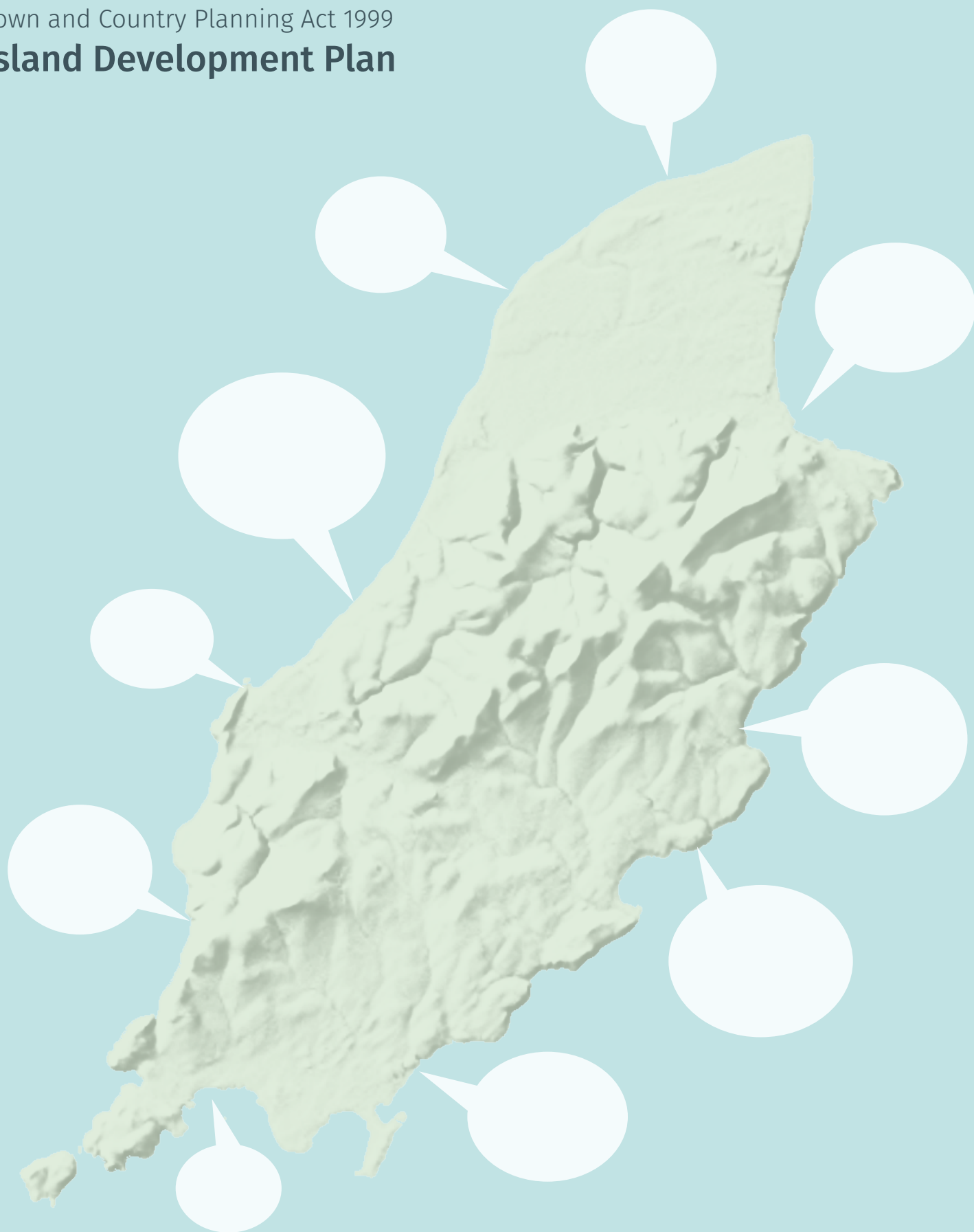


# Island Development Plan



Cabinet Office

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ny Shirveishee*

**Paper 2: Strategic Plan review Preliminary Publicity:**  
**Detailed summary of themes raised during the public consultation**  
Cabinet Office  
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## Executive Summary

This report provides an overview of the responses received to the Isle of Man Strategic Plan Review 'Preliminary Publicity' consultation (4<sup>th</sup> August to the 27<sup>th</sup> October 2025). It summarises the key issues, themes and concerns raised by respondents and identifies matters that will be considered further in the preparation of the draft Strategic Plan. The report deals with matters in the order of the published papers i.e. Paper 1, the Main Explanatory Paper, is discussed first

The preliminary publicity consultation received 150 responses. Respondents included members of the public, businesses, Local Authorities, Government Departments and Boards and a range of built environment professionals. The consultation identified strong interest in the future pattern and distribution of development, housing provision, infrastructure and the Island's economy. In addition to the public consultation, feedback was gathered from stakeholders through a number of interactive public exhibitions held across the Island in September and October 2025. The findings are summarised in sections 1 and 2 below and in a separate summary document titled *Summary of themes raised during interactive exhibitions*.

A range of issues were raised through the statutory consultation. Common themes included housing need and affordability, population growth, infrastructure capacity, regeneration, environmental protection, climate change, economic development and the future pattern and distribution of development across the Island. Many respondents highlighted the importance of ensuring that future development is supported by appropriate infrastructure and services, while balancing growth with the protection of the Island's natural environment, heritage and character.

All of the comments received are being considered as part of the preparation of the draft strategic plan which will be subject to further consultation ahead of a public inquiry.

# **1 Introduction**

## **1.1 Overview**

- 1.1.1 The Cabinet Office is responsible for preparing and reviewing the Isle of Man Strategic Plan, which, together with one or more Area Plans, forms the Island Development Plan.
- 1.1.2 On 4<sup>th</sup> August 2025, Cabinet Office re-launched the review of the strategic plan by way of 'preliminary publicity', (in accordance with Schedule 1 of the Town and Country Planning Act 1999), having originally launched the review in 2023. This marked the first stage in making a new development plan and the papers that were published at that time are available online at [gov.im/strategicplan](http://gov.im/strategicplan)
- 1.1.3 This report provides an overview of the responses received during the preliminary publicity consultation. It sets out the key themes and concerns arising from the consultation process which will inform the preparation of the draft plan. The report is structured to align with Papers 1 – 5 of the 2025 Preliminary Publicity Consultation.
- 1.1.4 The comments received were wide in scope, capturing a multitude of issues – some of which fall outside of the scope of planning policy. Those key themes and concerns that fall within the scope of planning policy are being carefully considered as part of the process to draft a new plan. The subsequent public inquiry will allow for detailed scrutiny of the Cabinet Office's policy proposals for the development and other use of land which are drafted on behalf of all of government.

## **1.2 Consultation Process: August - October 2025**

- 1.2.1 Preliminary publicity represents the first step in the preparation of a statutory development plan and sets out the matters which a new draft plan should deal with. Cabinet Office undertook an online public consultation from 4<sup>th</sup> August to 27<sup>th</sup> October 2025, and invited respondents to share their views on the key issues that the strategic plan seeks to address along with any other issues they wished to raise.

- 1.2.2 Any individual, group or organisation were able to respond to the consultation. Cabinet Office also sought the views of statutory consultees (such as Government Departments, Statutory Boards and Local Authorities). Copies of the Community Guide (a pamphlet designed as an overview of the plan and process), were also sent out to all 21 Local Authorities, highlighting the purpose of the strategic plan and what it means for the Island community. Responses could be made via the Consultation Hub, email or post.
- 1.2.3 To capture a wide range of views, Cabinet Office (Planning Policy) also arranged pop-up interactive exhibitions in Ramsey, Castletown and Douglas. These exhibitions took place:
- 1<sup>st</sup> to 24<sup>th</sup> September 2025 in Douglas
  - 30<sup>th</sup> September to 15<sup>th</sup> October 2025 in Ramsey
  - 13<sup>th</sup> to 21<sup>st</sup> October 2025 in Castletown
- 1.2.4 These exhibitions featured posters, post-it notes and stickers along with a suggestion box to encourage feedback in a more informal way allowing passers-by to comment on key issues, hopes or concerns important to them. The exhibitions also signposted members of the public to the online consultation material - to raise awareness and encourage them to take part further.
- 1.2.5 The Isle of Man Government Communications Team promoted the consultation and interactive exhibitions across social media platforms to maximise public awareness and engagement. In total there were nine posts on Facebook, Instagram and LinkedIn and two posts on X<sup>1</sup>. The consultation was also promoted during the Isle of Man Government Conference 2025 on 24<sup>th</sup> September 2025, as part of the presentation by the Cabinet Office Minister, Hon. David Ashford MBE MHK - *Foundations for the Future: Planning for 1,000 New Homes.*

### **1.3 Important notes on interpretation of results**

- 1.3.1 Not every respondent answered every question. Consequently, percentages quoted throughout this report relate only to those respondents who answered the relevant question and not the total 150 consultation responses received.

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<sup>1</sup> Formerly known as Twitter

1.3.2 Participation in the consultation was voluntary and self-selecting. The findings presented in this report therefore reflect the view of those stakeholders who chose to engage with the consultation and should not be interpreted as representing the views of the Island's population as a whole. The purpose of the consultation was to identify issues, concerns and opportunities that may be relevant to the preparation of the draft strategic plan, rather than to establish any settled policy position.

## 2 Who Responded?

### 2.1 Interested Parties and Age Distribution

2.1.1 A total of 150 responses were received during the consultation period. Where respondents submitted comments by letter rather than through the consultation form, key points have been incorporated into the relevant sections of this report. For completeness, the report also includes frequently raised issues that fall outside the scope of the strategic plan.

2.1.2 Respondents were asked to indicate the category or categories that best described them. 149 respondents answered this question and of these, 13 respondents identified as more than 1 category. The answers to this question are summarised below:

- 100 members of the public or private companies;
- 7 developers or built environment professionals;
- 8 local authorities or politicians;
- 4 government departments/statutory bodies/boards;
- 7 special interest/community groups;
- 8 landowners;
- 2 agents (representing another party); and
- 13 respondents who identified as more than one category.

2.1.3 Engagement through the interactive exhibitions is summarised below:

- 416 stickers identifying topics that participants considered important;
- 285 comments submitted on post-it notes; and
- 22 letters received.

2.1.4 The age distribution of public respondents who responded is shown in Table 1 below. Of the 115 public respondents who provided age information, the majority were aged 55 and over, with 31% in the 55-64 age group and 33% aged 65 or above. No responses were received from individuals under 25 years of age.

Table 1. Age Profile of Public Respondents

| <i>Age Group</i>    | <i>Number of<br/>Individuals</i> | <i>Percentage of<br/>respondents (%)</i> |
|---------------------|----------------------------------|------------------------------------------|
| <i>Under 18</i>     | 0                                | N/A                                      |
| <i>18 - 24</i>      | 0                                | N/A                                      |
| <i>25 - 34</i>      | 10                               | 9                                        |
| <i>35 - 44</i>      | 10                               | 9                                        |
| <i>45 - 54</i>      | 21                               | 18                                       |
| <i>55 - 64</i>      | 36                               | 31                                       |
| <i>65 +</i>         | 38                               | 33                                       |
| <b><i>Total</i></b> | <b>115</b>                       | <b>100</b>                               |

### 3 Key consultation findings

The percentages below relate only to respondents who answered the relevant question and should not be interpreted as representing all consultation respondents.

- **73 %** were concerned that future development may impact, and may not be adequately coordinated with, infrastructure provision and capacity.
- **65 %** did not support the principle of one or more new settlements.
- **53 %** did not support the projected net residential housing need to 2036 or 2041.
- **73 %** felt it was important to include policies to protect and integrate built heritage into new schemes.
- **52 %** supported a more restricted use of the rural exception rule for replacement dwellings to retain examples of Manx vernacular architecture.
- **74 %** were opposed to the inclusion of a new rural exception rule which would look to support the principle of renewable energy production.
- **54 %** did not support the removal of the agricultural workers' dwelling rural exception as listed in General Policy 3.
- **65 %** supported a nature focused policy approach to biodiversity net gain.
- **52 %** supported biodiversity net gain (BNG) being delivered via a combination of both on-site and off-site provision.

## **Responses to Paper 1: Main Explanatory Paper**

## 4 Issue 1: Population and Housing

### 4.1 Overview

- 4.1.1 79 respondents commented on this issue. A wide range of themes were raised by individuals, including housing type and need, population, regeneration, heritage and affordability. A summary of the key comments relating to population and housing is set out below.

### 4.2 Population

- 4.2.1 Many respondents questioned the proposed population target of 100,000, citing concerns about its basis and the impact on infrastructure, environment, and affordability. Several suggested that growth should be based on robust evidence and demographic trends, based on the 2026 census rather than aspirational targets. Challenges such as high travel costs, limited services, and the difficulty of attracting younger, economically active residents were highlighted. There was both scepticism and support for targeted growth to strengthen the economy and attract a skilled workforce.

### 4.3 Housing

- 4.3.1 **Need:** Housing was seen as a priority, with calls for a clear strategy to address diverse needs, including public sector housing, affordable homes, and options for downsizing. While some supported housing targets as achievable goals, others warned against overdevelopment and reliance on population growth for economic success, stressing that housing policy must remain adaptable and evidence based, sufficient to meet housing need up to 2036 or 2041, with regular reviews to reflect changing demographics.
- 4.3.2 Some responses called for housing provision to reflect demographic trends, with calls for modern terraces, flats for smaller households, and downsizing schemes for older people, including co-housing options.
- 4.3.3 Respondents also highlighted the importance of tackling vacant properties and prioritising brownfield sites over greenfield development to protect the countryside. Many advocated for high-quality, sustainable homes in locations that encourage mixed communities and align with climate and infrastructure goals.

- 4.3.4 **Type and Tenure:** The need for different housing types and tenures was emphasised.
- 4.3.5 **Affordability:** affordable housing and first-time buyer schemes were widely supported, with concerns about current rates of delivery. Suggestions included stronger delivery of affordable housing on-site rather than through commuted sums, tiered quotas for greenfield sites, and support for first-time buyers. Some responses also called for annual reviews of thresholds, increased affordable home requirement for greenfield sites, and increased densities in appropriate areas while maintaining community character.
- 4.3.6 Respondents highlighted that second homes, buy-to-let, and holiday lets impact affordability for residents. Rural housing for agricultural workers was supported. Other comments noted the need to bring vacant local authority housing back into use promptly, improve the quality of existing housing stock, and avoid over-reliance on flats.

#### **4.4 Brownfield, Greenfield and Regeneration**

- 4.4.1 Strong support was expressed for prioritising brownfield development and bringing vacant properties back into use, with suggestions for financial incentives and penalties to encourage regeneration. Growth was generally favoured in urban centres with existing infrastructure to reduce sprawl and protect rural character.
- 4.4.2 Concerns were raised about greenfield allocations undermining town centres and countryside protection. Respondents urged limits on greenfield development and incentives for brownfield sites, while acknowledging viability challenges.

#### **4.5 Economy, Infrastructure and Services**

- 4.5.1 Respondents stressed that infrastructure and essential services must be strengthened before any significant population growth is pursued. Concerns centred on transport, healthcare, education, waste management, and utilities, with many highlighting the strain these systems already face. Suggestions included forward planning for sustainable service delivery and clear, long-term strategies for schools, care facilities, and other critical infrastructure. Several respondents linked the quality of infrastructure to overall quality of life and environmental sustainability, urging that these considerations be fully integrated into land use planning.

- 4.5.2 Concerns were expressed about the risk of outmigration among young people and the need to create conditions that encourage them to stay, including affordable housing and access to jobs. A new spatial strategy should reflect current realities rather than historic trends.

#### **4.6 Heritage**

- 4.6.1 There was strong support for protecting built heritage, green spaces, and the character of villages. The erosion of local culture and identity was a clear concern, with calls for development to respect historic character. With regards to vernacular buildings there was concern regarding the loss of older buildings in favour of larger houses with calls for clearer policy that encourages more renovation.
- 4.6.2 The Island's Biosphere status was highlighted as a key reason to safeguard scenic landscapes and agricultural land, ensuring that growth does not compromise what makes the Island unique.

#### **4.7 Environment, Agriculture and Active Travel**

- 4.7.1 Respondents referred to the need for a development approach that protects the Island's natural environment and supports sustainable living, taking environmental constraints and infrastructure capacity into account when making decisions. Suggestions included integrating green spaces and active travel routes into new developments, reducing car dependency, and improving public transport. Some respondents proposed infrastructure levies on greenfield sites to fund active travel links – with the use of masterplans to ensure connectivity, preserve scenic views, and avoid piecemeal development.
- 4.7.2 Speculative development in rural areas that could undermine land management and food security was raised as a concern. There was strong support for safeguarding productive farmland to maintain food security and biodiversity, alongside promoting energy-efficient construction and retrofitting existing homes.

## **5 Issue 2: Towns, Centres and Regeneration**

### **5.1 Overview**

- 5.1.1 71 respondents provided comments on what the strategic plan should do in response to town centres. A range of themes were raised by individuals, including concern over dilapidated properties, out-of-town retail, parking, and residential accommodation above shops. A summary of key comments is set out below.

### **5.2 Retail: Town Centres and Out of Town**

- 5.2.1 There was clear concern about declining high street footfall, high rents, and competition from out-of-town retail developments. Suggestions included rent regulation to support small businesses, pedestrianisation of town centres, and promoting active travel. Several respondents advocated for mixed-use town centres where people can live and work, reducing reliance on single-use retail spaces. There were calls for more essential facilities such as libraries, pharmacies, and health centres, and for community spaces rather than an over-concentration of certain food and drink establishments. Respondents emphasised the importance of creating vibrant, mixed-use centres with public spaces, green infrastructure, and cultural amenities. Pop-up retail and flexible use spaces were suggested with the aim of reducing vacancy rates in town centres.
- 5.2.2 Respondents supported policies to keep retail within town centres and prevent expansion onto industrial land. Responses emphasised the need for a strong evidence base behind any changes to out-of-town retail policy, including supermarket and convenience retail. There is a concern that if more supermarkets are allowed, this will impact on local food producers.

### **5.3 Brownfield Sites and Regeneration**

- 5.3.1 There was strong support for prioritising brownfield sites over greenfield land to protect the countryside and revitalise urban areas. There were calls to release vacant sites such as Summerland and the former Park Road School site and incentivise redevelopment through grants, tax breaks, and streamlined planning processes among others. There were concerns highlighted about viability, environmental issues such as contamination, and the need for flexibility in affordable housing requirements to make brownfield schemes deliverable. Several responses suggested penalties for owners who leave plots vacant and using compulsory purchase powers for derelict properties. There was a general consensus among respondents that brownfield development should be more attractive than greenfield alternatives.
- 5.3.2 Many respondents felt regeneration has not kept pace with recent housing development, citing examples such as Peel and Ramsey. Suggestions included coordinated regeneration plans for each town, streetscape improvements, heritage-led restoration, and financial assistance for property owners. Other ideas included grants, rates holidays, and compulsory purchase powers to encourage private investment and tackle long-term dereliction of properties. Flood risk in Ramsey and the need for regeneration to respect local character and embodied carbon were also mentioned. Several responses called for Government to prioritise regeneration of its own land holdings and ensuring redevelopment schemes are adequately funded.

### **5.4 Traffic and Parking**

- 5.4.1 Parking in Douglas was referred to as a recurring concern. Respondents suggested affordable multi-storey car parks on vacant land. Some supported free parking, while others emphasised improved public transport and integration with the Department of Infrastructure's Transport and Bus Strategies.
- 5.4.2 Concerns were raised about congestion from new development placing pressure on existing networks and the need for audits to assess the impact of major road closures on town centre footfall.

## **5.5 Housing Opportunities**

5.5.1 Respondents called for balanced housing growth across the Island. In terms of approaches, suggestions included –

- using available capacity in the North;
- avoiding a Douglas-centric approach;
- focusing growth on existing centres to reduce commuting, and
- maintaining lower densities for access to green space and services.

5.5.2 Strong support was expressed for town centre living through converting upper floors and vacant retail properties into apartments. High-density housing in existing settlements was seen to avoid greenfield development, with apartments suited to younger residents, but some opposed town centre accommodation mentioning high costs and a general preference for houses with gardens, over flats.

## **5.6 Climate Change**

5.6.1 Comments highlighted the need for development to align with the Climate Change Plan, preparing for future climate risks, and ensuring high-quality, sensitive design that supports energy efficiency while respecting local character. Suggestions included installing solar panels on publicly owned buildings, using thermal imaging to identify heat loss, and adding timers to reduce energy waste. There was support for protecting and enhancing parks, green spaces and biodiversity in towns, e.g. adding seating and play equipment and improving access to parks and wildlife areas.

## **5.7 Planning Process**

5.7.1 Concerns were raised about delays and perceived complexity in the current process, with calls for a more streamlined and consistent planning system. Suggestions included making it easier to obtain permission for regeneration projects and introducing penalties for incomplete developments. One respondent gave support for a future public spaces document to guide interventions in town centres and for clear policy direction that prioritises brownfield regeneration over countryside development.

## **6 Issue 3a: Economic Vision (jobs and investment)**

### **6.1 Overview**

6.1.1 A total of 65 respondents provided comments on this issue. Respondents emphasised the need for a diverse and resilient economy. There was consensus among respondents that economic resilience depends on balancing established sectors with new industries, ensuring sustainability and inclusivity in future growth. A wide range of themes were raised by individuals, including decarbonisation, education, public services, and land requirement. A summary of key comments relating to jobs and investment is set out below.

### **6.2 Decarbonisation and Environment**

6.2.1 Consultation responses were mixed in respect of decarbonisation. Some supported ambitious climate goals and investment in green infrastructure while others questioned practicality and affordability of these measures. Suggestions included exploring tidal and nuclear energy, integrating solar panels on industrial sites, and promoting sustainability-focused employment.

6.2.2 There were concerns raised about balancing economic growth with environmental protection and ensuring renewable energy projects do not compromise the Island's natural beauty or agricultural land.

### **6.3 New and Existing Sectors**

6.3.1 In terms of new and existing sectors, there was support for –

- Manufacturing;
- Health services;
- Strengthening rural industries like agriculture and food production, tourism and hospitality;
- Encouraging innovation and supporting start-ups in sectors such as agriculture, plumbing, gardening, and electrical work;
- Capturing new business opportunities arising from AI, and
- Attracting remote workers and digital nomads.

### 6.3.2 Concerns were expressed about –

- Over-reliance on certain sectors, and
- Emerging AI technologies threatening jobs.

## 6.4 Population and Demographics

6.4.1 Opposition to population growth targets centred around infrastructure capacity issues and environmental impacts but others viewed targeted growth as necessary to strengthen the workforce.

6.4.2 Attracting and retaining younger, economically active residents is a key concern. It was suggested that this could be achieved through improved housing affordability, more job opportunities, and enhanced quality of life. Policies to prioritise local employment were seen to potentially help.

## 6.5 Education and Healthcare

6.5.1 To ensure that the workforce is equipped with the right skills, respondents recognised that enhanced higher education provision and specialist training opportunities for trades are needed - to meet future economic needs in key and emerging sectors such as renewable technologies, construction, and conservation. Suggestions included grants for training, partnerships with local employers, and improved access to qualifications through University College Isle of Man (UCM). There were also calls for better planning for healthcare to support a healthy workforce.

## 6.6 Economic Considerations

6.6.1 Respondents stressed the need for realistic growth targets and cost effectiveness. Rising costs and affordability were a key concern. Several comments highlighted recent economic challenges, noting a fall in GNP since 2023 and pressures on key sectors, calling for a pragmatic vision.

6.6.2 Respondents proposed tax incentives for critical roles, cost-effective transport for goods, and measures to attract investment. Another suggestion was to embed an economic appraisal framework into planning policy and recognise economic benefit as a material consideration. There was also a suggestion to incorporate natural capital and carbon values into planning decisions to ensure a balanced approach between economic growth and environmental sustainability.

## **6.7 Development Considerations, Land and Space Requirement**

- 6.7.1 Some responses advocated the need for strategic employment land allocation, factoring in links to the Airport and adjacent industrial estates. Others called for flexibility - with a wider distribution of employment land across the Island rather than concentrating in Douglas, with suggestions to make best use of existing public transport.
- 6.7.2 There was strong support for safeguarding land and integrating it with transport and housing for long-term sustainability, alongside promoting infrastructure such as digital connectivity and energy resilience.
- 6.7.3 Comments also stressed the importance of addressing shortages in modern office space and workshop facilities, and ensuring policies prevent oversupply or inappropriate retail use on industrial sites. Opinions differed on the role of the Economic Strategy. Concern was raised about specific industries which require significant space and infrastructure – there were calls for tools to assess Island-wide impacts of such developments.
- 6.7.4 There were calls for mixed-use zoning to revitalise town centres and the need to build confidence among private investors.

## **6.8 Investment and Regeneration**

- 6.8.1 Regenerating towns was considered a priority to build confidence among investors, supported by improvements to tourism infrastructure and transport links from the Sea Terminal. Financial incentives to support developments that create jobs were also suggested. The need for long-term infrastructure improvements was highlighted - better roads, pavements, and kerbs to improve accessibility.

## **7 Issue 3b: Economic Vision (supporting infrastructure)**

### **7.1 Overview**

- 7.1.1 A total of 66 respondents provided comments on this issue. Themes covered included maintenance of existing infrastructure, transport, community facilities and utilities. A summary of key comments relating to supporting infrastructure is set out below.

### **7.2 Maintenance of Existing Infrastructure**

- 7.2.1 Respondents stressed the importance of maintaining existing infrastructure, including footpaths and public rights of way (PROW), which were seen as vital for residents and rural tourism. Several respondents highlighted the need for long-term road improvements and prioritising maintenance over new development, with calls for timely investment in essential services and community facilities. Concerns were raised about poor upkeep of public spaces and tourism assets, which were viewed as detrimental to the Island's appearance and visitor experience.

### **7.3 Strategic Planning and Investment**

- 7.3.1 There was support for encouraging private investment. Many highlighted the importance of planning infrastructure and services alongside growth, integrating sustainable transport, and embedding climate and biodiversity considerations in new development. Others noted that providing infrastructure ahead of development is not always viable, as investment often follows growth.
- 7.3.2 Investing in green infrastructure links in built up areas were seen as ways to improve connectivity and reduce long commutes. Some responses stressed that infrastructure planning should align with population and economic goals. Other respondents wanted to see investment extended to rural areas to support sectors such as agriculture through reliable transport, energy, and digital connectivity.
- 7.3.3 There was support for a fully integrated approach linking land use and energy resilience, with suggestions to address waste disposal in strategic planning and promote innovation in resource recovery and circular economy models.

## **7.4 Transport and Connectivity**

- 7.4.1 Transport planning was considered essential to address congestion hotspots and support future growth.
- 7.4.2 Upgrading gateways to the Island was a recurring theme to create a better first impression, with calls for enhancements to airport facilities, stronger air links, and lower ferry fares to make travel more affordable and reliable. There was also a suggestion for a seaport masterplan to guide future port development.
- 7.4.3 Respondents highlighted the need to improve public transport, including better maintenance of bus shelters, real-time service information, and investment in electric buses. Improved public transport was seen to reduce congestion.

## **7.5 Community Facilities**

- 7.5.1 There were calls to expand healthcare provision, including better use of existing facilities. Respondents highlighted Peel as lacking investment in sewerage, parks, schools, and healthcare, causing delays and limited access to services. Additional comments included the need for more social housing for families, mandatory on-site parking for developments, and support for street design policies.

## **7.6 Infrastructure Improvements and the Environment**

- 7.6.1 Comments highlighted the need for stronger guidance on renewable energy development, particularly wind turbines, with concerns about their impact on the landscape and countryside. Respondents urged the strategic plan to better address environmental effects from major infrastructure projects. There was a clear focus on improving essential services, including upgrading sewage systems, the electricity grid and ensuring a reliable energy supply through measures such as new generation capacity and grid connections. Support was also noted for integrating sustainable drainage systems into new development to ensure they are resilient and future proof.

- 7.6.2 Comments suggested that there should be investment in skills and training to support

essential roles and emerging industries, alongside calls for identifying appropriate employment land. Responses highlighted mechanisms such as a community infrastructure levy for new development to fund improvements in existing infrastructure and active travel links. Broader points included ensuring infrastructure planning aligns with economic and agricultural needs, safeguarding productive land, and integrating renewable energy and rural enterprise hubs to promote sustainable growth.

## **7.7 Population Growth**

- 7.7.1 Some comments expressed concern that population targets do not reflect realistic infrastructure planning. The importance of a strong food sector to enable sustainable population increases was also mentioned. Others raised objections to the 100,000 population target, stating it lacks public support and may be unrealistic given historic migration trends. Some responses called for a clear strategy to provide housing and infrastructure if growth is pursued, while some felt the priority should be improving productivity within the existing population rather than relying on expansion.

## **8 Issue 4: Environment and Climate Change**

### **8.1 Overview**

- 8.1.1 A total of 90 respondents provided comments on this issue. A wide range of themes were raised, including climate targets, renewable energies, climate adaptation and biodiversity. A summary of the comments relating to the environment and climate change is set out below.

### **8.2 Net Zero and Climate Targets**

- 8.2.1 There were mixed views on achieving Net Zero by 2050 and the wider climate ambitions in the strategic plan. Some felt progress under the Climate Change Action Plan has been poor and targets are unrealistic in the broader international context - with strong calls to review or remove the targets and transition to net zero in its entirety. Concerns included affordability and the Island's limited global impact, with several questioning the emphasis on carbon reduction - reducing reliance on fossil fuels - when other nations are rolling back on their commitments.
- 8.2.2 Others supported embedding climate resilience and low-carbon development but stressed practicality and cost-effectiveness, proposing a focus on reliable and affordable energy. A few respondents called for stronger measures, including increasing reduction targets, alongside ensuring that climate resilience is fully integrated into future planning to align with the Climate Change Act 2021.
- 8.2.3 Concerns were raised about the use of the 2018 emissions baseline and the need for regular reviews to reflect evolving methodologies and market conditions. Some responses suggested including embodied carbon into assessment frameworks and noted the potential impact on the Island's Biosphere status.

### **8.3 Renewable Energy and Energy Security**

- 8.3.1 Views varied regarding renewable energy and the Island's future energy strategy. Several respondents emphasised the need for reliable and affordable energy, raising concerns about grid capacity and the ability to manage intermittent output from wind farms - gas-powered backup would remain necessary. Suggestions included infrastructure upgrades to integrate renewable energy into the grid, requiring on-site renewables for new developments, and removing fossil fuel heating systems in public buildings. Other suggestions included making stronger commitments in the plan, including:

- solar PV and air-source heat pumps on new builds – private dwellings and Government buildings;
- securing renewable energy through a mix of onshore and offshore sources;
- using brownfield sites for renewable energy generation; and
- a clear policy for integrating energy-generation technologies at the point of construction.

8.3.2 There were mixed views on wind energy. Some supported investment in wind energy, both onshore and offshore, to reduce reliance on oil and gas. Others strongly opposed turbines, citing high costs, landscape and wildlife impacts, and inefficiency. Alternative suggestions to wind power included tidal and river power and small-scale nuclear. A few respondents raised concerns that supporting carbon sequestration alongside wind energy could conflict with natural environment objectives of the plan and argued that such conflicts should be avoided.

#### **8.4 Economic Considerations**

8.4.1 There were significant concerns raised regarding the cost of achieving Net Zero and its impact on the economy – suggesting funds should be re-directed to healthcare, education, and policing. Alternative approaches included small, achievable improvements until practical and affordable solutions are available which are gradual and proportionate supported by adequate infrastructure funding. One response proposed an infrastructure levy on greenfield sites to fund active travel, while another highlighted the absence of a lead Department and budget for active travel initiatives.

#### **8.5 Biodiversity, Agriculture and Natural Environment**

8.5.1 Responses emphasised the need to safeguard the Island's natural assets, including designated ecosystems such as Ramsey Bay Marine Nature Reserve, saltmarshes, and glens. Concerns were raised about environmental damage from eco-tourism activities, with calls to avoid exacerbating these issues. The need to safeguard productive agricultural land for food security and recognise farming's role in carbon sequestration and biodiversity net gain was highlighted - warning against policies that impose undue burdens on rural businesses or ignore drainage impacts.

- 8.5.2 Concerns were raised regarding consultation on the Landscape Character Assessment 2025 and the inclusion of productive agricultural land in the candidate landscapes. Strong opposition was received regarding the potential for wind turbines in upland areas or other high-value landscapes. Some responses stated that ecological habitats should be prioritised over green energy projects to maintain the Island's biosphere status.
- 8.5.3 Suggestions for biodiversity improvements included tree planting, green corridors, and a coordinated nature recovery network to restore ecosystems and integrate biodiversity into well-designed growth. Respondents called for biodiversity net gain standards, supported by independent assessments, and robust metrics, with some respondents advocating a 10% net gain target in line with UK practice. There was also a view that carbon and nature credit schemes must be transparent, free from vested interests, and subject to rigorous scrutiny to prevent unintended harm to agriculture. There were calls for early completion of environmental impact assessments to ensure transparency, alongside concerns about management responsibilities for SuDS and biodiversity net gain.

## **8.6 Flood Risk and Climate Adaptation**

- 8.6.1 Responses highlighted the need for robust flood risk assessment and mitigation, particularly near coasts and rivers, alongside improved surface water drainage. Strong support was expressed for mandatory Sustainable Drainage Systems (SuDS) and climate-resilient building standards to address future risks such as overheating and flooding. Concerns were raised about visually intrusive flood protection works and the assumption that landowners must accept upstream drainage, stressing the importance of proportionate measures and planning consent.
- 8.6.2 It was noted that the plan should align with the Isle of Man Climate Change Plan 2022–2027, taking into account land management and carbon sequestration strategies to maximise storage potential across habitats. Policies on BNG, SuDS, and active travel, should be proportionate and achievable, advocating a pragmatic, outcomes-based approach that maintains viability for both small and large developments.

## **8.7 Planning, Policy and Governance**

- 8.7.1 Responses highlighted the need for clarity, impartiality, and robust governance within the strategic plan. There were calls for the plan to focus strictly on matters within the planning system, supported by up-to-date evidence and independent, science-based baselines. There was also a view that carbon and nature credit schemes must be transparent and subject to rigorous scrutiny to prevent unintended harm to agriculture. Several noted that a rigid, long-term strategy may not serve the Island well, advocating for adaptive mechanisms and improved public engagement.

## **8.8 Delivery and Implementation**

- 8.8.1 Delivery and implementation were recurring themes. Respondents supported sequenced development but stressed that success depends on clear Departmental responsibilities, adequate funding, and proportionate viability tests.

## **Responses to Paper 2: The Pattern and Distribution of Development**

## 9 Settlement Hierarchy

### 9.1 Overview

9.1.1 A total of 97 respondents answered the question on whether they supported the strategic plan naming additional settlements in the hierarchy as suitable for growth. Of those who responded, 46% did not support naming additional settlements, 31% supported and 23% had a neutral view.

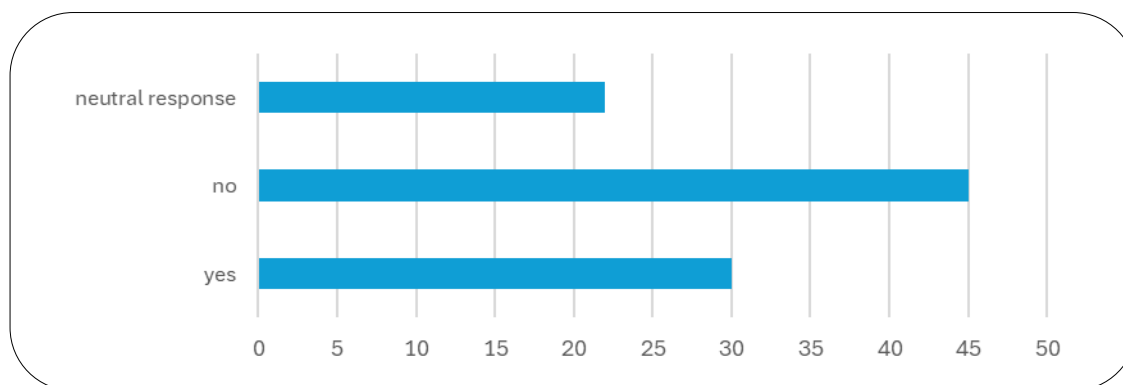


Figure 1. Breakdown of responses received on naming additional settlements in the hierarchy

9.1.2 A total of 94 responses indicated whether they supported the strategic plan re-ordering the settlement hierarchy, with higher tiers typically accommodating greater levels of development. Of those who responded, 42% did not support re-ordering the hierarchy, 36% supported and 22% had a neutral view.

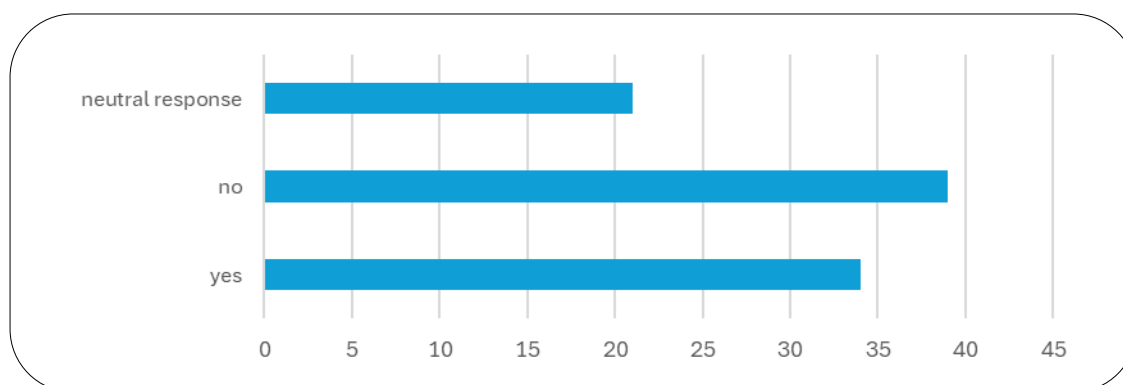


Figure 2. Breakdown of responses received on re-ordering the settlement hierarchy

### 9.2 Comments on Groups of Houses

9.2.1 There were 38 responses which commented on 'groups of houses' that could be added to the hierarchy, and 22 commented on settlements that could be moved up or down the hierarchy. These comments are summarised below by theme as similar suggestions were made across both questions.

9.2.2 There was some support for recognising additional groups of houses where they have access to services and potential for sustainable growth, with specific mention made in relation to -

- St Marks;
- Mount Rule - as having good connectivity and land availability to meet rural housing needs; and
- Croit-e-Caley and The Level forming part of Colby which is currently a Village under Spatial Policy 4 of the Strategic Plan 2016.

9.2.3 Some concerns were expressed about the value of new and/or additional settlements, particularly where they would depend on existing community facilities and risk undermining the character of smaller villages.

### **9.3 Expansion of Existing Settlements**

9.3.1 Support was limited for retaining the current hierarchy system, but where it was supported Douglas and the Service Centres were cited as the most sustainable locations for future growth. Others preferred a more dispersed pattern of growth, one warning that continued expansion of Douglas, Braddan and Onchan could create a settlement of such scale that walking or cycling becomes impractical.

9.3.2 Comments on modest expansion focused on the following settlements:

- Douglas, Peel and some of the settlements between (Crosby, Glen Vine, Union Mills) were most frequently mentioned, with support for limited expansion;
- Newtown;
- Glen Mona was proposed as suitable for potential growth;
- Jurby, Bride, Andreas and Sulby were also identified for potential growth; and
- Onchan was proposed to have a boundary adjustment eastward along King Edward Road.

9.3.3 There was support for rounding-off settlement edges where development can be integrated safely and would consolidate existing boundaries. Suggestions also included using land along Johnny Watterson's Lane near the lawn cemetery for new housing due to limited development land available in Douglas.

9.3.4 Castletown was noted as having little capacity for expansion due to constraints from the airport, runway approach, open countryside and wetland. Drainage constraints were highlighted for Andreas, Laxey and Ramsey, where redevelopment was seen as potentially the only viable option, indicating that not all settlements can accommodate additional growth to the same extent.

#### **9.4 Re-ordering Existing Settlements**

9.4.1 Higher tiers were acknowledged as better placed to accommodate growth, but with some support for limited, sustainable development in smaller settlements to maintain local employment and provide housing for workers outside Douglas.

9.4.2 Settlements suggested for re-ordering included:

- Ballasalla potentially warranting a higher tier due to its size, range of facilities, transport links and proximity to employment areas;
- Glen Vine, Colby, Newtown and Strang were suggested for consideration as service villages, reflecting their scale and proximity to facilities; and
- Strang was noted for its strong links to Braddan Roundhouse, the hospital, GP surgery and local stores, with some support for further development around the hospital campus.

9.4.3 Underlying these views was a call for any reordering to be based on robust evidence of future capacity, including infrastructure provision, environmental constraints and the need to protect agricultural land.

#### **9.5 Regeneration**

9.5.1 Ten comments opposed large-scale expansion of settlements and the loss of greenfield land, favouring regeneration within existing boundaries. Bringing vacant properties back into use and prioritising brownfield land were repeatedly highlighted, alongside calls for better coordination of infrastructure and utilities. There were also calls to make better use of government-owned sites such as Summerland, Park Road School and the Victoria Road Prison with suggestions to compulsory purchase long term vacant sites and properties. Ramsey was highlighted as a location where future housing could focus on densification within its existing footprint.

- 9.5.2 Concerns highlighted a perceived bias for greenfield development arising from the hierarchy, with calls to exhaust existing and brownfield allocations before releasing new land, supported by clear population triggers for greenfield sites.
- 9.5.3 Safeguarding agricultural land, maintaining green gaps and preventing urban sprawl were repeatedly identified as essential priorities. These concerns were closely linked to sustainability, with calls for development to incorporate green spaces, avoid developing in flood risk areas and protect areas of nature conservation value. Food security was also raised, with suggestions that low-grade soils should be prioritised for development to preserve productive farmland.

## **9.6 Tier Placements**

- 9.6.1 Questions were raised about whether settlements should be ranked on their current status or future potential, with concerns that those within the same tier currently vary significantly in size and capacity yet are expected to accommodate similar levels of growth. There were calls for clearer justification of tier placement, supported by evidence on housing numbers, services and facilities. Examples included constraints affecting Castletown and suggestions that Ballaugh could merit promotion to Service Village when compared with Jurby and Andreas in the same tier. St John's and Kirk Michael were also seen as having little to justify their current status relative to Ballasalla.
- 9.6.2 Respondents highlighted that traditional indicators of settlement vitality, such as public houses, may be becoming less relevant, while proximity to larger service centres continues to influence the attractiveness of neighbouring settlements and demand.

## **9.7 Protection of the Countryside**

- 9.7.1 Safeguarding agricultural land, maintaining green gaps and preventing urban sprawl were repeatedly identified as essential priorities. These concerns were closely linked to sustainability, with calls for development to incorporate green spaces, avoid developing in flood risk areas and protect areas of nature conservation value. Food security was also raised, with suggestions that low-grade soils should be prioritised for development to preserve productive farmland.

## 10 New Settlement

### 10.1 Overview

10.1.1 There were 97 responses who indicated whether they supported the principle of one or more new settlements. Of those who responded, 65% did not support the principle of a new settlement, 16% supported and 19% had a neutral view.

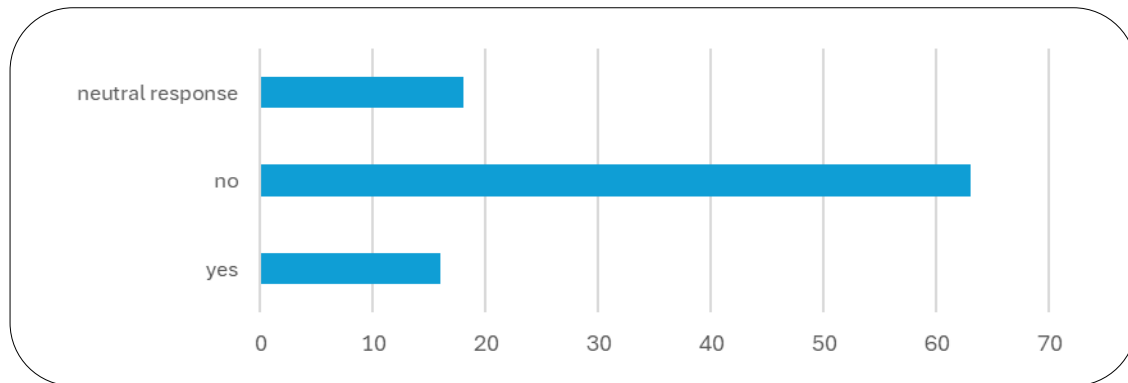


Figure 3. Breakdown of responses for supporting the principle of a new settlement(s)

10.1.2 In total 50 respondents gave views on what minimum requirements or components a new settlement should consist of and the principle of a new settlement. These comments are summarised below.

### 10.2 Principle of a New Settlement

10.2.1 In total 14 responses opposed the principle of a new settlement, mainly citing environmental impact, infrastructure constraints and the need to prioritise capacity within existing settlements. Two felt there are already too many houses, and a new settlement should not be considered without a real increase in population. Several comments emphasised the need to prioritise the re-development of brownfield sites and underused buildings - with three responses specifically calling for all brownfield land to be developed before any new settlement is considered.

10.2.2 Concerns were also raised about healthcare, education and transport network capacity, urging investment to be focused on existing settlements rather than a new settlement. Two responses warned of impacts on the biosphere status and greenfield land. Three questioned the meaning or purpose of the question and two were not supportive of the policy direction at all.

### 10.3 Location and Scale

10.3.1 Views on the potential location and scale of a new settlement were varied:

- Two respondents proposed that a new settlement should deliver at least 500 homes, while another estimated between 400 and 800 homes would be needed to support schools, services and transport;
- Two respondents emphasised that development should avoid widespread loss of agricultural land, favouring concentrated areas or smaller, well-designed pockets with essential facilities;
- One respondent felt that any new settlement should blend with its surroundings and avoid becoming a uniform estate;
- Another emphasising that areas of flood risk, sensitive landscapes or important areas for biodiversity should be avoided;
- One comment noted that the need of connection to Meary Veg sewage treatment works would restrict any new settlement to the south or east of the Island; and
- Two responses felt that the 'blueprint' of a new settlement should be based off existing settlements and what makes them viable.

10.3.2 There were calls for expansion to complement existing towns rather than undermine regeneration, with environmental sensitivity and reliance on existing infrastructure highlighted as priorities:

- Jurby was identified as having potential for housing and business growth;
- One respondent pointed to a missed opportunity at the former hospital site;
- Proximity to employment areas to enable active travel was highlighted; and
- There were some concerns that locating a new settlement in the east could place additional pressure on Douglas services without generating extra rate income.

## **10.4 Infrastructure and Services**

### **10.4.1 Responses highlighted:**

- The need for new settlements to provide essential services and infrastructure rather than relying on existing capacity;
- Schools were a recurring priority, with calls for both primary and secondary provision, safe access, and consideration of current capacity;
- Several comments stressed that settlements should include healthcare, shops, employment opportunities, community facilities and public transport, delivered in a coordinated way;
- Infrastructure requirements were also emphasised, including water, drainage, energy and digital connectivity, with some warning that development should not proceed where these are lacking;
- There were suggestions that investment should focus on strengthening infrastructure and services within existing settlements; and
- Another urged that decisions consider viability based on accessibility and any key facilities to be provided from the outset.

## **10.5 Housing**

10.5.1 The importance of providing a mix of housing types and tenures within any new settlement was emphasised - with repeated calls to prioritise affordable homes and ensuring a range of homes for varying demographics. Developments should include a significant proportion of first-time buyer properties and measures to discourage second-home ownership. Comments also supported a range of house types, including apartments, bungalows and larger family homes, delivered in a way that promotes community integration. Suggestions included the Housing Agency playing a role in shaping masterplans.

## **10.6 Employment, Green Spaces and Travel**

10.6.1 Several responses highlighted the importance of planning new settlements to support employment opportunities and economic resilience and reduce the need for commuting - aligning growth with business location requirements and the Employment Land Review 2025.

- 10.6.2 Strong transport links were considered vital both to meet climate change targets and to align with the transport strategy. Frequent and reliable connections between Douglas and other locations near to existing transport networks were called for - to minimise car dependency.
- 10.6.3 Good design principles should promote net zero homes, walkability, cycle paths, green spaces and strong public transport links, with neighbourhoods having a strong identity.

## **10.7 Parking and Planning**

- 10.7.1 Responses felt that far stronger measures to manage on-road parking are needed - particularly for larger vehicles, which were seen as creating safety hazards. Suggestions included increasing off-street provision, and more edge-of-town parking.
- 10.7.2 There was recognition that new settlements could face delays in delivery due to significant infrastructure requirements, and that establishing a sense of community might take time, potentially affecting their attractiveness. Linked to this, comments supported phased development to match infrastructure delivery and demand, with early engagement from providers and communities.

## 11 Candidate Special Landscapes

### 11.1 Overview

11.1.1 There were 91 responses indicating whether they supported the seven 'candidate special landscapes' being taken forward for designation as recommended in the Isle of Man Landscape Designations Study 2025. Of those who responded, 42% supported the candidate special landscapes being taken forward for designation, 30% did not support and 29% had a neutral view. Of the above responses, 39 provided comments on the candidate special landscapes which are compiled below by broad theme.

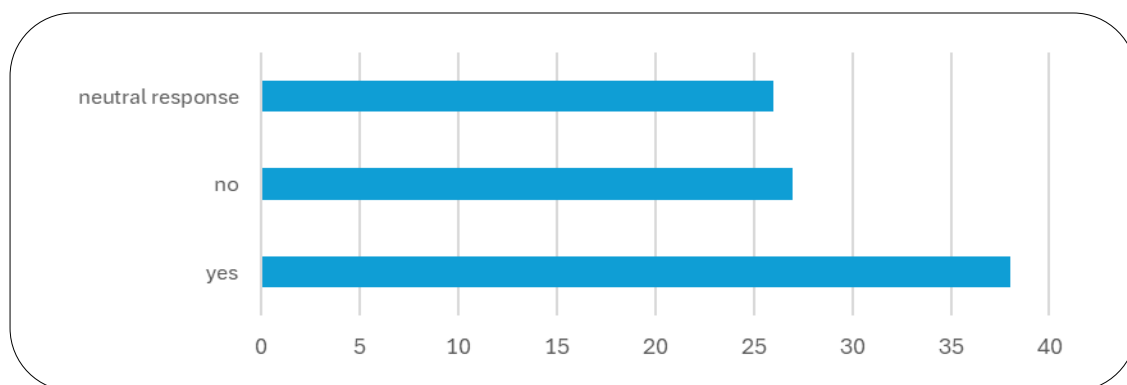


Figure 4. Breakdown of responses for supporting the candidate special landscapes

11.2.1 Support was expressed in protecting the Island's distinctive landscapes, particularly safeguarding greenfield land and sensitive upland areas to maintain existing character and sense of place. While the designations were generally welcomed, some suggested they should allow flexibility for renewable energy projects where biodiversity benefits and mitigation are demonstrated. Additional views included recognising agriculture's role in the landscape, strengthening environmental policies through evidence-based designations, periodic reassessment of ecological sites, and clearer definitions of 'national interest' within rural exception policies.

11.2.2 Eight responses explicitly stated their support for the proposed boundaries. The uplands and southern hills were supported by four responses - due to their tranquillity, wildlife and natural beauty. One response endorsed the principle of designations while emphasising that guidance should support sustainable agriculture without imposing additional planning constraints on actively farmed areas. Suggestions for additional Special Landscapes and changes to the report included:

- Recognising Douglas Head and Douglas Bay as a Candidate Special Landscape;
- Port Skillion being mentioned within the report;
- Ballaugh Curraghs - for its RAMSAR status and ancient green landscape; and
- Lowland Slopes and Glens, valued for their blend of Manx culture and natural beauty.

11.2.3 Generally, there were calls for greater recognition of ecologically important coastal habitats. One response highlighted the omission of key lowland habitats such as wetlands and coastal soft cliffs, warning that delays in ASSI designation leave these areas vulnerable.

### **11.3 Critique of Designation Process**

11.3.1 Generally, there were calls for greater recognition of ecologically important coastal habitats - the omission of key lowland habitats such as wetlands and coastal soft cliffs was highlighted - warning that delays in ASSI designation leave these areas vulnerable. Several responses noted that the whole Island is special, and all areas should be protected, with concerns that the assessment undervalues areas outside higher tiers and may increase development pressure elsewhere. Three responses stressed that the process should not prioritise recreation or wildness over agricultural needs and rural economies, and one noted that it should also contribute to nature conservation.

11.3.2 Some responses questioned the scale of the CSLs and the limited number of candidate landscapes. Others felt the approach was too broad, grouping diverse landscapes into a few types and applying a limited number of criteria, which favoured remote areas over smaller, accessible ones near communities.

11.3.3 The decision to review the 2008 study was queried, suggesting the new report appeared less detailed and therefore less accurate. It was questioned why built environment professionals, the agricultural sector and affected landowners were not consulted as part of the assessment.

## **11.4 Planning, Development and Policy Implications**

11.4.1 A number of respondents questioned what the implications of designation would mean in development planning terms:

- Two responses supported updating Areas of High Landscape and Coastal Value and Scenic Significance (AHLVs) but emphasised that policy should allow sensitive development rather than impose blanket restrictions;
- Two others suggested buffer zones around the boundary and queried if there would be prohibitions on new development in CSLs;
- Others questioned how these designations interact with housing policies and vernacular building protection;
- There were requests for clarity on how CSLs will influence planning decisions; and
- Three responses called for a constraints-led approach to utility-scale renewables, directing large wind projects away from high-value landscapes through sequential testing and limiting exemptions.

## **11.5 Cultural, Heritage and Community Values**

11.5.1 Responses emphasised the role of landscapes and heritage in the Island's attractiveness for residents and visitors, with several noting that designations help ensure growth does not compromise scenic character or cultural identity. Protecting special landscapes was viewed as important for tourism, biodiversity, and community well-being. One respondent recognised that accommodating population growth may require landscape change and evolution. Pressures were noted, such as:

- A requirement to increase access to landscapes to support tourism; and
- Potential impacts from wind turbines and industrial development.

## 12 Housing Need

### 12.1 Housing Need up to 2041

12.1.1 On the net residential need of 5,533 homes up to 2041, 94 responses indicated whether they supported the figure. Of those who responded, 52% did not support the housing need, 25% had a neutral view, and 23% supported the figures. Of those, 49 provided comments on the housing need up to 2041 which are summarised below.

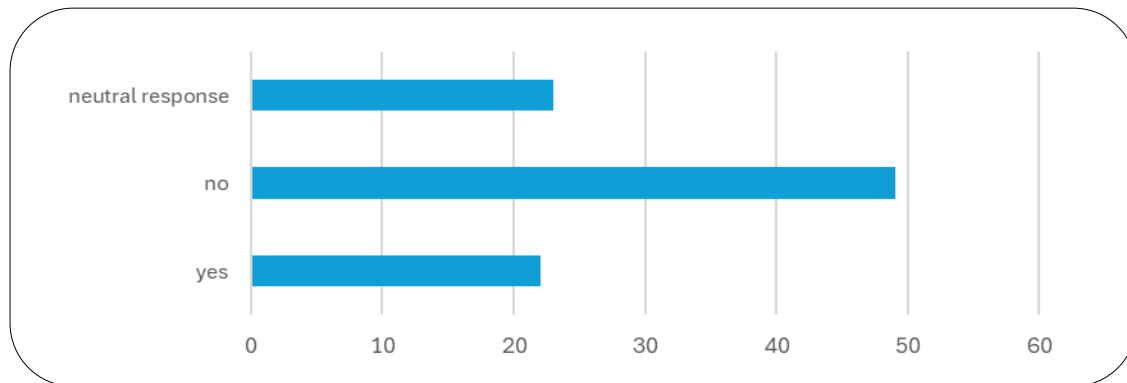


Figure 5. Breakdown of responses in supporting identified housing need up to 2041

- Support for the identified housing need, but conditional on measures to ensure affordability for residents, avoiding buy-to-let and second homes, and addressing empty or derelict properties;
- The need for a mix of homes for all demographics, alongside calls for development which does not increase traffic congestion;
- Two responses supported the overall housing figures but stressed the need for regular review to reflect economic trends and demographic change;
- The use of the OAHN as the evidence base; and
- The net need figure of 5,533 assumes all allocated land will be delivered - if sites do not come forward, the plan should be clear in this regard.

#### 12.1.3 Responses opposing the housing need figure raised several themes:

- Four responses felt that there was no additional housing need;
- Six responses questioned the realism of population growth targets, with repeated views that projections of 100,000 residents are unachievable and risk oversupply, loss of character, and environmental harm;
- Concerns centred on infrastructure capacity and investment in future upgrades, availability of construction labour, and the strain on services, with calls for investment in utilities, transport, and town centre regeneration before any new development;
- Some considered that the figures rely on too many assumptions - growth assumptions should be based on actual, demonstrated need and sustainability, rather the aspirational population targets; and
- Five responses advocated reusing vacant homes, one citing a 15% vacancy rate, and suggested bringing holiday homes into year-round use.

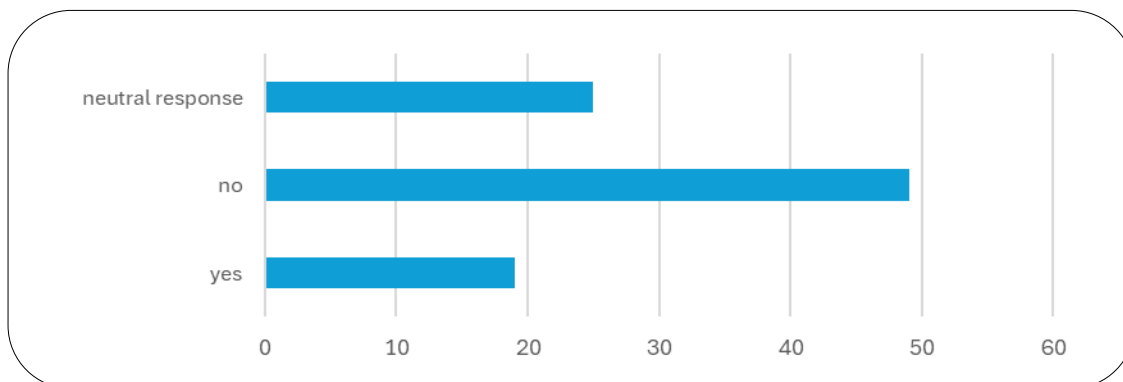
12.1.4 There were calls for prioritising brownfield redevelopment, deterring absentee ownership, protecting productive farmland, and safeguarding quality of life, and one response suggested that predicting exact numbers may be misguided and recommended placing greater emphasis on designating sufficient land to enable delivery.

12.1.5 Two responses called for regular review of housing need throughout the plan period to ensure flexibility and reflect new evidence.

## 12.2 Housing Need up to 2036

12.2.1 In relation to the net residential need of 3,286 homes up to 2036, 93 responses indicated whether they supported the figure or not. Of those who responded, 52% did not support the housing need, 27% had a neutral view, and 20% supported the figures. Of those, 38 provided comments on the housing need up to 2036, some responses repeated their comments, these are not repeated below.

12.2.2 Two respondents preferred extending the plan period to 2041 for greater certainty, while one advocated for flexibility to accommodate changing economic and demographic trends. Others questioned the reduction from the OAHN target from 7,425 to an additional need of 3,286.



*Figure 6. Breakdown of responses in supporting identified housing need up to 2036*

## 13 Employment Land

### 13.1 Overview

13.1.1 On the increase (44 hectares) in employment land up to 2041, 93 responses indicated whether they supported the figure. Of those who responded, 37% did not support the increase, 33% had a neutral view, and 30% supported the figures. Any comments relevant to employment land and need calculations received are summarised below.

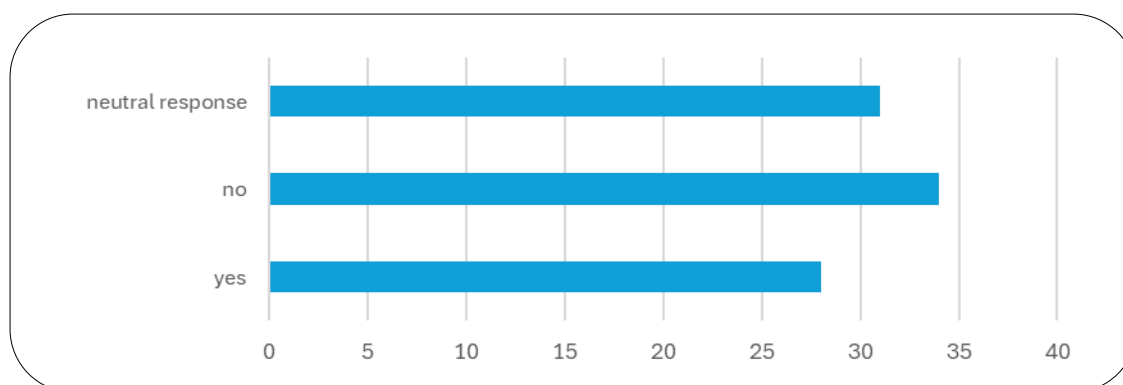


Figure 7. Breakdown of responses for supporting an increase in employment land.

### 13.2 Summary of Comments

13.2.1 Comments on the proposed increase of 44 hectares for employment land focused on the need for flexibility and appropriate siting. One considered the scale sufficient to support growth if land is well-located and serviced but questioned whether all employment uses should be confined to allocated sites, suggesting that certain uses, such as private medical facilities, could be accommodated on land designated for other use. There was support for delivering additional office space through redevelopment of existing premises and brownfield land in Douglas, ideally close to the city centre, with mixed-use schemes seen as a way to improve viability. The lack of employment land in Peel was highlighted as reinforcing its reliance on employment opportunities elsewhere. One response felt that there needed to be more single plots for employment development.

- 13.2.2 Further points addressed the methodology underpinning the Employment Land Review 2025. Observations included the limited response to the Business Survey, reliance on post-pandemic forecasts, and clarity sought over whether the identified requirement represents gross or net need. Clarification was sought on existing supply figures, with some questioning whether the net figure of 19.29 hectares would be sufficient, particularly if a large proportion is directed towards medicinal cannabis operations.
- 13.2.3 Some also felt that the identified need is too specific with focus being towards flexible and robust growth to meet any future demands. Broader themes emphasised sustainable development, advocating for industries with low land and energy demands, prioritisation of brownfield or lower valued sites, and carbon-neutral approaches. It was suggested that high-energy uses should contribute to renewable generation and that expansion should balance economic growth with food security and nature conservation. It was also suggested that green energy projects should be integrated, and greater wildlife mitigation be in place in industrial developments.

## 14 Availability and Capacity of Infrastructure

### 14.1 Overview

14.1.1 94 respondents indicated whether they were concerned about the impact of future development and its coordination with the availability and capacity of infrastructure, the results have been summarised below. Of those who responded, 73% were concerned, 20% had a neutral view, and 6% were not concerned. Additionally, 45 gave comment regarding infrastructure availability and capacity which are summarised below.

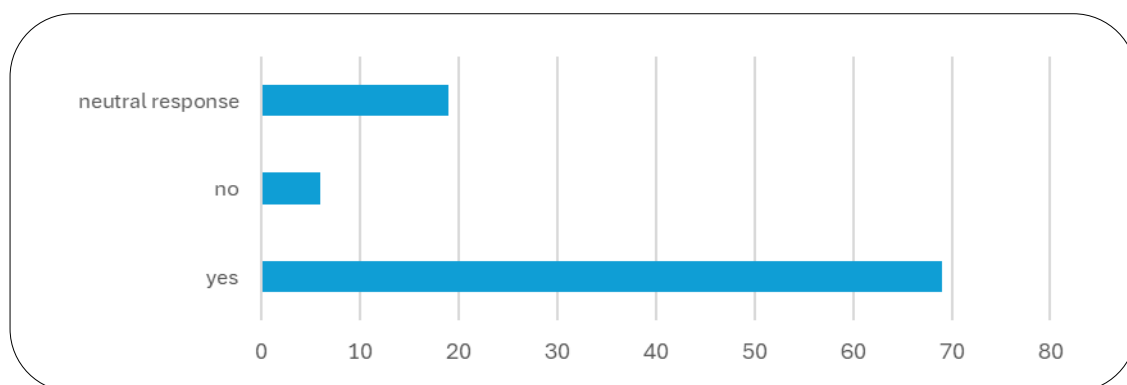


Figure 8. Breakdown of responses on concern regarding availability and capacity of infrastructure

### 14.2 Investment and Long-Term Planning

14.2.1 Eight responses supported growth being matched by investment in utilities, transport, and community facilities, with several stressing that improvements must occur alongside or ahead of development. Some advocated locating development within or near existing settlements where infrastructure and services already exist. Two responses noted that infrastructure provided by developers should be proportionate to the scale of development and supported by clear delivery frameworks. Some responses called for a more proactive approach to infrastructure planning. There were calls for a more strategic approach that aligns with the National Infrastructure Strategy and Transport Strategy. Concerns were expressed about resource constraints and the need for Departmental input during the early stages of planning to ensure effective implementation. Suggestions included:

- Focusing investment on areas where sustainable population growth creates demand;
- Locating development within existing settlements to minimise impact; and
- Checking infrastructure capacity for all new proposals.

### **14.3 Rural Infrastructure**

14.3.1 Several responses emphasised the importance of protecting agricultural land and avoiding development that could compromise food production. There were calls for thorough impact assessments to assess the lasting effects of new infrastructure and utilities on the landscape and environment.

### **14.4 Green Energy**

14.4.1 A number of responses addressed energy infrastructure and climate objectives, with several respondents noting that homes built to net zero standards would reduce pressure on the electricity grid, although increased electric car use could create additional demand. Some respondents supported renewable sourcing of electricity to meet climate obligations – others expressed scepticism about green energy describing wind generation as ineffective. District heating systems were suggested as a way to reduce emissions by recycling heat throughout a development.

### **14.5 Existing Infrastructure and Service Pressures**

14.5.1 Four responses highlighted that current infrastructure is already under strain, particularly roads, schools, and healthcare, and warned that future development should not proceed until capacity issues are resolved. Comments noted a lack of coordinated planning in this area and suggested addressing existing deficiencies as a foundation for population growth. Two responses raised concerns about traffic congestion in Douglas and the impact of commuter traffic, with suggestion to relocate some government services to ease pressure. Two responses felt the reduction of infrastructure and local services, including store closures, makes the Island appear less vibrant. There were also calls for an assessment to consider the wider environmental implications of development alongside infrastructure provision.

## **14.6 Population**

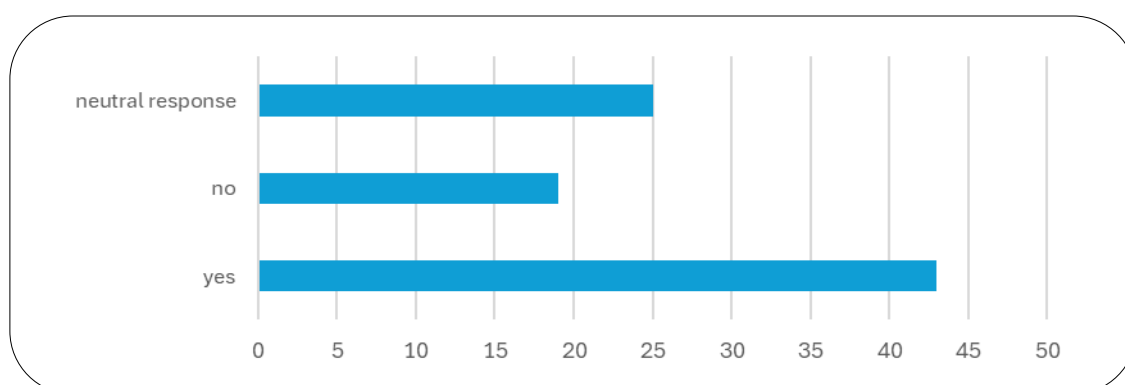
- 14.6.1 The sustainability of continued population growth was questioned. Concerns were raised about the proposed population increase, warning that it would place additional strain on infrastructure already perceived as inadequate - highlighting risks to hospitals, schools, countryside, and wildlife. One response noted that the capital investment required to support population growth may outweigh its benefits.
- 14.6.2 Doubts were expressed about the Island's ability to attract a younger, wealthier demographic, with a suggestion that only a distinctive, nature-focused approach could make this viable.

## 15 Town Centre Vitality and Out-of-Town Exceptions

### 15.1 Overview

15.1.1 87 respondents indicated whether they supported the strategic plan's continued commitment to town centre vitality and the proposal to consider further 'out-of-town' exceptions for specific purposes, such as retail. Of those respondents, 49% supported the proposal, 29% were neutral, and 22% did not support it. Comments from 40 respondents related to town centres and potential 'out-of-town' exceptions; these are summarised below.

#### 15.1.2



*Figure 9. Breakdown of responses to the question on supporting town centre vitality and considering 'out-of-town' exceptions*

### 15.2 Town Centre Vitality

15.2.1 The prioritising of town and village centres for retail and other businesses was stressed, with calls for stronger support for small enterprises. Six responses opposed out-of-town retail, warning it could harm town centres and lead to the death of the high street. Caution was urged in balancing out-of-town development against potential harm to Strand Street and other principle shopping streets including Peel, noting the need for centres to remain attractive destinations. Whilst there was some support for limited out-of-town development, this was caveated to ensure that uses that could be accommodated in town centres or through online shopping were precluded in any such policy provision. One response noted that out-of-town retail proposals should evidence how they contribute to the viability of agriculture and help to meet future need.

15.2.2 One response noted the impact of Tynwald Mills on Peel as a retail centre, noting that more services are being provided here. Another response felt that opportunities should encourage towns and village centres as a destination to attract visitors.

### **15.3 Controls and Exemptions**

15.3.1 Some responses highlighted a strong preference for maintaining town centre retail as the primary focus, many emphasising the need for stricter measures to prevent further out-of-town development. While some acknowledged that the Island has managed retail pressures relatively well, others called for a clear policy framework that prioritises town centre viability, protects employment land and promotes sustainable development. There was broad support for reviewing existing exceptions, but any review should be underpinned by robust evidence of need.

15.3.2 Some responses favoured a flexible but controlled approach, with clear definitions and safeguards to prevent incremental expansion contrary to original planning aims. Suggestions included:

- Ensuring developments contribute positively to local employment;
- Managing traffic and parking; and
- Utilising under-occupied sites.

### **15.4 Industrial Land and Out-of-Town Retail**

15.4.1 Views on industrial and out-of-town development were mixed. Some were of the view that industrial areas should remain focused on core uses such as warehousing and storage, yet others advocated for greater flexibility to accommodate research, creative industries and small-scale units to support local entrepreneurs. Certain uses, such as gyms, were suggested as potentially more appropriate for town centre locations. Designation of additional industrial land was advocated, but concerns were raised about permitted development rights in industrial areas, particularly for uses involving processes with environmental risks.

15.4.2 The practical challenges in selling bulky goods in town centres was highlighted – with exceptions for these uses supported, alongside corporate headquarters and business parks

15.4.3 Responses stressed that any out-of-town retail or business use should be tightly controlled, limited to bulky goods or distribution activities, and located where they do not undermine town centres.

15.4.4 Some suggested that out-of-town retail could help provide greater choice, parking, and accommodate services such as healthcare and libraries. Others stressed that any

expansion must be rigorously assessed to avoid undermining town centres and local food production. Several comments noted the growing reliance on online shopping – viewing out-of-town retail as a necessary alternative to meet consumer demand on Island.

### **15.5 Transport, Environment and Greenfield Safeguards**

15.5.1 Three responses commented that out-of-town developments can promote car dependency, undermine walkable communities and conflict with the Transport Strategy and emission reduction goals. Traffic congestion was noted as a detractor to town centre retailing. Lack of parking in Douglas was cited as a factor by some for reducing town centre attractiveness, alongside issues such as unsafe pavements. Some responses supported employment opportunities located close to settlements whilst mitigating the impact on nearby railway lines.

15.5.2 There was opposition to development on greenfield land, citing concerns about loss of wildlife habitat and food production potential – some believe that sufficient space exists within settlements and that landscapes outside should be safeguarded.

### **15.6 Regeneration and Mixed-Use Opportunities**

15.6.1 Four responses highlighted opportunities for mixed-use development, with some noting that industrial areas such as Balthane already accommodate a mix of uses and that existing built space should be fully utilised. Suggestions included:

- Incorporating housing and live-work units; and
- Promoting mixed use schemes in town and commercial centres to support regeneration.

15.6.2 The Local Economy Strategy 2024–2034 was mentioned, which seeks infrastructure improvements and diversification in retail, hospitality and leisure to strengthen rural resilience. Out-of-town retail was cautioned against where it could undermine these objectives.

## **Responses to Paper 3: Urban Communities and Centres**

## 16 Principles of Placemaking

### 16.1 Overview

16.1.1 On the seven principles of placemaking identified in Paper 3, 77 responses indicated whether they supported them. Of those respondents, 47% supported the principles, 38% were neutral, and 16% did not support the principles. Of those, 42 responses gave comment on measures that could help make great communities which are summarised below.

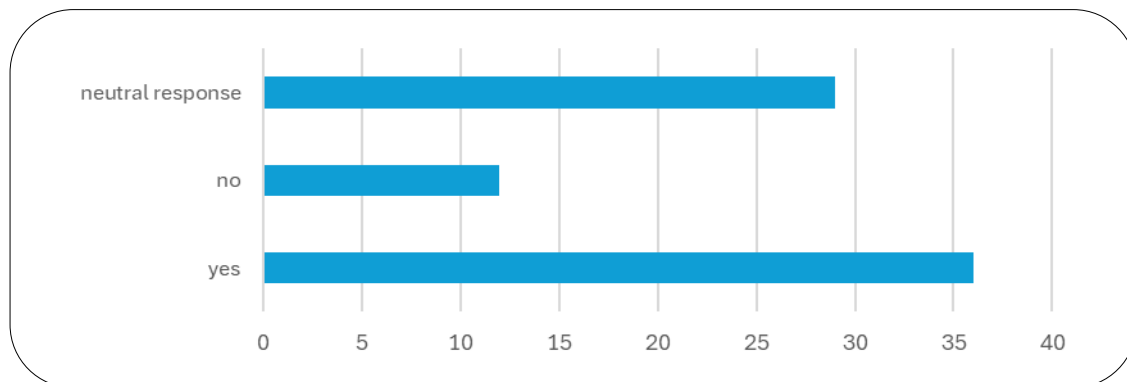


Figure 10. Breakdown of responses to the question on supporting the seven principles of placemaking

### 16.2 Social Inclusion

16.2.1 Responses emphasised the importance of creating inclusive spaces that foster social interaction and community identity. Suggestions included community hubs, improved maintenance of existing facilities, and centralised access to essential services such as healthcare and policing. Respondents highlighted the lack of provision for young people, calling for youth centres, training opportunities, and spaces for engagement.

16.2.2 Several comments stressed that placemaking should integrate social infrastructure alongside physical design to support wellbeing and belonging. Others urged a balance between placemaking principles with development viability. Respondents called for practical approaches that avoid excessive restrictions, while supporting regeneration rather than deterring investment.

### 16.3 Supporting Local Businesses

16.3.1 Responses focused on increased measures to support local businesses and revitalise town centres. Suggestions include controls on rental costs and temporary pop-ups to bring vacant shops back into use. Mixed-use development was supported, to sustain both daytime and evening economies.

## **16.4 Preserving Local Character**

16.4.1 There was strong support for design approaches that reflect settlement identity and character, including coherent architectural styles and interpretation features that connect to the past.

## **16.5 Accessibility and Connectivity**

16.5.1 Improving transport, inclusive design and active travel options was seen as an important measure with suggestions including:

- Pedestrianising major shopping streets;
- Enhancing walking and cycling routes;
- Providing amenities such as bus shelters; and
- Restricting parking of large vehicles.

16.5.2 Respondents also emphasised the need to maintain rural communities - ensuring housing and services remain accessible for all ages and abilities.

## **16.6 Green Infrastructure and Public Spaces**

16.6.1 Responses emphasised the need for green spaces that are both functional and well maintained, offering opportunities for recreation and biodiversity. Suggestions included street furniture (seating, play areas, bins) and community gardens, with investment to enhance usability. While some questioned the current definition of green infrastructure, there was broad support for approaches that connect communities and safeguard the island's natural character.

## 17 Masterplanning

### 17.1 Overview

17.1.1 79 respondents indicated whether masterplanning should be defined in the strategic plan. Of those respondents, 42% supported it, 39% were neutral, and 19% did not support it being defined. Additionally, 35 gave comments regarding masterplans and suggestions to ensure they work well - summarised below.

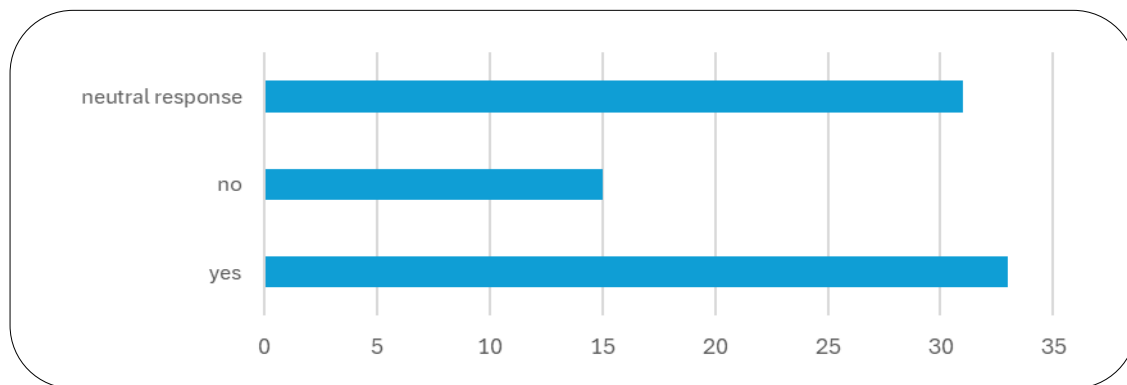


Figure 11. Breakdown of responses on defining masterplanning

### 17.2 Ensuring Effective Masterplanning

17.2.1 Masterplans were regarded as a way to provide confidence for investment, provided they are supported by robust delivery mechanisms, but views were mixed on the effectiveness of them. Five responses supported defining masterplanning within the strategic plan, emphasising the need for clarity and consistency. One respondent agreed with the principle but stressed that masterplans need to be considered in depth on their own merits. Several responses were opposed to masterplanning - arguing it adds little value and distracts from delivery. One response queried the distinction between masterplans and comprehensive treatment areas within area plans and the strategic plan.

17.2.2 Responses highlighted the need for masterplans to integrate climate mitigation and biodiversity from the outset. There was strong support for early engagement and open consultation with stakeholders and local communities, alongside collaboration with Departments, phased delivery under clear design policies and funding for public service improvements. Suggestions included improving transport links, provision for walking and cycling routes, and planning beyond site boundaries to address wider issues on multiple-ownership schemes. Respondents wanted masterplans to address public realm and connectivity, preserve key views and provide design cohesion, while allowing flexibility for changing market conditions and community needs.

17.2.3 Thresholds to trigger the need for a masterplan were suggested - using development briefs at area plan stage.

### **17.3 Delivery and Practical Challenges**

17.3.1 Responses often highlighted the practical challenges with masterplanning. Concerns included high preparation costs, past failures to deliver in Douglas, and doubts about implementation of capital improvements. Several noted difficulties in delivering masterplans that require complex co-operation when land is in multiple ownerships which causes delays. While some supported a coordinated approach, they stressed that success depends on robust delivery mechanisms, not just design. Other suggestions included economic zones, tax incentives, or grants such as the Island Infrastructure Scheme to improve viability.

## 18 Built Heritage

### 18.1 Overview

18.1.1 83 responses to the consultation indicated their views on the importance of including policies to protect and integrate built heritage into new schemes. Of those respondents, 73% felt it was important, 20% were neutral, and 7% felt it was unimportant to protect and integrate built heritage. 36 responses provided comment on protecting and integrating built heritage, comments received are summarised below.

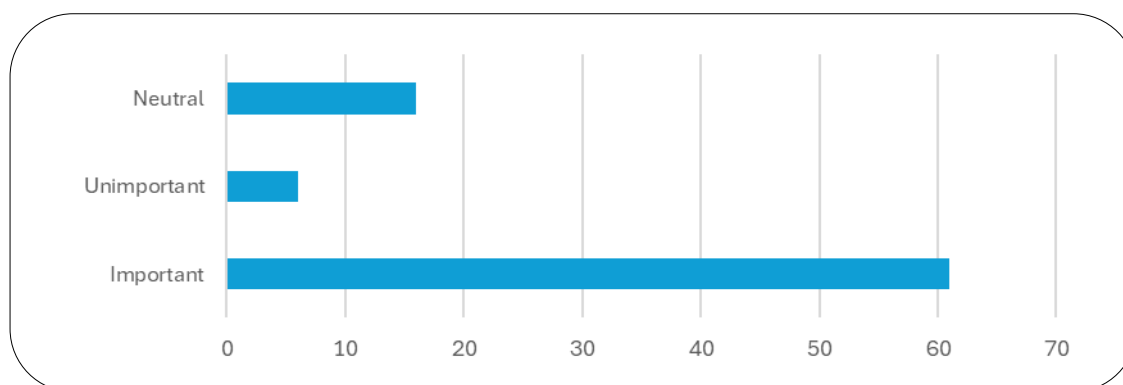


Figure 12. Breakdown of responses on protecting and integration of built heritage

### 18.2 Achieving the Right Balance

18.2.1 Responses highlighted heritage as vital for cultural identity, community pride, and tourism. Built heritage was seen as defining local character and distinctiveness, contributing to placemaking and sustainability through re-use. There was much support for protecting historic buildings and encouraging renovation rather than demolition, noting heritage should be integrated into new development to maintain local character. Some stressed the need for sympathetic modernisation - with heritage being seen as a driver of placemaking rather than a regulatory hurdle.

18.2.2 Some respondents were concerned about conservation holding towns back and making countryside living unaffordable, but others highlighted the lack of investment in key assets such as Queen's Pier and called for balanced regeneration that incorporates heritage as an economic and cultural driver.

18.2.3 Others acknowledged the historical value of the built environment but held the view that not every building can be saved - preservation should not come at any cost. Redevelopment should be allowed where buildings are beyond repair or hinder investment, citing high costs and poor-quality older stock.

### **18.3 Policy Guidance and Local Adaptation**

- 18.3.1 There was a call for clearer policies that focus on protecting buildings of genuine historic importance rather than all old structures. Some suggested reviewing rural buildings to identify those that are worth retaining to provide a baseline for future applications. It was acknowledged that high-quality design in new development and heritage-led regeneration can complement historic environments.
- 18.3.2 Supplementary guidance on materials and styles for different areas was suggested - to ensure harmony between old and new and to recognise the role of vernacular buildings as a habitat for wildlife.

## **19 Public Realm Changes**

### **19.1 Overview**

19.1.1 53 respondents gave comments on public realm changes they would like to see within our settlements. A range of themes were raised by individuals, including maintenance, green infrastructure, accessibility and local identity. Many respondents recognised the role of public realm improvements in enhancing wellbeing, safety, and fostering a vibrant community life.

19.1.2 A summary of the responses set out below.

### **19.2 Maintenance and Cleanliness**

19.2.1 Many respondents emphasised the importance of regular upkeep for public buildings, streets, and open spaces. There was a strong desire for more frequent cleaning, repairs, and attention to neglected areas. Some suggested introducing incentives for businesses to improve their shop frontages, alongside calls for greater investment in maintenance. Some responses commented that the costs and responsibilities for improving and maintaining the public realm should be carefully considered.

### **19.3 Green Infrastructure**

19.3.1 There was strong support for enhancing the natural environment within settlements, with suggestions for more trees, planting, ponds, and green spaces. Respondents advocated for the integration of biodiversity and sustainable drainage features into new schemes, such as rain gardens and permeable surfaces. There was a common view that greener streetscapes and increased tree cover would not only improve visual appeal of the street, but also contribute to climate resilience, mental wellbeing, and the overall quality of life.

### **19.4 Design Quality and Local Identity**

19.4.1 Responses frequently called for improvements in the design and character of public spaces, with a preference for using local materials - highlighting the need for coherence in street furniture, lighting, and signage, alongside interpretation boards and public art such as sculptures and street art. Suggestions included low-level lighting to protect dark skies, permeable surfaces for drainage, and coordinated approaches to ensure connectivity and a sense of place. Some respondents advocated for creating spaces to encourage both daytime and evening uses. A few responses noted that high-

quality landscaping and well-designed spaces could act as a catalyst for regeneration, support local economies, and encourage people to spend more time in town centres.

### **19.5 Accessibility, Usability and Community Engagement**

19.5.1 Respondents emphasised the need for welcoming, inclusive spaces that cater to all ages and abilities. Comments called for more seating, pedestrian-friendly streets, and features that improve accessibility, such as drop kerbs and better pavements. Suggestions included creating vehicle-free areas and providing spaces for community gardens, pop-up activities, and local events. There was strong support for active travel, social interaction, and opportunities for residents to be involved in decision-making.

19.5.2 Responses also highlighted the importance of multi-functional spaces and safer streets for children. Some respondents noted practical concerns, such as delays in completing recent works and the need for adequate parking.

## **20 Parking Standards**

### **20.1 Overview**

20.1.1 62 responses provided comments on what they thought the main issues with current parking standards are. A range of themes were raised by individuals, including the suitability of existing parking, active travel, and future design considerations. A summary of the comments is set out below.

### **20.2 Parking Provision**

20.2.1 Respondents widely felt that current parking standards are inadequate. While some considered the standards acceptable in theory, most noted they do not work in practice, as households typically require at least two spaces and provision is often uncoordinated or scattered. 10 comments highlighted that spaces are too small for modern vehicles and the 2.4m width is now insufficient. Several noted that garages are rarely used for parking. Redevelopment, such as on Douglas Promenade, has reduced availability of spaces. The increase in cars per household, more static vehicles due to home working, and the lack of affordable parking in Douglas was also raised.

20.2.2 There was strong support for minimum standards to address capacity, particularly in commuter towns, and criticism of a 'one size fits all' approach, which can lead to both over and under-provision, resulting in land consumption, congestion, and accessibility issues. Some wanted standards to better reflect the needs of disabled users, families, and visitors. Some called for more multistorey or underground parking.

### **20.3 Sustainable Travel and EV Integration**

20.3.1 There was broad support for standards that encourage public transport, walking, cycling, and car share schemes. Some advocated removing minimum standards to support climate commitments, provided alternatives are available, and highlighted the importance of active travel, the 15-minute city concept, and context-sensitive approaches.

20.3.2 Seven responses wanted better EV charging infrastructure, with some suggesting charging stations at every new house and all future spaces to have EV connection. Some raised concerns about the capacity of infrastructure to support widespread EV adoption, the current lack of cycle lanes and parking, and that reduction in standards may just increase parking issues. Many responses agreed that any reduction in parking should consider the development location and access to public transport.

## **20.4 Management and Enforcement**

20.4.1 Concerns were raised about misuse of car parks - long-term camping and antisocial behaviour - and parking on footpaths due to narrow roads. Issues with motorhomes, large vans, and commercial vehicles in residential areas were highlighted, with calls for restrictions, enforcement, or bans in some cases. Respondents emphasised the need for better parking management around schools and for larger vehicles, as well as the impact of campervans on the street scene and safety.

20.4.2 Failing to plan for sufficient parking results in gardens being paved over. A practical and flexible application of the standards is required. Restrictions on street parking should be better enforced and multiple car ownership discouraged. The impact of parking on the public realm and urban quality was also noted.

## **Responses to Paper 4: Rural Communities and the Countryside**

## 21 Agricultural Workers' Dwellings

### 21.1 Overview

21.1.1 116 respondents indicated whether they supported the removal of the rural exception in General Policy 3 relating to agricultural workers' dwellings. Of those respondents, 54% did not support the removal, 28% were neutral, and 18% supported the removal of the agricultural workers' dwelling rural exception. 29 gave comments regarding the removal of the rural exception for agricultural workers' dwelling.

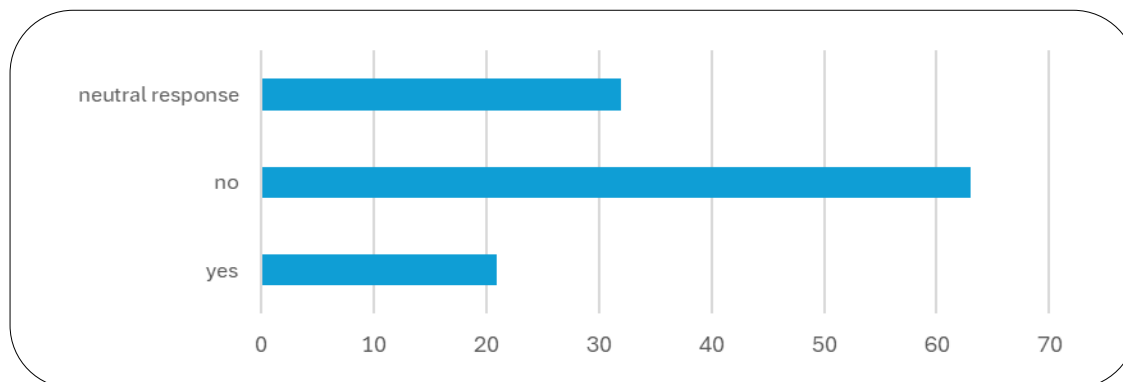


Figure 13. Breakdown of responses in supporting the removal of the agricultural workers' dwelling rural exception

### 21.2 Responses For and Against

21.2.1 Many were opposed to removal, with respondents emphasising the ongoing need for on-site housing to support farm operations, animal welfare, food security, and succession within the agricultural sector. It was argued that removing the exception could create barriers for new entrants, disrupt businesses, and risk making rural housing unaffordable for farm workers. Several highlighted the importance of retaining the policy to ensure affordable, purpose-built housing in the countryside. Responses stressed the need to retain current policies, with strict evidence requirements for removing agricultural ties.

21.2.2 Two responses did support removal - feeling that the number of farmworkers has declined and some may prefer to live away from their workplace. Three respondents felt that the policy for agricultural workers' dwellings is often misused, with ties removed and properties sold off for profit or not maintained for agricultural purposes, and the exception is now outdated. Alternative accommodation could be provided in nearby settlements due to improved transport, and exceptions should not extend to equestrian or other activities.

21.2.3 A small number of respondents supported permitting agricultural workers' dwellings only where justified, or using a more flexible approach, such as temporary accommodation or time-limited occupancy conditions. Some called for closer monitoring and case-by-case assessment to ensure genuine agricultural need is met and to prevent misuse of the exception. There were also calls for raising buyer awareness in respect of the land use status of equestrian and lifestyle land when purchasing.

## 22 Previously Developed Land

### 22.1 Overview

22.1.1 111 respondents indicated whether any changes are needed to the definition of previously developed land. Of those respondents, 16% wanted changes, 51% were neutral, and 32% felt no changes were needed to the definition. 21 commented on the definition of previously developed land.

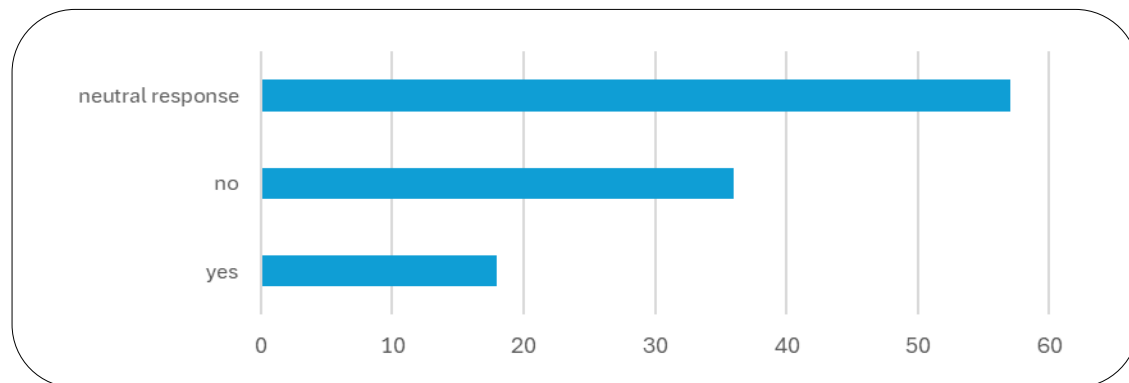


Figure 14. Breakdown of responses on any changes needed to the definition of previously developed land

### 22.2 Summary of Comments relating to Previously Developed Land

22.2.1 Greater clarity was called for, noting that some aspects of the definition are subjective or unworkable. Proposed suggestions of changes or clarifications included:

- Retaining land for its original use;
- Considering drainage and aesthetics;
- Ensuring only genuinely developed land is reused;
- Expanding the definition to cover historically approved sites;
- Expanding the definition to include previously surfaced, quarry land or industrial land; and
- Expanding the definition to include redundant rural buildings.

22.2.2 Others emphasised the need to avoid creating loopholes for lifestyle land or inappropriate development, with suggestions to return previously developed land in the countryside to nature or agriculture where possible.

22.2.3 Some respondents advocated for stronger incentives for brownfield development, using a tiered or criteria-based approach.

22.2.4 Four respondents felt the current definition of previously developed land did not need changing.

## 23 Rural Tourist Accommodation

### 23.1 Overview

23.1.1 113 responses indicated whether they supported a policy provision for new tourist accommodation in the countryside whether serviced or non-serviced. Of those respondents, 47% supported, 30% did not support, and 23% had a neutral view. Eight responses provided comment on tourist accommodation in the countryside, a summary is provided below.

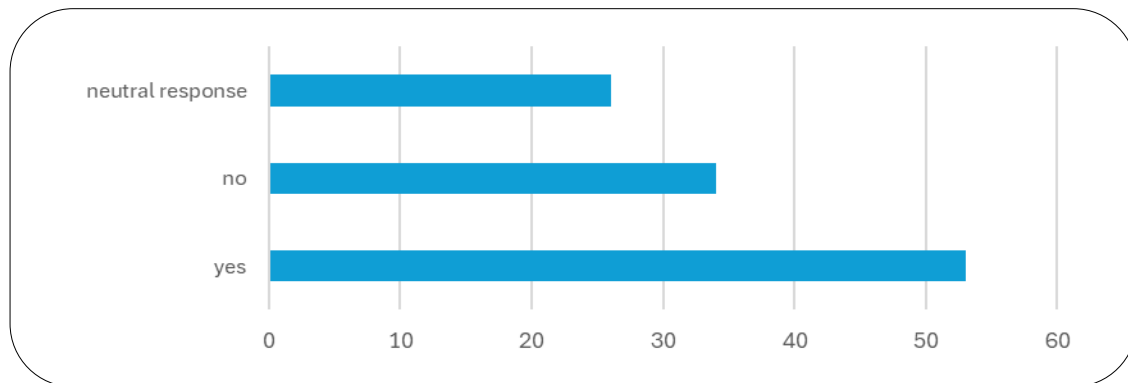


Figure 15. Breakdown of responses in supporting a policy provision for new tourist accommodation in the countryside

### 23.2 Summary of Comments relating to Rural Tourist Accommodation

23.2.1 Views varied on tourism development in the countryside. There was support for small-scale, eco-friendly sites that integrate with the landscape and for reusing agricultural buildings rather than new builds - one respondent noting this could support the industry and future investment in food production, but others stressed that such development must not compromise the countryside, highlighting the need to protect rivers, hills, and coastal areas.

23.2.2 Some emphasised the need to align policy with the Tourism Strategy where development delivers demonstrable benefits for the countryside. Modern serviced options such as coastal hotels and spa retreats were suggested by one respondent - to improve visitor choice. Broader comments included diversification opportunities for landowners, whilst ensuring occupancy controls to avoid second homes being permitted under such policy. Two respondents raised concerns that new tourist accommodation might be converted to permanent dwellings, advocating stricter controls and demolition requirements to prevent further blight or enlargement.

## 24 Other Exceptions in the Countryside

### 24.1 Overview

24.1.1 116 respondents indicated whether there should be exceptions for other development types in the countryside. Of those respondents, 51% expressed disagreement with allowing exceptions, 28% supported other exceptions, and 22% remained neutral. Additionally, 43 gave comments on if there should be exception for other development types in the countryside.

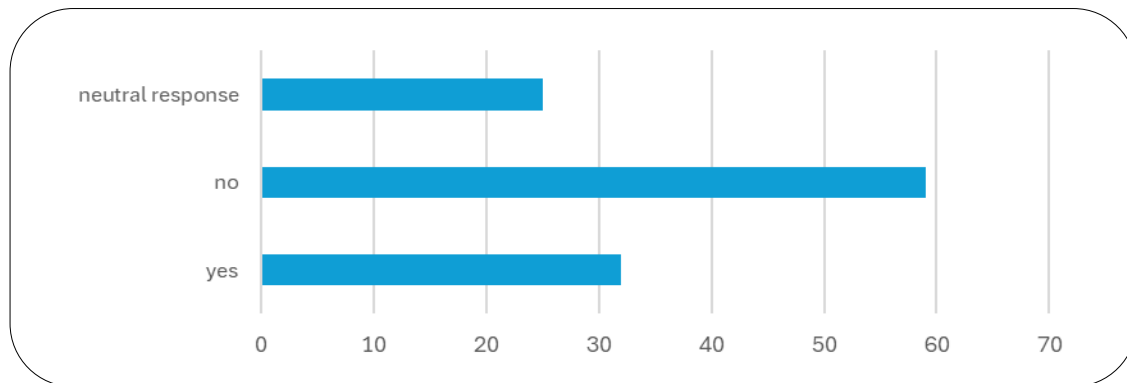


Figure 16. Breakdown of responses on whether there should be exceptions for other development types in the countryside

### 24.2 Views and Suggestions on Other Exceptions in the Countryside

24.2.1 Opposition to exceptions to further development of the countryside was strong - citing environmental harm, loss of farmland, and threats to the Island's Biosphere status. Several stressed that the countryside is not a renewable asset and should be preserved for food security, biodiversity and to preserve the Island's unique character.

24.2.2 Concerns centred on the loss of greenfield land, habitat destruction, and relaxed policy leading to unintended consequences. Some stressed the importance of environmental impact assessments for any proposals whilst others argued that development should remain within existing towns or built-up areas unless strategically justified. A controlled, case-by-case approach was supported by some respondents, with exceptions tightly aligned to sustainability goals and the Island Plan. Suggestions included:

- Limiting development to areas of low agricultural value or where environmental benefits of the development are demonstrated;
- Opportunities to restore tholtans for tourist use;
- Small plot development of houses - both on and off grid;

- Development which supports rural enterprises, agricultural businesses, and facilities that benefit local employment without harming landscapes; and
- Exceptions for renewable projects to meet sustainability and decarbonisation goals, provided robust evidence, environmental appraisals, and site assessments are in place – with a clear policy distinction made between large-scale strategic renewable schemes and smaller domestic installations.

## 25 Replacement Dwellings

### 25.1 Overview

25.1.1 112 responses indicated whether they support a more restricted use of the rural exception rule for replacement dwellings to retain examples of Manx vernacular architecture. Of those respondents, 52% supported, 30% had a neutral view, and 18% did not support a more restricted use. Six responses gave comment on replacement dwellings elsewhere in the consultation, these comments are summarised below.

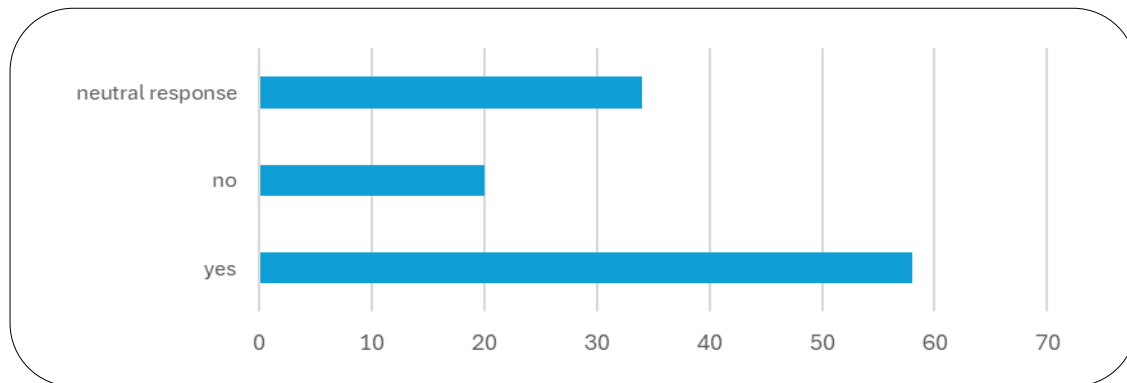


Figure 17. Breakdown of responses in supporting a more restricted replacement dwelling exception

### 25.2 Summary of Comments on Replacement Dwellings

25.2.1 The principal concern relates to the loss of buildings that display characteristics that are typical of the Manx vernacular, as this is key to maintaining the Island's built heritage. Six responses called for greater protection of Manx vernacular architecture and Tholtans - prioritising renovation of existing stock over new development. It was felt that too many countryside dwellings have been demolished to make way for new builds.

25.2.2 Two responses supported retaining examples of Manx vernacular architecture beyond those within the seven candidate special landscapes, including those on quarterland farms.

25.2.3 One respondent felt that planners lack understanding of vernacular design and suggested consulting local organisations, alongside updating Planning Circular 3/91.

## **26 Rural Industries**

### **26.1 Overview**

26.1.1 35 responses gave examples of what should be included in the definition for rural industries. Respondents suggested a broad definition of rural industries covering traditional land-based activities and modern sectors. A summary of the suggestions is set out below.

### **26.2 Traditional Industries**

26.2.1 Core examples of traditional industries included:

- Farming (crop and livestock) and agri-food production, together with horticulture;
- Forestry, timber conversion;
- Peatland and upland management;
- Fisheries;
- Arboriculture;
- Gamekeeping and estate management; and
- Rural contracting such as fencing and environmental land management.

26.2.2 Responses also highlighted:

- Building conservation trades;
- Mechanical engineering for farm vehicles, and land surveying;
- Traditional crafts and artisan trades, including weaving, cheese making, flax growing, blacksmithing, basket weaving, charcoal burning, instrument making, cooperage, shoe making, butchery, and smoking meat;
- Food-related industries such as market gardening, fruit growing, and jam and cheese manufacturing were also noted;
- Rural tourism - including glamping, farm stays and horse riding; and

- Ecotourism and nature-based experiences as part of a sustainable rural economy – such as eco-lodges, wildlife watching, and outdoor leisure activities such as hiking, cycling.

### **26.3 Emerging Industries**

26.3.1 Emerging opportunities in rural industries mentioned by respondents included;

- Renewable energy (wind, solar, and land-based solutions);
- Waste management and circular economy initiatives, such as green waste recycling, and compost production – to support farming and land restoration;
- Carbon and natural capital projects; and
- Agri-tech.

26.3.2 A few responses emphasised that rural industries should remain low-impact, sustainable, and in keeping with local character, with concerns raised about pollution, noise, traffic, and the visual impact of equestrian facilities.

26.3.3 One respondent proposed a broad principle for the definition of rural industries as any economic activity that primarily serves or depends on rural areas using local resources, labour, and skills.

## **27 Overriding National Need**

### **27.1 Overview**

27.1.1 50 responses commented on whether overriding national need should be defined in the strategic plan. 18 responses supported defining overriding national need. Respondents raised a range of views on the need for clarity, governance, and environmental considerations, as well as concerns about flexibility and potential misuse. A summary of the comments relating to overriding national need is set out below.

### **27.2 Suggested Content and Purpose of a Definition**

27.2.1 The following suggestions were made by respondents in respect of the content and purpose of a definition:

- Six felt a definition would prevent ambiguity, misuse, and spurious appeals, ensuring transparency and consistency;
- Three wanted clear tests to prove the need is imperative, including evidence that the development is essential, proportional, and without alternatives;
- Two wanted clear thresholds and limits to prevent short-term policy agendas;
- One pointed to UK guidance, saying the term should only apply to projects that are truly critical for national strategic interests;
- Two respondents suggested non-exhaustive examples rather than a fixed definition;
- Two suggested previously approved examples could help clarify the term;
- Four respondents stressed the definition should identify who decides, what circumstances qualify, and include types of development considered overriding national need;
- Four respondents stressed that it must include environmental protection, biodiversity, and climate obligations;
- One respondent saw renewable energy and net-zero projects as potential qualifying developments; and

- Some focused on the priorities it should reflect – with two suggested rephrasing it as “overriding biosphere need” to better reflect ecological priorities and the Island’s Biosphere status.

### **27.3 Opposition**

- Opposition centred on the following concerns:
- The potential harm to landscapes, and the long-term impacts on wildlife and scenery;
- Future priorities which are not yet known may be excluded;
- Flexibility is needed for future circumstances – each case should be judged on its own merits;
- Reliance on overriding national need exemptions should be avoided altogether and citing risk of abuse and calling for alternative sites to be assessed first.

### **27.4 Decision Making**

27.4.1 Some respondents raised concerns about how decisions on overriding national need would be made. Five responses worried about political influence and called for independent scrutiny to ensure decisions are evidence-based. Others supported stronger governance measures, with one suggesting approval by Tynwald for any project under this exception and another recommending inspectors’ recommendations be accepted without exception to maintain impartiality. Two respondents wanted clear thresholds and limits to prevent short-term policy agendas, while one pointed to UK guidance, saying the term should only apply to projects that are truly critical for national strategic interests.

## 28 Rural Exception for Renewable Energy Production

### 28.1 Overview

28.1.1 135 respondents indicated whether they supported a new rural exception rule to support the principle of renewable energy production. Of those respondents, 74% expressed disagreement with such exceptions, 19% supported a renewable energy exception, and 7% remained neutral. 83 provided comment to explain their answer, a summary of the comments are outlined below.

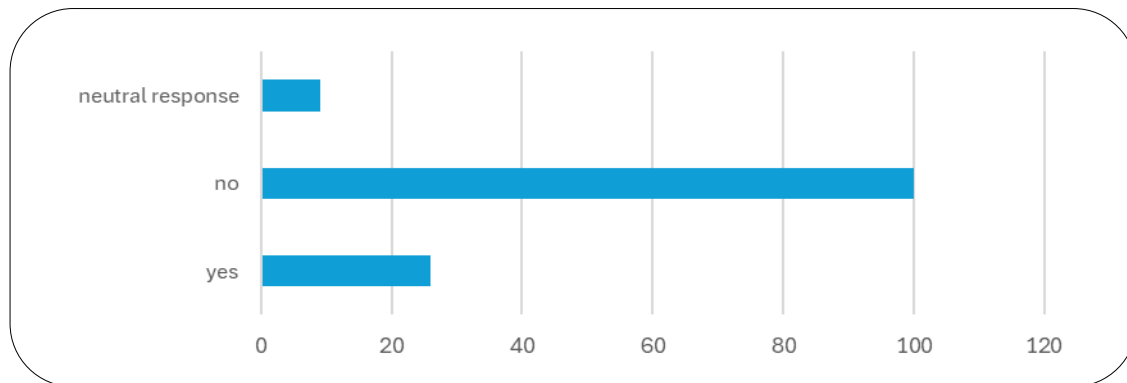


Figure 18. Breakdown of responses on whether there should be a renewable energy rural exception clause

### 28.2 Opposition to a rural exception for renewable energy

28.2.1 The majority of respondents opposed a rural exception for renewable energy - expressing concern about the impact of onshore wind and solar developments on the Island's landscape, wildlife and agricultural land. Some respondents argued that the Island is too small to accommodate large-scale renewable projects without harming landscape character and biodiversity. Many responses raised concerns about misuse of policy or risk of widespread development under a blanket exception. Respondents stressed that the countryside should be protected at all costs and that renewable energy should not compromise the Island's Biosphere status or enjoyment of the landscape for future generations. Respondents warned that such an approach could undermine safeguards for candidate special landscapes and agricultural land, threatening food security and traditional farming practices. Any policy must avoid creating loopholes for potential developments and ensure robust environmental impact assessments are carried out.

#### 28.2.2 Alternative suggestions included:

- Prioritising alternatives such as installing solar panels on all new builds, government properties, rooftops, car parks, and brownfield sites rather than using rural land;
- That offshore wind should be considered instead of onshore developments, citing visual intrusion and environmental damage; and
- Building in flexibility - to adapt to evolving technologies.

28.2.3 Several responses questioned the justification for renewable energy projects, arguing that the Island's limited landmass and existing interconnector make large-scale developments unnecessary. Respondents also felt that that renewable energy generation should be limited to meeting local needs, with all proposals assessed fairly on their individual merits. Some noted differences between small-scale and large-scale schemes, stressing that each proposal should be judged on its merits and subject to robust planning processes.

### **28.3 Those in Support**

28.3.1 Some respondents did support a rural exception for renewable energy - emphasising the importance of energy security, climate change mitigation, and progress towards net-zero targets. Some respondents considered renewable energy to be of national importance. Some felt that policy should enable onshore wind and solar developments where the impacts on landscape and communities can be carefully managed - highlighting potential benefits for rural landowners or tenant farmers under this clause in progressing towards the Island's long-term sustainability. Others mentioned the need to address misinformation about renewable energy - fast-tracking projects is essential under the climate emergency.

28.3.2 Support was often conditional on safeguards, including environmental impact assessments, mitigation near sensitive areas, and measures to preserve landscape character. There were also calls for flexibility in any policy to accommodate emerging technologies and additional renewable options such as tidal power, biomass, and bio-digesters.

## **28.4 Planning Processes and Mechanisms**

28.4.1 Governance concerns were strongly highlighted. There were calls for any renewable energy proposals to be assessed under a separate overriding national need test, with clear definitions and exceptional circumstance criteria. Other suggestions went further – with calls for independent scrutiny, including suggestions for major projects to be subject to a public referendum and all applications going through a transparent planning process. Responses often called for transparent planning processes, rigorous planning conditions, and enforcement if any projects proceed rather than being permitted under an exception. Some emphasised the need for case-by-case assessment of renewable energy projects.

28.4.2 Several responses proposed that, if renewable energy projects are permitted, they should be governed by strict policy criteria. These responses emphasised the need for safeguards, including:

- Analysis of alternative sites;
- Consideration of national need;
- Exceptional circumstance tests for candidate special landscapes;
- Restrictions on skyline intrusion across southern hills;
- Protection of dark skies and tranquillity;
- Buffers for sensitive habitats and recreational routes; and
- A landscape-led approach supported by rigorous siting assessments.

## **Responses to Paper 5: Our Climate Responsibilities**

## **29 Carbon Sequestration and Ecosystem Services**

### **29.1 Overview**

29.1.1 46 responses gave comment on how the strategic plan will promote carbon sequestration or the maintenance and enhancement of ecosystem services. Comments included support for protecting habitats, calls for clear policy guidance, concerns about conflicts with other policies and the need for balance. A summary of the key comments is set out below.

### **29.2 Those in Support**

29.2.1 Measures to protect peatlands and areas of natural carbon sequestration were supported - highlighting their role in biodiversity, flood risk management, and carbon storage – with specific calls for policies to maintain permanent pasture, wetlands, and ecologically important areas, and provide clear guidance on calculating sequestration values.

29.2.2 Respondents also supported tree planting and green infrastructure in new developments, alongside improved drainage in flood-prone areas. Other responses emphasised that all developments should deliver environmental benefits and avoid damaging peat, heathland, or removing established trees.

29.2.3 Concerns were raised about conflicts between carbon sequestration policies and renewable energy exceptions, with calls for a balance between green energy and habitat protection.

29.2.4 Suggestions included proportional contributions through landscaping and management plans rather than rigid targets.

### **29.3 Those Against**

- 29.3.1 Several responses opposed carbon sequestration and ecosystem services policies - arguing that the Island's contribution to global climate targets is minimal and warning of high costs and unrealistic goals.
- 29.3.2 While some dismissed the climate agenda entirely, others stressed the need for evidence-based decisions and engagement with projects such as Blue Carbon to align policy with biodiversity and flood resilience objectives, and to discourage development in areas at risk of flooding. The need to balance carbon sequestration with food production and energy generation was highlighted.
- 29.3.3 Responses noted the complexity of assessing impacts and called for clear guidance, mapping, and support for landowners. Suggestions included long-term tree planting plans with incentives, integration of waste management into carbon budgeting, and alignment with the Climate Change Act and DEFA Biodiversity Strategy.

## 30 Biodiversity Net Gain

### 30.1 Biodiversity Net Gain Delivery Location:

30.1.1 79 responses to the consultation indicated a preference for where biodiversity net gain (BNG) should be delivered for new developments. Of those who responded, the most supported option with 52% of responses was a combination of both on-site and off-site provision, and the second largest was on-site only with 28% of responses. 38 responses provided comments which are summarised below. Some comments indicated the preference for more than one delivery mechanism.

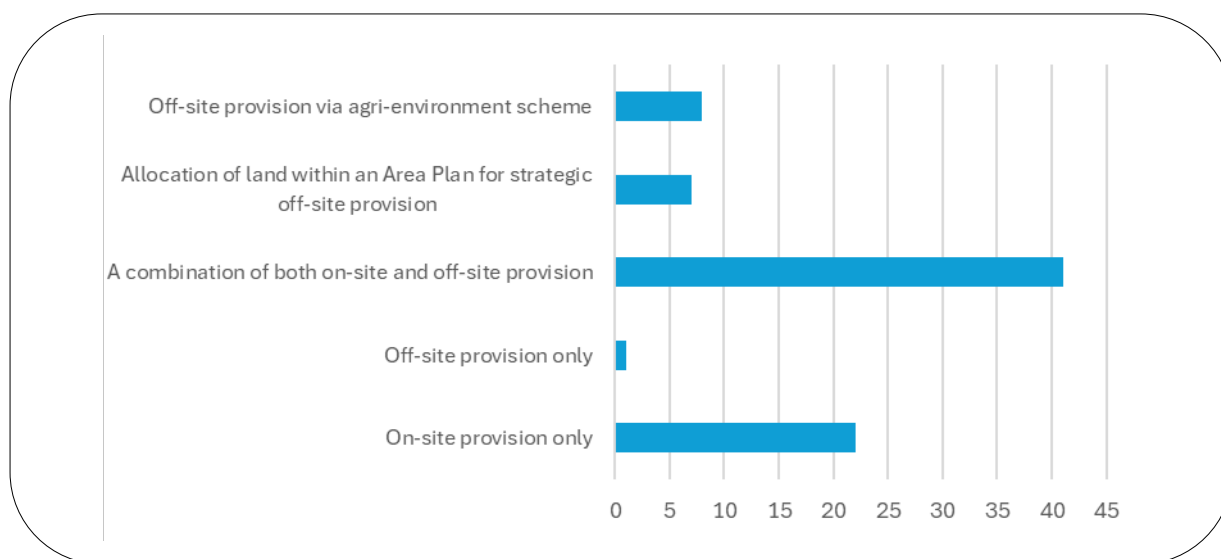


Figure 19. Respondents' preferences for delivery locations of biodiversity net gain

### 30.2 Preferences

30.2.1 Most respondents supported a flexible approach to BNG, favouring a combination of on-site and off-site provision. This was considered the most practical solution, particularly as on-site delivery is not feasible in all circumstances and was viewed as offering the greatest flexibility to align with biodiversity objectives.

30.2.2 Alignment with the Agri-Environment scheme was also supported, highlighting potential benefits such as supporting the rural economy, providing value for money, and enabling landscape-scale improvements including peatland restoration.

30.2.3 Others emphasised that on-site provision delivers local ecological benefits but must be supported by modest on-site objectives and clear maintenance responsibilities. Comments also noted that off-site provision should be locally focused and managed to ensure ecological gains across the Island. Support for off-site provision only was very limited.

30.2.4 While many respondents supported multiple options, some expressed reservations about allocating land within area plans, citing potential impacts on agricultural land value and food security.

30.2.5 A number of responses expressed scepticism about BNG, with some describing it as wasteful, unrealistic, or ineffective.

### **30.3 Concerns**

30.3.1 Several responses raised economic concerns, emphasising that BNG requirements should not negatively impact the economics of development land or impose disproportionate costs.

30.3.2 There were concerns that applying BNG to small housing plots could create unnecessary financial pressures. Some respondents noted that the long-term costs of BNG are likely to be passed on through higher house prices, while others called for a responsible approach that does not translate into increased costs for the wider community. Suggestions included introducing commuted sums in place of on-site provision and clear guidance on allocation between urban and rural areas.

30.3.3 Practical concerns were also highlighted, including difficulties in monitoring and enforcement and challenges in assessing BNG through planning processes. Concerns were raised about the reliability of biodiversity metrics - some felt that desktop-based assessments fail to reflect real site conditions with some calling for independent verification processes. Others highlighted the risk of short or medium-term benefits rather than long-term gains. Strict rules for managing and overseeing off-site provisions, supported by compliance checks, were called for.

30.3.4 Several responses proposed strengthening policy and improving implementation – with some noting that Environmental Impact Assessments may not capture sufficient detail - stressing the need for evidence-based site improvements.

30.3.5 Some responses recommended requiring gains to remain on-Island and avoiding reliance on BNG credit systems. While proportionality for minor applications was supported, some respondents warned against exempting small-scale developments entirely.

## 31 Biodiversity Net Gain Approaches

### 31.1 Overview

31.1.1 81 respondents indicated what type of biodiversity net gain policy approach they supported the most. Of those who responded, 65% supported a nature focused approach, 24% supported a site focused approach and 11% supported an amenity focused approach. 28 responses provided comments in this regard.

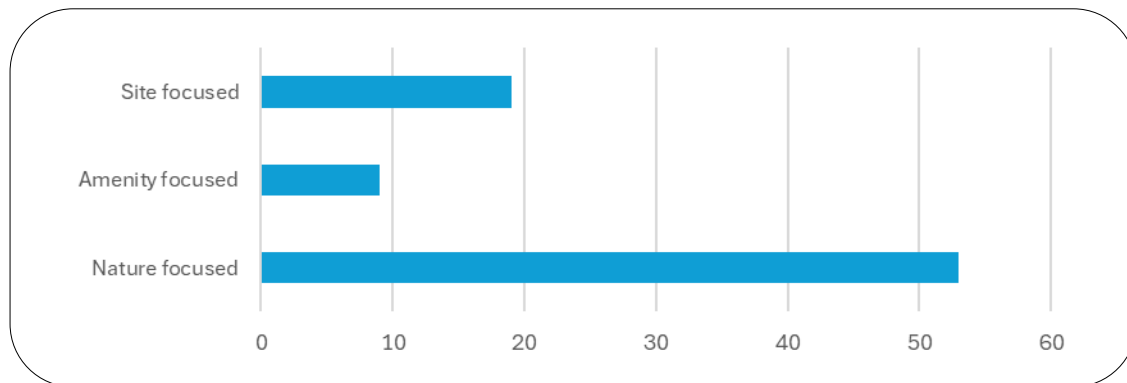


Figure 20. Breakdown of preferred policy approach for biodiversity net gain

31.1.2 Several comments supported a nature-focused policy approach, emphasising the need to protect and restore natural environments, prioritise ecological value and connectivity, and integrate opportunities for nature within daily life and new developments. Suggestions included tree planting, community gardens, and measures to safeguard natural beauty, heritage, and rural character.

31.1.3 Respondents who supported a site-focused approach argued that BNG should be delivered within the same area as the development to ensure benefits remain local. This approach was viewed as keeping improvements tied to the development, providing flexibility through site-specific assessments and complementing large scale enhancements elsewhere.

31.1.4 Other responses indicated that all proposed approaches have merit, with calls for a more holistic or hybrid model combining different elements of the suggested approaches. Concerns were raised about adopting a single approach, which could neglect other important factors from other approaches.

31.1.5 Others cautioned against overly rigid policies and reliance on mechanisms that oversimplify biodiversity loss, stressing that mitigations must be practical and feasible.

## 32 Active Travel

### 32.1 Overview

32.1.1 102 responses indicated whether they felt there should be a specific policy provision for active travel. Of those respondents, 49% agreed, 26% had a neutral view, and 25% disagreed. Twelve responses gave comment on active travel elsewhere in the consultation, these comments are summarised below.

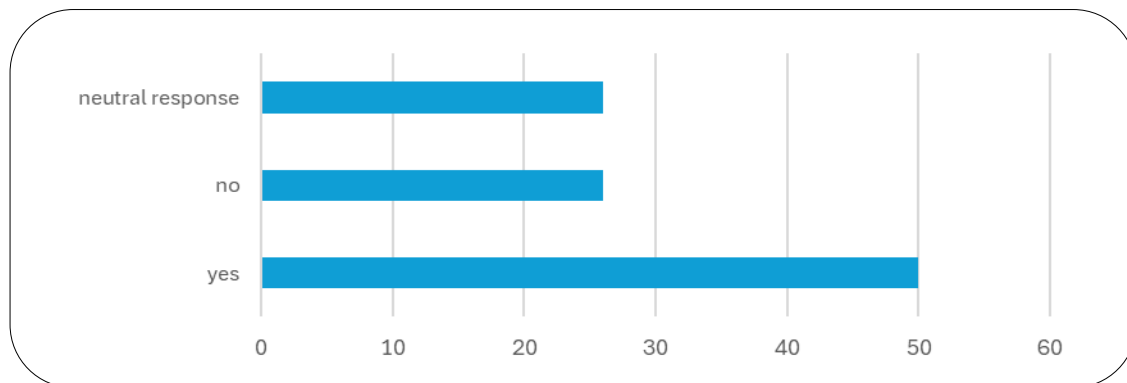


Figure 21. Responses on if there should be a specific policy provision for active travel

### 32.2 Co-ordination and Investment is Key

32.2.1 Views were mixed on active travel. Several respondents supported active travel in principle but stressed it requires significant off-site investment and better integration between developments and existing areas. Some respondents supported investment, including for electric charging facilities and micromobility infrastructure to avoid barriers.

32.2.2 There were concerns about the feasibility of active travel given the distances between housing and employment under the current settlement hierarchy, with one respondent emphasising that good public transport connectivity is essential for success.

32.2.3 Others felt active travel is unrealistic and a waste of money, with one describing it as civil service driven.

#### 32.2.4 Suggestions to encourage active travel included:

- Master planning for joined up cycleways;
- Safe routes within and between towns;
- Allowing bikes and mobility aids on buses;
- Lowering speed limits in villages; and
- Investment in public transport alongside road upgrades to reduce car dependency.

## **33 Draft Flood Policy 1**

### **33.1 Overview**

33.1.1 37 responses commented on Draft Flood Policy 1, which concerns managing the risk of flooding in new developments, as set out on Page 44 of Paper 5. Most respondents supported the draft policy as a proportionate and essential measure to manage flood risk. Responses welcomed its alignment with climate resilience and adoption of a precautionary approach to inform robust flood risk assessments, taking account of updated mapping, and vulnerability classifications.

33.1.2 A recurring theme was avoiding development on floodplains and high-risk zones, with calls for stricter controls and, in some cases, complete bans on development in these areas.

### **33.2 Key Concerns**

33.2.1 While most agreed flood risk should be a major consideration for a development proposal, some argued for balanced decisions, proportionate assessments for small sites, and practical, financially viable and enforceable mitigation measures. Several responses highlighted the need for flexibility within the policy to support regeneration and investment in urban areas while ensuring flood resilience. A few respondents called for the Unoccupied Urban Sites Register to be updated to ensure completeness of the register and to provide additional clarity on sites which are at risk of flooding. Some responses opposed to development on previously developed sites in high-risk zones, citing insurance and safety concerns. Others supported the precautionary approach but requested clearer guidance on brownfield exceptions and how to treat sites which are partially at risk of flooding.

33.2.2 Concerns were raised about cumulative impacts of flooding on land drainage and the potential for developments causing flooding elsewhere within the catchment. Respondents stressed the need for ongoing maintenance of rivers, waterways, and drainage networks, with suggestions for community-led initiatives to clear debris and prevent blockages. Agriculture was seen as a key partner in flood management, with calls for clearer guidance on drainage regulation and how to treat essential farm infrastructure and rural diversification projects.

- 33.2.3 Some responses advocated for nature-based solutions within catchments, including forestry and upland management, to regulate water flow and reduce flood risk.
- 33.2.4 Respondents supported sustainable land use and policy that encourages partnerships between government, developers, and communities.

## **34 Draft Flood Policy 2**

### **34.1 Overview**

34.1.1 20 responses provided comment on Draft Flood Policy 2, which concerns managing the risk of flooding in new development, as set out on Page 47 of Paper 5. Generally, the draft policy was supported as a sensible, practical, and necessary complement to Flood Policy 1, but there were also some concerns.

### **34.2 Key Concerns**

34.2.1 The high cost of protecting properties was seen to strengthen arguments against allowing new development in flood-prone areas.

34.2.2 A recurring theme was the importance of ensuring that new or upgraded defences do not cause a significant loss of amenity. Some questioned the impact and long-term effectiveness of hard engineered defences. While often necessary, they can be visually or physically intrusive. Respondents stressed the need to maintain public access, views, and local character to ensure community support - alternative or less intrusive approaches should be explored where feasible. Some respondents emphasised that any new or improved flood defences must be financially viable and practical to implement.

34.2.3 A small number of respondents also noted that flood risk affects whole catchments, including upland areas, and defence measures should be planned in a way that avoids increasing risk further downstream. Several responses advocated for greater use of natural flood management and nature-based solutions, highlighting co-benefits for biodiversity and landscape quality. Examples included peatland restoration, sustainable drainage systems, and improved floodplain and river management. Agricultural landholdings may still require a combination of engineered and natural measures to protect land and assets.

## **35 Draft Flood Policy 3**

### **35.1 Overview**

35.1.1 20 responses commented on Draft Flood Policy 3, which concerns managing flood risk in new development, as set out on Page 48 of Paper 5. Many responses supported the principle of requiring flood risk assessments where appropriate, recognising their importance in ensuring safe and sustainable development.

### **35.2 Key Concerns**

35.2.1 Some emphasised the need for proportionate assessments and clearer guidance, particularly for infill or agricultural proposals, to avoid creating unnecessary barriers. Some respondents felt that assessments should more clearly account for site history, watercourses, drainage needs and the potential effects of climate change, including rising sea levels and the design life of buildings. Others raised concerns that existing flood risk assessments are not always followed or applied consistently and noted the importance of expert input during the planning process.

35.2.2 There were calls for policy to ensure that off-site and downstream consequences are fully considered in assessments, while it was cautioned that this should not place unclear liabilities on the planning authority. There was also support for requiring site-specific flood risk assessments for major developments to ensure that risks are properly understood and mitigated. Many respondents supported the general intent and direction of the draft policy and agreed that undeveloped floodplains should continue to be protected from development. It was noted that flood risk should be considered alongside other planning factors and policy should avoid creating absolute constraints that cannot be balanced with wider planning objectives.

## **36 Draft Flood Policy 4**

### **36.1 Overview**

36.1.1 17 responses gave comment on Draft Flood Policy 4 concerning drainage and flood risk in new development, as set out on Page 50 of Paper 5. Respondents generally supported the policy, recognising that effective drainage is essential and that regular maintenance of existing infrastructure, such as ditches, drains and culverts, is critical to reducing flood risk. Key concerns are detailed below.

### **36.2 Key Concerns**

36.2.1 Ensuring new development provides adequate foul and surface-water drainage is key - both to avoid a return to historic problems and, where appropriate, to allow standalone treatment solutions as an acceptable alternative.

36.2.2 Respondents endorsed the inclusion of flood-resilient design measures and the requirement for drainage masterplans on larger schemes, although it was noted that achieving reductions in surface-water run-off on brownfield sites may present challenges.

36.2.3 Several respondents expressed concern about surface-water entering watercourses and the associated risk of pollution. There was strong support for the use of sustainable urban drainage systems, accompanied by calls for clearer guidance on adoption arrangements and long-term maintenance responsibilities.

## **37 Draft Sustainable Drainage Systems PPS**

### **37.1 Overview**

37.1.1 21 responses commented on the Draft Sustainable Drainage Systems Planning Policy Statement (PPS). There was broad support for sustainable urban drainage systems (SuDS) being required for new developments - accompanied by clear maintenance and operational plans to ensure long term functionality. Many responses indicated support for the introduction of this PPS, recognising it as a clear and practical framework for ensuring sustainable surface water management.

### **37.2 Key Concerns**

37.2.1 Several respondents agreed that developers should be responsible for mitigating any drainage impacts arising from their proposals, including ensuring that water is not discharged onto neighbouring land, although some called for a more qualified approach to allow flexibility for small sites or in rural settings where the feasibility of SuDS may be limited. Respondents emphasised the importance of ensuring that new development manages surface water appropriately, with one respondent suggesting wider use of permeable surfacing materials.

37.2.2 Respondents supported the early integration of SuDS during the design process and the need for practical, enforceable maintenance arrangements. Clarity was sought regarding maintenance responsibilities and future funding arrangements, particularly where local authorities may be expected to adopt SuDS features. Responses expressed support to ensure that SuDS are designed to an adoptable standard for the responsible organisation, but one respondent queried who would pay the costs associated with the long-term management of SuDS.

37.2.3 One asked whether SuDS components might contribute towards amenity space requirements.

37.2.4 One respondent highlighted the potential environmental impacts associated with human-made drainage systems, such as concrete leaching.

## **38 Draft PPS for Flood Planning Guidance and Flood Risk Assessment Guidance**

### **38.1 Overview**

38.1.1 16 comments were received on the Draft PPS for Flood Planning Guidance and Flood Risk Assessment Guidance.

### **38.2 Highlighted Issues and Concerns**

38.2.1 Respondents who indicated support for the PPS, saw it as a clear and practical guidance and a sound basis for managing development in flood-prone areas. Comments highlighted the value of clear thresholds, practical examples and flexibility while maintaining responsible flood-risk management.

38.2.2 There was support for ensuring that the guidance remains practical and up to date, and for drawing on expert and local knowledge in assessing flood risk. The inclusion of biodiversity and ecosystem services within the PPS was also welcomed.

38.2.3 One respondent suggested that clearer guidance for lower-risk developments would be helpful, including the potential use of simplified templates or screening tools.

38.2.4 Additional clarity on how surface-water flooding relates to other sections of the PPS was also considered beneficial.

## **39 Draft Manual for Manx SuDS**

### **39.1 Overview**

39.1.1 18 responses provided comment on the Draft Manual for Manx SuDS. The draft Manual for Manx SuDS was broadly welcomed by respondents, who recognised its potential to strengthen the delivery of sustainable drainage across the Island. Several responses supported the manual's aim of providing clear, proportionate standards tailored to Manx conditions, including its recognition of biodiversity, ecosystem services and nature-based solutions. Key concerns are set out below.

### **39.2 Key Concerns**

39.2.1 Many highlighted the importance of retaining flexibility within the guidance, noting that the suitability of SuDS can vary across different site conditions, including sloping ground and areas with existing field drainage. One respondent commented on the importance of integrating SuDS at the outset of the planning and design process, observing that early site investigations such as infiltration testing may be required and that SuDS can influence site layout, open space provision and overall development capacity.

39.2.2 Some respondents felt the manual would benefit from being as accessible as possible, with suggestions for worked examples, diagrams and case studies to show how SuDS principles can be applied in varied development contexts.

39.2.3 Questions were raised regarding long term maintenance responsibilities, particularly where local authorities may be expected to adopt SuDS, with respondents seeking clarity on resourcing and ongoing management.

39.2.4 Additional clarification was requested on how SuDS should integrate with existing drainage systems in already developed areas.

39.2.5 It was noted that the reference to Peel Limestone should be corrected to Peel Sandstone to ensure geological assumptions are accurate.

## 40 Next Steps

- 40.1.1 The Cabinet Office thanks all respondents for their contributions to the Preliminary Publicity consultation.
- 40.1.2 The responses will be made available to view on the Consultation Hub and the strategic plan website - where the Department has permission to publish in full or anonymously. Responses have been redacted where references could be used to identify individuals.
- 40.1.3 Cabinet Office is reviewing all comments received in detail. Responses will be considered alongside all other relevant evidence and information in informing the preparation of the draft strategic plan. Comments relating to Flood Management and SuDS have been forwarded to the Department of Infrastructure for consideration.
- 40.1.4 In accordance with statutory requirements, the Cabinet Office must publish the draft Strategic plan within 18 months of the conclusion of the Preliminary Publicity stage. A further consultation on the draft plan will follow. All subsequent stages in the development of the strategic plan will be appropriately publicised.