

Cabinet Office

Rural communities and the countryside

Balancing pressures and opportunities

Paper 4



**Isle of Man
Government**
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“...Our environment is multidimensional and determining more clearly the boundaries and balance between people and nature will go a long way to improving our quality of life – and help achieve a sustainable Island for the future...”

Our Island Plan, January 2024-25, page 29



View from Knockaloe Beg

Contents	Page
PART 1 Introduction	
The planning approach to the Manx countryside	8
The Manx countryside is synonymous with the Manx landscape	9
Separating the issues	10
How rural communities are continuing to evolve	11
Being prepared for change is important	12
Findings from earlier public consultation	13
PART 2 Reviewing the rules	
Countryside development	18
Concerns about the loss of vernacular buildings	19
A. Essential housing for agricultural workers	20
B. Conversion of redundant rural buildings	22
C. Previously developed land	23
D. The replacement of existing rural dwellings	24
E. Location dependent development	26
F. Building and engineering operations essential for rural industries	27
G. Development recognised to be of over-riding national need	28
H. Buildings or works required for the interpretation of the countryside	29
PART 3 New exceptions	
Other possible changes to GP3 not previously referred to in the Strategic Plan 2016	33
Conclusion	34



Archallagan Plantation

Part 1

Introduction

The planning approach to the Manx countryside

The Strategic Plan 2016 describes ‘the countryside’ as being all land outside of the 29 settlements defined in the spatial strategy. The countryside includes all land that’s not designated for development in an area plan.

Environment Policy 1 in the Strategic Plan 2016 contains the full policy, but in summary, it advocates for the protection of the countryside and its ecology for its own sake. It has worked well in doing so since the mid-2000s but the underlying approach was not new even then. The protection of the countryside from a proliferation of new development (particularly residential development) was established by earlier planning circulars and plans which were applied consistently for the good of the Island.

The Island’s countryside is unique and extremely special to the nation that calls the Island home. There is no less of a desire to recognise this going forward in new planning documents which are a significant tool to help ensure its protection.

As the title of this paper suggests, the countryside is made up of rural communities. It’s where people live,

work, farm and spend time in nature. There are pressures of course, and it is necessary to sometimes resist change that would harm our rural environment in some way. There are also opportunities; chances to do things differently, to allow new activities and facilities for leisure and tourism for example. At times there is a need for location dependent development or strategic infrastructure and occasionally works may be needed that are unexpected, but vital. We need a clear framework to deal with these pressures, needs and opportunities.

This paper explores what exceptions there should be to development in the countryside set out in strategic policy. The existing strategic plan includes a set of ‘exceptions’ and lists these in General Policy 3 (GP3). This means that in principle, development which meets the exception criteria would be supported. GP3 does not guarantee that approval will be forthcoming, rather it defines the types of development that may be treated as an exception and for which there is broad policy support. The draft plan will identify which rural exceptions have been retained, amended, added or omitted.

The Manx countryside is synonymous with the Manx landscape

According to the Landscape Character Assessment 2025, the Manx landscape is remarkable: “from wild open uplands to peaceful lowland farmland, and from dramatic rugged cliffs to sheltered wooded glens.” The countryside, which encompasses a huge variety of environments and landscapes is one of the Island’s biggest assets and there is a need to think very carefully about how the planning system allows it to change.

Inevitably, where development is proposed in the countryside, the need for it will have to be balanced with its impact. In some cases, sympathetic design may help to mitigate the impacts. For others, like quarrying and minerals extraction, impact may be time limited and allow the chance of restoration making a contribution to biodiversity over the longer term. In other cases, need may override visual impact and other factors.



Plantation fringe in the Northern Uplands

Separating the issues

The focus of this paper is about development in the countryside which may be considered 'exceptional'. This paper may reference settlements and settlement changes but it does not repeat the content of Paper 2 - the pattern and distribution of development, which explores in detail the housing needs of the

Island and the potential changes and expansion of places into the countryside. The following sections explore the situations in which it may be acceptable to allow development in the countryside and they begin to draw together some preferences about how Policy GP3 could change going forward into the new draft plan.

General Policy 3: The 8 planning tests for countryside development (current)

Development will not be permitted outside of those areas which are zoned for development on the appropriate Area Plan with the exception of:

- (a) essential housing for agricultural workers who have to live close to their place of work; (Housing Policies 7, 8, 9 and 10);
- (b) conversion of redundant rural buildings which are of architectural, historic, or social value and interest; (Housing Policy 11);
- (c) previously developed land which contains a significant amount of building; where the continued use is redundant; where redevelopment would reduce the impact of the current situation on the landscape or the wider environment; and where the development proposed would result in improvements to the landscape or wider environment;
- (d) the replacement of existing rural dwellings; (Housing Policies 12, 13 and 14);
- (e) location-dependent development in connection with the working of minerals or the provision of necessary services;
- (f) building and engineering operations which are essential for the conduct of agriculture or forestry;
- (g) development recognised to be of overriding national need in land use planning terms and for which there is no reasonable and acceptable alternative; and
- (h) buildings or works required for interpretation of the countryside, its wildlife or heritage.

How rural communities are continuing to evolve

It is important to recognise that the countryside has always been a dynamic and evolving space. Settlements and industries have historically adapted to the available resources and opportunities, through farming, fishing, or other forms of industry. This adaptability is what has allowed rural areas to thrive and sustain their communities over time.

The countryside is home to a rural population living in clusters of dwellings or in isolated farm houses amidst farmland. It hosts rural or locally dependent industries such as quarries and mineral sites, and supports leisure facilities, camping areas and tourism. The countryside is used in many ways, and the purpose of the strategic plan, along with the

area plans, is to oversee the rate and need for change. This ensures that the countryside remains one of the Island's most special assets.

Development in rural areas can and does happen, but change has been carefully controlled over the last 40 years. Thanks to a consistent policy framework, the Island has managed to preserve its open, unspoilt landscapes and has successfully taken a firm stance against speculative development that could harm or erode the character and appearance of the countryside. Where development has been permitted, specific considerations such as siting, design, size, materials and other mitigating factors have influenced the end result ensuring as much harmony as possible with the natural environment.



Pastoral farming methods at Port Soderick

Being prepared for change is important

As part of the overall goal of having a sustainable Island over the long term, there is a need to be prepared for the unexpected.

It is very difficult to plan for every possible scenario but if the planning framework is able to be responsive, then decision making can be measured and reasonably straightforward.

Development pressures will always exist: there are 'knowns' such as Government's aim to deliver an onshore wind farm - and there are unknowns such as technological

advances or changes in agricultural practices that both require different development responses.

There is a responsibility to anticipate future issues and have clear policies set out at the strategic level.

Feedback to this early public consultation will help Cabinet Office do just that and shape policy direction and wording even if this draws out difficult topics such as how the strategic plan should address renewable energy.



Expansive views over the wider landscape at St Marks

Findings from the public consultation 2023

A strong theme emerging from the 2023 Preliminary Publicity exercise was a concern about protection for the Island's landscape. The following quote from a special interest group sums up this concern well.

"In terms of the Review's scope, whilst recognising the undoubted importance of providing housing, infrastructure for growth etc., all areas and aspects of the new Strategic Plan must pay attention to policies that will ensure that such development is sympathetic and does not destroy the Island's attractiveness which contributes to its residents' wellbeing, ... visitors and new residents, and in turn to the Island's evolution and indeed the Manx Government's Island Plan."

Some comments questioned the continued need for some types of rural exceptions in the countryside, while others sought a relaxation of existing rural exception policies. Still others highlighted an approach that factors in best practice in carbon management.

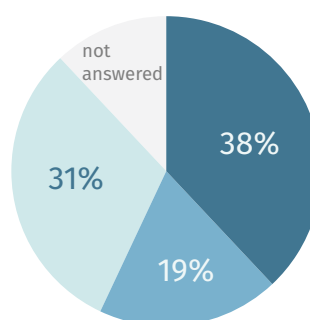
From the comments received, our use of the Island's landscape and the impact this has for rural heritage and identity, both now and for future generations, is clearly a very emotive issue.

Three options were set out for energy generation in 2023.

31% of respondents expressed a preference for Policy Option 2 – to include an additional rural exception policy within General Policy 3 specifically for renewable energy initiatives e.g. on-shore wind development, allowing for consideration based on its merits allowing for a careful balancing of the impacts including factors for and against.

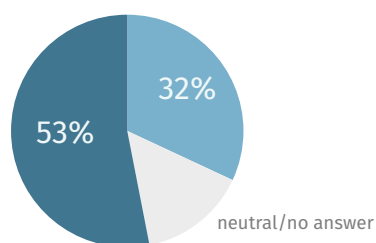
19% preferred to retain the exception in case it relates to over-riding national need - recognising that strategic renewable energy initiatives would be considered to be of "over-riding national need

38% of respondents requested absolute protection of the countryside from renewables or small scale renewable energy solutions.



Question 20

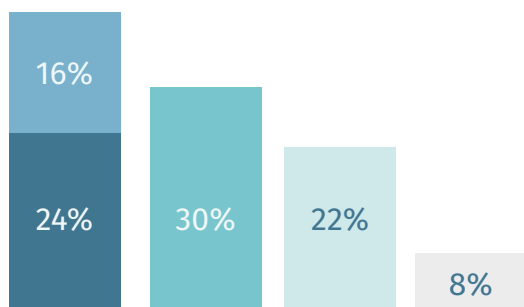
Just **over half** of respondents expressed a view that housing in the countryside may be permitted in exceptional circumstances as set out in General Policy 3. The other **32%** think there should be a presumption against residential development in the countryside without exception.



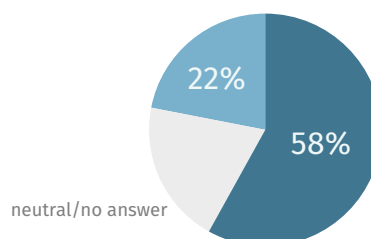
Question 22

Of those 53% -

- **24%** of respondents supported essential housing for agricultural workers who have to live close to their place of work, and **16%** on top supported a widened definition of workers' dwellings to include rural industries generally.
- **30%** of respondents expressed support for conversions
- **22%** supported residential development on previously developed land.



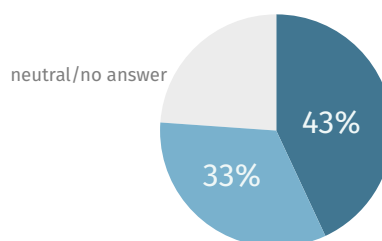
58% of respondents supported greater protection for vernacular dwellings, while only 22% were against



Question 24

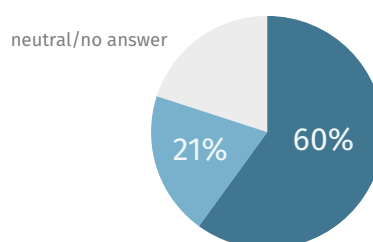
43% supported renovation of tholtans with a greater degree of service provision for tourism and permanent residential uses, and **33%** of respondents supported them to be turned into 'bothies*' with little environmental impact

**bothy - a small hut or cottage for use as a mountain refuge*



Question 28

60% supported design guidance or pattern books relating to rural dwellings and other development while only **21%** were against.



Question 25

The 2023 consultation responses have revealed three emerging themes:



Preserve rural heritage and identity



Secure environmental benefits from renovation instead of rebuild



Limit development in the highest value landscapes



Eairy Beg Farmhouse Tholtan



View from Bayr Hogg

Part 2

Reviewing the rules

Countryside development

Current policy supports development in the countryside only where there are exceptional reasons. Assessment is based on the evidence available and whether it is sufficient to set aside the presumption against development in the countryside.

General Policy 3 (GP3) Points 'a' to 'f', in the current strategic plan lists the types of development that are 'exceptions'. If a type of development is on this list, then it establishes the principle of development.

Policy GP3 does not guarantee that approval will be granted, but rather defines the types of development that may be treated as an exception.

The current preference is to retain a form of GP3 and a list of exceptions in the new draft strategic plan. The remainder of this paper discusses GP3 in detail and how effective it's been and suggests ways how it could be changed i.e. should points be retained, amended, added or omitted?



Sartfell (Photo Credit: Edmund Sumner)

Concerns about the loss of vernacular buildings

It is worth noting the concerns raised by a recent Tynwald Select Committee before exploring points 'a' to 'f' of Policy GP3.

[The Tynwald Select Committee's Report on Built Heritage 2022-23](#), (paragraphs 70 – 76) expressed a particular concern about the loss of vernacular buildings and the impact on the wider countryside, recommending that the relevant housing policies needed to be reviewed. It stated –

“There is evidence that vernacular buildings in the countryside are being lost at an alarming rate, despite the protections of Housing Policies 12, 13 and 14.

This should be investigated with some urgency... Vernacular relates to houses typically built before 1920. Concerns have been raised that demolition and rebuild is resulting in the loss of vernacular buildings in the wider rural landscape.”

[The Council of Ministers Response to the Report](#) (dated February 2024) responded by confirming these policies are to be reviewed as part of the strategic plan review presently underway.

Cabinet Office is now reviewing the wording of the policies to ensure they can be interpreted and applied consistently.



Vernacular buildings at Grenaby

GP3 a. Essential housing for agricultural workers

It has been recognised for many decades that there is a need for farm workers' dwellings. The principle began with the work of the Local Government Board (LGB) in the 1950s where in the years that followed and up to the 1980s, the Board built a number of farm workers' dwellings on farmland, often closely associated with an existing farm. The agricultural workers' tied houses scheme is evidence of an obvious need for more homes in the countryside at the time that were connected to farming.

The 1982 Development Plan established the first planning guidance referring to the siting of agricultural dwellings. When considering development proposals, the plan refers to *"the location of buildings including agricultural dwellings, in the countryside, out of sight or as far away as is practicable from a public highway, and closely related to existing buildings or groups of mature trees, or both."*

Between 1989 and 2007, further planning guidance - Planning Circular 1/88 - set out the rules for allowing new agricultural workers' dwellings, introducing the preference that these were built in the nearest village, hamlet or existing group of buildings, while acknowledging that siting would have to be considered on its merits having regard to the individual circumstances. Where justified, these new properties had agricultural ties (or occupancy conditions). There remain examples of these dwellings with ties still attached as well as examples of where ties have been removed.

Cabinet Office understands that the LGB initiative was originally intended to support an increase in the home grown output of food - originally to address the continuance of the rationing system in the aftermath of the Second World War. It was around the same time that clusters of local authority properties sprung up on the fringes of existing settlements to further supplement rural housing needs.

The Strategic Plan 2016 has continued the exception rule for farm workers' dwellings where there is full time employment in agriculture (Environment Policy 16, Strategic Plan 2016).

Impact of the exception rule for agricultural workers' dwellings

A significant number of dwellings have been approved and constructed. Published data (in response to a Freedom of Information Request) dated June 2017) suggests that:

- 187 dwellings were approved with agricultural occupancy conditions between 1984 and 2000; and
- 79 dwellings were approved with agricultural occupancy conditions between 2000 and 2017.

So, 266 dwellings were approved with an agricultural occupancy condition between 1984 and 2017. In the same period, 32 properties had an

agricultural tie removed.

Between June 2017 and June 2024 planning records show that there have been eight approvals for agricultural workers' dwellings and four approvals relating to the removal of agricultural ties.

These figures show that –

- the number of planning approvals for farm worker dwellings have cumulatively contributed to the wider housing supply on the Island over the last 40 years, and
- the number of approvals for agricultural dwellings has significantly decreased in recent years.

Is the exception rule still needed?

It is worth considering that farming methods have changed considerably:

- technology has advanced, easing manual labour requirements to some degree;
- some farm holdings have merged to deliver efficiencies at scale;
- many farms have diversified to make best use of redundant buildings, in some cases supporting tourism by providing holiday lets and short term rental premises;
- the agri-environment movement is changing farming methods to some extent on the Island - resulting in less productive farmland being set aside for the benefit of nature;
- 'off-site' farming practices are being explored - which reduces the necessity for new dwellings on site; and

- In some cases land assets have been divided up and sold off.

All of these changes reduce the labour demands historically associated with the farming industry. It is noted that the [Agricultural Strategy 2024](#) is silent on the subject of agricultural workers' dwellings.

There is no doubt that dwellings will continue to exist in rural areas with agricultural ties. The question is whether there is still a need for new agricultural dwellings considering the number of applications submitted to have ties removed.

Retain, update or remove this policy clause in the new draft plan?

Having considered the changing statistics and reduction in demand, having a rural exception clause for agricultural workers' dwellings may no longer be justified in the new draft plan.

Cabinet Office is minded to remove General Policy 3(A) as well as the detailed policy references which are set out in the Environment and Housing Chapters in the Strategic Plan 2016.

GP3 b. Conversions of redundant rural buildings

General Policy 3(b) makes a rural exception for -

“conversion of redundant rural buildings which are of architectural, historic or social value and interest (Housing Policy 11)”.

The policy aim recognises the value of re-using existing rural buildings which have a special quality and thus are worthy of retention even if used for a new purpose.

There has been general support for this form of development subject to detailed design proposals and suitability of end uses. Older farm buildings in particular are often not fit for purpose and new buildings are often better suited to the modern demands of farming and agricultural practices.

Re-use has more recently been recognised for being inherently sustainable, by supporting carbon management. Conversion helps to retain embodied carbon and preserves those rural assets that have special merit.

The public consultation in 2023 asked for views on renovations and this showed support for the renovation of tholtans and making best use of existing vernacular buildings with a greater degree of service provision for tourism or permanent residential uses.

Renovation does contribute to housing stock and short term visitor accommodation in the wider rural environment, and old buildings can bring biodiversity benefits, such as bat roosting sites or cavity nesting opportunities for birds. However, tholtans can be situated in exposed and inaccessible areas of open countryside. The rebuilding of tholtans may only be suitable in certain circumstances.

Retain and update or omit this policy in the draft plan?

The Cabinet Office is minded to retain this policy provision, subject to appropriate amendments including the wording of Housing Policy 11 of the existing strategic plan.



Tholtan at Park Moor

GP3 c. Previously developed land

General Policy 3(f) makes a rural exception for -

“previously developed land which contains a significant amount of building; where the continued use is redundant; where redevelopment would reduce the impact of the current situation on the landscape or the wider environment; and where the development proposed would result in improvements to the landscape or wider environment.”

A definition of ‘previously developed land’ is included in Appendix 1 of the Strategic Plan 2016:

“Previously developed land is that which is or was occupied by a permanent structure including the curtilage of the developed land and any associated fixed surface infrastructure. It includes defence buildings but excludes,



land that has been occupied by agricultural or forestry buildings;



minerals extraction sites or waste disposal sites;



parks, recreation grounds and allotments; and



previously developed land where the remains of fixed structures have blended into the landscape in the process of time.”

There are no detailed policies currently associated with this exception but it is helpful, as previously developed land can detract from the wider landscape. However, care must be taken to ensure any new development doesn’t become an even greater detractor. The Cabinet Office is reviewing how this exception has been applied and is seeking public feedback on whether the definition should be revised.

Retain, update or remove this policy clause in the new draft plan?

The Cabinet Office is minded to retain this policy provision subject to appropriate amendments to clarify the definition to ensure it is fit for purpose.

GP3 d. The replacement of existing rural dwellings

General Policy 3(d) makes a rural exception for -

“the replacement of existing rural dwellings”

A number of Housing Policies (HPs) relate specifically to this exception (Housing Policies 12, 13, 14). There has been general support in the strategic plan and earlier planning circulars for the replacement of existing dwellings subject to certain conditions. The Island has been successful at avoiding the proliferation of new dwellings in the countryside and Cabinet Office is minded to take this stance forward into the new strategic plan.

Cabinet Office supports the principle of the replacement of dwellings in the countryside but will look to consolidate housing policies where appropriate. Policy drafting will take account of the Landscape Character Assessment 2025 and the status of any special landscapes. Where special landscapes are taken forward, consideration will be given to having more protective measures in these areas. Such an approach may help to steer development to more settled places, avoiding the very best landscapes.



Raising awareness of nature in the Manx countryside

Identifying special landscapes may allow specific policy development for vernacular buildings in an attempt to preserve the best examples of 'Manx vernacular' in these areas.

It is acknowledged that older dwellings can present certain challenges, simply given their age and method of construction but it is possible to retain buildings in situ and still allow for sympathetic changes, extensions and adaptations.

The draft plan will include appropriate guidance relating to:

- The size, design and siting of any replacement dwellings in the countryside;
- The importance of retaining examples of the 'Manx vernacular' in the countryside. Many Manx cottages have been lost in recent years and consideration will be given to policies which better protect them. This means policy support for 'retain and renovate' as opposed to 'demolish and rebuild'. There may be a presumption against demolition in certain areas;
- The redevelopment of ruins/tholtans. There may be tighter rules to prevent the development of any ruined buildings which would risk the domestication of the countryside. Residential paraphernalia and ancillary elements can have a detrimental effect on the natural environment and landscape setting.
- Extensions to rural dwellings.

Retain, update or omit this policy clause in the draft plan?

The Cabinet Office is minded to retain this policy provision subject to appropriate amendments to ensure it is fit for purpose. Consideration will be given to better protecting vernacular architecture and landscape impact will be an integral factor.

GP3 e. Location dependent development

General Policy 3(e) makes a rural exception for -

“location-dependent development in connection with the working of minerals or the provision of necessary services”.

Cabinet Office recognises the need for clarity and will explore if development other than minerals needs to be mentioned here as well as the meaning of ‘necessary services’. The related policy is Minerals Policy 1 in the existing strategic plan which sets a planning test, namely that there must be a need for the minerals which cannot be met through the provision of secondary aggregates.

Retain, update or omit this policy clause in the draft plan?

The Cabinet Office is minded to retain this policy provision subject to appropriate amendments to ensure it is fit for purpose. Given the estimated timeframes for depletion of existing minerals reserves over the next 10 years, as expressed in the [Annual Minerals Monitoring Report](#), the retention of General Policy 3(e) is justified but needs to be updated alongside:

- Reviewing Mineral Policy 1;
- Exploring if there are any other location dependent forms of development that need to be mentioned; and
- Clarifying the meaning of ‘necessary services’ if beneficial.



Historic structures associated with the Laxey Wheel, Laxey

GP3 f. Building and engineering operations essential for rural industries

General Policy 3(f) makes a rural exception for -

“building and engineering operations which are essential for the conduct of agriculture or forestry”.

In taking this exception forward, it is useful to consider if reference to just agriculture or forestry is sufficient. It is proposed to make it clear that this exception excludes dwellings associated with those industries. Consideration will be given to whether the other rural industries needs to be defined.

Also, if it would be beneficial to consolidate the following to reduce the risk of duplication: Environment Policy 15 (relating to agricultural buildings), Environment Policy 17 (relating to horticulture) and Environment Policies 20 - 21 (relating to equestrian activities).

Retain, update or omit this policy clause in the draft plan?

It is proposed to retain and update this policy.



Sulby Reservoir (photo Manx Utilities)

GP3 g. Development recognised as overriding national need (ONN)

General Policy 3(g) makes a rural exception for –

“development recognised to be of overriding national need in land use planning terms and for which there is no reasonable and acceptable alternative.”

There is no definition of ‘overriding national need’ in the existing strategic plan. Planning inspectors have tended to adopt a common sense approach: if no types of development are identified as overriding national need – everything is on an even footing.

There is merit in this approach so care will be needed when determining if and how to define ONN.

While it is more common to argue ONN when it comes to national infrastructure, energy schemes or waste proposals, this is not always the case. All applications doing so would however need to demonstrate evidence to make a full and proper assessment.

Retaining the policy clause recognising ONN is both sensible and practical. It ensures flexibility and a way to deal with proposals that are strategically important but have not been previously anticipated.

Overriding National Need discussions often centre on:

- whether a development meets a national need - does it address a deficiency affecting the Island as a whole, not just a specific area or group? ;
- whether the need is strong enough to override the general presumption against countryside development;
- whether consideration has been given to suitable alternative sites; and
- whether the benefits outweigh any adverse impacts.

Cabinet Office sees value in retaining the ONN clause to address unforeseen circumstances and provide a flexible policy baseline.

Retain, update or omit this policy clause in the draft plan?

Cabinet Office will give further consideration to overriding national need including whether this should be defined as well as the circumstances where this could be applied.

GP3 h. Buildings or works required for the interpretation of the countryside

General Policy 3(h) makes a rural exception for -

“buildings or works required for interpretation of the countryside, its wildlife or heritage”.

Given the limited impacts that this policy has on the wider rural environment, balanced against the benefits of increasing awareness of the countryside, it is proposed to retain this policy clause.

Retain, update or omit this policy clause in the draft plan?

It is proposed to retain and update this clause.



Maughold Lighthouse



Former works at Agneash

Part 3

New exceptions



Snaefell from Sulby reservoir

Other possible changes to GP3 not previously referred to in the Strategic Plan 2016

There is an opportunity to expand General Policy 3 allowing more development in the countryside in exceptional circumstances.

While the clause on overriding national need places all development on an even footing (see GP3(g)), there may be good reason to identify particular developments more explicitly.

GP3 could make exceptions in principle for:



- Renewable energy - for example the principle of an on-shore windfarm connected at MUA's transmission voltage. Other forms of renewable energy production could be mentioned specifically;



- Facilities, cables and pipework associated with any offshore wind farm; and



- New reservoirs.

The draft plan will make it clear that the need for renewable or low carbon energy does not automatically override environmental or landscape protection. There will still need to be an assessment of all evidence available.

Conclusion

The policy approaches to development in the countryside rightly recognise the value that is placed on the rural environment. Policy seeks to minimise the impacts to the Manx landscape, whilst ensuring that change can be accommodated in the right way when justified.

This paper summarises the work undertaken since 2023 on development in the countryside and exceptions that are currently supported in principle in Policy GP3.

A new set of 'rural exception' policies will eventually be the output in the draft strategic plan.

We hope these early Cabinet Office stances stir public feedback which can be used to steer the draft plan policy approaches.

Responding to the consultation is a good way to help Cabinet Office ensure that any exception 'rules' relating to building in the countryside are heading in the right direction.

Cabinet Office

Rural communities and the countryside

Paper 4