Response ID BHLF-4B6T-S7QA-V

Submitted to Should Douglas Head be considered for Conservation Area status? Submitted on 2021-09-15 10:37:51

Introduction

1 What is your name?

Name:

Pauline Stewart

2 What is your email address?

Email:

Secretary@manxantiquarians.com

3 Are you responding on behalf of an organisation?

Yes

Organisation:

Isle of Man Natural History & Antiquarian Society

4 May we publish your response?

Yes, you can publish my response in full

Should Douglas Head be considered for Conservation Area status?

5 Do you think Douglas Head should be designated as a Conservation Area?

Yes

6 Where do you think the boundary should be?

Please add your comments:

Generally as proposed except that it should run along the ridge line above the Head and encompass the quarry/ies so that views of any development proposal in relation to the backdrop within the Conservation Area may be properly assessed with regard to landscape back drop.

7 Please list any buildings, structures, particular land uses etc. that you feel contribute to the area and support arguments that the area has special architectural or historic interest.

Please add your comments:

Conservation Areas are generally about the overall character of the area not necessarily about the detail of the individual buildings. In this case the character is mixed into different sections, older buildings and potential redevelopment sites near the quayside, terraces of buildings and then large individual structures separated by large areas of open space. Throughout it is important to maintain the existing balance of breathing spaces / open space in relation to built fabric and not let any changes to the latter, particularly extensions, dormers break up the rhythm as seen from the harbour and port entrance, North Quay Conservation Area and the Douglas swing bridge.

In the Isle of Man Strategic Plan 2016

"Spatial Policy 6: The strategic roles of Ronaldsway Airport and Douglas Harbour as principal gateways to the Island will be protected and enhanced" The view from Douglas Harbour as one enters it is thus key in delivering a favourable impression on first time visitors to the Island and how the Island looks on itself. Notwithstanding the Promenade works, the Promenades are all in a Conservation Area and thus have some kind of protection. Not so Douglas Head which is much closer to the port on entering. It is therefore crucial that it gets protection by way of Conservation Area status so that greater control on the design of development may be had. Crucial elements of this must be that development / redevelopment along South Quay should not be higher than the Head Road behind it; development in the former quarries should not be higher than the quarry face behind them; any redevelopment of the building site partially in front of Manx Radio Station should not obstruct views of the radio station; and maintaining a balance of staggered development and open space along the approaches to and within the locality so that no one building is allowed to dominate at the expense of others. Isle of Man Natural History & Antiquarian Society fully support the proposal to designate a Conservation Area on Douglas and also attach a link to the Buildings at Risk article produced in the Examiner under the auspices of Alliance for Building Conservation which also sought to promote this designation. http://www.abc.org.im/BAR/BAR102%202020-06-30%20Douglas%20Head%20Conservation%20Area.pdf.

An additional structure that should be Registered is the former open air theatre / explosives store on Douglas Head. Along with the Camera Obscura which is Registered this is a key surviving part of the entertainment history of Douglas Head.

Designation of Conservation Areas is not just about the ability to give grants or stop development. If an old property is bought that has slate roof, stone / rendered walls and timber windows and doors, one should only be purchasing in the knowledge that one should be expecting to have to maintain it in traditional materials regardless of any Conservation Area or Registered Building status. If Government imposes additional building requirements / standards on such properties eg roof insulation, double glazing, prohibition of coal fires then any building alterations required as a result fall into a

different category.

Land-uses: There should be no development on existing open space; this includes air space adjacent to upper levels and roofs of buildings.

The use of the former battery site above battery quay for building and waste materials should cease and the overgrowth cleared with the site made into a proper viewing point of the harbour with information on its history as a battery site and the development of the harbour quays and the inclined railway that started close by going up Douglas Head.

The Island's heritage assets need to be seen as economic assets and not just as sideshows. Design of new development must take them into account. Planning has to be seen to be much stronger in terms of control of design of development. Conservation Area status is seen as one way in which this could be achieved.

8 Please explain why you think Douglas Head should not be Conservation Area and where possible please list any buildings, structures or particular land uses etc. that you feel detract from the area and weaken any arguments that the area has special architectural or historic interest.

Please add your comments:

None. See above for potential improvements.

Isle of Man Natural History & Antiquarian Society is however concerned that in this consultation and questionnaire a shortened version of the statutory definition of Conservation Areas is being utilised. The actual version in the Town & Country Planning Act 1999 states

18 Designation of conservation areas [1991/14/12]

(1) The Cabinet Office shall determine which parts of the Island are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance,

By omitting the second part of the definition Government is giving a false impression that Conservation Areas are only about buildings when it is about buildings, open space, and street scene / landscape.

This omission may invite opposition to such a designation.