, as distinct from the related Objectives and Proposals, show the will of CABO that Departments work together in line with the vision of the Plan to clarify strategy, funding and timing in respect of the built environment as well as public health and well-being.
52. Thus, in its Spatial Vision, the APNW itself acknowledges both the National Strategies that have informed its preparation and, at the same time, shows the limitation upon CABO, as the plan-making authority under the TCPA99, that the APNW cannot initiate but must take account of National Strategies, which are the province of other Departments and Boards.
53. Among critical issues identified by the Spatial Vision is the question of how to secure drainage improvements, including an appropriate RSTW location for Peel, noted at paragraph 5.3.4 Item 10. This should be updated to reference a preferred location now identified at site PE003, albeit that has now received initial approval which is currently subject to third-party appeal. This is the subject of **RMC2**.

Provision for Infrastructure

54. There is widespread public concern that the APNW fails to provide for adequate highway and community infrastructure, including for health care and education, with implications for the effectiveness of the proposals of the Plan in enabling development to come forward in the requisite general conformity with the IMSP16.
55. This was expressed especially strongly in relation to potential traffic generation from development in the North and West across other Areas of the Island, and the East in particular, noting that the conjoined APNW now represents virtually half of an Island Area Plan in physical extent. I return below to the specific question of traffic generation in connection with Transport.
56. More generally, it is true that the APNW itself makes no direct provision for new or improved infrastructure, without which some of its development allocations could fail at

the application stage for want of available community facilities. A prominent example of this is the dependency of major proposed housing allocations in Peel, where their ultimate approval could be reliant upon a new RSTW coming into operation, whilst its approval is yet to be confirmed and its construction has yet to commence.

57. As noted above in connection with National Strategies, CABO has no more than a duty to keep matters of infrastructure under review, including community facilities and the communications and traffic networks, and I accept that this duty cannot extend to undertaking the role of other Departments and Boards responsible for such matters.
58. The Plan itself makes this clear at text paragraph 1.2.3, which states that the Plan includes Recommendations, which are statements of intent where CABO does not have direct control over implementation. So these Recommendations are intended to act as encouragement to other Departments or bodies to work together with the support of CABO to take action or to deliver on particular matters, sites or policy statements.
59. Text paragraph 4.1.3 cites the most recent NIS First Monitoring Audit of 2018, as identifying issues faced by specific assets in the North and West, including coastal erosion at Kirk Michael, traffic congestion at Parliament Square, Ramsey, and the need for sewage treatment upgrades.
60. It would clearly be better for the planning process if any draft plan were to proceed with a clear accompanying infrastructure strategy. The availability or otherwise of supporting infrastructure is potentially key to the effectiveness of the Plan in operation. That is a matter largely for the consideration of individual sites later in this Report, including whether provision should be made for reserve sites.
61. In principle though, I do not find any shortcoming of the Draft APNW with regard to the adequacy of its provision for infrastructure to be of such concern as to override my earlier-stated view that to proceed with and adopt the APNW is the most desirable option for planning in the North and West.

Brownfield priority

62. There is justifiable concern expressed in terms that brownfield land should take priority over greenfield land in the selection of sites to be allocated in the APNW for necessary development.
63. 'Brownfield' is an undefined colloquial term used only rarely and descriptively in the IMSP16. The IMSP16 more frequently references 'previously developed land' (PDL) and defines this as land that is or was occupied by a permanent structure, including its curtilage and associated fixed surface structures. The definition names certain exceptions, such as agricultural buildings or mineral sites with provision for restoration, parks and allotments or, importantly, PDL which has regenerated over time and has become part of the natural landscape.
64. In connection with the latter exception, there is equally justified concern that, where PDL or brownfield land has acquired an ecological or heritage value, perhaps even of national or international status, that value or status should be maintained as a development constraint.

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65. The priority to brownfield or PDL is a clear theme of the strategic and locational policies and text of the IMSP16. For example, Strategic Policies 1-2 together expressly seek optimal use of PDL and under-used sites, with new development primarily located within existing towns, villages or urban extensions. And, for example, Housing Policy 4 repeats that locational requirement for residential development in the wide interest of sustainability.
 66. In turn, Environment Policies (EP) 1, 3 and especially EP4-5 of the IMSP16 impose national requirements protecting, respectively, the landscape, ecology and woodland generally. They also protect individual species and habitats of designated local, national or international importance, including by the use of mitigation measures where justified. EP6 provides that the Department will seek to identify and designate national heritage areas in collaboration with other Government Departments and appropriate agencies in order that they are recognized for their importance.
 67. Such planning policy requirements apply across the whole Island and do not strictly need to be repeated in the APNW. However, for general conformity, the APNW must demonstrably adhere to those national strategic provisions, both in principle and in the sites selected for allocation.
 68. The Draft Plan itself suitably acknowledges the need to give priority to urban brownfield or PDL sites, in particular within its Spatial Vision and in Built Environment (BE) Objective 2. MC23 proposes an additional criterion to BE Proposal 1, supporting development of brownfield or underused land within settlements subject to site investigation. Certain Town Centre Proposals and Tourism Objective 1 also appropriately reference PDL.
 69. It is shown with reference to the Unoccupied Urban Sites Register (UUSR) that some 29 urban brownfield sites, whether or not occupied by buildings, are allocated within the Draft APNW [CD27, COD11].
 70. In principle it is evident that, through its site assessments, the preparation of the Draft Plan has in practice given priority to the use of urban PDL whilst taking appropriate account of other planning constraints. I therefore do not find it necessary to recommend any overall policy changes to the draft APNW with respect to the use of brownfield or PDL save for the implementation by **RMC9** of the additional criterion to BE Proposal 1 mentioned above.

Use of agricultural land

71. The IMSP16, through its Strategic Objectives and Environment Policies 14 and 19 in particular, protects important versatile agricultural land of Classes 1-2 from development, in order to encourage self-sufficiency in Island food production. That is unless there is an overriding need for the development and no lower-grade alternative. This stipulation applies nationally and strictly there is no need to repeat it in the APNW.
 72. However, it is noteworthy that the Draft APNW appears to make no mention of agricultural land as a planning constraint and reliance is placed upon site assessments and selection to take account of the requirement to protect agricultural land of high quality.
 73. There is also a notable body of well-informed local opinion that the policy protection of agricultural land is ineffective in that it takes no account of factors such as the heritage
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value of coastal-orientated quarterland or historic farming methods and buildings. Nor is it informed by a complete or up-to-date soil classification survey. Only indirect safeguards are provided by the inclusion of Landscape Character Assessment (LCA) information to be taken into account under Landscape Objectives and Landscape Proposals 1-10.

74. At the same time, the IMSP16 makes clear, at text paragraphs 4.3.6-7, that protection of landscape does extend to more than simply the sum of its parts and that geology, wildlife, archaeology, history and traditional buildings and customs combine in the rural and built environment to provide an inseparable element of “Manxness”, which is an important element to be acknowledged and protected from inappropriate development. This is applied to sites of heritage value and to general traditional landscape settings, which are deemed to contribute to the sense of the heritage identity of the island. Heritage landscape value will therefore be a consideration in all aspects of planning, with a view to retaining and enhancing this value wherever possible.
75. Again, this provision does not strictly need to be repeated in the APNW and I think it covers the local concerns in principle, such that any planning application would be subject to appropriate assessment against the best evidence available at the time. These might also be matters for the ongoing IMSPR but for this Plan I can make no recommendation in that regard.
76. In the circumstances, I do not recommend any overall policy changes to the Draft APNW with respect to the use of historic agricultural land, albeit I understand that this will be of little comfort to those with specific local concerns that they would prefer to be addressed in more detail at this stage.
77. It is for the consideration of site allocations to establish whether the Draft APNW in practice maintains the requisite protection for historic or high-quality agricultural land in its selection of individual sites for development.
78. With respect to the APNW, I am left with the question of whether additional information regarding soil quality and historic agricultural land might feasibly be added to the Environmental Constraints Maps. I deal below with the graphical representation of environmental constraints.

Definition of village envelopes

79. There is informed concern that there is insufficient definition of village envelopes, especially around smaller, rural settlements, to set a pattern for residential and other development. This might potentially be beneficial to the local community and economy but would be excluded by current rural policy. It is advocated that this approach would also provide scope for designating any historic settlement core, built groups or other features of a village worthy of note or protection.
80. The definition of settlement boundaries is a strategic matter and there is nothing in the IMSP16 to suggest that the APNW should seek to undertake this role in terms of its general conformity. For the time being, the IMSP16 contains the relevant development management provisions for the spatial location of rural residential and other new development in the countryside. That includes development in or near small villages without defined envelopes, and it is for individual planning applications to be determined on merit.

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81. The aim for further definition of the extent and nature of small settlements might properly be regarded as laudable – it is not for me to say in connection with this Area Plan – but in any event it is an Island-wide consideration that is known to be a subject for consideration in the ongoing IMSPR.
 82. For my part, I do not find it appropriate to propose any change to the Draft APNW in respect of the definition of village envelopes.

Southern Uplands Landscape Character Assessment Area

83. Comment arose at the Inquiry as to whether it is appropriate for the APNW, at Landscape Chapter 6 and Environment Chapter 7, to refer to the Southern Uplands LCA Area. That is of no consequence in principle because the Southern Uplands is a Character Area which happens to span the boundary between the APNW and the APS and deserves protection as a matter of national strategy. Any revision of LCA Area boundaries lies outside the scope of the APNW.
84. However, it is noted that Landscape Proposals 3 and 7 and Appendix 2 F5 should be corrected to refer also to the Northern Uplands. This should be implemented by **RMCs 3,4 and 73**.

Flood Risk and Flood Maps

85. Chapter 5 of the Plan, in line with the IMSP16, highlights the issue of flood risk within its own Spatial Vision. Natural Environment Chapter 7 deals with areas subject to flooding and erosion. It notes the findings of the 2016 Report on the National Strategy on Sea Defences, Flooding and Coastal Erosion that areas of Peel, Ramsey, Sulby and The Ayres are at high risk, with flood management schemes being pursued. The very serious flooding at Laxey in 2019 is also noted, together with the recommendation of the Independent Review of that incident that greater urgency is given to existing plans to deal with surface water flooding.
 86. Natural Environment Objective 4 and Outcome 4a support green drainage initiatives, such as sustainable drainage systems (SuDS) where practical. For consistency with the Climate Change Act 2021 (CCA21) and general conformity, further discussed below under Climate Change, it is necessary to amend Objective 4 and Outcome 4a to introduce reference to long-term adaption to climate change. These changes are implemented by **RMC5**.
 87. Updated Flood Maps have recently been published, applying a climate change allowance of 30% to peak river flows, whilst sea mapping reflects predicted mean sea levels to 2122. Further modelling work is ongoing and it is apparent that site selection takes account of flood risk. There is no evidence that earlier publication of updated flood maps would have affected the selection of sites for allocation in the Plan, but it will be for the assessment of planning applications to verify that the best available flood risk evidence is taken into account in the layout and design of proposals.
 88. Under the heading of Flood Maps, Natural Environment Proposal 8 (NEP8) supports flood alleviation measures for the Ramsey and Peel Harbour areas, subject to assessment of heritage, landscape and visual impacts. Suggested AMC 11 to NEP8 adds a requirement also to assess nature conservation sites and biosecurity. This a logical change conforming with Environment Policy 4 of the IMSP16 and should be implemented by **RMC8**.
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89. I consider that the Draft Plan deals appropriately with flood risk in general. Flood risk is also considered below in connection with drainage under Transport and Utilities and in connection with site selection in connection with Housing.

Development Constraints Maps

90. Several Respondents propose that the Environmental and Infrastructure Constraints Maps accompanying the APNW should indicate more categories of information as an improved safeguard against adverse development impacts on material interests.
91. First, it must be remembered that such graphical representations, whether regarded as part of the adopted Plan or merely illustrative, can only provide information available to CABO at the time of the adoption of the Plan. Such information is used as a guide to the preparation of the Plan and subsequently to inform the assessment of the impacts of specific development proposals, which must always be considered on individual merit and planning circumstances at the time.
92. Meanwhile, it is certainly appropriate to optimise the detail shown by the Constraints Maps (and the Proposals and Landscape Character Maps for that matter) and ensure that they are as up-to-date as possible at adoption.
93. Suggestions for additional information included: draft conservation areas; soil survey results; ancient forts and quarterlands; landfill sites subject to coastal erosion; agri-environment schemes; wildlife sites and Areas of Ecological Interest (AEIs).
94. CABO, rightly in my view, make a distinction between mandatory or prohibitive constraints and additional layering of information on matters which are mere considerations to be weighed in the planning balance for any application. The latter could over-complicate the maps.
95. However, CABO concedes, and I agree, that the maps could beneficially include proposed conservation areas, noting that these carry planning weight in deciding applications, and also sites with a risk of pollution, such as from landfill. In addition, CABO agreed that the list of known Wildlife Sites and AEIs, protected by the IMSP16, should be updated. This highlights the need for caution regarding development proposals potentially affecting them.
96. The other suggested categories of information are all available via established sources of information. These sources include Historic Environment Records and Manx National Heritage, as well as Landscape Character Assessments, potentially to be updated to include quarterland farms. Soil survey information is known to be incomplete and subject to individual consideration as a material factor in assessing applications, whilst agri-environment schemes are a developing area of enhancement administered by DEFA. These interests would be highlighted in statutory consultations in connection with future planning applications.
97. On balance, I consider that the concessions by CABO, put forward as AMCs 1-2, represent an appropriate compromise with regard to the optimum content of the constraints maps and propose these changes as **RMCs74-75**.
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Plan Monitoring

98. There were calls at the Inquiry for a monitoring framework or matrix, setting quantitative criteria to measure the effectiveness of the Proposals and allocations of the Plan in practice over time.
99. Chapters 6-14 of the Plan include ranges of Objectives with associated target Outcomes. I consider that these provide a suitable basis for such a monitoring framework.

Climate Change

Application of climate change policy

109. The single-page Chapter 3 of the Draft APNW, on Climate Change and Sustainability, outlines the Island response to climate change via the goals of the Our Island Plan to uphold global climate objectives for transition to climate neutrality and adaption to climate change effects.
110. The TCPA99 makes no express mention of climate change, whilst the IMSP16 makes limited references to it. However, the Climate Change Act 2012 imposes a statutory duty upon CABO which includes consideration of how best to contribute to the net zero emissions target, protect biodiversity and the ecosystem, whilst Ministers may make additional regulations.
111. The IMSP16, originating in 2007, is clearly out of date regarding climate change, albeit the APNW must conform generally with its provisions for sustainability. In current circumstances, that properly includes demonstrably complying with all relevant law and Government policy on climate change that has subsequently been enacted. However, the APNW could not by itself make strategic policy changes, which are for the ongoing reviews of strategic planning policy and legislation.
112. Chapter 3 includes no express proposal on meeting climate change requirements. However, text paragraph 3.1.5 asserts that the new legislative framework has helped shape the vision for the APNW, including beyond the Plan period.
113. The updated 2024 Climate Resilience Appraisal of emerging planning policy [COD9] reported initial key findings that the APNW should better support protection and enhancement of carbon sequestration sites, where relevant, and provide for property flood resilience, if flood risk is identified.
114. However, in a detailed assessment of the Proposals and supporting text of the Draft APNW, as subsequently amended, the Appraisal finds that the Plan would have some neutral but mainly positive influences on carbon emissions. For example, this was found to be the case with respect to biodiversity, including Marine Nature Reserves water quality and regarding carbon sequestration due to the protection of peatland by Natural Environment Proposal 3. Built Environment Proposal 1 on Urban Regeneration and the several Transport and Utilities Proposals cover flood risk. The Appraisal also notes the Plan Objectives and Outcomes as a basis for future monitoring of its effectiveness.

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115. CABO points out [COD34] that climate change allowance is applied to the river and sea flood maps in two ways. River flood maps reflect projected increases in river flows, based on a predicted increase in annual precipitation. In line with Industry best practice, river flood mapping allows for a 20% increase in peak flow estimates. Marine flood risk is mapped to reflect predicted increases in mean sea levels to the year 2115. Flood maps are based on the UK Climate Projections 2009 (UKCP09) as the primary source of climate change projections in the British Isles and the best information available during the development of the maps.
116. The Plan visibly demonstrates its alignment with best practice on climate change. This is reflected in its approach to biodiversity net gain (BNG), discussed below under Natural Environment Chapter 7. Best practice is also demonstrated in the preparation of the Draft Plan by its preliminary ecological assessments, its consideration of flood risk in site selection, its priority for new development on brownfield or PDL, and its adherence to the settlement hierarchy to reduce travel.

Provision for renewable energy

117. With respect to renewable energy specifically, there is no legislation but the Draft APNW nevertheless includes Transport and Utilities Proposal 11. Pending the adoption of Island-wide strategic renewable energy provision, TUP11 supports the principle of solar power installations as part of a transition to renewable and low-carbon energy generation and nominates Government sites at Balladoole and Clenagh Road, Sulby, as potential trial sites. Renewable energy is further considered below under Utilities, in relation to decarbonizing the energy network.

Provision for tree planting

118. Tree planting will naturally contribute to biodiversity gain, promoted by the APNW, and additional broadleaf tree planting is already promoted in the text supporting Environment Policy 3 of the IMSP16 which protects woodland generally.
119. The Draft APNW itself includes Natural Environment Proposal 1 (NEP1) to protect, enhance and create new green infrastructure within the North and West, with new development proposals expected to demonstrate alignment with any approved Green Infrastructure Strategy and contribute to the green space network. At the same time, NEPs 2-3 together protect the Northern and Southern Uplands and the ground conditions of peatland
120. Otherwise, it is for the IMSPR to reinforce Island-wide policy for increased tree cover in the interests of carbon capture. I do not find it necessary to make any change to the APNW regarding tree planting.

Coastal erosion

121. It is widely accepted that coastal erosion is an aspect of climate change due to rising sea levels. The degree of coastal erosion close to Kirk Michael is of particular local concern. This is the subject of section 7.22 of the Draft APNW, which is devoted to Coastal Erosion. It refers to the Kirk Michael Coastline Management Zone designated under the Coastline Management Act 2005 and includes Natural Environment Proposal 9. This resists development proposals that would inhibit or prevent sustainable management of coastal land within or adjacent to the Management Zone.

122. The supporting text to NEP9 explains that the area is at particular risk, with certain property potentially in direct danger post-2060. The risk was assessed in detail in the Evidence Report on the National Strategy on Sea Defences, Flooding and Coastal Erosion [CD30], which is acknowledged in Chapter 4 on national strategies. However, the Report recommends no specific coastal defence schemes for Kirk Michael, albeit its accuracy is questioned by local Respondents. Most recently in 2023, this complex area of concern has been the subject of a specialist Erosion Risk Assessment for Kirk Michael, seeking to define triggers for management of the effects of continuing coastal erosion on the community. It is not within the role of the APNW to make provision for coast protection works in any event.

Overview of response to climate change

123. In my judgement, the Draft APNW adequately demonstrates general conformity with the IMSP16 regarding climate change and I therefore take the view that no express Proposal on its response to climate change is necessary. However, detailed provisions regarding flood risk and drainage are considered below in connection with Utilities.

Natural Environment

Biodiversity net gain (BNG)

122. The current IMSP16, originating in 2007, makes brief reference to protecting biodiversity in its Strategic Objectives and Environment Policy 4(c), citing the Manx Biodiversity Action Plan. In 2022 Tynwald formally recognised an Island biodiversity crisis and, in this rapidly emerging area of national strategic planning policy, the IMSP16 is plainly out of date. Therefore, a properly flexible interpretation of the requirement for general conformity in this regard is that the APNW must demonstrably conform to all relevant law and Government policy that has subsequently been enacted or adopted with respect to the protection and enhancement of biodiversity in relation to new development. This includes the Climate Change Act 2021 (CCA21), also referenced above in relation to Climate Change Chapter 3.
123. It is now a well-established planning principle that new development should aim to provide a BNG, albeit there is yet no quantitative statutory requirement for it on the IoM. Moreover, the available metrics for assessment of baseline and likely post-development biodiversity value are complex. The measurement, protection and enhancement of biodiversity, and in particular policy and potential statutory requirements for BNG, are strategic matters which, in practical terms, can only be addressed Island-wide via the ongoing review of national strategic policy or legislation.
124. Similarly, any questions of setting aside land for biodiversity enhancement within the IoM UNESCO Biosphere or the designation of new Areas of Special Scientific Interest (ASSIs) or National Nature Reserves (NNRs) are for agencies other than CABO. Any new such designations would then be matters to be taken into account by the planning system, whilst the inclusion of such environmental constraints on development is the subject of their graphical representation considered above.
125. As for the Draft APNW itself, Chapter 3 on Climate Change, at paragraph 3.1.3, rightly points out that the Plan cannot by itself bring in strategic policy changes but can demonstrate alignment with best practice including with regard to BNG. Chapter 7 is

- devoted to the Natural Environment and includes, within Objective 2, the promotion of BNG.
126. Chapter 7 also details a range of natural environment Objectives, including to identify natural assets, specific locations and green spaces for protection, to support sustainable drainage and water quality and to manage light pollution. The Island UNESCO Biosphere status is separately recognized, as are the whole range of international, national and local environmental designations, including ASSIs, NNRs, Marine Nature Reserves (MNRs) and Ramsar Sites. Also recognised are Manx Wildlife Trust (MWT) Reserves, Areas of Ecological Interest (AEIs) and Wildlife Sites, for which a precautionary approach is advocated.
 127. Natural Environment Proposal 1 (NEP1) aims to strengthen the green infrastructure network, whilst NEP2 safeguards the openness of the unspoilt Northern and Southern Uplands. NEP3 protects known and suspected peatland. Natural Environment Recommendation 1 is that the Department will support further work to progress the designation of Wildlife Sites. It was questioned why both the latter Recommendation and NE Objective 6 on light pollution are both proposed for removal by minor changes but neither add anything to the Plan that is not already covered by the IMSP16 and this is a matter for CABO to decide.
 128. With respect to Wildlife Sites, it is appropriate to update text paragraph 7.13.1 to correctly reflect the number of designated Wildlife Sites in the North and West from 17 to 25 and to amend Table A.1.3 of Appendix 1 accordingly. These changes are implemented by **RMCs 6 and 72**.
 129. Chapter 14 on Housing sets out at paragraph 14.11.2 that the need for space for BNG is broadly taken into account in the estimation of the numbers of dwelling units the sites proposed for allocation are likely to yield. The calculation is based on a range of statistical assumptions depending on site condition, detailed in Table 1 of the updated Housing Supply Report [PIP7]. These assumptions are strongly qualified in terms that designs would need to be preceded by preliminary ecological assessments and, if required, a protected species survey. Where allocated housing sites are the subject of development briefs, these generally contain a requirement of no loss of biodiversity and, in certain cases, for Environmental Impact Assessment (EIA).
 130. I consider that the Draft APNW thus provides the appropriate text in support of BNG being secured in connection with new development. However, the draft Plan includes no express requirement for BNG. Given the current direction of emerging policy on this important aspect of development management, I do not regard mere requirements for no net loss of biodiversity and for EIA in certain cases to be sufficient for general conformity with strategic policy in current circumstances.
 131. I therefore take the view that an additional Proposal should be added to Natural Environment Chapter 7, expressly requiring BNG in accordance with prevailing Government policy and legislation. Further, I propose that references to 'no net loss of biodiversity' in development briefs, and any made elsewhere in the text and Proposals of the Plan, be qualified in terms that BNG should also be sought according to current strategic policy or legislation. These Proposals are the subject of **RMCs 8 and 61**.
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Built Environment and Urban Regeneration

Brownfield Land

132. For reasons already set out above in connection with the overall priority for the re-use of brownfield land, I propose by **RMC9** the addition to Built Environment Proposal 1 of a criterion supporting the redevelopment of brownfield or under-used land.

Comprehensive Treatment Area – West Quay and Sulby River, Ramsey

133. Proposed MCs 24-25 to BE Proposal 2 make uncontroversial detailed amendments to BE Proposal 2 and are implemented as **RMCs10-11**.

Development density

134. Built Environment Proposal 3 draws upon the broad assumptions of development density used in estimating the yield of allocated housing sites to set minimum densities for new residential development. CABO accepted at the Inquiry that this results in a series of over-prescriptive requirements that make no allowance for judgement of the practical circumstances of individual sites and planning proposals.
135. In my view, it is sufficient that it is already a fundamental provision of the development plan, by Strategic Policy 1(b) of the IMSP16, to ensure the efficient use of sites in making the best use of resources. This does not need to be repeated in the APNW. I therefore consider BE Proposal 3 to be inappropriate and its supporting text unnecessary.
136. On consideration, CABO suggest by AMC12, and I agree, that Section 8.16 of Chapter 8, including BE Proposal 3 should be deleted in its entirety. This change is implemented by **RMC12**.
137. It follows that reference to development density should be deleted from all site development briefs, as considered below with respect to Housing.

Transport, Utilities, Minerals and Waste

Transport

Traffic Generation

138. Traffic generation by the new development for which the APNW provides is central to the concerns with regard to community infrastructure that were expressed at the Inquiry and in subsequent legal submissions. These are considered in broad terms above under General Considerations.
139. The Draft Plan, at Chapter 12, largely relies upon Chapter 11 of the IMSP16 as its framework for transport provisions, including the requirement of Transport Policy 4 for new development safely to accommodate expected vehicle traffic volumes, as well as the needs of all other road users, as informed by transport assessments.

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140. Section 10.5 of Chapter 12 of the Draft APNW quotes the evidence of the Transport Study that supported the IMSP16, as demonstrating that the Island highway network could cope with expected traffic growth from a required 5,100 additional dwellings to 2026. That is apart from the single junction of Parliament Square, Ramsey, which required minor improvement works in Parliament Street, and further investigation of the Onchan Main Road signals. Sensitivity testing on the Ballacraigne-Ramsey strategic link had shown no requirement for further investigation in rural locations such as Kirk Michael.
 141. Proposed MC27 appropriately adds a bullet point to paragraph 10.5.2 to state that the foregoing findings will need to be evaluated as to the scale and proportion of junction and corridor improvements. This change is implemented by **RMC14**.
 142. There is no question that Chapter 10 of the Draft Plan reflects the strict terms of current strategic policy. However, I have some concern at the level of reliance placed by the Draft APNW on the traffic data set out in the relatively dated IMSP16. For true conformity, ensuring the implementation of Transport Policy 4 of the IMSP16, the APNW should look ahead in its transport provisions to the real prospect that, as found above under General Considerations, the practical life of the Plan will be extended for several years beyond its nominal horizon date, with corresponding increased development over the levels for which the IMSP16 provides to 2026.
 143. To inform the preparation of the APNW on highway impact specifically, DoI Highways Division did provide a high-level assessment of vehicle trips likely to arise on the primary and district road network from new development on sites allocated in the North and West by the draft Plan and the proposed MCs. These assessments took account of the entire capacity of the allocated sites, as distinct from their assumed partial yield to 2026, thereby allowing for an extension beyond the Plan period. Vehicle trip rates were based on 85% of the values of the widely acknowledged TRICS database, as previously accepted for the APE and were combined with travel to work data from the 2021 Census.
 144. This analysis identified prospective developments likely to generate movements above certain thresholds, typically 30 or more two-way movements per peak hour, or 100 per day, or significantly increased Heavy Goods Vehicle (HGV) traffic, or accident risk. For these developments, next steps were recommended highlighting needs for further cumulative traffic modelling, and for safety improvements in cases where facilities such as pedestrian footways along the routes affected are inadequate.
 145. This work resulted in estimated guideline additional peak hour trips in the ranges 173-216 in Ramsey and 331-401 in Peel and proportionately fewer in the service villages.
 146. Further analysis is recommended at the application stage on the operational impact of strategic junctions at Parliament Square, Ramsey and Ballacraigne, St Johns and, in the East outside the APNW area, Main Road, Onchan and at Quarterbridge and neighbouring junctions in Douglas.
 147. Section 6 of Chapter 12 of the Draft Plan asserts that, on the basis of the preferred sites, the predicted impact in terms of trip rates and traffic flows on the overall network would be relatively low and that, in terms of baseline values, broad traffic growth has remained level for ten years, with some traffic control improvements having been made. However, it is accepted that site-based traffic modelling will be required for sensitive locations.
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148. I consider the approach of the DoI high-level assessment to be proportionate to the level of analysis justified to inform plan preparation and it is sufficient to indicate likely traffic and highway issues to be resolved at the application stage for the full development of the allocated sites, including at important junctions within the strategic highway network across the Island.
149. However, the study was locally based and is inconclusive. The study does not make clear to what extent the acceptability of proposals to develop sites allocated by the Plan might be affected by the need for highway improvements. These are likely to be at important locations in Douglas and elsewhere outside the area covered by the APNW. They could require separate approval, public funding or developer contributions. This has implications for whether the APNW will truly conform with the IMSP16 provisions, and Transport Policy 4 in particular, in terms of development being capable of safely providing for the traffic it generates.
150. CABO is content that the matter of cumulative traffic flows outside the area subject to the APNW is a matter for consideration at the time of specific planning applications. Certain Respondents disagree and submit that the Plan should not proceed without definitive evidence of traffic impact on the whole Island highway infrastructure. For my part, I do not consider that the approach of CABO is necessarily preferred, depending on the likely scale of development and resulting traffic generation and movement.
151. At the same time, in traffic engineering terms, experience indicates that increased overall traffic movements, of the order suggested by DoI Highways, can reasonably be regarded as comparatively modest. That is, given they would be distributed not only locally but Island-wide, and even accepting that there would be a significant component of commuting to Douglas via junctions already at or over capacity.
152. It must be remembered that the APNW is not a means of providing wholesale desirable improvements to the capacity of the highway system across the whole Island. The question for the preparation of the Plan, and the appraisal of subsequent development proposals, is the degree to which an adverse situation might be made worse; for example, by a road junction carrying traffic flows above its capacity.
153. On the evidence before me, I consider it unlikely that projected development allocated by the APNW would give rise to unresolvable problems of traffic flow or congestion anywhere on the Island. On that basis, it is also unlikely that proposals would be judged unacceptable in highway planning terms or unviable with respect to public or developer funding.
154. I recognise the strongly expressed concerns of Respondents regarding perceived shortcomings in the extent of the evidence supporting the Draft APNW, with particular reference to its provisions for highway infrastructure across the wider Island network. As I have noted, I share these concerns to a point, but nowhere near to the extent that they warrant the withdrawal of the Draft APNW in its entirety.
155. Thus, as I find in connection the provision of the Draft APNW for infrastructure generally, I do not consider there to be such shortcomings of the Draft APNW with regard to traffic generation to be of such concern as to override my previously-stated view that to proceed with and adopt the APNW is the most practical and desirable option for planning in the North and West.
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Road Links to Kirk Michael

156. Kirk Michael Commissioners and residents take exception to the assertion of IMSP16 that there was no need for traffic congestion work in Kirk Michael. This is on grounds that traffic circumstances have changed since 2016. Objectors raise concern about an increase in school traffic. They also point to the location of Kirk Michael between Ramsey, Peel and Douglas, with only a designated secondary coastal road link carrying the regular bus service between Kirk Michael and Peel, whilst the route via St Johns is a designated strategic link. This is seen as a disadvantage to Kirk Michael in terms of its relationship with the facilities of the larger settlement of Peel.
157. The designated status of road links is a feature of the IMSP16 Key Diagram, which is repeated in Chapter 5 of the Draft Plan on the Spatial Vision for the North and West. CABO and DoI Highways state that the Peel to St Johns strategic link carries the most traffic.
158. The question for the APNW is whether the sites allocated for development in Kirk Michael would make any traffic flow or congestion within Kirk Michael worse than it is already. CABO suggests, and I agree, that an appropriate way for the APNW to address this concern is for site-specific development briefs to include a criterion for potential traffic and amenity impacts in Kirk Michael to be considered in connection with any future development proposal. These changes are implemented by **RMC66**.

Strategic leisure routes

159. Following discussion at the Inquiry, CABO proposes an appropriate amendment to Transport and Utilities Proposal 3 regarding applications to re-establish or improve the route of the former Ramsey-Peel–St Johns-Foxdale railway line to be specifically for inclusive public access and use by all for active travel or leisure purposes. [COD25] This change implemented by **RMC16**.

Jurby airfield safeguarding

160. An additional Transport and Utilities Proposal 5 with supporting text at section 10.7 and paragraph 10.7.1 was introduced by MCs 1 and 28-29, applying a three-dimensional safeguarding zone around Jurby airfield, including a potential future runway extension. This caused strong adverse reaction from the community, both within and outside the APNW Inquiry, who were unaware of any proposal to extend the runway, with its implications for local residents and businesses.
161. The reason for the safeguarding was to protect the airfield as a potential national airport. It was later stated by the DoI Airport Division, on consideration, that this matter will be dealt with by way of a Masterplan for Ronaldsway that recognises the strategic importance of Jurby airfield as a potential contingency to Ronaldsway Airport; but that is yet to be formally assessed with full engagement through the DoI Airport Division. It is also the intention that the Masterplan will include any current safeguarded areas around the Island's airports, airfields and air traffic control sites in accordance with IMSP16 Transport Policy 10.
162. A replacement section 7.0 and paragraph 10.7.1 explaining this is put forward by AMC 15, whilst AMC 16 proposes the removal of TUP5 in its entirety.

163. In the circumstances, I agree with the latter changes and propose that MCs 1 and 28-29 are not implemented but that the Plan text and Infrastructure Constraints Map 1bN are modified in line with AMCs 3 and 15-16, implemented as **RMCs 15 and 76**.

Utilities

Electricity supply

164. It is evident that Manx Utilities, as the integrated generator-supplier of electricity for the Island, has substantial spare generating capacity at least until 2050, including provision for zero fossil fuel dependency after the target date of 2030. That is noting an overall reducing demand due to increased energy efficiency in buildings but not including increasing contributions from private solar installations.
165. There are currently multiple arguments in the public domain surrounding the environmental, economic and planning concerns regarding future moves to renewable wind or solar energy generation and the practical achievement of zero fossil fuel reliance. But these are strategic planning matters for separate review, also involving other Departments and Boards, as in other areas of infrastructure provision and traffic generation discussed above. These matters are outside the scope of the APNW and this Report.
166. As for the APNW itself, it is important that new development allocated by the Plan can be served in a timely manner by adequate electricity supply infrastructure. CABO accepts that major investment will be required to provide adequate supplies of electricity to major new developments in Peel and Ramsey. It is reasonably to be expected that this will come from developer contributions directly associated with the developments concerned in consultation with Manx Utilities. There is no evidence that necessary electrical supply connections would be unduly delayed so as to impede development.

Water supply, flood risk and surface water drainage

Water Supply

167. As for electricity, so for water supply, it is evident that there is sufficient broad Island supply capacity to serve new development when required. It is noted that there are pressure and leakage problems to address, as well as high levels of use, amounting to 210 litres per person per day, compared with 110 litres per person in the UK. The latter problem might be resolved to some extent by an increased level of use of water meters, which is currently low. Again, these are strategic matters involving other agencies and are not for this Plan or this Report. Otherwise, it is noted that the Jurby area needs a new service reservoir, and this is now subject to planning approval granted in November 2023.

Flood Risk

168. With respect to flood risk, Transport and Utilities Objective 6 and Outcomes 6 and the original version of paragraph 14.8.2 vi of Housing Chapter 14 all seek to prevent new development in areas of flood risk. For consistency, it is appropriate to retain the discretion for judgement on flood risk to development by also rewording Objective 6 to require published flood maps to be taken into account in site allocation and development briefs. In addition, Paragraph 14.8.2 vi should be amended to clarify that

judgement of site allocations and yields should take account of published flood maps. Objective 6b is unnecessary and should be deleted as it duplicates other objectives regarding SuDS. These changes are necessary for conformity with the IMSP16, which makes reference to site-specific flood risk assessment, and are put into effect by **RMCs 13 and 57**.

Surface Water Drainage

169. On the issue of surface drainage, after discussion and consideration with respect to the legal obligations of the CCA21, CABO put forward AMCs 14 and 17, together introducing text and amended wording to Transport and Utilities Proposal 7. New paragraph 10.10.3 explains, properly in advance of the Proposal, that the development benefits of SuDS to manage surface water run-off and protect other property. The Proposal itself is modified to make clear that the location and nature of a development, as well as its scale, are key to the consideration of SuDS in design solutions. I agree that these modifications are necessary to the conformity of the APNW as well as consistency with the approach of the APNW to climate change. That is subject to the addition of a clause expressly requiring the inclusion of SuDS where appropriate. These changes are introduced by **RMCs 18 and 19**.

Regional and Local Sewage Treatment

170. Development that will result from the allocations of the APNW will naturally require sufficient foul sewerage connections and sewage treatment capacity to be available prior to occupation.
171. It is evident that there is adequate sewerage connectivity and treatment capacity to serve the likely levels of new development in Ramsey and in local areas including Foxdale and St Johns.
172. However, it is a major issue of concern that, following a number of planning reversals, there is still no regional sewage treatment works (RSTW) serving Peel. Progress has been made with the approval of a proposed RSTW on Site PE003b west of Glenfaba Road but this is currently subject to third party appeal.
173. The timescale of practical provision of permanent sewage treatment to obviate additional foul discharge into the sea at Peel is therefore uncertain. Any new RSTW may not be fully operational for a period of years beyond the Plan period to 2026. This has significant ramifications for the delivery of major residential site allocations in Peel. These are discussed below under Housing.
174. Appropriate provision for a Peel RSTW is made by Transport and Utilities Proposal 6, preferring site PE003b with a detailed development brief. For so long as the approval and full operational commissioning of adequate sewage treatment infrastructure to serve Peel remain in any way uncertain, the Plan should continue to provide for a new RSTW. Accordingly, TUP6 should remain unchanged in the present circumstances.

Decarbonisation of the energy network

175. Transport and Utilities Proposal 11 supports the principle of solar installations and an interconnector landing substation, pending the approval of Low Carbon Energy and Renewable Heating Strategies.

176. It was agreed at the Inquiry that the supporting text to TUP11, at section 10.12 on supporting the decarbonisation of the energy network, requires updating regarding the approval by Tynwald of the Climate Action Plan [COD24]. This commits to 100% carbon neutrality in electricity supply by 2030, consistent with the approach of the APNW to climate change, considered above. The necessary change for general conformity is the subject of AMC13, implemented as **RMC20**.

Minerals and Waste

Mineral safeguarding

177. The Isle of Man enjoys predominant self-sufficiency in mineral aggregates currently and into the future, avoiding expensive imports. It is therefore particularly important for the Island economy to safeguard both active mineral workings, as well as sand and gravel and hard rock reserves.
178. Minerals Proposal 1 of the Draft Plan imposes Consultation Zones based on distances of 300m for sand and gravel and 500m from hard rock quarries, taking account of the higher level of blasting required for the latter.
179. Development proposals within the Consultation Zones will be subject to assessment as to whether the development would prejudice present or future extraction of known valuable aggregate minerals. This is in conformity with the provisions of the IMSP16 with respect to mineral working.
180. In the particular circumstances of the Isle of Man, the defined extent of Consultation Zones is justified, even though the threshold distances are greater than those generally applied in the UK.
181. As to concerns that mineral safeguarding buffer zones in some cases extend over designated AEIs, there is nothing in the safeguarding provisions to prejudice the proper consideration of ecological or any other material environmental interests in the assessment of any planning application that might be made in the future.

Site GMin001 – Dreemskerry Quarry

182. Dreemskerry Quarry is dormant but is one of the sites subject to mineral safeguarding by the Draft Plan. There is an objection that it should also be allocated for mineral development, given its past history and present unrestored condition.
183. The Annual Minerals Monitoring Report [CD101] estimates that the Island currently benefits from a 9.6-years supply of mineral aggregates from three active quarries. In view of this level of supply and the general self-sufficiency of the Island in such minerals, I do not consider it necessary in planning terms to allocate the Dreemskerry Quarry site for active mineral extraction and restoration for the purposes of this short-lived Plan. Any proposal in the short-term to rework and restore the Quarry would be assessed on planning merit.

Mineral site restoration

184. Proposed MC30 puts forward an additional Minerals Proposal 4 to provide a firm policy stance to secure proper restoration of mineral extraction sites at the end of their

working life. This is uncontroversial and in conformity with the IMSP16. The change is implemented by **RMC21**.

Waste strategy

185. The Draft Plan properly relies upon the current Dol Waste Strategy 2018. Essentially this seeks to reduce waste disposal by landfill in favour of recycling or incineration. This is explained in section 10.16 of the Draft Plan by way of new paragraphs 10.16.1-2 introduced by minor changes not central to the general conformity of the Plan. Any change to Island waste strategy in so far as it affects planning policy is a strategic matter for the Dol and outwith the scope the APNW and this Report.

Silt Disposal from Peel Marina

Peel Marina

186. Waste Proposal 1 and supporting paragraph 10.16.3 recognise an issue in Peel Marina of silt build-up. Silt is currently removed to a level area between Mill Road and Glenfaba Road for onward disposal. Waste Proposal 1 supports continued use of allocated industrial land at Ballaterson Farm for a lagoon and pipelines, as currently subject to temporary planning approval.

187. At the Inquiry CABO accepted [COD28], rightly in my view, that references in Waste Proposal 1 and its text to the temporary approval regarding the silt processing are unnecessary, adding nothing to the Plan, but that paragraph 10.16.3 should be retained to the extent that it sets out the context for Waste Policy 1. This led to suggested AMCs18-19.

188. I agree that the narrative of paragraph 10.16.3 should remain but see it as more relevant to Waste Proposal 2 and its support for processing dredged material from Peel Marina. I therefore propose by **RMCs 22 and 23** that the first sentence of paragraph 10.16.3 be retained but that Waste Proposal 1 be deleted in its entirety.

Wrights Pit North and Rockmount

189. There is evidence from the Dol that the planning approval for operations and restoration plans at Wrights Pit North, to 31st December 2030, did not include provision for non-hazardous silt deposits, as originally stated in Waste Proposal 2 of the Draft Plan as published.

190. Accordingly, original Waste Proposal 2 requires to be amended to correct the error and state support for the retention of Rockmount to deal with non-hazardous silt deposits. And Waste Proposal 3 should be reworded to support the retention of Wrights Pit North as a facility for construction waste and other hazardous materials, noting that it is now approved for operation and restoration until 2030.

191. These proposed changes are put forward by MCs 31-32 and appear uncontroversial. They are implemented by **RMCs 24 and 25**.

Employment

Employment land requirement and supply

190. The IMSP16, by its Business Policies, encourages employment growth, with land for industrial development designated in all parts of the Island, but specifies no quantitative employment land requirement.
191. The Employment Land Review 2017 Supplement (ELR17) evidently relied upon limited sampling and attributes only 5% of gross need for employment land to the North and West, amounting to only 1.86ha overall. This is significantly at odds with the IMSP16 broad apportionment of 30% new residential development to the North and West and would seem to ignore the employment opportunities of the main service centres and ports of Ramsey and Peel, as well as the Jurby and Andreas airfield industrial areas.
192. To allow for choice and churn in the land market and to align with the spatial development distribution of current strategic policy, CABO calculates a more realistic requirement and relatively generous figure of 12.11ha for the Plan period to 2026, of which 1.22ha has already been developed, leaving a net outstanding requirement of 10.89ha.
193. Table 10 of the Draft Plan, once updated with the foregoing figures, shows that land identified in the Draft APNW for industrial use amounts to 29.53ha and that 11.89ha is available to meet the net need of 10.89ha with an oversupply of 1.0ha. I consider that this represents a sufficient uplift in supply to provide for the likely extension to the practical life of the APNW. I reach this view in light of the relatively generous estimate of overall requirement and given that these figures are not substantively disputed.

Individual employment sites

Site JE001 – land at Jurby Industrial Estate

194. This site encompasses a total of 15.13ha of industrial land either side of Jurby Road, designated for employment use. The allocation is subject to objection due to the presence of an AEI. However, the development brief includes a criterion for this constraint to be considered in any development proposal. Such ecological interests are protected by Environment Policy 4 of the IMSP16 in any event. I make no recommendation regarding Site JE001.

Site PR001 – Barfords (Olive Court and Edward Loades Buildings) and Site PR008/010 - Faulkners

195. The 1.38ha Barfords site, on Ramsey Road in Peel, is partially developed for employment use. It is estimated that the site could potentially yield either a net 0.8ha of employment land or some 44 dwellings, including 19 within the Plan period.
196. Faulkners is an essentially undeveloped site of some 0.57ha on Ballaquaine Road. It was originally allocated for residential development in the 1989 Peel Local Plan and has an estimated potential yield of 14 dwellings, including six in the Plan period, or alternatively the full 0.57ha for employment.
197. Both sites form part of the housing land supply for the Draft APNW. However, their proposed residential use is subject to local objection on grounds that many

employment sites previously allocated in Peel by the 1989 Local Plan have been lost. Both these small urban sites would add to the variety in scale and choice as well as the quantum of employment land available within the town. At the same time, there is also a local view that Barfords is dilapidated and in need of the type of refurbishment that residential redevelopment would bring.

198. Future residential use of Faulkners would not represent any change from the 1989 allocation, whilst the change to residential use of Barford would reduce employment options in Peel. On the other hand, removal of both sites from the housing land supply would involve a reduction of around 63 units in total and 33 in the Plan period and a commensurate increase of some 1.58ha in available employment land in urban Peel. [COD13]
199. Housing land requirement and supply are considered below under Housing, but I take the view that the reduction of 33 units in housing delivery to 2026 would be relatively insignificant if there is surplus overall capacity in the housing supply. By comparison, the additional 1.58ha of employment land would provide a greater percentage increase in employment land supply, as well as bringing the benefit of increased choice.
200. On a balance of all considerations for and against changing these two currently allocated residential sites, I reach the view that the transfer of both sites to the employment land supply is the preferable option in terms of the conformity of the APNW with the broad employment aims of the IMSP16.
201. The necessary changes are brought into effect by AMCs 5-6 implemented as **RMCs 33, 35, 36 and 82** to allocate both the Barfords and Faulkners sites for light industry or research and development, with suitable development briefs as appropriate, and to make commensurate amendments to the employment land supply Table 10.

Overview of employment provisions

202. In the foregoing respects, and in the detail of site-specific employment proposals, the Plan needs to be updated by proposed MCs 33-41 to paragraphs 11.1.8, 11.2.3, Employment Objective 3, paragraph 11.4.3-5, the whole of Section 11.5, and the Employment Site Proposals to allow for the insertion of sites PTE001, PR001 and PR008. Finally, proposed MC42 appropriately introduces a new paragraph 11.10.1 to acknowledge the potential, recognized in Our Island Plan, for a future economic need for large flat-floor buildings that could conveniently be delivered in the North and West. All these necessary changes are implemented by **RMCs 26 to 32 and 34, 37 and 38**.

Tourism and Leisure

Tourism policy

203. The IMSP16 covers Tourism in Business Policies 11-15 and their supporting text. The text makes clear the importance of Tourism to the Island in terms of its landscape, history and specific attractions, such as the TT races, and welcomes new and high-quality contemporary tourist developments.

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204. The draft APNW at Section 12.1 highlights the clear objective of the subsequent Our Island Plan and Visitor Economy Strategy for ambitious tourism development in the ten years to 2032, noting the UNESCO Biosphere status of the Island and requiring a re-evaluation of tourism provisions in the ongoing IMSPR.
205. Meanwhile, for general conformity, the Proposals of the APNW should demonstrably follow the principles of the IMSP16 as expanded in the national ambitions for tourism subsequently established.

Hotels

206. Tourism Proposal 1, in support of strategic tourism policy, appropriately protects hotels from loss to non-tourist uses, unless it is demonstrated that they would no longer be viable after modernisation.

Tourism use of previously developed land

207. Section 12.4 of the Draft Plan includes Objective 1 to encourage new tourism developments in settlements and on PDL. Tourism Proposal 2 favours new tourist accommodation in settlements but requires modification in line with MC43 to include reference to PDL, consistent with Objective 1 and broad strategic PDL policy. This is implemented by **RMC39**.

Harbour and marina developments

208. Tourism Proposal 3 (TP3) gives general support to new or improved harbourside facilities in Peel and Ramsey but proposed MC44 would broaden this to consideration on merit of any applications for new harbour works or facilities and marina type developments.
209. Significant Inquiry time was taken up by the promoters of a project titled the Ellan Vannin Maritime Centre (EVMC) for a Marina and associated development for Ramsey. The marina itself would be below the Mean High Water Mark and harbourside residential and other facilities would occupy a section of South Beach identified as Site RM010. It was put forward that such a development is necessary to modern Island tourism and the local economy, including to accommodate developing demand from the sailing community for convenient, high-quality stop-over facilities for trans-Atlantic voyages. It was stated that such facilities are now available in competing locations elsewhere in the western British Isles but are not yet provided on the Island. This is seen by the promoters of the EVMC as a missed opportunity.
210. The EVMC proposal led to expressions of concern by other Respondents seeking a clear definition of the meaning of marina type development within TP3 and raising concerns regarding likely adverse impact on marine biodiversity and protected birds in particular.
211. It was repeatedly explained that the question of whether major marina and associated development of this kind should be promoted as an objective of the planning system is beyond the scope of the APNW in terms of its general compliance with the IMSP16 but is a strategic matter for the ongoing IMSPR. Development below the Mean Low Water Mark is outside the jurisdiction of the APNW in any event.

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212. However, it was strongly submitted that the APNW Inquiry had provided the only available public forum for the advancement of the EVMC, whereas its supporters had hitherto been frustrated by a lack of public or Government engagement concerning the project.
213. It is for this reason that I have briefly reported the representations made concerning the EVMC and the submitted documentation promoting it remains in the public domain via the Inquiry library. But I make no further comment upon it.
214. However, I agree that TP3 needs to be clear as to the implications of support for marina type facilities or their consideration on merit. A marina typically refers to a berthing area for mainly pleasure craft, often with waterside services for crews. But the aspirations of the promoters of the EVMC go far beyond that, and contemplate the kind of major public commercial and residential development often seen on land alongside the marina itself.
215. I consider that it is sufficient for TP3 to refer to neutral consideration of applications of any scale on merit, in place of express support, as proposed by MC44 and AMC20. But I think it appropriate for TP3 also to encompass other public facilities likely to accompany a marina proposal. This is achieved by **RMC40** and in this way TP3 fulfils the requisite general conformity with IMSP16 in facilitating due consideration of any project of any scale that would potentially align with strategic tourism objectives.

Campsites - general provision

216. Respondents suggest that the Plan should make broader provision for tourist campsites but Tourism Proposals 5 and 8 do provide for small scale campsites to be assessed on merit and allow for bothies and bunk houses where acceptable and associated with national trails.
217. Otherwise, initiatives of the Visitor Economy Strategy such as for broader provision of non-serviced, distinctively Manx visitor accommodation are for consideration Island-wide under the IMSPR.
218. I do not consider that the draft APNW requires modification in relation to the general provision of campsites.

Derby Road campsite, Peel

219. However, it was agreed at the Inquiry that a campsite off Derby Road and adjacent to Ballaquaine Road, Peel, should be included within a designated area of Open Space on the Peel Proposals Map, whereas the Draft Proposals Map 6 includes the site within an area of Civic, Cultural and other use. The campsite is established and I agree that this an entirely logical modification put forward by AMC9 to be implemented by **RMC81**.

Site PO007, Marine Parade, Peel

220. It was agreed at the Inquiry that an area at the north eastern end of Marine Parade, identified as Site PO007, should be designated for Tourism, Leisure and Recreation on the Peel Proposals Map, consistent with its practical and potentially enhanced use [COD15]. I note that an application for a café, bowling clubhouse and community facilities on the site has now been approved in principle.

221. On the Draft Proposals Map 6, Site PO007 is included within a much larger area of informal open space adjacent to the south east and north east. I agree that this draft designation is inappropriate, given the nature of the land in question, and I support the suggested change, put forward by AMC7 to Map 6 and implemented by **RMC81**. This site is also considered in connection with Open Space and Recreation below.

Dark Skies and landscape

222. It was pointed out by Respondents that the North and West offers many opportunities, for tourists and Manx residents alike, to experience dark skies free of light pollution as an aspect of some of the finest landscape the Island has to offer. Yet the Draft APNW makes no specific mention of these attractions.
223. However, CABO respond, and I agree, that no such mention is necessary in the Draft APNW for general compliance with the IMSP16. That is because sufficient protection for valued landscapes generally is provided by the policies of the IMSP1, as well as for the Northern and Southern Uplands by Natural Environment Proposal 2 of this Draft APNW.

Open Space, Recreation and Community Facilities

Policy

224. For general conformity with respect to the provision of open space, recreation and community facilities, the APNW should implement the provisions of Chapter 10 of the IMSP16, which also includes sport.
225. Recreation Policies 1 and 3 and Appendix 6 of the IMSP16 set sport, recreation and open space standards to be met in Area Plans. For new residential development over 10 units, these standards amount to 3.2ha per 1,000 population subdivided: 1.8ha sports pitches, 0.6ha play space and 0.8ha amenity space.
226. Community Policies 1-11 of the IMSP16 make only non-quantitative provision for community centres, shops, schools, health care and emergency services. However, Our Island Plan 2022 reinforces the importance of these strategic provisions.
227. Chapter 13 of the Draft APNW contains seven Objectives to fulfil the requirements of strategic policy on sport, recreation and community facilities. These include Objective 1 to assess current provision, consider future needs and set out recommendations to help facilitate improvements. Objective 2 is to protect existing facilities and strive for improved provision. Objective 6 is to identify education, health and social care needs and Objective 7 is to identify safer walking routes to schools and play areas and also to facilitate discussion about play and its provision.

Existing provision

228. Tables 11 and 12 of the Draft Plan provide a simple inventory of the types of community facilities available in the settlements of the North and West.
229. Section 13.6 of the Draft Plan records the assessment of current facilities undertaken for the Draft APNW. Tables 13 and 14 are drawn from the Updated Community

Facilities Audit of February 2024 [PIP8]. Using the IMSP16 requirements for new development as a baseline, the Audit shows a general surplus in amenity space but deficits in existing play provision in all 11 Parishes of the North and West and deficits in sports pitch provision in all but four of the 11 Parishes, and none with any surplus.

230. Most significant is under-provision in sports pitches per 1,000 population of 1.28ha in the North and 1.45ha in the West, compared with the standards of the IMSP16 of 1.8ha per 1,000. This is particularly pronounced in Bride, Jurby, Lezayre and Maughold.
231. Also very significant is the under-provision of play space, again in every Parish but one (Patrick). The deficit in the North amounts to 0.54ha per 1,000, and in the West 0.47ha per 1,000, compared with the IMSP16 requirement of 0.6ha per 1,000.
232. The evidence of CABO is that this level of under-provision is the result of a low response to the call for sites in terms of suitable and available land.

Planned provision

233. The Plan fails to make specific quantitative allocations for sufficient sports pitches to make good the current deficit and, in effect, relies upon new development on the larger allocated sites to include appropriate new sports and community facilities. However, these would be related to increased demand due to the development itself and would not address the existing shortfall.
234. Only a single allocation is made in the original Draft Plan by Open Space and Community Proposal 5 (OSCP5). This is for Site LO0001 with a development brief for 3.5ha of formal open space, including sports pitches at Jurby Road, Lezayre, and is subject to the appropriate addition by MC46 of a proposed connection to the public footpath network, implemented by **RMC46**.
235. MC47-48 together insert Site GO003 as OSCP6, in place of OSC Recommendation 3, with a development brief for 0.6ha of amenity, recreation or play space at Glebe Field, Glen Mona. This change is implemented by **RMCs 47, 48 and 49**.
236. These are the only Open Space and Community allocations in the Draft Plan.

Representations

237. Concern was expressed that the actual level of community facilities available, in Kirk Michael in particular, is less than claimed in Table 12 of the Plan.
238. Strong representations were made at the Inquiry for the Western Vikings Rugby Football Club in Peel, a well-established club with no prospect of funding its own premises and reliant upon school playing fields for fixtures. The Club notes the significant deficit in sports pitch provision, failing to meet Recreation Policy 1 of the IMSP16 or the projected Outcome of OSC Objective 2 of the Draft Plan to improve provision. The Club also draws attention to a reducing amount of available designated open space in Peel, lost to school expansion. Potential for new sports pitch provision is limited to the new residential site allocations east of Peel and the designated open space at Derby Road-Ballaquaine Road.

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239. Representations were also made for Ramsey Association Football Club who similarly have experienced frustration in attempting to obtain a forum and funding to promote improved facilities within an area of designated open space in which the Club has an interest.
240. Like the promoters of the Ellan Vannin Marine Centre, considered above in connection with Tourism, Western Viking RFC and Ramsey AFC demonstrate acute frustration at a perceived lack of public engagement or official response to their needs and ambitions in support of improved sports facilities and the public benefit they might bring. The promoters of the EVMC also put forward the potential recreational benefits of that project.
241. Similar frustration was equally expressed by the charity Isle of Play (IoP), regarding the deficit in availability of suitable children's play space. IoP commented that the Draft APNW is unclear as to where responsibility lies to provide play space and that it would have been difficult for an organisation such as IoP to respond to a call for sites without local authority or central Government input.
242. IoP questions the baseline information used to calculate the existing provision, on grounds that it includes no demographic analysis by settlement and in light of detailed information obtained by IoP that some listed play sites are private and not available to the general public.
243. IoP considers that there was insufficient community engagement regarding children's play in the preparation of the Plan and submits that the Draft Plan also fails in its stated objective to seek higher quality and safer cycling and walking routes to play areas.
244. IoP refer to the report on the APE Inquiry, wherein the Inspector noted a similar lack of response to a call for sites and made the suggestion that CABO consider initiating a joint study of the most pressing deficiencies in play space and a potential remedy for it. There is no evidence that such a study has taken place in the years since.

Degree of conformity with strategic policy

245. Whilst I report the foregoing sentiments as a matter of public record, I can only consider and comment upon the planning issues within the strict role and remit of the APNW to achieve general conformity with the IMSP16.
246. OSC Recommendation 2 cites Our Island Plan in addition to IMSP16 requirements. It also supports the development of partnerships from public and private sectors to provide the right mix of sports, recreation, amenity and play in the North and West. Local Authorities and the IoP are recognised as already invested in improving play space. The Recommendation notes that the Department is keen to ensure local communities have the right opportunities for all aspects of open space, potentially linked to any Active Travel Plan and green infrastructure network.
247. OSC Recommendation 1 welcomes further discussion between CABO and the Department of Health and Social Care regarding its long-term strategy for future health provision, in particular following the closure of the Corrin Memorial Care Home in Peel.

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248. Plainly, these Recommendations are no substitute for focused proposals to meet strategic requirements. But they are an indicator of the limitations upon CABO as plan-making authority in the absence of available sites for allocation.
249. I find myself broadly of the same view as the Inspector for the APE Inquiry in 2019 that no purpose would be served by making allocations in the development plan for play space, or indeed sports pitches, unless agencies with the requisite resources were willing and able to bring such projects to fruition. In connection with this Draft APNW too, there is no evidence that any public or private body has land or a budget to fund additional recreation space.
250. As discussed above in relation to community infrastructure in general, it is essentially for Departments and Boards other than CABO planning policy and the APNW to advance improvements to infrastructure at a national strategic level. In a similar way, the significant unmet need for sports and play space would be a proper subject for CABO to debate in partnership with other public agencies and the private sector including stakeholders such as IoP, in accordance with OSC Recommendations 1-2. This would also be consistent with the suggestion by the Inspector for the APE Inquiry that CABO consider initiating a joint study of the most pressing deficiencies in play space.
251. However, in contrast with concerns regarding the availability of infrastructure to serve new development, the concerns voiced in relation to sports pitches and play space are primarily related to current lack of provision compared with adopted national standards. In the face of this level and type of public concern, I have formed the view that OSC Recommendations 1-2 should be recast as clear commitments by CABO to seek dialogue with interested parties beyond the previous passive call for sites. I put forward **RMCs 45 and 47** accordingly.
252. It is clear that the Draft APNW fails by a long margin to meet the numerical standards of the IMSP16 for sports pitches and play space. However, such under-provision does not necessarily place the Plan out of general conformity with strategic policy. Following a call for sites, albeit largely unsuccessful, Chapter 13 of the Plan does demonstrate in its Objectives and Recommendations, once changed to definitive Proposals for action, that it has sought to comply with the relevant policies of the IMSP16 on open space, recreation and community facilities. To that extent, Chapter 13 of the Plan is to be regarded as being in general conformity with the IMSP16.
253. As in the case of traffic generation and other aspects of infrastructure provision, I do not find that the shortcomings in relation to the provision of open space, recreation and community facilities, whilst serious, are such as to override my view that to proceed with and adopt the APNW is the most practical and desirable option for planning in the North and West.

Developer contributions to community infrastructure

254. A question was raised concerning the degree to which developers are required by Open Space and Community Proposal 1 (OSPC1) to contribute to community facilities in connection with new development. For large-scale developments generating significant additional local demand on such as education, health, shopping and play space, it is reasonable that developer contributions should be sought as a matter of policy and requirements of development briefs.

255. OSCP1, both as submitted and as replaced by MC45, includes a requirement for all residential proposals for ten or more dwellings that the application has taken account of the potential impact of the development on demand for community infrastructure. As applied to developments not subject to specific development briefs, this requirement is open-ended and vague and fails to provide planning certainty to prospective developers.
256. Whilst it is right that the Plan identifies the need for expanded community facilities in accordance with its Community Facilities Objective 6, OSCP1 is inappropriate and unnecessary, as conceded at the Inquiry by CABO and confirmed by AMC21. CABO cite Strategic Policy 1 of the IMSP16 as sufficient to help ensure the sustainable location of development close to existing and planned community facilities. I agree with these views.
257. OSCP1 should therefore be deleted and this change is put into effect by **RMC42**.

Site-specific concerns

PO007 – Marine Parade, Peel

258. Consistent with the agreed redesignation of Site PO007 for tourism use, discussed above, it is appropriate to amend Open Space and Community Proposal 2 regarding Site PO007 to recognise the important existing and potential tourism, recreation and leisure use of this area and to provide for its retention and enhancement for such use. This change is brought about by AMC22, implemented as **RMC43**.

Corrin Memorial Care Home, Peel

259. In response to submissions following the closure of the Corrin Memorial Care Home and to be consistent with the designation of other such sites, CABO proposes that the former Home be included within a wider Predominantly Residential area [COD18]. I agree that this is a logical change put forward by AMCs 8 and 23-24 to be implemented by **RMCs 41, 44 and 84** respectively to OSC Outcome 6b, OSC Proposal 4, and Maps 6, Peel and Map 7, Peel Town Centre.

Open Space at Ballaquaine Road, Peel

260. The designation of undeveloped land between Ballaquaine Road and the Primary School on Derby Road, Peel, is appropriately changed from Civic and Cultural to Open Space to facilitate future recreational development, as already implemented by RMC81 to Map 6 with respect to the adjacent campsite considered above in relation to Tourism.

Housing

General Housing Considerations

Housing land requirement

261. The IMSP16 includes the Strategic Social Objective to provide sufficient housing of appropriate nature and location to meet community needs, whilst Strategic

- Policies 11-12 and Housing Policy 1 provide for a net 5,100 additional dwellings Island-wide between 2011 and 2026 and favour improving the existing housing stock, including by conversions.
262. The IMSP16 Spatial Strategy and Housing Policy 3 set down the spatial distribution of the additional housing to include 770 dwellings in the North and 770 dwellings in the West, totaling 1,540 units. Housing Policy 2 of the IMSP16 commits the Department to keep the land allocations of Local and Area Plans under review to ensure the targets of Housing Policies 1 and 3 are met. Housing Policy 4 provides that new housing will be located primarily in towns, villages or sustainable urban extensions, in accordance with the spatial strategy. Housing Policy 5 sets a normal requirement of 25% affordable housing for developments of eight dwellings or more. Beyond that, the IMSP16 makes no numerical stipulation regarding the mix of housing size or type.
263. Housing Objective 1 of the consultation Draft APNW is to implement the housing policies of the IMSP16, including providing for a total of 1,540 dwellings between 2011 and 2026.
264. The housing land requirement figures of IMSP16 were based on a projected increase in total Island population to over 93,000 by 2026. This has so far failed to materialise due largely to lower inward migration than was predicted in 2016. As a result, in 2019, the Inspector for the APE Inquiry found that, if the full requirement of IMSP16 for the East were implemented, a serious over-provision of housing would result. A substantial proportion of the housing land supply in the adopted APE was accordingly placed in strategic reserve.
265. The circumstances of the Draft APNW are substantially different. There is now a political and emerging policy imperative, via the Economic Strategy, to increase working cohort of the population with 5,000 extra jobs and increased inward migration and to plan for the infrastructure required to sustain an Island population of 100,00 by 2037. Tynwald has received an Objective Assessment of Housing Need (OAHN), based on methodology accepted in the UK, to inform the current IMSPR. In a range of potential scenarios from baseline to net inward migration of 1,000 persons per annum, the OAHN predicts a need for between 6,400 and 9,900 new dwellings in the period 2026-41, or more if net inward migration is greater.
266. I do recognise submitted alternative evidence [WR221] that the OAHN proceeds on the IoM Government stated aspiration for population growth, whereas data sources such as the probabilistic population projections of the United Nations World Population Prospects would predict a lower starting assumption for growth in household numbers. This would imply a commensurate reduction in the assumed upward trend in Island housing need. However, the OAHN is accepted as a major component of the evidence base to the current IMSPR. I therefore consider that it is the OAHN predictions which must guide my interpretation as to the general conformity of the APNW with the IMSP16.
267. Whilst future strategic planning requirements remain strictly for the IMSPR, the overall figures of the OAHN are thus the appropriate evidence to inform the judgement as to whether the housing requirement of the APNW should be varied in order for the Plan to be in conformity with the Strategic Social Objective of the IMSP16 to provide sufficient housing for community needs.

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268. Moreover, it is evident from the results of the 2021 Census that average household size on the Island is progressively falling, with a commensurate likely significant increase in need for additional homes of several hundred above 2016 predictions for the North and West.
269. Clearly, unlike in the case of the APE, this current evidence would militate in favour of an increase in the stated requirement of 1,540 for the Plan period.
270. At the same time, again unlike the APE in 2019, this Plan will potentially be adopted less than two years before its end date of 2026. Its effective life will necessarily extend significantly beyond the adoption of the IMSPR until an All-Island Area Plan is in place. However, the timescale of that extension is undefined. Therefore, it would be impractical to recalculate the housing land requirement figure of the APNW with any degree of certainty.
271. In the circumstances, I favour the pragmatic approach of CABO which is, in effect, to base the housing land provisions of the APNW on the IMSP16 figure of 1,540 but to provide an uplift in the housing land supply to cater for the needs of the North and West beyond the Plan period of the APNW as well as in the light of the potential increase in population and decline in household size during that time.
272. Proposed MC49 appropriately rewrites Section 14.2 of the housing chapter to explain how the 2021 Census has influenced the approach of the Plan in terms of household size, including that it is prudent to take account of the transitional arrangements from the APNW to the projected All-Island Area Plan. This change is implemented by **RMC50**, with slight modification for clarity.
273. Proposed MC50 appropriately adds paragraph 14.3.6 to Section 14.3, on Strategic Plan Implementation, to further explain the uplift in housing land supply during the anticipated extended life of the Plan. This change is implemented by **RMC51**, but modified to omit reference to IMSPR preliminary publicity and the amount of the uplift, which I consider unnecessary at this point in the Plan.

Housing objectives

274. The Draft APNW at Section 14.4 states its Housing Objectives, including Plan Objective 1 to meet the IMSP16 housing need figures, with the Outcome of sufficient housing opportunities to be delivered in the Plan period.
275. In view of the practical approach of the Plan to its housing land requirement, I agree that Objective 1 and Outcome 1a should be modified, as suggested at the Inquiry, to refer to meeting IMSP16 figures in the first instance and to provide further housing opportunities for the transition period beyond 2026. These changes are the subject of **RMC52**.

Housing site assessments

276. Following a call for sites in the preparation of the original 2022 draft of the Plan, 176 sites put forward for housing were subject to a three-stage assessment process [CD95]. 103 of these were eliminated either at preliminary Stage 1, as unsuitable due to their location, or at Stage 2 with reference to detailed critical planning constraints. The remaining 73 sites were taken forward to Stage 3 for consideration as to whether they are developable.

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277. The Stage 3 assessment applied a total of 18 planning criteria scored by a five-category Red/Orange/Yellow/Green/Critical Constraint matrix. These included consideration of adjacent land uses, landscape character, wildlife, flood risk, agricultural land, settlement character, accessibility and public transport.
278. The results of the Stage 3 assessments then informed the final selection of sites for allocation in the Plan. The Stage 3 results are not tabulated nor subject to any further numeric scoring procedure and to that extent the selection process lacks transparency. Ultimately though, planning judgement and local knowledge are equally important in the final selection of sites to accord with the spatial vision and land supply requirements of the Plan.
279. Those judgements necessarily involved an assessment of the potential yields of the chosen sites up to and beyond the end of the Plan period to 2026. These were based upon a series of data assumptions as to the assumed percentage of the area of a site likely to be required for such as BNG, landscaping, community use and also depending on the size and condition of the site concerned [PIP7].
280. In general, the scoring and judgements made in the site assessments and yield estimates are not substantively challenged and I find them to be broadly logical and robust. Some Respondents criticised the methodology of the site yield estimates, especially regarding the assumptions for ecological impact and BNG, which are particularly site-specific. But I consider them to be reasonable and proportionate to the process of plan preparation, as distinct from future development management, when each application will be assessed on detailed evidence.
281. Importantly, every site considered for allocation in the Plan, not only at the 2022 consultation stage but also in the 2024 major changes version, were included in the series of Stage 3 assessments and so properly formed part of the published evidence base of the Plan from the outset.
282. The crucial question for the general conformity of the Plan with strategic policy is whether the choice of housing sites from those considered in Stage 3 of the selection process is appropriate in terms of location and potential yield contributing to the requisite housing land supply.

Housing land supply and site selection

283. In due compliance with Housing Policy 2 of the IMSP16, the Department has kept housing performance under review. This has been by way of the Residential Land Availability Study (RLAS), most recently in 2023 [CD28, PIP7]. This showed a total existing supply of 1,144 units from completions, approvals, conversions and likely yield from other urban sites, leaving an outstanding need for 396 units from new allocations within the Plan period to 2026.
284. This figure is substantially greater than the additional supply on which the housing allocations of the 2022 consultation Draft Plan were based. However, during the intervening two years, the need for additional dwellings increased, resulting in significant additional allocations, now proposed by way of the MCs of 2024.
285. The 2023 figure is not seriously questioned and I consider it now to be a proper starting point for the establishment of an additional supply of housing for the duration of the Plan period of the APNW to 2026.

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286. Following the recalculation of the outstanding Plan period requirement, CABO used planning judgement to assign a range of developable and available housing sites to the respective settlements of the North and West. These judgements took account of the need for a range of sites as well as the availability of public transport routes to serve them.
287. There is a predominance of the largest allocations within, or as sustainable urban extensions to the Main Service Centres of Ramsey and Peel. There is a further distribution of smaller sites to the Service Villages of Jurby, Andreas, Kirk Michael, Foxdale and St Johns, as well as to the smaller villages of Ballaugh, Sulby and Glen Mona.
288. I am aware that, in some cases, sites selected for allocation overlap town or parish boundaries and that, earlier in 2024, a bid to extend the boundary of Ramsey, for example, was rejected, following a public Inquiry. For the purposes of providing sufficient housing sites for the needs of the APNW, the location of such local boundaries has not evidently been a determining consideration and there is nothing to indicate that it should affect my judgements at this stage.
289. Overall, it appears to me that the selection of sites from those subject to Stage 3 assessment is logically aligned with the spatial vision and housing land requirement of the Plan.
290. For each draft allocated site its potential total capacity for housing is estimated, as well as its likely yield within the Plan period. These estimates form the basis for calculating the housing land supply, first up to 2026, and secondly for a period during which the life of the APNW will necessarily be extended.

Allocated housing sites

291. I now turn to deal individually with those housing sites in the Draft Plan or introduced by the proposed MCs that are subject to objection or comment.
292. First, I cover four considerations which apply to many or all of those sites and their development briefs.

Sewage treatment criteria

293. The potential delay in the provision of a regional sewage treatment plant for Peel is discussed above in connection with Utilities. With respect to the draft allocations of major housing sites east of Peel in particular, there is strong local concern that no new development should be approved until a new regional sewage treatment works for Peel is fully operational and can accept connections from new development. This concern is expressed on grounds of adverse community experience of temporary sewage treatment plants, allowed pending a permanent RSTW. These have allegedly given rise to serious problems of unreliability and odour, whilst foul discharge into the sea at Peel continues and bathing water pollution results.
294. Draft Residential Proposal 2 acknowledges the need for a new RSTW and the development briefs of the sites concerned include, in effect, a negative condition that no development take place until the RSTW is operational. But this is qualified that it may be possible to condition an approval such that occupation of the dwellings shall not take place until the RSTW is in operation and a date for this is certain. I have some

sympathy with Respondents who question the practical meaning of the term 'operational', given past and continuing delays.

295. In response to these concerns [COD20], CABO reasserts its judgement that it is very important to have development linked to new and improved sewage treatment infrastructure. CABO proposes some refinement to Residential Proposal 2 and a more radical rewording of the development brief criteria. CABO quotes Manx Utilities as stating that it would take 12 months from accepting flows for a RSTW to be considered fully operational and proposes, by AMCs 25 and 27, an amendment in those terms to the sewage treatment criteria for the sites concerned. There is an added requirement that applications set out a design proposal and timeline for connection to the main sewage network and RSTW.
296. So neither the original draft criterion nor suggested amended version expressly contemplates any temporary sewage works but the revision is somewhat more rigorous. I consider that the terms of these proposed changes place an appropriate level of constraint upon new residential schemes that rely on connection to the projected RSTW.
297. It remains for the determination of future planning applications as to whether the requirements of the Proposals and development briefs of the APNW, once adopted, are set aside on a balance of all material considerations. Even if the APNW expressed the total ban on temporary sewage treatment plants sought by objectors, that option would remain and I note that it has indeed been exercised since the Inquiry in connection with Ballaterson Site PR002.
298. As for the terms that I consider the APNW should adopt, I propose that the additional changes suggested by CABO be implemented, in accordance with **RMCs 58 and 59**.

Development density criteria

299. As determined in connection with the recommended deletion of Built Environment Proposal 3 in Chapter 8, reference to development density should be deleted from all site development briefs by **RMC60**.

Biodiversity criteria

300. As determined above in connection with biodiversity net gain, references to 'no net loss of biodiversity' in all site development briefs should be qualified by RMC61, in terms that BNG should also be sought according to current strategic policy or legislation.

Agricultural land criteria

301. Given concern that available information to inform the classification of agricultural land quality is not up to date, it was conceded at the Inquiry that development briefs for greenfield sites should include a requirement for a soil survey to aid judgement as to the weight to be accorded the loss of agricultural land in future planning applications. **RMC62** deals with this.

Site BR010 – Main Road, Ballaugh

302. This 2.3ha hitherto undeveloped site for up to around 16 dwellings lies between the existing main residential area of Ballaugh and Hunters Croft on the north side of the A3 TT course and opposite other roadside dwellings.
303. There is a local petition of some 124 signatures against the allocation on grounds of siting, access, highway safety and biodiversity impacts. Approximately the western third of the land is indicated to be at high risk of surface water flooding. Objectors refer to recent incidents of surface flooding due to heavy rain, fearing that further built development would exacerbate this problem, citing examples of new development suffering from inadequate drainage provision. Objectors also point to traffic congestion and excessive vehicle and motorcycle parking causing road safety issues during the annual TT period. They refer in addition to the need for new residents to commute by car to larger urban centres for work. Objectors further fear loss of biodiversity and raise doubt as to the potential for any development to provide BNG when required. That is given the flood risk and the contribution surrounding vegetation currently makes to local ecology and wildlife corridors. In their original response the local objectors also raised concerns on the loss of agricultural land and local character.
304. From inspection and notwithstanding all these plainly heartfelt local views, it appears to me that, in practice, the residential development of the larger part of this land, not subject to high flood risk, would potentially make a logical extension to the residential area of Ballaugh village, between the A3 and the Active Travel Route. I consider that a design could be evolved that would respect local character, as required by established policies of the IMSP16. Any application would be subject to the provision of safe access, and some local inconvenience due to the TT is acknowledged as part of Island life. There is also provision in established development management policy for mitigation and compensation for any loss of biodiversity or to provide BNG. These would be issues for the assessment of any future planning application alongside all other material considerations.
305. On balance, I find no substantive planning objection to the allocation of Site BR010.

Site GMR001 - between Mac's and Allansons Nurseries and Site GMR006 – Dreem Faaie Nursery, St Johns

306. Site GMR001 was included in the original Draft Plan. Site GMR006 is introduced by MCs 15 and 57. The two sites, totaling 4.89ha in area, are situated adjacent to each other south of Peel Road in St Johns. They have an estimated likely yield of 43 dwellings of which 24 could contribute to the supply to 2026.
307. There is no question that these flat, well-screened sites are sustainably located and appropriately allocated.
308. Following discussion at the Inquiry it was agreed that the two sites could come forward for development either together or separately, provided they were developed in accordance with a masterplan approved in advance.
309. The joint development brief should be revised accordingly and both sites allocated by **RMC69**.

Sites GMR008, GMR009, GMR2023, GMR003 and GMC002 - east of Peel

310. The three adjacent sites GMR008, GMR009 and GMR023 are proposed in the 2024 version of the Plan by MC8 as a major 35ha urban extension to the existing residential area along the eastern boundary of Peel. This would occupy hitherto undeveloped farmland between Queen Elizabeth II School playing fields in the south and Ballagyr Lane in the north. Together, these sites are assessed as having a potential yield of 300 dwellings, including a contribution of 131 units to the Plan period requirement of 1,540, with another 169 adding to the supply during the extended life of the Plan. It is proposed that the development would incorporate a district link road running north from Douglas Road across agricultural land to connect with Poortown Road and potentially Ballagyr Lane and ultimately Ramsey Road.
311. At the Inquiry, however, it was suggested by a local Respondent that the 2.55ha Site GMR003, currently allocated for civic use in connection with the neighbouring QEII School, and the 1.68ha Site GMC002 on the opposite side of Douglas Road, also allocated for civic use associated with the adjacent cemetery, would both be better included for residential use within the urban extension. This would be in exchange for a portion of Site GMR023, which is more suited to serve as level school playing fields. It was generally agreed that this was a logical and desirable additional change. It would also enable any possible link road to take a shorter route, avoiding agricultural land outside the residential area, to form a junction with Douglas Road. CABO therefore suggest this change by way of AMC4 to the Peel Proposal Maps [COD10] and the development brief requires amendment accordingly, implemented by **RMCs 63 and 79**. The change would also result in a potential addition of 11 dwellings to the housing land supply.
312. It was also suggested that the eastern boundary of Site GMR009 be rationalized to follow the boundary of Sunset Lakes and this is a logical further amendment to Map 6, also by **RMC79**.
313. The development brief appropriately requires an EIA covering all the proposed sites, together, as well as a masterplan to include community facilities and public open space for the whole urban extension, phased from south to north with a break at Poortown Road, and with demonstration that road connections can be achieved. The indicative link road itself is locally controversial but is supported in principle by DoI Highways as potentially beneficial to the local highway network.
314. The brief further requires a sustainable travel plan, improved general pedestrian and cycle links, in particular to the Heritage Trail in support of active travel, protection of registered trees and retention or replacement of the allotments at Ballagyr Lane with no net loss. The viability of the allotments is questioned but there is scope in any application for this requirement to be set aside if justified.
315. However, the brief should also be amended with respect to development density, biodiversity, soil survey and sewage treatment, all as discussed in general above and in accordance with **RMCs 59-63**.
316. Given my findings above with respect to housing requirement, site selection and supply, I consider that, with the changes I recommend, the allocation and development criteria for Sites GMR008, GMR009, GMR023, GMR003 and GMC002 are appropriate.

Site GR021 – adjacent to Dhoon School, Glen Mona

317. This site is allocated for about 11 dwellings between the existing residential area and Dhoon School in Glen Mona. There is a local request for the site to be changed to mixed use to allow for a car park to relieve school traffic congestion. However, on-street parking and road safety would be material considerations in the assessment of any housing proposal. Therefore, I do not find it necessary to recommend the suggested change to the designation of Site GR021 in the APNW.

Site LR007 – off Sulby Glen and Claddagh Road, Sulby

318. This site comprises an irregularly shaped 1.47ha agricultural field, which is evidently historic quarterland. The main part of the site is immediately west of Sulby Glen Road, with a relatively narrow strip having a short frontage on Claddagh Road to the south east. The site has an estimated yield of 8 housing units.
319. There are local objections to the allocation on grounds of the loss of the quarterland and impact on local rural character, bearing in mind the relatively low village status of Sulby in the strategic settlement hierarchy. There are also concerns regarding parking and highway safety close to the local school, as well as flood risk and foul water drainage connection.
320. The development brief provides for considerable flexibility in the design of predominantly residential development of the site to reflect and complement this part of the village. The main access is specified to be off Sulby Glen Road with consideration of a pedestrian link to Claddagh Road. But there is no objection to a secondary vehicle access at the short Claddagh Road frontage.
321. Any development would be required to include safe access and sufficient off-street parking space to obviate increased kerbside congestion and I see no reason why a development of the scale envisaged would give rise to undue additional road safety hazards, even accepting schoolchildren regularly pass along the site frontage.
322. Significant surface flood risk only exists over the narrow, south eastern part of the site, reserved only for secondary access and not required for built development. Even so, a detailed flood risk assessment is rightly required by the development brief, along with suitable environmental information. Thus far, on those terms, I find no substantive objection to the allocation.
323. With respect to foul water drainage, it was agreed at the Inquiry that further information on potential sewerage connection would be provided. Advice from Manx Utilities submitted by CABO after the Inquiry [COD22] is that the site cannot be drained by gravity to adopted foul sewers. Connection via a pump station is not recommended due to the distance of 500m to the nearest connection point in St Stephens Meadow. Given the small number of properties proposed and the length of any pumping main required, this would give rise to septicity problems.
324. I have not been provided with any countervailing evidence that satisfactory foul drainage could be achieved. It would be for any planning application for the development of the land to be assessed on more detailed information. However, on the evidence available to this Inquiry, the allocation of Site LR007 appears inappropriate and, unless this matter is otherwise resolved before the Plan is adopted, I consider that this allocation should be deleted by **RMC67**.

Site LR017 – south of Jurby Road, Cronk Mayn

325. This small, currently undeveloped, four-unit site would provide relatively well-screened infill dwellings hard against the edge of the major housing development in the west of Ramsey. Existing residential development immediately west of the site is relatively sporadic and of lower density but the land itself is not subject to any particular landscape protection. Development could be designed to respect the character of the area. I find no objection to this allocation, introduced by MC6 and confirmed by **RMC71**.

Site LR040 - Clenagh Road, Sulby

326. The site is an elongated 0.58ha of undeveloped land fronting Clenagh Road, opposite existing frontage dwellings, just north of the former railway track and active travel link. It could accommodate about three dwellings sustainably located in proximity to public amenities. Local objections highlight the status of the site as quarterland associated with the rural village of Sulby, at the bottom of the settlement hierarchy. However, the site is not subject to any specific landscape protection and thus far I see no objection to the addition of this allocation to the Plan by way of MCs 18 and 57.
327. With respect to foul water drainage, it was agreed at the Inquiry that further information on a potential sewerage connection would be provided. Post-Inquiry advice from Manx Utilities provided by CABO [COD22] is that this site cannot be drained by gravity to public foul sewers. Although a pumping option could be considered it would not be adopted by MU and, given the low number of proposed properties, septicity would be an issue in any rising main, as the nearest connection point is 230m away. It is not known if there is any watercourse or ditch in the area to accept discharge from any proposed stand-alone treatment works.
328. I have not been provided with any countervailing evidence that satisfactory foul drainage could be achieved. It would be for any planning application for the development of the land to be assessed on more detailed information. However, on the evidence available to this Inquiry, the allocation of Site LR040 appears inappropriate and, unless this matter is otherwise resolved before the Plan is adopted, I consider that this allocation should be deleted by **RMC68**.

Site LR027 – west of Kella Close, Sulby

329. The site is an open area of 1.57ha between the A3 main road and the former railway track and active travel link. The site lies immediately west of the houses of Kella Close and could accommodate an estimated additional 11 dwellings. From inspection, it appears that satisfactory vehicle access could be provided through Kella Close, avoiding any fresh entrance of the main road.
330. In the site assessment, the land scored highly on compatibility with adjacent development but had medium to low scores for landscape, visual amenity, wildlife and flood risk. However, on the updated flood maps the site is not indicated as subject to fluvial flooding.
331. Regarding the availability of a foul water sewage connection, post-Inquiry advice from Manx Utilities provided by CABO [COD22] is that Kella Close is connected to the public sewerage system via a private pumping station not considered for adoption. If

the number of properties were to increase to 11 and the pump station were upgraded to MU requirements it could be considered for public adoption.

332. I consider on balance that, in the determination of a future proposal on detailed evidence, there would be good prospect that all adverse planning impacts, including surface water flood risk and foul drainage issues, could be acceptably mitigated in the design and that such development would be sustainable.
333. Therefore, I find no objection to the allocation of Site LR027 as proposed by MCs 19 and 57 and implemented by **RMC71**.

**Site MR007 – Cass A Lhergy, Main Road, Kirk Michael and
Site MR008 – adjacent to school grounds, Kirk Michael**

334. Site MR007 is a 1.84ha greenfield site comprising two fields for an estimated 21 dwellings south east of the main settlement of Kirk Michael, with existing access off the main A3. The allocation is introduced into the Draft Plan by MCs 13 and 57.
335. Site MR008 comprises two areas allocated for a total residential development of 26 dwellings, east of the centre of Kirk Michael. The two parts of the allocation are separated from each other by an area of proposed public open space and a projected route for a local access road behind the primary school. The land extends to 3.74ha in total. These allocations are introduced by MCs 14 and 57.
336. As discussed above with respect to Transport, there are local objections with respect to traffic congestion on the narrow main road through the centre of the village. There are also concerns regarding potential visual impact on the Kirk Michael Conservation Area (CA) and on more distant views of the mountains to the east.
337. The access to Site MR007 is clear of the narrow section of the A3 through the village. Access to the southern part of Site MR008 is also from the south east. Access to the northern part could be via the existing residential area of Slieau Curn Park, whilst the road link between them would enable local traffic to avoid the area of congestion of most concern.
338. From inspection, I do not consider that distant mountain views from the village would be much affected by the low-rise dwellings likely to be proposed. With careful design of the modest number of houses envisaged for these areas of land, I consider that reasonable separation could be maintained between the new built development and the CA boundary, such that I do not believe that there need be undue impact on the CA or its setting.
339. However, additional criteria should be added to the development brief for both sites MR007 and MR008 requiring particular attention to traffic management and avoiding adverse impact on the CA and visual amenity generally.
340. Further, a correction is required to Proposals Map 10 for Site MR007 to encompass both Fields 230794 and 234268 within the predominantly residential designation, consistent with the development brief.
341. These necessary modifications are made by **RMCs 66 and 85**.

Site PR002 – Ballaterson, Glenfaba Road, Peel

342. This greenfield site is immediately south of the existing residential area of Ballaterson Meadow with access from Glenfaba Road. It is allocated in the Draft Plan for 84 houses over 5.7ha, including 37 contributing to the Plan period requirement. Since the Inquiry, a large part of the land has been approved for 92 dwellings, subject to the completion of a legal agreement and the usual appeal period. This could affect the way in which the site is represented in the final adopted APNW but, for the purposes of this Report, I consider the terms of the allocation as discussed at the Inquiry.
343. The primary concern relates to the matter of sewage disposal pending the commissioning of a RSTW. This matter is covered in general terms above, leading to RMC58.
344. Also covered in general terms are matters of development density, biodiversity and agricultural land development criteria, leading to RMCs 59-61.
345. With those RMCs in place, I find no planning objection to the continued allocation of Site PR002 in the APNW, unless the planning status of the land is altered such as to require further modification at adoption.

Site PTR004b – south of Mines Road, Foxdale

346. This is a site of 0.85ha adjacent to the settlement of Foxdale with an estimated overall low-density yield of 10 dwellings, introduced by MC17. There are local concerns that the density of any housing on the land should not be excessive in relation to the comparatively loose-grained development pattern opposite, on the north side of Mines Road. It is also noted that the land is within a designated AEI shown on the draft Environmental Constraints Map due to the presence of rich grassland habitat with potential for the presence of rare invertebrates.
347. However, both such material interests would naturally be considered in the assessment of any planning application and they do not amount to an objection to the allocation of Site PTR004b as proposed by MCs 17 and 57. But in the circumstances an appropriately worded development brief covering these and any other known constraints would be beneficial and should be added, as proposed by **RMC70**.

Sites RR006 and RR007 - Vollan Fields, Andreas Road and Bride Road, Ramsey

348. These greenfield sites extend over a total of 12.83ha of agricultural fields against the north western edge of urban Ramsey. They are introduced by MC5 for a total estimated 147 dwellings including 37 during the Plan period. The larger Site RR006 is north west of Bride Road and east of Andreas Road and has an estimated potential yield of 109 dwellings. The smaller Site RR007 with potential for 38 houses lies west of Andreas Road.
349. Site RR006 is now approved for 153 dwellings subject to the completion of a legal agreement. This could affect the way in which the land is ultimately represented in the final adopted APNW but for the purposes of this Report I consider the terms of the allocation as discussed at the Inquiry.

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350. The Inquiry heard strongly voiced objections to the development of this land on grounds including rural landscape impact, loss of agricultural land, amenity conflict due to adjacent agricultural uses and kennels, as well as distance from bus services.
351. Nevertheless, the development would form a logical urban extension to Ramsey and it is evident from the consideration of the current application that there is scope to mitigate any adverse planning impacts. There is evidently also room for judgement as to whether a detailed design could be acceptable, subject to conditions to safeguard such as ecology, trees, highway safety and amenity.
352. It was agreed by CABO, by way of AMC29, that the development brief should be amended for the two sites to come forward separately, as well as including requirements for environmental and transport assessments. I find these changes to be appropriate and I also consider it logical and appropriate to facilitate a small extension to include a farmhouse and boarding kennels, potentially alleviating noise concerns.
353. I consider overall that the proposed joint allocation of Sites RR006 and RR007 should remain in the Plan, subject to **RMC65**, as well as RMCs 60-61 to remove the density criterion and modify the development brief with respect to agricultural land and biodiversity.

Site RR009 – between former railway line and A3 Sulby Road, Ramsey

354. This roughly square greenfield site of about 12ha is part of an area of 30ha south of the Sulby River. It was originally assessed for up to 190 houses but the site comprises predominantly rare, semi-improved grassland and includes an AEI.
355. The allocation, estimated to yield 108 dwellings including 47 in the Plan period to 2026, is limited to the south easternmost part of that land, adjacent to the western edge of urban Ramsey and extending into Lezayre. Development here would be a logical and sustainable urban extension to Ramsey, despite an intervening narrow belt of vegetation.
356. Such development would undeniably encroach into the Lezayre countryside and be relatively more distant from the community services of Ramsey, compared with more central locations. It would also be separated from existing residential development by an industrial area. However, good access is available from the main Sulby Road.
357. This site, together with an adjacent area further to the west, was the subject of an appeal in 2022 for 138 houses. The Inspector found the location and rural landscape impact of the development then proposed unacceptable in terms of prevailing planning policy, noting also likely ecological harm that would require mitigation. The Inspector was also unpersuaded by evidence of market need for the development and recommended on balance that the appeal be dismissed.
358. Objectors to the present draft allocation also referred to the susceptibility of the area to fluvial flooding but it is evident that this mainly affects the area north of the railway track, adjacent to the River and not forming part of the site now proposed for allocation.
359. The rejected 2022 proposal placed the housing further to the west, leaving half the present Site RR009 as undeveloped open space and the new housing detached from the existing built settlement. Moreover, that proposal was necessarily assessed under

local policy then applicable on the supply and location of housing, which is now reappraised for the purposes of the APNW. The two matters are clearly not directly comparable.

360. On the evidence to this Inquiry, I see no insurmountable planning constraints on the allocation land, although any application should include a flood risk assessment and a sustainable drainage system, as well as the EIA already required by the development brief. MC4 also proposes to amend the size and location of public open space within the allocation. With those changes in place by way of **RMC64**, I find on balance that there is no objection to the allocation of Site RR009.

Alternative housing sites

361. I now consider sites put forward as alternatives or in addition to those allocated for housing in the Draft APNW.

Site AM001 – Andreas airfield

362. The site put forward comprises the whole of Andreas airfield and surrounding land, proposed for a large-scale mixed renewable energy commercial hub, incorporating a residential element. A comparatively small part of the land between the airfield and the settlement of Andreas is designated as employment site AE001 in the 2024 modified version of the Draft APNW.
363. The major proposal, especially the residential component outside any defined settlement, would not meet the strategic spatial strategy of national policy in terms of the general conformity of this Plan with the IMSP16. Accordingly, I make no recommendation regarding the larger site. However, the project might form a subject for the ongoing IMSPR.

Site AR001 – off Smeale Road, Ballalough, Andreas

364. This site was assessed as developable for around 24 houses, extending the service village of Andreas north westward into presently open countryside. CABO has made other residential provisions for Andreas alongside employment allocations.
365. I accept that this site scores similarly against assessment criteria as others which are allocated in the Plan, such as Site AR018 at the western boundary of the village. But in my view Site AR018 would tend to consolidate rather than expand the settlement into its rural surroundings. The choice is a matter of planning judgement. On the evidence before me I see no reason to recommend against the judgement of CABO regarding this site, in the absence of any identified additional need for housing in Andreas. I accordingly make no recommendation for Site AR001.

Site AR009 – Larivane, Bride Road, Andreas

366. Assessed for some 25 houses, this site, immediately west of the built settlement Andreas was rejected outright on grounds of flood risk but this is not borne out by the latest flood maps nor by the flooding history asserted by the landowner.
367. At the same time, the site scored very low on landscape and wildlife compared with the allocated Site AR018 or with Site AR001, which was also rejected. I find no reason to override the judgement of CABO in declining to allocate Site AR009 for housing,

without evidence of additional need and I therefore make no recommendation in this connection.

Site BR003 – rear of St Mary’s Meadow, Station Road, Ballaugh

368. This 2.4ha greenfield site lies immediately south west of the residential St Mary’s Meadow and south east of the Ballaterson Moar Farmstead. It was assessed for about 14 dwellings and found developable. That was despite scoring low on landscape and visual amenity, loss of agricultural land, wildlife and flood risk, albeit scoring highly on road access and availability of community facilities.
369. There is detailed evidence that access would indeed be available, any built development screened by vegetation, and that flood risk could be mitigated.
370. Nevertheless, I consider that, despite the proximity of existing development, housing on the land would still appear to jut prominently into the open countryside, detrimental to landscape character. In the circumstances, I support the judgement of CABO not to allocate this site for housing in the Plan.

Site BR006 – south of Main Road, Ballaugh

371. This site comprises 6.5ha of undeveloped fields extending southward from the rear of existing properties fronting the A3. It was assessed for around 27 houses. The site scored well for access and community facilities but was found not developable, with low scores for settlement and landscape character, loss of agricultural land, road access and flood risk.
372. There is detailed evidence maintaining that appropriately landscaped, low-density housing could be accommodated here, if further sites were needed to meet the housing land requirements of the Plan.
373. However, such development would very considerably extend the built settlement of Ballaugh into the open countryside, between the local roads of Ballaugh Glen and Ballamoar Lane. This would markedly alter the character of the landscape. I agree with the judgement of CABO not to allocate this site for housing at this time, in the absence of evidence of additional need.

Site BR009 – south of the A3 and west of Ballaugh Glen, Ballaugh

374. This site of 1.92ha comprises two linked areas of undeveloped land with a finger of existing development in between, lying to the south west of the Ballaugh settlement. The site scored relatively low for compatibility with the adjacent development and landscape character but was rejected on the critical constraint of flood risk.
375. There is evidence that the risk of flooding relates only to the eastern part of the land, such that the western part could be developed separately.
376. Overall though, I am more concerned that such development would damage the landscape by extending into open countryside, contrary to strategic policy, and I agree with the judgement of CABO not to allocate this land for housing in the Plan.

Sites GMR003/GMC002 – Douglas Road, Peel

377. These sites are considered above in conjunction with allocated sites GMR008/009/023.

Site GMR005 – Watsons Nurseries, Main Road, Greeba

378. The 7ha Watsons Nurseries is in the countryside on the main A1 east of St Johns. The site failed Stage 1 of its assessment on grounds that it was unsuitably located for housing, being outside any settlement. CABO maintains that the land is not to be accorded exceptional priority for development as brownfield land because agricultural land is specifically excluded from the IMSP16 definition of PDL. CABO also note that part of the area is a designated AEI, albeit no formal assessment has been undertaken in that regard.
379. In response, it is contended that the site could accommodate new housing beneficial to the local community and that Greeba, with some 40 dwellings and a successful restaurant in the vicinity of the Nurseries, should be reclassified as a village suitable for additional residential development. That is plainly a question for the IMSPR but in connection with the general conformity of the APNW, I agree with the site assessment and consider that allocation of this site for housing is unwarranted.

Site GMR018 – Kennaa Road, St Johns

380. This 5.15ha area of open fields was assessed as having a potential yield of 43 dwellings but was rejected at Stage 1 of the site assessment due to its location outside any settlement boundary. The land lies east of a rural settlement some way south of St Johns. It was formerly designated for residential development in the 1982 development plan but its development would be contrary to the spatial strategy of the current IMSP16.
381. It is noted that locality benefits from a range of community facilities including schools. It may be that a housing scheme could be designed for the land which would have satisfactory main road access, could take account of existing settlement character and could safeguard visual amenity. However, these factors do not justify the allocation of the site in this Plan, contrary to the locational provisions of current strategic policy. I therefore make no recommendation with respect to Site GMR018. It would be a matter for the ongoing IMSPR to review national policy regarding new development in such rural settlements.

Site GR001 – Dreemskerry Quarry

382. As noted above in connection with mineral development, Dreemskerry Quarry is a dormant, unrestored but safeguarded mineral site. It is located in the countryside, remote from any defined settlement, and consequently failed at Stage 1 of the site assessment.
383. A case is made for exceptional allocation of the site as brownfield land for sympathetic development acting as a catalyst for landscape restoration.
384. Reconsideration of rural exceptions to overall spatial policy could be a subject for the IMSPR. However, taking account of all the circumstances of the site in light of current

strategic policy, I am not persuaded that such exceptional residential allocation of the Dreemskerry Quarry sites is justified in this Plan.

Site GR004 – Booilushag, Maughold

385. Some 0.6ha of land was assessed at this location, associated with the property Copper Top, but the representations relate to about the north western two-thirds of that area with a potential capacity of around 8 dwellings.
386. Such development could potentially add to the rural housing stock in a relatively unobtrusive manner, as the site is well screened and has adequate access to the local road network.
387. However, the site was rejected at Stage 1 of the assessment process due to its location remote from any defined settlement, such that its allocation would be contrary to current strategic spatial policy. Accordingly, the allocation of this land in the APNW is unwarranted. The matter of the addition of new housing to rural built groups may be for the ongoing IMSPR but I make no recommendation for Site GR004 in connection with this Plan.

Site GR026 – the Dhoon, Garff

388. This proposal relates to two areas of land totaling 0.7ha either side of the Manx Electric Railway line, east of the main A2 and not far north of the Dhoon Glen halt. It was assessed with an estimated capacity of around 7 houses but is in such a remote location that it was rejected at Stage 1. I make no recommendation regarding Site GR026 as its allocation would be entirely contrary to current national spatial strategy for housing.

Site JR001 – plot at Sandygate

389. This site comprises a single plot at Sandygate, a small group of built development on the A13 junction with the A14, in the countryside some distance south east of Jurby West and the Jurby airfield.
390. Notwithstanding submitted evidence that the plot might have potential for a single sustainable dwelling, under present strategic policy such a proposal would fall to be decided on merit and allocation in the APNW is not justified. Policy for additional houses within small groups of rural dwellings may be for review in the IMSPR.

Site LR001 – Ballacarbery, Andreas Road, Ramsey

391. This is a 15.67ha greenfield site on the outer north western edge of Ramsey with an estimated potential yield of 87 dwellings, including 38 in the Plan period. It was found at Stage 3 of the site assessment to be developable, despite red scores for archaeology, agricultural land, settlement character and active travel. But it scored highly for compatibility, visual amenity, access and community facilities.
392. Thus, despite its location strictly within the boundary of Lezayre, a mixed residential development of the land would be a logical and sustainable urban extension to Ramsey. That is with an appropriate design and if the balance of other planning considerations were judged in its favour. Such judgement would include consideration

of the degree of need for the housing the development would provide, potentially including a significant affordable element.

393. CABO accepts that there are no overriding planning constraints upon the land and that this warrants its favorable consideration alongside other available options for residential development in the main service centre of Ramsey, should an increase in supply be warranted. I have noted elsewhere that several of these other options have so far been subject to rejection at appeal.
394. Taking these circumstances into account, together with the overall amounts of requirement and supply which currently exist and the estimated yields of the Ballacarbery land, I reach the view, on balance, that it would be appropriate to designate Site LR001 in the APNW for residential development and propose **RMCs 71 and 78** accordingly.

**Site LR005 - Kella Farm, St Judes Road, Sulby and
Site LR020 - north of the A3, Sulby**

395. These two sites together comprise 7.8ha of farmland east of St Judes Road, north of the A3 and west of the A17. The land is excluded from the settlement boundary of Sulby, which terminates on the opposite southern side of the A3.
396. Roughly the northern half of the land is separated from the southern portion by the track of the former railway line. This area plainly forms part of the open countryside and therefore failed Stage 1 of the site assessment. There is no justification for its allocation for housing development under current strategic policy.
397. Site LR020 is the southern part of the land, extending to 3.79ha, and was assessed for a potential yield of 16 dwellings. Although residential development of the site was found to be compatible with existing development to the west and south, it was rejected at Stage 2 on grounds of flood risk.
398. At the Inquiry there was evidence that residential use of the southern Site LR020 would potentially be sustainable and beneficial as an extension to Sulby, with good road access and proximity to village amenities and no loss of high-quality agricultural land.
399. Despite some historic controversy over the former allocation of the land, under current strategic policy the only outstanding objection to its allocation in the APNW is flood risk.
400. Fluvial flood risk is indicated mainly over the eastern third of the land but there was conflicting oral evidence of flooding history on one hand and the potential for its mitigation within a scheme design on the other. It would be for any planning application for the development of the land to be assessed on more detailed flood risk information. However, on the evidence to this Inquiry, the level of flood risk remains sufficiently uncertain that I do not consider it appropriate to recommend the allocation of Site LR020 for housing in the Plan.

Site LR037 - the Meadow, St Judes

401. The Meadow is a flat, square field adjacent to the south of a family-owned farmstead that fronts St Judes Road around half a mile north of Sulby. The land would potentially accommodate up to about 7 dwellings if it were developed.
402. The family attended the Inquiry in good faith, quoting previous advice that an application for one or more additional family homes on the land might be successful.
403. However, the site is plainly in open countryside outside any recognised settlement where the IMSP16 presumes strongly against new residential development in order to protect rural landscape and character. Accordingly, there are no grounds for this land to be allocated for housing by the APNW.
404. Whether a planning application might be treated exceptionally under current policy or whether the future IMSPR might make different provisions for rural development are not matters for me to conjecture. I therefore make no recommendation for any change to the APNW in connection with this site

Sites MR003 and MR004 – Ballarhenny Farm, Orrisdale

405. These two sites, each of about 0.3ha, are situated at Ballarhenny Farm, Orrisdale, between the A8 and the disused railway track, north of Kirk Michael. They are both proposed for bespoke houses which would be near a number of existing properties to the north and east. Both sites failed Stage 1 of their site assessments due to their rural location.
406. The question of additional housing to such small rural groups may be a matter for the IMSPR with respect to Island spatial strategy. Meanwhile, any proposals would be subject to consideration on individual merit but there is no justification for their allocation in the APNW under current strategic policy.

Site MR011 – Slieau Curn Park, Kirk Michael

407. This is a greenfield site of about 0.4ha with potential for up to five dwellings to the rear of the south eastern part of the existing Slieau Curn Park residential development. It would form a logical small extension to the estate at the eastern edge of the settlement, with space for access between the existing dwellings at the end of the cul-de-sac. I note that a previous approval for a garage in that position is no longer extant.
408. The Site Assessment indicates no loss of key landscape features and a minor effect on the Kirk Michael Conservation Area, due only a narrow part of the CA extending to the north east of the site. The location of the land makes it impractical for farming. Although it is strictly backland, I consider that a small number of houses could be located along a suitable access drive, and could be sufficiently separated from the rear of existing dwellings to avoid unacceptable loss of amenity. The land was previously affected by the line of a projected bypass to the east of Kirk Michael but that is no longer the case.
409. Overall, I consider that a modest development of the site would have minimal adverse planning impacts whilst making efficient use of the land, in a sustainable location, close to village amenities, and add beneficially to the variety of development options

within the housing land supply. I accordingly propose its designation by way of **RMCs 71 and 85**.

Site PE002 – west of Glenfaba Road, Peel

410. This 0.75ha site lies on the west side of Glenfaba Road, opposite the residential area of Ballatessan Meadow but is otherwise surrounded by industrial or civic land and is itself shown on the submitted Proposals Map 6 as designated green space.
411. Repeated claims were made at the Inquiry that this land, following prior employment use, has been approved for residential development and that it should be so designated by the APNW. Despite building control evidence that construction work was commenced, CABO maintains that any previous residential approval has lapsed. That dispute may remain between the landowner and DEFA Planning and it is not for this Report to make a determination on the established use of the land.
412. Meanwhile, the implication of the landowner objection could be taken to be that the land should be allocated for residential development at this stage. However, I have seen no clear information of its suitability or otherwise for a different designation in the APNW and there is no evidence of any current need for an additional housing site in this location.
413. I accordingly make no recommendation for any change to the APNW in connection with Site PE002.

Site PR003/PO005– adjacent to Lheany Voar west of Ballaquaine Road, Peel

414. This 1.5ha rectangular plot of land fronts the west side of Ballaquaine Road and extends between the southern domestic boundary of Lheany Voar and Derby Road/Poortown Road. Although the land was historically allocated for housing in the Peel Local Plan, in the Draft APNW it is designated for civic, cultural or other use over approximately the southernmost 1ha, and as predominantly residential over the remaining northern part. The civic designation is evidently to facilitate a new community area to serve the new developments to the east of the town, as well as primary school expansion. The landowner understandably seeks specific clarification in the Plan of the type of community facility envisaged for the area and also proposes that the division of the land between the two designations be equalised, increasing the extent of the residential area adjacent to Lheany Voar.
415. There is no overriding constraint in the site assessment to preclude any type of residential or civic development of the whole of the site. Nor is there any clear evidence as to how the site should be apportioned beyond the expressed preference of the landowner. I therefore do not find justification to revise the draft designations of the site but I do agree that in this closely urban and partly residential area of the town, the potential civic, cultural or other uses of the southern part of the land should be more clearly specified before adoption of the Plan, as set out in **RMC80**.

Sites PR004/PO006 (part) – south of Ballatessan Meadow, Peel

416. Site PR004 is the same area of originally open land as site PO006, south of Ballatessan Meadow. Both included Field 314539, which is the present Peel Golf Club practice field. This was duly designated open space in the Draft Plan and excluded from the residential allocation of the main part of the land as Site PR002.

417. At the Inquiry a suggestion was discussed of replacing the golf practice area on another Field 311889, abutting the southern part of the golf course, which offers a more suitable location for that activity. The present practice area could then be released to residential allocation contiguous with Site PR002.
418. There are no insurmountable planning constraints upon this proposed change and CABO does not object to it. The result would be an incidental addition of around ten dwellings to the overall housing land supply. I consider these changes logical and appropriate and they are implemented by **RMC83**.

Site PR007 – Lyndale Avenue, Peel

419. The site concerned is a 0.3ha wooded area of designated open space close to the Cathedral and opposite the houses fronting Lyndale Avenue. It could accommodate about 4 dwellings but was rejected at Stage 2 of the site assessment on heritage and landscape grounds. There is a suggestion that the land should be redesignated for church use but that is not a separate development category. Therefore, any proposal for the development or change of use of the land would properly fall to be assessed on merit. There is no evident justification for Site PR007 being allocated for residential use in the APNW.

Site PTM002 – former claypit and adjacent land, Knockaloe Beg Farm

420. This 5.95ha of undeveloped land was rejected at Stage 1 of the site assessment for mixed development on critical constraints of landscape impact and flood risk. It is proposed for church use, for which there is no defined development category under current strategic policy. There is no justification for its allocation in the APNW but any development proposal would be subject to consideration on individual merit.

Site PTR004 – south of Mines Road, Foxdale

421. This is an area of undeveloped but formerly mined land, extending to some 5ha east of the service village of Foxdale and opposite the outlying frontage development of Springfield Terrace. The land was formerly designated as predominantly residential in the Foxdale Local Plan 1999. The assessment of the site in the preparation of the Draft APNW included the 0.85ha Site PTR004b, which is now allocated for housing immediately east of the Foxdale settlement boundary. The rest of the land was rejected as not developable due to low scores for settlement character and wildlife, the latter due to an AEI along the area fronting Mines Road.
422. The site is known to be contaminated following its mining history, giving rise to a danger of groundwater pollution, and its development has been seen as a potential catalyst for its proper restoration. It is noted that the Landscape Character Assessment specifies that the strategy to conserve local quality and distinctiveness should include the restoration of landscapes disturbed by mining activities. On the other hand, CABO has also noted the level of natural revegetation which has taken place over the land and oppose built development as a form of reclamation.
423. On a balance of the evidence to the Inquiry, I see no reason to reverse the judgement of CABO not to allocate a larger part of the original Site PTR004 in the context of the present spatial vision and housing land supply position and I make no such recommendation in this Report.

424. However, there is a complex planning history of the land, including several current development proposals under consideration by DEFA and at appeal. Therefore, the allocation status of Site PTR004 could possibly need to be reconsidered by CABO prior to the adoption of the APNW.

Site PTR011 – adjacent to Kinsale, Dalby

425. This 0.12ha undeveloped site, fronting the east side of the A27 through Dalby, could potentially accommodate two infill houses between existing dwellings, Kinsale and Driftwood. Dalby includes several properties under refurbishment or new development following planning approvals.
426. The site was assessed as developable and I accept that an appropriately designed small residential scheme could be a suitable further addition to the village, subject to detailed consideration of all planning effects. However, the land is outside the defined settlement boundary of Dalby and I see no evidence of local housing need or special justification for allocating Site PTR011 in the APNW. I therefore make no recommendation in this respect. But potential variation of settlement boundaries might be a question in relation to the IMSPR and meanwhile any proposal would fall to be considered on individual merit.

RM010 – South Beach, Ramsey

427. The prospect of a substantial area of the South Beach, Ramsey, being developed for residential and other uses associated with a proposed marine centre is considered above in connection with Tourism and Recreation.
428. When assessed for potential residential development, the site was rejected on very low scores for landscape, wildlife and heritage interests. This assessment was strongly borne out by evidence from Respondents at the Inquiry. On current evidence, there is no justification for the allocation of Site RM010 in the Plan to include residential development.

Site RR004 – Ballachrink, Poyll Dooley Road, Ramsey

429. This site of a little over 7ha comprises approximately the southern half of a larger open area in the centre of Ramsey. It lies between Poyll Dooley Road and the Gladstone Park industrial area and the former railway track and active travel link at its southern boundary and the Sulby River in the north, where there is saltmarsh.
430. The land was rejected as not developable at site assessment due to red scores at Stage 2, including with respect to landscape character, wildlife, flood risk, agricultural land and settlement character. The site has a history of planning refusals for such reasons.
431. Nonetheless, since the Inquiry the site has received approval in principle for residential-led development, subject to the completion of a legal agreement. This is unlikely to lead to a full approval within the timescale of the adoption of the APNW and for the purposes of this Report I consider the site on the evidence discussed at the Inquiry.
432. CABO highlighted serious concern remaining over worsening tidal flood risk to the site. That is mainly restricted to the northern part of the open area between the River and
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the northern site boundary, such that there is some scope for mitigation and controlled rewilding of that area as part of a development. However, development is also strongly opposed as critical to wildlife interests, although the precise location, extent and importance of such interests in terms of relevant protective designations is unclear.

433. The site was assessed on the basis of a potential yield of 26 dwellings in the Plan period out of a total of 60. It seems to me that significant doubt remains as to the whether this land could be satisfactorily developed to contribute this amount of development, even within the extended practical life of the Plan.
434. Despite the approval in principle now contemplated, on balance I do not consider it appropriate to allocate Site RR004 for residential development in the APNW on the evidence available to the Inquiry.

**Site RR011 – off Bowring Road, Ramsey and
Site RR012 – off Richmond Rd, Ramsey**

435. Site RR011 is a flat, undeveloped 0.8ha field fronting the east side Bowring Road, Ramsey, opposite the grounds of the Grove Museum. It is bounded in the north by Rheast Mooar Lane and to the east by the rear boundaries of properties in Rheast Mooar Close. The site has an estimated potential yield of 19 dwellings, including eight in the Plan period.
436. Site RR012 is also undeveloped, extends to 0.39ha and is situated on the west side of Bowring Road south of its junction with Richmond Road and across Bowring Road from Myrtle Hill, a property proposed for Registration. The site is estimated to have a potential yield of 11 dwellings, including five in the Plan period.
437. Objections to the allocation of these sites include disapproval of their proposed disposal from public ownership and protection by Manx National Heritage and the motivation behind it. Be that as it may, it is the planning effects that their development would have and the value of their potential contribution to the housing land supply that are the determining considerations for this Report.
438. The Grove Museum uniquely preserves a Victorian residence and justifies a high level of protection in itself and with regard to its setting. That setting essentially consists of its own extensive grounds, which have well-defined boundaries with the surrounding roads and more recent residential development.
439. Site RR011 is separated from The Grove by the main A9 Bowring Road as well as by the stone wall and fence bounding The Grove. The house itself and its outbuildings lie well back from the road. In the circumstances, I do not consider that the presently open Site RR011 contributes so significantly to the setting of The Grove that appropriately designed residential development on the land would detract from the heritage value of the Museum. I have not been made aware of any other overriding planning impediments to the allocation of Site RR011 for housing if it would contribute appropriately to the housing land supply.
440. Site RR012 is also separated from the southern boundary of the grounds of The Grove by the width of Richmond Road and intervening domestic uses, whilst it is further than Site RR011 from the house itself. I also consider that it is also well enough removed from Myrtle Hill to avoid compromise to its potential Registered status. Again, I am not

aware of any other objection to the allocation of Site RR012 if it could contribute appropriately to the housing stock.

441. If these relatively modest housing sites were added to the supply, they would widen the choice in size and type of residential development options available in Ramsey, without creating a significant inflation of the overall supply.
442. I accordingly propose that both Sites RR011 and RR012 be designated for residential development in the Plan by **RMCs 71 and 78**.

Waterfall Hotel, beer garden and car park, Shore Road, Glen Maye

443. The property comprising the former Waterfall Hotel at the entrance to Glen Maye consists of two parcels of land with a right of access along Shore Road between them protected by covenant. The northern parcel accommodates the Hotel building itself, whilst the southern parcel, separated by the width of Shore Road, encompasses the former Hotel car park and beer garden.
444. On submitted Proposals Map 18 the Hotel and beer garden are designated for mixed use, whereas the northern Hotel site has now been approved for residential redevelopment. The associated beer garden is thus redundant for hotel use and also lends itself for residential development within the settlement of Glen Maye. The intervening car park is designated as such on Map 18 but is not a public facility and would more logically be designated for mixed use. This position was essentially conceded by CABO at the Inquiry as confirmed by AMC10.
445. Given that public access to the National Glen along Shore Road is assured, I consider that the Hotel and beer garden sites should now be designated for predominantly residential use and the car park for mixed use. These changes would be brought into effect by **RMC86**.

Housing Land Supply Summary

446. Based upon my foregoing findings and RMCs regarding the individual sites, the existing supply is reduced by 6 units to 1,138 due to the reallocation of the Barford site for employment, leaving an outstanding requirement of 402 dwellings to be met during the Plan period. The housing land supply would be summarised as set out in the following table, based upon Table 16 of the Draft Plan.

Housing Land Supply Summary incorporating Recommended Changes				
Existing supply				
A, B, C	Completions, Approvals and Conversions			1,105
D	Available without approval (after deletion of Barford, Peel)			33
Total existing supply				1,138
E - Allocated Sites				
Site Ref	Location	Supply to 2026	Full Capacity	Headroom Post 2026
RR006	Vollan Fields Andreas Road & Bride Road	48	109	61
RR007	Fields 134079 and 131077, Mount Pleasant	17	38	21
RR009	Fields 134278, 134279, 134280, 134281, 134282, 134283, 134284, 134288 & 134289, Lezayre Road	47	108	61
RR011	Land off Bowring Road, Ramsey	8	19	11
RR012	Land off Richmond Rd, Ramsey	5	11	6
LR001	Ballacarbery, Andreas Road, Ramsey	38	87	49
PR002	Fields 311843, 311884, 314538, 314542 & 314543 Ballaterson, Glenfaba Road	37	84	47
PR004 (part)	Field 314539 south of Ballatessan Meadow	0	10	10
GMR008 GMR009 GMR023 GMR003 GMC002	Urban extension east of Peel with addition of GMR003 and GMC002 (+11 capacity)	131	311	180
AR004	Fields 124281, 124282 & 124283 Oatlands Farm, Andreas	17	38	21

AR018	Field 121432 & 125001, Andreas	11	24	13
MR007	Fields 230794 and 234268, Kirk Michael	9	21	12
MR008	Part Field's 234267, 234456, 234555 & 230578	11	26	15
MR011	Slieau Curn Park, Kirk Michael	0	5	5
PTR004(b)	Field Number- 333129, Foxdale	4	10	6
BR010	Field 2244256, Main Road, Ballaugh	7	16	9
LR017	Field south of Jurby Road at Cronk Mayn	2	4	2
LR027	Land to the West of Kella Close	5	11	6
GMR001	Plot of land located between Mac's and Allanson's Nurseries Peel Road St. Johns	6	13	7
GMR006	Dreem Faaie Nursery	13	30	17
GR021	Field 621884, Glen Mona	5	11	6
GR022	Former Glen Mona Hotel and Country Pub car park	1	3	2
Total Allocations		422	989	567
Total supply to 2026		1,560		
OVERALL TOTAL SUPPLY				2,127

447. From this table it is evident that, in practical terms, subject to my RMCs, the allocated sites are likely to provide some 422 dwellings, a comfortable 20 units above the amended requirement of 402 units for the Plan period to 2026. More importantly, their joint total capacity of 989 units is sufficient to provide an additional supply headroom of some 567 units, of which 330 (567-10-47-180) would not be dependent upon the completion of the proposed Peel RSTW.
448. The average yearly requirement of the APNW amounts to a little over 100 new dwellings per year (1540÷15). On that basis, even allowing for an increasing rate of need, this amount of additional supply would be sufficient to cater for the continued housing needs of the North and West for several years beyond 2026. The supply headroom would thus enable the Plan to conform with the Strategic Social Objective of the IMSP16 to provide sufficient housing to meet community needs for the likely practical life of the Plan. Unlike CABO, I do not describe this 36% inflation of supply above the original strategic requirement as modest. But I consider it necessary for the Plan to meet the test of general conformity in the prevailing circumstances.
449. Therefore, text paragraphs 14.7.1-2 and 14.8.2 and both Housing Supply Table 15 and Housing Summary Table 16 of the Plan should be updated in accordance with foregoing tabulated figures and in line with MCs 52-58 and **RMCs 53, 54, 55 and 71**.

Strategic reserve sites

450. On the question of whether a portion of the housing land supply should be placed in reserve, as in the case of the APE, I do not consider this to be necessary for the APNW because the excess of supply is equivalent to the likely need for the extended life of the Plan.

Distribution between North and West Areas

451. There is some concern that that the quantum of proposed new housing for Peel is comparatively great and it is questioned whether the allocations for Ramsey are sufficient. In practice, notwithstanding that the North and West areas have, for practical reasons, been conjoined for the purpose of completing Area Plan coverage of the Island, it is evident that the total numerical distribution of housing completions and draft planned allocations results in an almost equal split between the two main service centres and between the two Areas as a whole [COD17]. This apportionment will not be much altered by the RMCs of this Report.

Affordable Housing

452. Concern over a perceived preponderance of large, relatively high-priced homes in village settlements, including Kirk Michael, raises the question of the proportion of genuinely affordable homes to be required and provided in new residential proposals. In planning terms the question of affordability relates more to the nature of tenure than to housing market price. Currently, affordable housing contributions are governed Island-wide by Housing Policy 5 of the IMSP16, seeking 25% affordable housing for developments of eight dwellings or more. This is a matter for the ongoing review of strategic policy outside the scope of the APNW.

Eldercare

453. IMSP16 makes no specific provision for eldercare and merely provides that homes suitable for elderly people, including sheltered housing and care homes, can be provided in conjunction with any residential proposal. This is a matter for the current strategic review. The delivery and management of residential and nursing care is a function of the Department of Health and Social Care and is outside the remit of area planning policy.

Other changes not covered elsewhere

454. Where Proposed MCs or suggested AMCs are uncontroversial and not covered elsewhere in this Report they are noted in the appended schedule of RMCs for completeness.
455. Other uncontroversial changes to the Proposals Maps involving the redesignation of certain sites in the modified 2024 version of the Plan, such as in response to granted planning approvals, are also not specifically referenced in the Report.
456. The RMCs set out in Appendix A are likely to lead to further consequential amendments for internal consistency or to include development briefs where deemed necessary for added site allocations.

Overall Conclusions

457. In my judgement, for the reasons explained above, the Draft APNW, as originally subject to public consultation in 2022, does not achieve the requisite general conformity with current Isle of Man strategic planning policy.
458. However, I conclude overall that, in order for the Draft APNW to be in general conformity with current national strategic policy contained in the Isle of Man Strategic Plan 2016, as required by Manx law, the Plan should be modified in the manner set out in detail in the foregoing sections of this Report.

Overall Recommendation

459. I accordingly recommend that, before being taken forward for formal adoption, the Draft Isle of Man Area Plan for the North and West be modified by the **Recommended Major Changes** set out **Appendix A** to this Report.

B J Sims

Independent Inspector

11 October 2024

APPENDIX A

SCHEDULE OF RECOMMENDED MAJOR CHANGES

Note: The implementation of the changes set out below may lead to consequential amendments necessary for the internal consistency of the Plan.

RMC Number	Plan Ref	Recommended Major Change	Source MC/AMC Document
	Chapter 4	National Strategies	
1	After section 4.5	Add a new section: 4.6 The Island as a UNESCO Biosphere 4.6.1 The Isle of Man was designated a UNESCO Biosphere in 2016 in recognition of its special environment, culture, heritage, economy, and its popular desire to cherish and nurture them, with commitment to seek re-accreditation in 2026. The Island is the only entire nation Biosphere. This has particular relevance to Chapter 7 The Natural Environment.	n/a
	Chapter 5	Spatial Vision	
2	Paragraph 5.3.4 Item 10	Reword as follows: 10. How to secure drainage improvements as part of planned development through SuDS and identify a preferred site for regional sewage treatment, and ...	COD27
	Chapter 6	Landscape	
3	Landscape Proposal 3	Amend to make reference to Northern Uplands	COD12
4	Landscape Proposal 7	Amend to make reference to Northern Uplands	COD12
	Chapter 7	The Natural Environment	
5	Plan Objective 4 and Outcome 4a	Reword as follows: Plan Objective 4: To support the integration of greener drainage initiatives, such as Sustainable Drainage Systems (SuDS), into development schemes, as part of the wider approach to manage flood risk in the longer-term adaptation to climate change Plan Outcome 4a: There will be an increase in the number of new developments incorporating SuDS (green drains) in the North and West adopted by an appropriate statutory undertaking.	COD27
6	Paragraph 7.13.1	Amend to:	COD32

		There are <u>25</u> designated 'Wildlife Sites' (see Appendix 1, Table A.1.3). Wildlife Sites are designated by the Manx Wildlife Trust	
7	Natural Environment Proposal 8	Amend to read: Flood alleviation measures will be supported in principle for the Ramsey harbour area and the Peel harbour area. The schemes must demonstrate the known flood risk <u>and assess nature conservation (including designated sites), biosecurity (invasive non-native species), heritage and landscape visual impacts.</u> There must be clear demonstration that the final design and finishes have been prepared with the findings in mind with clear mitigation proposals where necessary to minimise those impacts.	AMC11 COD32
8	Natural Environment	Add an additional Proposal to Natural Environment Chapter 7 expressly requiring Biodiversity Net Gain in accordance with current Government policy and legislation.	n/a
	Chapter 8	Built Environment	
9	Built Environment Proposal 1: Urban Regeneration	Additional point 7 at the end of the Proposal to read: In addition, in line with the Policies in the Strategic Plan, Cabinet Office supports the development of brownfield, or otherwise unused or under used sites within settlement boundaries. The Department does acknowledge that, in the absence of a register of contaminated land, there can be a need for comprehensive site investigation works as part of brownfield development. Early investigation of these potential issues can help identify technical restrictions to site redevelopment and any costs associated with remediation and waste management.	MC23
10	Built Environment Proposal 2 - CTA Proposal for West Quay and Sulby River, Ramsey	In point i: Delete "showing levels at the appropriate local datum".	MC24
11	Built Environment Proposal 2 - CTA Proposal for West Quay and Sulby River, Ramsey	Delete point iv, relating to a new over river link	MC25
12	Paragraph 8.16 and Built Environment Proposal 3	Delete section 8.16 including Built Environment Proposal 3 in their entirety	MC26 AMC12 COD26
	Chapter 10	Transport and Utilities	
13	Section 10.3 Plan Objective 6	Reword Objective 6 as follows:	COD27

	and Outcome 6b	Plan Objective 6: To take into account published flood maps when allocating sites for development and in the drafting of site-specific development briefs. and Delete Outcome 6b	
14	Paragraph 10.5.2	Add fourth bullet point to read: As more information becomes available the above findings will need to be re-evaluated as to the scale and proportion of improvements to junctions and corridors.	MC27
15	Section 10.7 Paragraph 10.7.1	Replacement section: 10.7 Airfields 10.7.1 Within the North and West there are two major former airfields, one situated at Andreas and one at Jurby. The strategic importance of the Jurby Airfield as a potential contingency to Ronaldsway Airport is recognised by the Department of Infrastructure (Airport Division), however this has yet to be formally assessed. It is the intention that this will form part of the Masterplan for Ronaldsway and a commitment has been made by the Department that ahead of any inclusion within the Masterplan full engagement will take place through the Airport Division. It is also the intention that the Masterplan will include any current safeguarded areas around the Island's airports, airfields and air traffic control sites in accordance with Strategic Plan Transport Policy 10.	AMC15
16	Transport and Utilities Proposal 3	Reword as follows: Applications that seek to re-establish or improve the route of the former railway line (Ramsey to Peel, St Johns and Foxdale) for inclusive public access and use by all, whether for active travel or leisure purposes will be supported provided that such proposals comply with other proposals in this Plan. Surface treatment must be appropriate for all users.	COD25
17	Transport and Utilities Proposal 5	Delete the Proposed	AMC16
18	New paragraph 10.10.3	Insert: 10.10.3 There is an increased recognition that Sustainable Drainage Systems (SuDS) can bring enhancements to management of surface water drainage when land is developed. The benefits of SuDS include being able to: a. Protect and enhance natural water systems while controlling and minimising effect on neighbouring properties; b. Integrate stormwater treatment into the landscape; c. Protect the quality of water;	AMC17

		<p>d. Reduce run-off and peak flows; and e. Minimise drainage and infrastructure costs.</p>	
19	Transport and Utilities Proposal 7	<p>Reword as follows: In order to respond to the increasing risk of flooding in terms of stormwater and overland flow on new developments, neighbouring properties and surrounding catchments, applications shall, where the nature, location or the scale of development warrants, demonstrate that consideration has been given to the use of Sustainable Drainage Systems (SuDS) in the development design and included where appropriate.</p>	AMC14
20	Section 10.12 Supporting the decarbonisation of the energy network	<p>Replace paragraphs 10.12.2 to 10.1.6 with the following:</p> <p>10.12.2 The Climate Action Plan 2022 to 2027 was approved by Tynwald in October 2022. The Action Plan is committed to developing a Low Carbon Energy Strategy - to supply 100% of our electricity from carbon neutral sources by 2030 – set out in Deliverable Action 1.1. It also sets out an action to develop and implement a Low Carbon Heating Strategy which will deliver a 15% sector reduction by 2027 – set out in Deliverable Action 2.1.</p> <p>10.12.3 Principle 2 of the DEFA Energy Strategy 2023 sets out a benchmark to optimise the level of on Island renewables and carbon neutral energy generation. The aim is to seek a level of home-grown energy production that maximises the benefits of energy independence, balances costs and economic benefits, and maintains existing levels of resilience.</p> <p>10.12.4 Much research and analysis will be required to arrive at the optimal technological vision that will underpin future plans for power system development – essentially mapping out a clear route to net zero. It is likely that a change in energy mix with a greater focus on solar, wind, biomass or an ‘interconnector’ to a neighbouring jurisdiction or any combination of the aforementioned will be influential in reaching this goal. Importantly for the grid, there is a need to balance renewables such as solar and wind because they are not available all of the time. It is also important that there is network resilience and security.</p> <p>10.12.5 The resulting land requirements for any future proposals should achieve a balance</p>	AMC13 COD24

		<p>between competing economic, social and environmental objectives. Depending on what is being proposed, there will be different issues and challenges to balance.</p> <p>10.12.6 Not all of the strategic policy changes required to deliver wide-scale green energy solutions can be achieved through the North and West Plan. Such strategic policy change will be delivered via the Isle of Man Strategic Plan Review - having regard to wider Island wide government strategies identified above.</p> <p>10.12.7 Given the clear government commitment to transition to green energy and heating solutions, the following Proposal has been prepared.</p>	
21	Section 10.15.3 New Minerals Proposal 4	<p>Add after Minerals Proposal 3: Minerals Proposal 4 Any applications to extend or develop existing mineral extraction sites must demonstrate that consideration has been given to how the entire site can be remediated to allow the restoration of entire sites at the end of their operational lifespans. Remediation schemes must show how the nature conservation/ecology interest of the site can be preserved and/ or enhanced over time.</p>	MC30
22	Paragraph 10.16.3 and	<p>Amend paragraph 10.16.3 to read: In Peel, there is a recognised issue with silt that builds up in the Peel Marina. This is currently being dealt with via an existing planning approval whereby the silt is set out in a lagoon (for onward disposal) on the area of industrial land on the level area between Mill Road and Glenfaba Road.</p>	AMC 19 COD28
23	Waste Proposal 1	Delete Waste Proposal 1 in its entirety	AMC 18
24	Waste Proposal 2	<p>Amend Waste Proposal 2 to read: This Plan supports the retention of Rockmount as a waste facility (which allows for non-hazardous silt deposits) and that this plan supports the permit use of the site for storage and monitoring of dredged material from Peel Marina.</p>	MC31
25	New Waste Proposal 3	<p>Reword New Waste Proposal 3 as follows: This Plan supports the retention of Wrights Pit North as a waste facility (for Construction waste and other hazardous materials) and notes the extension of planning approval for operations and restoration plans to 31st December 2030.</p>	MC32
	Chapter 11	Employment	
26	Paragraph 11.1.7	Delete sentences 2 and 3 and renumber 11.1.8	MC33

27	Paragraph 11.2.3	Reword to read: Since the approval of the Area Plan for the East by Tynwald in 2020 there has been no update to the ELR. For this Plan, Cabinet Office has commenced an internal review of the findings of the Employment Land Review and has worked closely with the Department for Enterprise to compliment workstreams already underway in the Department. Additionally, up to date employment statistics from Statistics Isle of Man, stemming from the 2021 census have been provided to complement existing data. Cabinet Office has also undertaken an assessment of sites suggested for development including the likely best sites for employment uses in the short to medium term. Site specific Proposals take account of the Island Spatial Strategy, market-based evidence on the supply of, and demand for different types of employment land, as well as the availability of existing employment sites; their opportunities and their constraints.	MC34
28	Employment Objective 3	Add: as well as additional land to existing employment uses adjacent to the Clocktower Industrial Estate in Foxdale.	MC35
29	Paragraph 11.4.3	Reword to read: To account for 'choice or churn', an over-allocation of 50% was applied which increased the 'need' figure to 2.79 hectares. The ELR calculates employment land need in the North and West from 2014 to 2026 and therefore, any employment land development undertaken since 2014 'counts' towards supply. Since 2014, a total of 1.22 hectares in Jurby has been developed, and on this basis the outstanding need or residual 'target' based on the ELR is 1.57 ha to 2026.	MC36
30	Paragraph 11.4.4	Delete the paragraph	MC37
31	Paragraph 11.4.5	Delete the paragraph	MC38
32	Section 11.5 Emerging Data	Add new section 11.5 as follows: 11.5.1 The findings of the Employment Land Review do not properly align with the Island Spatial Strategy, or the status of Jurby and Ramsey as major employment and regeneration areas. Additionally, Cabinet Office have identified limitations in the ELR's data collection which resulted in an underestimation of growth in some sectors whilst overestimating growth in others. 11.5.2 In formulating an approach to employment land proposals for the North and West, Cabinet Office has undertaken a focused internal review of the findings of the ELR, and has used the latest quarterly employment statistics to determine an appropriate figure as follows:	MC39

		<p>i. The Employment Land Review calculates the demand for employment land (manufacturing, distribution & warehousing and out of town office) from 2014 – 2026 and produces a combined figure for the North and West of 1.86 hectares. However, the ELR distribution is not properly aligned with the Island Spatial Strategy (N&W 30%) and the major employment and regeneration areas of Jurby and Ramsey, the commercial port of Peel or other opportunities available in the North and West. Rather, the ELR uses the responses data received via a survey to draw conclusions.</p> <p>ii. A significant under estimate of employees within the Manufacturing sector was made as measured on average of the last four quarters (Table 6: Private Sector –Office Based Employment).</p> <p>iii. This figure does not allow for choice or churn and therefore an element of over-allocation is required, 35% is proposed, and additional uplift proportional to the North and Wests combined regional distribution percentage is also proposed to address the aforementioned shortfall in the employment estimates, giving a figure of 12.11 hectares.</p> <p>iv. Sites have been identified as being developed since 2014, giving a total of 1.22 hectares and a residual target of 10.89 hectares.</p> <p>11.5.3 This approach has been adopted with the acknowledgement that the lifetime of the Area Plan for the North and West will, in all likelihood, last beyond the end of the Plan period. In doing this, Cabinet Office have aimed to provide adequate employment land opportunities in the medium term as a buffer to accommodate need as this Plan transitions to the All-Island Area Plan after 2026. The approach supports the aims of Our Island Plan which aims to create and fill 5,000 new jobs across new, enabling and key sectors by 2032. In addition to this, Cabinet Office acknowledges that the North and West may provide suitable locations for the future development of emerging industries which, may include but are not limited, to medicinal cannabis.</p>	
33	Section 11.6 Table 10	Amend Table 10 to include Sites PR001 and PR008/010 as set out in COD13.	COD13
34	Section 11.8 New Employment Proposal 3	Insert new Employment Proposal as follows: Employment Proposal 3 The development of site PTE001 will be supported for the following uses: light industrial,	MC40

		general industrial, storage and distribution uses; office accommodation (subject to compliance with Strategic Plan Business Policy 7); or retail outlets (subject to compliance with Strategic Plan Business Policy 5)".	
35	Section 11.8 New Employment Proposal 5	Insert new Employment Proposal as follows: Employment Proposal 5 The development of Site PR001 will be supported for the following uses: light industrial, research and development [<i>add any appropriate additional wording and development brief points</i>]	AMC5 COD13
36	Section 11.8 New Employment Proposal 6	Insert new Employment Proposal as follows: Employment Proposal 6 Site The development of Site PR008/010 will be supported for the following uses: light industrial, research and development [<i>add any appropriate additional wording and development brief points</i>]	AMC6 COD13
37	Section 11.9 Employment Proposal 4	Renumber and reword to read: Employment Proposal 7 Site AE001 - Andreas Airfield supports light, general or special industrial, research and development, storage or distribution, HGV parking and other compatible 'sui generis' uses (i.e. not falling within a defined use class) that would otherwise be unacceptable in or adjacent to residential areas. Any application must provide an annotated location plan to describe nearby uses and buildings to provide a context for any new applications.	MC41
38	Paragraph 11.9.1 [New paragraph 11.10.1]	Renumber 11.10.1 and reword as follows: The Isle of Man Economic Strategy sets out an ambition and a vision for the Island's economy up to 2032 and recognises the importance of emerging sectors and their potential future contribution to the Island's economy. The broad aims of the Economic Strategy were incorporated into an amended 'Our Island Plan' which was approved by Tynwald. Cabinet Office recognises that large, flat floor plates which could be delivered on employment opportunities in the North and West may potentially be well suited to the development of emerging industries, which may include but are not limited to, medicinal cannabis.	MC42
	Chapter 12	Tourism and Leisure	
39	Tourism Proposal 2	Reword as follows: The establishment of new, or alterations to existing, tourist accommodation within the settlement boundaries of towns and villages in the North and West or on previously developed land, will be supported so long as compliant with	MC43

		the other proposals in this plan and the policies of the Strategic Plan.	
40	Tourism Proposal 3	Reword as follows: Applications for new harbour works, harbour facilities and marine leisure facilities such as marinas (at any scale) and other development associated with marine development will be considered on their merits taking into account the Strategic Plan and all other Proposals in this Plan.	MC44 AMC20 COD14
	Chapter 13	Open Space, Recreation, Community Facilities	
41	OSC Plan Outcome 6b	Reword as follows: Care challenges and site availability in Peel are recognised as well as the ongoing wider government work on nursing, residential and home care reform	AMC24 COD18
42	Open Space and Community Proposal 1	Delete the Proposal	MC45 AMC21 COD16
43	Open Space and Community Proposal 2	Reword as follows: Site PO007 on the northern end of Peel Promenade is recognised as important existing and potential tourism, recreation and leisure space and will be retained for such uses. Opportunities to enhance these facilities or introduce new compatible uses that would complement the primary use of the site for tourism, recreation and leisure space will be considered on their merits, taking into account overall scale, design and layout, traffic generation and other planning considerations	AMC22 COD15
44	Open Space and Community Proposal 4	Reword as follows: The site occupied by the Corrin Memorial Care Home (now closed) is still recognised as having potential to deliver nursing or residential care home facilities, if required. Types of care falling into Use Class 3.2 – hospitals, nursing homes and residential institutions -set out in the Town and Country Planning (Use Classes) Order 2019 (or its replacement) would be appropriate on this site given its former use. Where applications propose to develop the site for residential development i.e. Class 3.3 'Dwellinghouses' set out in the Use Classes Order 2019 (or its replacement) or other uses, regard will be had to the progress and outcomes of the nursing, residential and home care reform project (relating to future land needs) which is underway as part of the Health and Care Transformation programme.	AMC23 COD18
45	Open Space and community Recommendation 1	Rename as OSC Proposal 5 and Reword as follows: Cabinet Office will seek discussions with the Department of Health and Social Care in terms of its emerging long-term strategic policies in	n/a

		respect of future health and well-being 'campus' or 'hubs' and specifically the future opportunities to expand current facilities in Peel following on from the closure of the Corrin Memorial Care Home.	
46	Open Space and Community Proposal 5	Rename as OSC Proposal 6 and Add new Point 7 to the development brief as follows: A new public footpath that connects to Public Right of Way 632 via the Sulby River and Mountain View Innovation Centre would be beneficial. The Applicant must demonstrate the extent to which this can be achieved as part of any development proposals.	MC46
47	Open space and Community Recommendation 2	Rename as OSC Proposal 7 and Reword as follows: Pursuant to reaching the goals identified in Our Island Plan, and in addition to the requirements set out in the Strategic Plan in terms of the level of formal and informal space needed, the Department will endeavour to develop partnerships with the public and private sectors which seek to provide the right mix of sports, recreation, amenity, informal play and children's play space in the North and West. Local authorities, Isle of Play, community groups may already be invested in improving play space and the Cabinet Office supports development which may include community planting schemes. The Department will seek to ensure local communities have the right opportunities for all aspects of open space and that where appropriate the right guidance is available especially in respect of children's play park provision. This is important community infrastructure and could be linked with any Active Travel Plan and any future measures or strategies to better connect green infrastructure and open 121 space in the North and West to provide a network of accessible and practical 'greened' space that the community is invested in.	
48	Open Space and Community Recommendation 3	Rename as Open Space and Community Proposal 8 and insert: To address the short fall in community facilities in Glen Mona and to seek to make the village a more sustainable and safer place, the following development brief for Glebe field forms part of this Proposal.	MC47
49	New Development Brief GO003 - Glebe Field, Glen Mona	Insert after new OSCP 6 - Development Brief for Site GO003, Glebe Field, Glen Mona as set out in PIP2 p121	MC48 PIP2

	Chapter 14	Housing	
50	Section 14.2	<p>Reword as follows:</p> <p>14.2.1 The Strategic Plan states that there is an expected drop in household size of 0.04 every 10 years, as was the case at the 2011 Census as a 10-year rolling average. Shortly after the approval of the Strategic Plan, the 2016 Census results were published showing an increasing decline in average household size, as did the most recent 2021 Census. The decline in average household size between 2011 and 2021 is 0.01 per annum or 2.5 times more than the current policy assumption. Cabinet Office has recently published population projections containing several scenarios for future growth and the net inward migration required to achieve these outcomes. These figures are not predictions but indicative of the scenarios required to achieve a given outcome and are to be further investigated as part of the Strategic Plan Review. Cabinet Office notes that the Strategic Plan housing need figures were based on population estimates for 2026 that are higher than current projections for 2026 following the 2021 Census.</p> <p>14.2.2 While the plan period of this Plan is to 2026, and there is the requirement to be in general conformity with the Strategic Plan, it is only prudent to take into account the time remaining in the plan period, emerging data projections, the deliverability of housing units in the next two years and the transitional arrangements from one plan to another.</p> <p>14.2.3 Proposed housing allocations in this plan therefore go beyond the housing numbers specified in the Strategic Plan to take into account the changes in average household size that were at the time acknowledged as susceptible to influence from a wide range of macroeconomic factors and is in the spirit of the plan with the intention of having a regular reviews to plan, monitor and manage.</p>	MC49
51	New Paragraph 14.3.6	<p>14.3.6 Cabinet Office acknowledge that this plan comes towards the end of the plan period and is likely to last beyond 2026 until the updated Strategic Plan and All-Island Area Plan are approved and brought in to operation. It is very unlikely that all of the sites identified in this Plan and all of the associated infrastructure referred to will be</p>	MC50

		fully built out by 2026. To ensure adequate delivery of housing in the plan period, Cabinet Office proposes to pro rata the expected yield of proposals sites for the remaining time to deliver Housing Policy 1 of the Strategic Plan 2016.	
52	Section 14.4 Housing Objective 1 and Housing Outcome 1a	Reword as follows: Plan Objective 1: In the first instance to meet the housing need figures set out in the Isle of Man Strategic Plan 2016 and demonstrate an adequate supply taking into account the remainder of the plan period and further to provide additional housing opportunities to meet need in the transition period beyond 2026. Plan Outcome 1a: There are sufficient housing opportunities on a mix of sites for a variety of housing types (including opportunities for affordable housing) to be delivered over the plan period. There is also sufficient and considered expansion space to support sustainable planning in the longer term as this Plan transitions into the next.	n/a
53	Table 15	Update consistent with Table 16 (<i>below</i>)	MC51
54	Paragraph 14.7.1	Reword as follows: The calculations undertaken suggest a number of sites need to be allocated. The plan approach is to identify several Sustainable Urban Extensions in the Service Centres of Ramsey and Peel, smaller sites in the Service Villages of Andreas, St Johns, Kirk Michael and Foxdale and several modest sites in the Villages of Ballaugh, Sulby and Glen Mona. It is judged that these are sustainable sites which are deliverable within the plan period. In the case of the sites on the edge of Peel and Ramsey, proposals would benefit from the significant employment and leisure opportunities afforded by these larger settlements. In the case of the other proposal sites, all are on edge of existing settlements and in communities which have retained village pubs, schools, open spaces and paths for active travel/leisure purposes. Development on these sites has the potential to deliver high quality, sensitively designed developments which can be accessed by public transport and these sites would be proportionate to the character and scale of the settlements.	MC52
55	Paragraph 14.7.2	Update consistent with Table 16 (<i>below</i>)	MC53
56	Paragraph 14.8.2 v	Reword as follows: Development sites identified in the Service Villages of Andreas, St Johns, Foxdale and Kirk Michael and Villages of Ballaugh, Sulby and Glen Mona which is in scale with the character of these Villages which already have good services and infrastructure and community facilities.	MC56
57	Paragraph	Reword as follows:	COD27

	14.8.2 vi	Allocation of sites is to be informed by published flood risk maps. Within sites appropriate to allocate, adjustments may be made to layouts and expected yields to mitigate any flood risks.	
58	Residential Proposal 2	Reword as follows: Any further residential development applications on land in Peel or its sustainable urban extensions, whether or not such land is specifically named or numbered in this Plan, will need to provide clear information about how the proposed development will be drained and wastewater dealt with. All applications will be judged taking into account the level of additional discharge into the public sewerage system and any added harm on biodiversity, ecosystem health and human health. Any applications which would add to the current level of discharge into Peel Bay will also take account of Strategic Policy 4 (c), Environment Policy 22 in the Strategic Plan.	AMC25 COD20
59	Development Briefs	In development briefs PR002 and GMR008, GMR009, GMR023, GMR003 and GMC002 reword the sewage treatment criterion as follows: No development shall take place until the Regional Sewage Treatment Works planned to serve Peel and the West is at its initial operational capacity. If there is certainty about when the new works will reach this stage be operational, it may be possible for a planning condition to be used to restrict properties being occupied until the necessary regional infrastructure is in operation available. This is to ensure that there is no significant additional discharge of untreated sewage/wastewater into Peel Bay. In all cases, the effective management of sewage and wastewater is a priority and applications must set out a design proposal and timeline for connection to the main sewerage network to enable delivery of sewage from this site for treatment at the RSTW.	AMC4 COD20
60	Development Briefs	Delete reference to development density in all development briefs	AMC26 COD26
61	Development Briefs	Add to all references 'no net loss of biodiversity' the following: "..... And biodiversity net gain shall be sought according to current strategic policy or legislation."	n/a
62	Development Briefs	Add to all site development briefs for greenfield land allocations where development could involve the loss of agricultural land of Classes 1 or 2 a criterion as follows: Where development might result in the loss of agricultural land of Classes 1 or 2 the application must be accompanied by a soil quality survey of the site.	n/a

63	Paragraph 14.10.2 Development Brief GMR008 GMR009 GMR023 GMR003 GMC002	Amend Site Number and Site Size to accord with the inclusion of sites GMR003 and GMC002 in the allocation and the rationalisation of the boundary of GMR009 with Sunset Lakes by RMC79. and amend the development criteria with respect to development density, biodiversity, soil survey and sewage treatment in accordance with RMCs 59-62.	COD10
64	Paragraph 14.10.3 Development Brief RR009	Add to the development brief additional criterion as follows: A Flood Risk Assessment is required for this site and. A Sustainable Drainage System (SuDS) must be considered as part of any application. and Delete criterion 7 on development density and Reword criterion 8 on biodiversity In accordance with RMCs 60-61	n/a
65	Paragraph 14.10.4 Development Brief RR006 RR007	Insert the joint allocation and Reword development brief criteria 1-6 as follows: 1. The sites shall be used for predominantly residential uses. 2. Given that the sites are in separate ownership, they may be developed at different times. 3. Any planning application to develop one or both of the sites must include suitable supporting environmental information to allow full and proper assessment of the impact of the proposals. As a minimum, a preliminary ecological assessment will be required. 4. A full Transport Assessment is required for any planning application covering either or both sites providing justification for the access solution proposed and all traffic impacts including consideration of potential impacts at Parliament Square, Ramsey. Site RR006 should provide for access off Andreas Road A9. 5. Development must not adversely affect Registered Tree Area RA1594. 6. A structural landscaping plan must be included with any application which should, wherever practicable, aim to retain existing hedgerows as part of the design approach. and Delete criterion 7 on development density and Reword criterion 8 on biodiversity In accordance with RMCs 60-61	MC5 AMC29 MC57

66	Paragraphs 14.10.7-8 Development Briefs MR007 MR008	Insert both allocations and Add a criterion to both development briefs as follows: Any proposal must demonstrate that careful consideration has been given to avoiding significant adverse impact on traffic congestion in Kirk Michael, the Kirk Michael Conservation Area or its setting and mountain views to the east.	MC13 MC14 MC57
67	Paragraph 14.10.10 Development Brief LR007	Delete the allocation of Site LR007 (unless foul water drainage issues resolved pre-adoption)	MC6 COD22
68	Paragraph 14.10.11 Development Brief LR040	Delete the allocation of Site LR040 (unless foul water drainage issues resolved pre-adoption)	MC18 MC57 COD22
69	Paragraph 14.10.12 Development Brief GMR001 and GMR006	Amend Site number and Description to accord with the addition of site GMR006 and Reword development brief criteria 1-6 as follows: 1. The sites shall be used for predominantly residential uses. 2. Given the sites are in separate ownership, they may be developed at different times, but the development of one should not prejudice the development of the other 3. Any planning application should be supported by an indicative Masterplan for the combined sites which may be broken down into Phases and must address the following matters: i. individual development phases which may be broken down into GMR001 and GMR006, ii. areas of public open space, iii. options for highway access and internal road network, iv. sustainable transport options which recognise the need to encourage active travel; v. landscaping and structural landscaping buffers. vi. Sustainable drainage systems. 4. Given the characteristics of the site to the south of the Village and that it has more than one potential access point onto the Main Road, a full Transport Assessment is required for any planning application covering one or both sites providing	MC15 MC57 AMC28

		<p>justification for the access solution proposed.</p> <p>5. Any planning application to develop one or both of the sites must include suitable supporting environmental information to allow full and proper assessment of the impact of the proposal. As a minimum, a preliminary ecological appraisal and any necessary protected species surveys will be required given the proximity to an Area of Ecological Interest to the south east.</p> <p>6. Design should not inhibit any long-term potential active travel connections in a southerly direction to the school and the heritage trail.</p> <p>and Delete criterion 6 on development density and Reword criterion 7 on biodiversity In accordance with RMCs 60-61.</p>	
70	Development Brief PTR004b	Insert Site PTR004b with a development brief including reference to an AEI designation affecting the site, local development character and any other known constraints.	MC17 MC57
71	Table 16 Housing Supply Summary	Amend as set out in the table under Housing Land Supply in the Report (<i>above</i>)	
	Appendix 1	Designations	
72	Table A.1.3	<p>Amend to read:</p> <p>4799/001 Andreas Rectory, Andreas 4096/002 Ballachurry, Andreas 3697/001 Ballamoar Castle, Jurby 4600/001 Ballavarkish, Bride 3292/001 Bishop's Court Glen, Michael and Ballaugh 2282/002 Cashtel Moar, Patrick 2283/001 Close Chiarn, Patrick 4001/001 Close Sayle, Andreas 3286/001 Eary Farm, Michael 4096/001 Glen Duff Quarry, Lezayre 3180/001 King's Forest, Marown 4292/001 Kirk Christ, Lezayre 2887/001 Lady Port, German 3894/001 Lezayre Community Hall, Lezayre 4096/001 The Dollough, Lezayre 2482/001 The Raggatt, Patrick 2280/001 Traie Cronkan, Patrick 4788/001 Traie ny Halsall, Maughold 2886/001 Wood's Strand, German 4001/002 Lough Gat-y-Whing, Andreas</p>	COD32

		4990/001 Maughold Head, Maughold 2282/001 Gob ny Garvain, Maughold 2072/001 Contrary Head, Patrick 3893/001 Sulby Waterworks and Mill Cottage, Lezayre 2582/001 Mullen Beg and Ballamoar, Patrick	
	Appendix 2	Landscape Character Summary Tables	
73	Landscape Character Area F5	Amend to make reference to “Northern Uplands”	COD12
	Maps	<i>Note In addition to the following RMCs to the Maps, further changes put forward by MCs 1,2,3,7,9-12 and 16 are uncontroversial and should also be implemented</i>	
74	Environmental Constraints Maps 1aN and 1aW	Add designated and proposed draft Conservation Areas and sites of potential high environmental pollution risk arising from natural erosion processes such as landfill	AMC1
75	Environmental Constraints Maps 1aN and 1aW	Add Marine Nature Reserves up to the Mean Low Water mark showing the foreshore in the West as an Area of Ecological Interest and the expansion of the Ramsey Hairpin Woodland Park	AMC2
76	Map 1bN	Remove the Jurby Airfield Safeguarding Area	AMC3
77	Map 4 Ramsey	Amend size and location of public open space within the allocated site according to appeal report 20/01080/B	MC4
78	Map 4 Ramsey RR011 RR012 LR001	Designate Sites RR011, Bowring Road and RR012, Richmond Road, and LR001, Ballacarbery for residential development .	n/a
79	Map 6 Peel	Change GMR003 and GMC002 from Civic, Cultural or other use to Residential. Change fields 314533 and 314528 (part of GMR023 adjacent to Tommy Clucas Avenue) from Residential to Civic, Cultural or other use. Change indicative route of district link road through GMR003 and change of fields 311906, 314532 and 314531 from Agricultural and District Link Road to white land (amendment of Settlement Boundary) all as shown on the plan attached to COD10. and Rationalise the eastern boundary of Site GMR009 to follow the boundary of Sunset Lakes	COD10
80	Map 6 Peel	Specify the civic, cultural or other use proposed for Site PR003/PO005.west of Ballquaine Road,	n/a

81	Map 6 Peel	Amend the designation of Site PO007, Marine Drive to Tourism, Leisure and Recreation and Amend designation of Derby Road/Ballaquaine Road campsite and undeveloped land from Civic and Cultural to Open Space as shown on map attached to COD15	AMC7 AMC9 COD15 PS105addm
82	Map 6 Peel	Change the designation of sites PR001 and PR008/010 from residential to employment	AMCs5-6
83	Map 6 Peel	Change the designation of the Golf Club practice area Field 314539 to Predominantly residential and Designate Field 311889 as Open Space for the purpose of golf	n/a
84	Map 6 Peel ad Map 7 Peel Town Centre	Amend designation of former Corrin Memorial Care Home to Predominantly Residential as shown on map attached to COD18	AMC8 COD18
85	Map 10 Kirk Michael	Extend predominantly residential designation to include field 230794 within Site MR007 and designate Site MR011 as predominantly residential	n/a
86	Map 18 Glen Maye	Change the designation of the Waterfall Hotel and adjacent beer garden from Mixed Use to Predominantly Residential and Change the designation of the former Waterfall Hotel car park from Car Park to Mixed Use.	AMC10

- *end of schedule* -

APPENDIX B

LIST OF APPEARANCES

For the Cabinet Office

Ms D Brown	Cabinet Office
Mr K Murray	Innova Law
Mr E Grubb	Cabinet Office
Mr C Long	Cabinet Office
Ms F Huyton	Cabinet Office
Mr J Durney	Cabinet Office
Mr A Dobbins	Manx Utilities Authority
Ms L Riley	Manx Utilities Authority
Mr T Woakes	Manx Utilities Authority
Mr M Cowin	Department of Infrastructure
Mr R Webster	Department of Infrastructure
Dr R Selman	Department of Environment, Food and Agriculture
Ms S Costain	Department of Environment, Food and Agriculture
Ms D Heather	Department for Enterprise
Mr S Moore	Department for Enterprise
Mr T Cowsill	Department for Enterprise

For Arthur Radcliffe

Mr R Jelski	Dickinson Cruickshank Ramsey
Mr K Dalrymple	

For the Ashby Family

Mr B Quayle	Black Grace Cowley
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For Ballamanaugh Properties

Ms E Bellhouse	
Mr C Smith	Lichfields
Mr J Gartland	Lichfields

For the constituency of Ayre and Michael

Mr A Cannan MHK	
Mr T Johnstone MHK	

For the constituency of Garff

Ms D Caine MHK

For the constituency of Glenfaba and Peel

Ms K Lord-Brennan MHK

For the constituency of Ramsey

Dr A Allinson MHK

Mr L Hooper MHK

For Dandara Ltd

Mr D Humphrey

For Ellan Vannin Maritime Centre

Ms M Maska

Mr R Bromley-Martin

Mr K Szymanski Ramsey Shipping Services Ltd

For Garff Commissioners

Ms M Fargher

For Green Party IOM

Ms L Craine

For Hartford Homes

Mr D Green Delta Planning

Ms M Sheridan Delta Planning

For Isle of Play

Ms M Bridson

Mr C Gregory

For Island Aggregates

Mr S Smyth

For Lezayre Parish Commissioners

Mr J Teare

For Manx National Heritage

Ms E Spencer

Ms Sarah Corlett

Sarah Corlett Town Planning Consultancy LTD

Mr S Murray

For Manx Wildlife Trust

Mr G Makepeace-Warne

Mr D Bellamy

For Maple Homes

Mr K Dalrymple

Mr J Messham

Mr M Messham

For Michael District Commissioners

Ms C Lillywhite

Ms A Muller

Ms C Livingstone

For Mr and Mrs Wright

Mr K Dalrymple

For Mrs Julie Watterson and Monomotapa Ltd

Ms Sarah Corlett

Sarah Corlett Town Planning Consultancy LTD

For Peel Golf Club

Mr R Baker

Ms Sarah Corlett

Sarah Corlett Town Planning Consultancy LTD

For Peel Town Commissioners

Mr D Sewell

Ms S Corlett

Sarah Corlett Town Planning Consultancy LTD

For Ramsey Association Football Club

Mr J Leece

For Simon Marshall

Ms Sarah Corlett

Sarah Corlett Town Planning Consultancy LTD

For Western Vikings RFC

Mr N Cowley

Other Interested Persons

Dr A Martin

Captain C Wood

Ms C Hughes

Ms C Dale-Beeton

Mr D Craine

Mr D Doran

Mr D Jones

Ms E Coren

Mr G Witcher

Mr I Gunton

Ms J Holden

Ms K Jenkins

Mr M Muter

Ms P Newton

Mr P Willers

Mr R Harmer

Mr R Furner

Mr R Midghall

Ms S Lambert

Ms S Furner

Mr W Holden

Mr W Tomlinson

- *end of list* -