

Response ID BHLF-4B6T-S7RU-H

Submitted to Should Douglas Head be considered for Conservation Area status?
Submitted on 2021-09-20 10:38:35

Introduction

1 What is your name?

Name:
Andrew Johnston (MNH)

2 What is your email address?

Email:
andrew.johnson@mnh.im

3 Are you responding on behalf of an organisation?

Yes

Organisation:
Manx National Heritage

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:

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:

The Town and Country Planning Act 1999 makes provision under the terms of Section 18 for the designation of conservation areas. The following are particularly relevant:

18. Designation of conservation areas

(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, and shall by order designate such areas as conservation areas.

(4) Where any area is for the time being a conservation area, special attention shall be paid to the desirability of preserving or enhancing its character or appearance in the exercise, with respect to any buildings or other land in the area, of any powers under this Act.

The terms of the Act are explicit in requiring that an area must have existing special architectural or historic interest, and that this character or appearance is worthy of preservation or enhancement.

The proposal document describes in some detail the surviving character of the area, which has seen military, maritime, industrial, residential and tourist activity over an extended period, all of which have left their mark. In so doing, the proposal document demonstrates the historic interest of the area and its potential as a conservation area and also emphasises the protection afforded by Registered Building status to several individual structures.

In some respects, however, the document itself also highlights the loss of character that has already occurred, and prompts pause for further consideration. The whole of Woodhouse Terrace has been lost, as has the fine suite of stone-built industrial buildings which stood to the west. In their place, and at other sites to which access has been enabled by the gradual extension of quayside infrastructure eastwards to Battery Pier, various modern industrial buildings have been constructed (the former Woodhouse Terrace site is now once again facing redevelopment): these do not make a positive

contribution to the character of the proposed area. Immediately adjacent are other industrial and commercial developments on the former gasworks and quarry sites: these uses are established and unlikely to change in the near future, but compromise the setting of the proposed conservation area.

The document is also candid in respect of the alterations, some of which are quite substantial, that have taken place to individual buildings, which have reduced their architectural and historical integrity, but in our view also underplays the effects of modern residential development at Rockside House, Nos 1-9 Rockside Apartments (referred to in the document as 'Cliffside') and Nos 1-10 The Arches. These are two substantial developments that stand either side of Douglas Head Road, which we consider make a potentially negative, or at best neutral, contribution to the area.

Nevertheless, as the proposal document very effectively demonstrates, Douglas Head is enhanced by the presence of several 19th century residential terraces of substantial scale and character, by several large residential properties standing individually in established woodland and garden settings, and by several other prominent landmark structures serving various purposes to which significant historical significance is attached.

A significant aspect of status as a conservation area is the opportunity for its enhancement, as specified within Section 18(4) of the Act. At present this is provided through the application of provisions provided under the terms of other parts of the Act such as enhanced scrutiny in the design of new-build and greater oversight of demolition. It would be a significant benefit were conservation area status for Douglas Head to lead to a more thoughtful approach to planning and design in the area.

However, a notable loss for both the protection and enhancement of individually-protected historic buildings, and conservation areas generally, was the withdrawal in 2011 of grant-aid administered through the Planning and Building Control Directorate. Reinstatement of this scheme would allow publicly-funded contribution towards the repair and enhancement of properties using traditional materials in keeping with the protected status or Registered Buildings and conservation Areas and would be a clear indication of Government support for the retention and regeneration of historic built environment.

In respect of both of the previous paragraphs, we would suggest that of the two outcomes accruing from protected status - preservation and enhancement - it is the latter which is of unusually important significance for Douglas Head.

Douglas Head is also notable in the wider Douglas area as a place of extensive open green space, unusually accessible to the public and by a variety of routes, from which fine views of the capital may be enjoyed. It provides onward access to Marine Drive, or alternatively is the setting for a dramatic visual 'reveal' near the Point Apartments for longer-distance walkers approaching the capital along the coast from the south. The protection of this open space (or even its enhancement), as would be guaranteed were it to be included within the boundary as currently proposed, would be a positive benefit.

Lastly we note that Spatial Policy 6 of the Strategic Plan 2016 calls for the role of Douglas harbour to be protected and enhanced, and while this primarily relates to harbour infrastructure and maintaining its ability to function as a port, there is an argument that presenting one of the Island's gateways in the best possible light creates a positive impression on those using it.

Noting that this proposal has progressed in the absence of any wider initiative to designate new or review existing conservation areas we feel that the Island's built heritage would benefit from a strategic island-wide approach by Government. This should be led by the Cabinet Office as the responsible body for conservation areas, and should draw on its own expertise and knowledge, together with that of the Planning and Building Control Directorate within DEFA, ourselves at Manx National Heritage, special interest groups such as the Victorian Society and the Isle of Man Natural History and Antiquarian Society, and individuals such as the authors of this appraisal of Douglas Head.

Such an approach would provide consistency in the appraisal and designation of new areas, as well as offering the opportunity to reappraise the value of some of the older areas which did not benefit from proper characterisation when they were first designated. Such designations are not universally popular, and any system leading to restrictive practices and policy has to be seen to be fair and balanced.

Having considered the proposal document in detail, we are also conscious that its authors have already waited a considerable time for it to be considered, and that further delay whilst an Island-wide approach is developed would be unfortunate.

In conclusion, we are of the view that the proposal that Douglas Head be designated a conservation area is finely balanced however we believe it has justification in itself and welcome the proposal. Because it has come forward in isolation however, there is a potential danger that its merits cannot be measured objectively.

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: