### Full technical consultation

### Isle of Man Strategic Plan Review

Strategic issues and options for the purposes of 'Preliminary Publicity'



Isle of Man Strategic Plan Preliminary Publicity Publication Date: 21st July 2023

Front Cover Image: The Northern Plains, Isle of Man

#### Preliminary publicity

When preparing a plan and before finally determining its content, the Cabinet Office shall take such steps as will in its opinion secure -

(a) that adequate publicity is given to the matters with which it intends that the proposals in the plan should deal;

(b) that persons who may be expected to desire an opportunity of making representations to the Cabinet Office with respect to those matters are made aware that they may do so; and

(c) that such persons are given an adequate opportunity of making such representations.

Schedule 1, Town and Country Planning Act 1999

#### Contents

Forewo	ords	6
Data protection		8
Overview		9
<b>Section 1</b> A new Strategic Plan - a written set of policies guiding change		11
<b>Section 2</b> Building great communities - in the face of many challenges and policy goals		23
<b>Section 3</b> Evidence - what we have and what we need		29
<b>Section 4</b> The critical issues		33
<ul> <li>Section 5</li> <li>Summary of evidence papers</li> <li>5.1 A new Island spatial strategy</li> <li>5.2 How will we calculate housing need in the future</li> <li>5.3 How will we calculate employment land needs in the future</li> <li>5.4 Rural change and housing issues - teasing out the critical issues</li> <li>5.5 The Climate Change Act 2021 and biodiversity net gain</li> </ul>		49 51 53 56 57 59

- Supporting Papers
  1. P.EP 1: Island spatial strategy paper
  2. P.EP 2: Rural change and housing issues paper
  3. P.EP 3: Biodiversity net gain paper



#### Forewords

The Isle of Man Strategic Plan sets out the general policies for the development of and use of land across the Island. It is a key document when preparing Area Plans, other policy documents and in the determination of planning applications.

A full review of the Strategic Plan is an opportunity to support the delivery of <u>Our Island Plan</u> and the vision to have a Secure, Vibrant and Sustainable Island, specifically in terms of Building Great Communities.

Whilst the ethos of the 2007 Strategic Plan and its subsequent update have stood the test of time, this full review will embrace many of government's new commitments – whether in terms of sustainability, climate change, energy and infrastructure and aspirations for the long term economic growth. It will address how to plan for future infrastructure and determine key policies about how the Island looks and feels and how we experience it at eye level. The Plan will help set a solid reference point for place making through good policy provision. This is important for our towns and villages, how we move around and experience the built environment, and crucially how we plan for the future and meet our needs.

Commencing the Preliminary Publicity signals the start of the public engagement in the plan process and we are keen to encourage a high level of interest. The new Plan will ultimately by partnered by the All-Island Area Plan, which will sit in conformity with the updated Strategic Plan.

In this way, we are taking a long term, overarching holistic view in terms of the spatial planning needs of the whole Island and with that in mind the plan period is to extend up to 2041. I am confident that this approach, along with the other work progressing under the Built Environment Reform Programme, will make for tangible, creative, beautiful and sustainable developments which enhance and provide for our Island over the longer term. This will be an overarching national planning guide for the future.

With such a significant review, it's vital we consult widely. I encourage everybody to respond to the consultation which is open over the summer and until just after the Government Conference which takes place 20 - 21 September this year. Planning Policies will be a topic for discussion - I hope you can join us at the Conference.

Hon Kate Lord-Brennan MHK Minister for the Cabinet Office

6



A lot has changed in the 16 years since Tynwald originally approved the first Isle of Man Strategic Plan and, although some of the basic principles will always remain constant, we now need to ensure our planning policies are modern, fit for purpose and reflect the strategic direction of Our Island Plan and approved Economic Strategy.

The Strategic Plan is made up of a written set of policies which guide how the Isle of Man will develop and change. The Strategic Plan relates to the whole Island, our vision for now and into the future, influencing decision making at the national and local levels, and in the determination of all planning applications.

From my time working with the Planning Policy Team, I have come to understand the importance of the Planning framework. We are keen to make the topic as accessible and responsive to the needs of the Island as we can. We have set off down the route to review the Strategic Plan and hope you will get involved too – the finished Strategic Plan, together with our Area Plans, will detail the policies that will inform and guide all development on our Island for the next 18 years or so as a complete framework, known as the Island Development Plan.

#### Diane Kelsey MLC Member for Cabinet Office with responsibility for Planning Policy

#### **Data Protection Notice**

It is important to note that the content of all 'Preliminary Publicity Response Forms' and accompanying documents submitted to the Department will be collated and made available for public viewing in due course. A Data Protection Impact Assessment has been carried out.

The personal data you provide is being collected for the purposes of updating Strategic Plan Documents in accordance with statute. Personal data includes names and addresses, and shall not be included within any future publications associated with a revised Strategic Plan.

The Cabinet Office will be the data controller for this information and it is being collected and processed with your consent. Details will be retained for planning purposes only. Our Privacy Notice can be viewed at: www.gov.im/CO-privacy

For further information on your rights contact the CO Data Protection Officer: Email: DPO-CabOff@gov.im Telephone: +44 1624 686779

#### **Overview**

All of the documents and information pertaining to this early stage of the Strategic Plan Review are included under the banner of The Isle of Man Strategic Plan Review 2023 Consultation page on the Consultation Hub.

This part of the plan process seeks your views on some of the big issues that will inform the drafting stage of the new Isle of Man Strategic Plan which will replace the current Strategic Plan approved in 2016. Key questions are set out in the Reponse Form forming the online survey.

Responses submitted via the Hub are preferred. If this is not possible then thereistheoptionofsendingcomments by email to iomstrategicplan@gov.im. A copy of the documents in paper form is available for viewing at the public counter, 3rd Floor, Government Office, Bucks Road, Douglas, Isle of Man, IM1 3PN during normal working hours.

The deadline for submitting views is:

#### 5pm, Friday 29th September 2023

Further information on the plan process, as well as other planning documents, a rolling Core Documents List and updates on other policy projects can be found on the planning policy webpage <u>www.gov.im/</u> <u>planningpolicy</u>

Anvone can respond to the consultation and Cabinet Office would like to hear from a wide range of stakeholders, businesses, local groups and the public. The Plan will influence the future development of the whole Island for the next 20 years and it is important that there is interest, engagement and debate. Cabinet Office will encourage community involvement throughout the process to help achieve the Island's sustainable development over the next few years.

The constituent parts of the Preliminary Publicity are:

Paper P.EP Main: Consultation Paper Paper P.EP 1: Island Spatial Strategy Paper P.EP 2: Rural Change and Housing Paper P.EP 3: Biodiversity Net Gain Paper P.EP 4: Response Form



Planner's copy of the Strategic Plan 2016

# 1. A new strategic plan

a written set of policies guiding change

#### Introduction

### Consulting on the issues that affect all of us

The Strategic Plan is the backbone of planning and deals with a wide range of topic areas. Before policy is set there is a need to shape that policy and to do this, there is evidence gathering and importantly there is consultation. At the end of the process when the final plan is approved by Tynwald, it will carry significant weight in decision making. It has a big part of play in the determination of planning applications and it needs to be right.

The starting point in designing the new plan will be to examine the existing content, format, and policy wording to measure the extent to which they still have merit. Are there any parts which chould be retained? What needs to be modified or added in? What needs to be omitted?

It is likely that the new Plan will still retain a revised version of:

- A Strategic Aim and overall Plan Vision;
- A set of Strategic Objectives and Strategic Policies; and
- General Development Considerations.

The above will reflect and connect closely with a new Spatial Strategy for the Island which will determine the location of, scale of and type of development permitted on Island.

### Format of this document and the new Draft Plan

It is likely that the new Plan will continue to be topic based and include both refreshed and new policy direction on the topic areas covered previously in Chapters 7 to 12 of the Strategic Plan 2016. There will be a number of completely new policies on issues not previously addressed in detail before including policy areas associated with Climate Change.

The current Strategic Plan topic Chapters include:

The Environment, Housing, Business and Tourism, Sport, Recreation, Open Space and Community Facilities, Transport, Infrastructure and Utilities, Minerals, Energy and Waste.

The new Strategic Plan will address the substance of these topics but may be describe them differently and include new terminology and slightly different policy approaches. For instance there will be new policies on "Active Travel" - a term not used in the existing Strategic Plan. However, the need to locate new development close to existing public transport facilities and routes, including pedestrian, cycle and rail routes and to make provision for new bus, pedestrian and cycle routes linking into existing systems has been embedded in strategic policy since 2007.

#### What is the Isle of Man Strategic Plan?

The Strategic Plan is a key part of the planning framework to deliver sustainable development on the Isle of Man. It looks to the future; seeking to balance our economic, environmental and social needs in a set of interrelated Policies.

This consultation document asks for your views at the very start of the plan making process. It's important to be aware of it as it will be one of the matters taken into account when planning applications are considered in the future. It is also the primary planning document which will shape and influence our future Area Plans which will set out the more detailed 'local level' land use proposals involving development briefs and maps across the whole Island.

Government's overall vision for building a sustainable future for the Island is set out in Our Island Plan (including the Economic Strategy) approved in January 2023. The new Strategic Plan will help to address the challenges and achieve the goals laid out in Our Island Plan in relation to housing, the economy, infrastructure, community facilities and transport. It will also provide a sound basis for protecting the environment, responding to the impacts of climate change and delivering quality spaces and thriving places where people and businesses want to be.

Planning is always about finding the 'right balance' and weighing up competing points of view. And there is no doubt that judgements will inevitably have to be made throughout this plan process that will please some but not others.

Reassuringly, there is a clear process to plan making and there are a number of opportunities to get involved. So, with the help of responses and comments, the process of reaching the right balance is open and transparent and in the end more effective.

The final plan will look ahead over the next 18 years but there will be periodic reviews. Nevertheless, the aim from the outset is to deliver a Plan which provides enough certainty as well as enough agility to shape the Island we live on now, want to live on in the future and reflects one which we're happy to pass on to generations to come.

#### Why is a Strategic Plan good for the What is Preliminary Publicity? Island?

The Strategic Plan will help to:

- Coordinate future development • patterns
- Evaluate all relevant factors on national issues at an Island-wide scale
- Make future Area Plan(s) more straightforward and consistent in approach
- Deliver sustainable projects aligned with climate change goals
- Plan effectively for strategic • infrastructure across the Island with coordinated investment streams
- Provide certainty to developers and communities
- Set a vision: to help enable the right growth in the right place with the right infrastructure at the right time.

Preliminary Publicity is the first formal stage in the preparation of the new Isle of Man Strategic Plan. It aims to publicise the process, set out the matters that the Plan intends to deal with and to seek views on those matters.

Preliminary Publicity is essentially a public consultation and the act of asking for views is synonymous with every stage of the development plan process. In the drive to be open and transparent, all correspondence bar personal information will be released once the Preliminary Publicity period has ended.

#### What will the Plan look like?

The Strategic Plan will be a written set of Policies. There may be diagrams and tables but there will be no detailed maps; the Plan will not allocate specific sites in the same way Area Plans do. It will likely start with a new Spatial Strategy which will be an Island overview of the expectation for the distribution of and level of future development. Chapters will likely be topic based but the Plan will stress and recognise the interplay and connections between issues.

Plan will be The based on a comprehensive assessment and understanding evidence of and objectively assessed needs. The Plan as a whole will be an overarching framework, representative of the spatial element of Our Island Plan. There will be reference throughout to strategies and legislation from across Government embedding those elements in the Plan which need to have a firm basis in planning policy.

The Plan will not be a delivery document itself but will play an important role in bringing forward development on sites; because good and up to date policy and guidance can facilitate project delivery which turns sites into buildings and spaces and in time into successful places. As a result, this can encourage and bring to life economic, social and environmental regeneration in our settlements.

Progress on the new Strategic Plan will directly influence and support any measures to prepare an Island Infrastruture Delivery Plan.

#### What are the key issues that the Plan will cover?

Our Island Plan is the key driver for setting new Planning Policy for the Island. A number of the issues identified in Our Island Plan have a direct link to planning which the Strategic Plan will need to address. Drawing out these broad topics is key and this is covered in more detail in later sections. Preliminary Publicity will help shape the progression of this work so that a Draft Plan can be published for consultation in around 10 to 12 months time. The Plan will address a number of spatial issues such as:

- 1. What the pattern of new development will look like;
- 2. How and where to build new homes and align development with infrastructure;
- 3. How and where to provide for development to support the economy industry, retail, office, tourism and leisure;
- 4. How to revitalise our high streets and ensure their adaptability, vitality and viability;
- 5. How best to deal with telecommunications infrastructure;
- 6. How and where to provide for the provision of health, community and education infrastructure and other local facilities;
- 7. How to use, enjoy and protect our countryside, coast and rural environment;
- 8. How to protect the Island's landscape character and appearance;
- How to achieve regenerated and heathier towns and villages that are designed well in context, have longevity and promote a good quality of life and well-being;
- 10. How to be a good basis for directing public spend to improve place making and lever private investment.
- 11. How to provide certainty about the future policy approach to a Community Infrastructure Levy and planning gain where new development takes place
- 12. How to protect the Island's cultural heritage and historic environment
- 13. How best to plan for minerals and waste and the sustainable use of natural resources including renewable energy.
- 14. How to integrate the following climate change policies into all planning decisions:
  - Biodiversity net gain
  - The maximisation of carbon sequestration
  - The minimisation of greenhouse gas emissions
  - The maintenance and restoration of ecosystems
  - The need for sustainable drainage systems (SuDS)
  - The provision of active travel infrastructure

#### The plan-making process

All development plans or review thereof are prepared under the Development Plan Procedure, as set out in Schedule 1 of the 1999 Act. While the Act sets out prescribed guidelines for some plans there can be other stages for example the Area Plans often have 'Call for Sites' stage but this is not a requirement.

The stages for the production of the Strategic Plan are summarised in Diagram 1.

#### Why are there a number of stages?

Before a new development plan is considered by Tynwald, the Plan needs to be properly examined. There are three reasons for this:

- to allow time for adequate publicity and consultation of the content which will be policy guidance for a number of years;
- to allow evidence to be collated, updated and examined/challenged in detail, and
- 3. to ensure that the Cabinet Office follows a formal procedure and that the process is clear to all involved and is not easy to change.

#### How long will the plan last?

The plan period is proposed to extend to 2041 with the base year being 2021 to reflect the most recent Census year. Each iteration of the Strategic Plan in the past has had a plan period of 15 years in total. Given the fact that the base year for the new strategic plan is 2021, and by the time the plan comes into operation it will be 2025, it is considered that having 15 years left to run from the date of approval is important and is why a '20 year' plan is being pursued. It is also relevant to any future All-Island Area Plan. Each Area Plan has to follow the same plan period as the Strategic Plan and so a longer time frame makes sense.

This way of thinking reflects the approach in the UK set out in the National Planning Policy Framework (NPPF) which states the Policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long term requirements and opportunities.

As stated above, the aim for Cabinet Office would be to regularly update the plan well before the Plan period came to an end.

#### Diagram 1: Development Plan Stages



**Evidence Gathering** - what evidence/data is available? What are the gaps? How can gaps be filled? Analysis and engagement with stakeholders.



**Preliminary Publicity** - setting out in a public consultation the matters and issues that the draft plan will deal with. Anyone can make comments.



**Draft Plan** - the Draft Plan will be published no later than 12 months from the end of the Preliminary Publicity (unless extended). The Draft Plan forms the basis for Inquiry. Anyone can make comments on the Draft Plan.



**Public Inquiry** - the Draft Plan is considered by an Independent Inspector. Cabinet Office may propose amendments following analyis of comments. Registered parties can present evidence to the Inquiry in writing or by giving oral evidence.

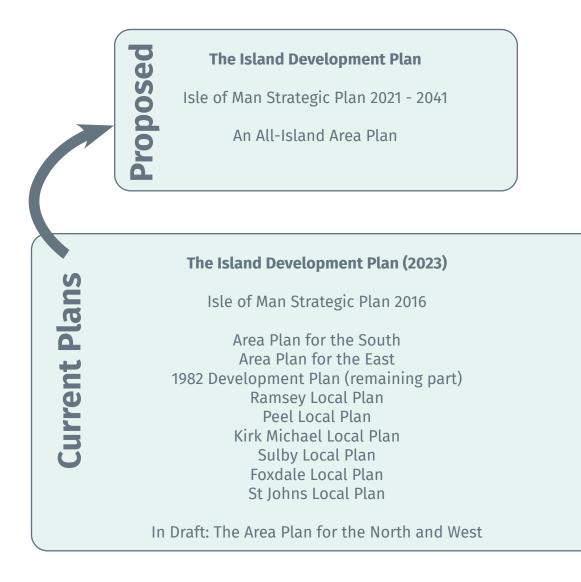


**Adoption & Approval** - Inspector's Report is considered, normally leading to some publicised modifications. The Draft Plan - as modified - is 'Adopted' by Cabinet Office by Order ahead of the final Plan being taken to Tynwald for 'Approval' and then published.

#### How will the Island Development Plan change in the future?

The long term objective for future revisions of the Island Development Plan is to review and consolidate the various policy documents that form the current Island Development Plan. This should result in a simplified policy framework that is easier to understand.

#### Diagram 2: Long term development plan format



#### The Challenges of Plan Making

**It takes time.** The Area Plan for the East took over 3 years from Preliminary Publicity to Tynwald Approval although the Strategic Plan update took 2 years

**Uncertainty.** The process can lead to frustration for those involved - both those seeking to promote development and those seeking to prevent it.

**Possibility of legal challenge.** Both the Area Plan for the South and the Area Plan for the East had legal challenges relating to specific sites or proposals.

**Keeping evidence up to date over extended periods.** New data/information may need to be woven into policy proposals, particularly up to public inquiry. Data in the Spatial Strategy Paper will most likely change between now and the Draft Plan and again before inquiry. The Department will always try and use the most up to date evidence/data available in plan making as:

Good data = good evidence = a good plan which will stand the test of time

#### Lessons learned from previous plans

- 1. Public engagement events in local communities are useful and well received. Social media helps to bring issues to a wider audience.
- 2. Summarised, straighforward guidance on stages, timelines and data is helpful for everyone in the process. Leaflets and FAQs still have value.
- 3. It is best to anticipate areas of controversy ahead of time and be ready with details and approaches.
- 4. There is a place for negotiation with developers/land owners ahead of inquiry to potentially resolve some issues and reduce inquiry time.
- 5. There is a need to speed up analysis of responses to ensure the process is quicker whilst ensuring analysis is sufficienly robust.

#### Why Are We Continuing with the Development Plan Format?

**To Take a Long Term View and Bring Certainty of Approach.** The intended Plan Period for the new Strategic Plan will span 20 years - this gives an appropriate window of opportunity for development to be planned and come forward over time, in response to the market.

**To Consider all Relevant Factors.** Inevitably, with a plan such as a Strategic Plan there are many issues to take account of. Data gathering and analysis takes time and likely future development needs requires careful consideration.

Data is considered alongside legislation, the goals of government and current commitments and investment priorities. These all influence the location of and approches to new development - so as to ensure that future development is located in the best locations, whilst preserving those rural aspects of the Island that make the Island a special place to live.

**To Co-ordinate Change.** Adopting a Plan led approach is the only way to coordinate investment streams and the only way to offer certainty to developers and to communities, and prevent piecemeal one-off decisions.

# about our Island...

The land mass of the Isle of Man is 572km<sup>2</sup>.

**6.5%** of this land mass falls within a defined settlement - This equates to an area of 37km<sup>2</sup> (approx.)

535km<sup>2</sup> of the Island's land mass is laregly countryside, with a scattering of dwellings, some strategic infrastructure and other rural development. Between 2011 and 2023 planning approval has been granted for **3,476** new dwellings.

64% of those approvals have been taken up.

The regional take up when broken down equates to: 75% - West 73% - South 55% - East 52% - North

According to the Unoccupied Urban Sites Register, all areas have a number of unoccupied urban sites:

54 sites in the East

 $22\,\,{\rm sites}$  in the South

21 in the North and West

There is 18.3ha of land on unoccupied urban sites

42% of land allocated for development in existing plans has some form of approval or residential development.

There is 158 ha of residential land available now. (n.b. development on some of this land may be limited due to constraints on site)

# 2. Building Great Communities

in the face of many challenges and policy goals

#### How does the Strategic Plan fit with other Government policy and strategy?

Building Great Communities is a stated goal of Government. The Strategic Plan is integral to this and its successful delivery is one of the milestones in the Built Environment Reform Project; a project which has the aim of working across Government in a focused area of project work to help deliver activity on key unused and underused sites in our urban centres and deliver improvements in the planning system.

There are many linkages between the Strategic Plan and the different strands in this Administration's Island Plan. Re-balancing our population to achieve economic sustainability in the longer term is a firm policy stance. The challenge for planning the Island's readiness for this is to achieve a steady growth in the Island's population while managing the impacts of such increase, for instance, on housing, on the highway network and other services, on the needs for sports provision and open space, on job opportunities, on our environment and also on our social infrastructure such as health, education and social care.

Throughout the plan process it will be essential to work across Government with Departments and Statutory Boards and with other stakeholders and relevant bodies and groups.



Laxey Harbour, Laxey, Isle of Man

**Economic goal 1** 

**5000** new jobs by 2032

reaching an overall GDP of £10bn.

### Economic goal 2

Further develop infrastructure and services

to plan for **100,000** residents by 2037

### Economic goal 3

## **£200m**

additional annual income by 2032

to invest into community services

### Economic goal 4

# **35%** reduction in greenhouse gas emissions

(when compared to 2018 figures)

as set out in Our Island Plan 2023

#### The Strategic Plan and Climate Change

### Our response to Climate Change affects all levels of policy development in the Isle of Man

One of the most significant pieces of legislation to affect what the planning system will look like going forward is the Climate Change Act 2021. This has brought renewed impetus to improve the Island's environmental and social sustainability and reduce greenhouse gas emissions to meet net zero by 2050.

All public bodies must plan ahead taking into account Climate Change.

The Island's commitment to renewable energy is demonstrated by the aim to deploy around 30MW of electricty from onshore wind and solar by 2026. Progress is being made by Manx Utilities in preparing a technical study on a possible wind farm site across the public estate. Further environmental impact work and technical assessment is required ahead of identifying an optimal site but the short-list of preferred sites has now been made public by the MUA.

The Energy Strategy has just been published by DEFA which is relevant in terms of the Island's approach to renewable energy and decarbonisation generally.

The Draft Strategic Plan will align with government strategy for renewables and include appropriate new policy and other detailed guidance in respect of wind energy and other forms of renewable energy. There is a commitment to produce 100% of the Island's electricity from renewable sources by 2050.

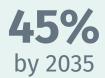
Cabinet Office will continue to work with Manx Utilities, DEFA and other stakeholders to co-ordinate policy approaches, guidance and delivery.

### **NET ZERO TARGET 1**



reduction in greenhouse gas emissions (when compared to 2018 figures)

### **NET ZERO TARGET 2**



reduction in greenhouse gas emissions (when compared to 2018 figures)

### **NET ZERO TARGET 3**



reduction in greenhouse gas emissions (when compared to 2018 figures)

as set out in the IOM Net Zero Road Map to 2050



Upland Peatlands, Isle of Man (Picasa)

# 3. Evidence

what we have and what we need

#### Data and Evidence Requirements for New National Planning Policy

The Island we were planning for in the early 2000s when the Isle of Man Strategic Plan was first being drafted is not the Island we are planning for now.

However the broad aims of government then and now are not too dissimilar. The current core themes of government, namely:

- 1. Building Great Communities
- 2. An Island of Health and Wellbeing
- 3. A strong and diverse economy
- 4. An environment we can be proud of
- 5. Outstanding lifelong learning and development opportunities for all

build on earlier principles to achieve economic progress, social well-being, a quality environment, sound infrastructure, good government; and a positive national identity. These are embedded in the current Strategic Plan. This is why the Strategic Plan has stood the test of time and has worked well for the Island.

While the partial review of the Plan in 2016 updated the housing needs element up to 2026, for the most part the Plan reflects its original format and content.

Drafting a new plan is an opportunity to update the level of and quality of data upon which the plan is based, review the evidence, amend the context, references and presentation. The aim is to realise a document that is fit for purpose and easy to follow.

Data, whether quantitative or qualitative essentially underpins the evidence base for the Plan. Some data/evidence might be updated or become available as the plan develops and where this is the case, Cabinet Office will publish it and add it to the 'Core Documents' list which will be published to support the plan process.

#### **The Core Documents List**

Examples of key evidence that will support the new Strategic Plan are -

#### **Baseline Evidence**

- Our Island Plan: GD 2022/0095
- Isle of Man Census 2021
- Isle of Man Economic Strategy (GD 2022/0080)

#### Legislation and other policy documents

- Town and Country Plannng Act 1999
- Climate Change Act 2021
- Landscape Character Assessment 2008

#### **Government Documents**

- Isle of Man Climate Change Plan 2022 2027
- Isle of Man Biodiversity Strategy and mid-term Audit
- Isle of Man Strategy for Sport
- National Strategy on Sea Defences, Flooding and Coastal Erosion: Evidence Report 2016
- Isle of Man Waste Strategy
- Visitor Economy Strategy (2022 2032)
- Isle of Man Government Action Plan for achieving Net Zero Emissions by 2050
- Active Travel Strategy
- National Broadband Plan
- Energy Strategy

Further documents are being developed which will influence the Draft Plan as it develops -

- Isle of Man Population Projection Model
- Objective Assessment of Housing Need
- Integrated and Socially Inclusive Transport Strategy (expected 2024)
- Parking Strategy
- Active Travel Strategy 2023 2028
- Carbon Sequestration Plan
- Waste Management and Circular Economy Strategies
- Integrated Health and Social Care Framework to respond to Joint Strategic Needs Assessments
- Blue Light Hub Strategy



Peel Castle, Peel, Isle of Man

# 4. The Critical Issues

### **ISSUE 1**

### **POPULATION AND HOUSING**

Let's tackle the housing crisis and plan for future population growth.....

#### Key references in Our Island Plan

- Our housing stock should meet the needs of our population now and into the future.
- The Island needs "sustainable population growth."
- Need for "national housing policy to support the action plan to ensure every resident has a safe and secure and affordable home".
- Need to "tackle the housing crisis by ensuring everyone has a suitable and affordable place to call home".
- "To further develop the infrastructure and services for our community to plan for an estimated population of 100,000 by 2037."
- "Housing, especially for 20-40 year olds."
- Ensure that we meet the needs of our older population and those with disabilities.

#### ..... we need to plan for new housing and meet changing population needs.

#### The Draft Strategic Plan will....

- Include a Spatial Vision and new Spatial Strategy that will represent the policy foundation for the pattern, scale and design quality of the places where we live (following a full exploration of future spatial options).
- Include a Key Diagram depicting this overall Spatial Strategy.
- Set out a clear approach to satisfy housing need to provide sufficient opportunities to 2026 and over the rest of the plan period, to facilitate a net growth in housing units to meet the needs of the population.
- Ahead of any revised population statistics, the findings of an Objective Assessment of Housing Need (as commissioned by the Housing and Communities Board) and decision on the plan period, follow the 'standard method' approach used in other jurisdictions. This takes into account projected household growth, affordability, and the age of current plans to produce a need figure:

- Plan for just over **1,800** additional dwellings throughout the plan period (as a minimum). This is based on a 10 year household growth calculation and is in addition to sites currently allocated and valid planning approvals). Full calculations are provided in Paper P.EP 1.
- Address the size, type and tenure of housing needed for different groups in the community as well as number of new units needed.
- Set out an updated policy for affordable housing having considered different approaches to about how such units can be retained in the longer term.
- Align housing policies with other policies in the Plan ensuring a coherent infrastructure delivery approach and achievement of sustainability goals.

### **ISSUE 2**

### **TOWNS AND CENTRES**

Let's make our centres destinations - so we can work hard and enjoy our free time...

#### Key references in Our Island Plan

- To revive our urban landscape and improve the public realm in a sustainable way.
- To "ensure the attractiveness of brownfield development."
- To have a Town Centre First Model and Regeneration Strategy
- To recognise the link between healthy places, active lifestyles and overall wellbeing in policy choices.
- To have a Research & feasibility study into the viability of developing niche educational & training campuses based on the Island's sector strengths in order to attract international students to the Island.
- To ensure that there is a comprehensive leisure infrastructure with more things to do as the economically active population increases.
- To ensure street policy is informed by communities so that streets and places are inclusive, easy to navigate, safe and healthy and reflects the wishes of the people who live there.

#### ...... we need to plan for good quality places that, by design, will support thriving communities in the longer term

#### The Draft Strategic Plan will....

- Support regeneration and placemaking principles to revive our urban environments, and strengthen local identity
- Explain what 'placemaking' means and the benefits to be had for local communities - setting out the principles for making sustainable places that can adapt to climate change and endure.
- Protect the vitality and viability of our towns and villages ensuring retail policy supports our centres taking account of changing retail habits and consumer needs.
- Set the policy direction for new retail development generally having reviewed all possible approaches.
- Guide the location of and promotion of new leisure uses in our centres, protecting key shopping areas and town centre living opportunities.
- Support connectivity and 'life' in our centres in all of its guises:

Buildings: Spaces: Links: Heritage

- Consider how strategic policy can support the development of niche educational and training campuses in our towns whilst managing infrastructure demands and impacts.
- Enable communities to thrive in well designed places that support improved health and well-being.
- Support the need for master planning for a co-ordinated planning and development approach that will uplift an area and be more than the sum of its parts - to create a 'sense of place'.
- Protect existing green infrastructure in urban areas, and set out an approach to extend tree cover in defined locations and promote the benefits of pocket parks.
- consider defining the meaning of 'good urban design' and set out planning approaches whereby design becomes integral to a scheme. What could be accceptable parameters for design quality within a design assessment framework?

#### Urban Revival Through Regeneration

Regeneration has now become a key policy focus within Our Island Plan, with a view to attracting private sector investment and bringing vacant land back into economic use.

The recommendations arising from the Select Committee on the Built Environment gave rise to the first iteration of the Unoccupied Urban Sites Register (East) 2020, which was intended to identify under-used land that could form the focus for future regeneration initiatives.

The Register was updated in 2022, extending to the main service centres on the Island, and has served to identify key sites that are unoccupied within existing settlement boundaries that would benefit from a regeneration focus.

The publication of the Unoccupied Urban Sites Register has catalysed recent government initiatives to regenerate our town centres. Notably, the Island Enterprise Scheme provides grants for regeneration initiatives. The Manx Development Corporation (MDC) is making good progress on various schemes.

These recent initiatives have shown that the re-vitalisation of our town centres will need to involve a number of stakeholders to support positive change. Within our town centres, our planning policies incorporate mixed use policies to support a market led approach. This can include a range of uses such as retail, leisure, town centre living, education and associated ancillary uses as - highways, access and parking.

A revised Strategic Plan will need to ensure that strategic policy provision supports new leisure uses in our centres, whilst protecting key shopping areas and town centre living opportunities.

The approach to retail policy on the Island differs to the sequential approach taken in the UK - it is simpler, in resonse to the Island's smaller scale. New retail provision is focussed within town centres, unless an exception can be made for retail on land allocated for industrial use.

Throughout the Strategic Plan there is strong recognition that new retail development must be directed to existing town and village centres on land that is zoned for such purposes, making exceptions for neighbourhood shops and bulky goods (see Strategic Policy 9, Business Policy 5, 9 and 10). This is to ensure that the viability of existing town centres is not undermined through out of centre retail developments.

There is an opportunity to review the Business Policies as part of the review process.

#### Strengthening Community Spirit and Local Identity

Against a new backdrop of urban revival, opportunities are opening up to strengthen community spirit and local identity - by putting the needs of people at the heart of planning in our town centres, and addressing areas of urban blight.

This can be achieved in a number of ways and the review of the Strategic Plan provides an opportunity to consider these in full and find the best fit for the Island.

## **ISSUE 3**

## ECONOMIC VISION a. jobs and investment

Let's develop a strong and diverse economy; sustainable and ambitious... which positively impacts on all residents

#### Key references in Our Island Plan

- A £1bn long term public and private investment programme
- To create and fill 5,000 new jobs across new, enabling and existing sectors by 2032.
- A £10bn economy with infrastructure that can support 100,000 Island residents by 2037
- A commitment to reinvest additional annual income in services and quality of life
- A commitment to create a Government Economic Appraisal Framework to estimate economic, social and environmental impacts of policies.
- A commitment to substantially decarbonise the services parts of our economy by 2030, in line with our Climate Change plans.

... underpinned by a sound planning framework that provides land where needed for different business sectors in line with sustainability goals

#### The Draft Strategic Plan will....

- Provide policy support for different
   employment sectors including any parameters for the location of development and provision of employment land including (manufacturing - light, general and special industry), research
   and development, storage and distribution.
- Provide policy direction and support for new development in areas of employment land to ensure they have the necessary services and facilities and infrastructure to serve the needs of an expanding workforce.
- Provide policy direction for all types of office development.

- Provide co-ordinated planning policy so there is a balance of considerations in decision making to support sustainable economic growth.
- after working with DEFA, seek to set out a clear approach to applying weight to economic evidence and information in decision making.
- To embed in statutory planning policy for new development - as necessary - the principles of any economic appraisal framework in decision making.
- To include and address matters relating to the rural economy.

## **ISSUE 3**

## ECONOMIC VISION b. supporting infrastructure

Let's improve our infrastructure to ensure an attractive place to live, visit and do business in

#### **Key references in Our Island Plan**

- To improve our basic infrastructure and provide for vibrant communities where people feel pride in their surroundings and where our rich and diverse environment is being protected, nurtured and sustained."
- To "develop our infrastructure to support a population of 100,000 by 2037."
- To deliver future infrastructure provision to support the needs of business arising from future economic activities and also local residents, whilst meeting future net zero targets.
- To have a National Broadband Plan to create enhanced opportunities for learning in the Digital Age.
- To review the Blue Light Strategy for Fire, Ambulance and Police.
- To ensure we are a well-connected Island enabling travel to, from and around the Island.
- To deliver sustainable sewage treatment across the Island.
- To ensure that public services are increasingly digitally enabled, and residents have access to fast, reliable internet.

## ... and better align our plan objectives with those of infrastructure providers

#### The Draft Strategic Plan will....

- Include effective policy guidance for aligning development with all necessary infrastructure, services and facilities.
- To set out an improved approach to infrastructure delivery which may include support for an infrastructure delivery plan. This could supplement existing national infrastructure strategic thinking to facilitate more aligned delivery at the local level.
- Provide coherent policy to help co-ordinate development so the 'vision for place' comprises more than the sum of individual development decisions.
- Set out the long term approach to a Community Infrastructure Levy so that policy is ready for any future implementation.
- Set out a broad approach to the provision of new/replacement police, ambulance and fire infrastructure taking account of the Blue Light Strategy.

- Set out policy guidance for the siting of/provision of new telecommunications infrastructure and apparatus including how this needs to be integral to the design of new development schemes.
- Take account of the Island Road Transport Plan as part of the Island Spatial Strategy work and strategic decision making on the location of new development.
- Take into account any new Street Policy on road design and quality.
- Take account of the long term Regional Sewage Treatment Strategy for the Island and embed this into Planning Policy along with a clear and workable policy on Sustainable Drainage Systems.
- Take into account the Waste Strategy and forthcoming Strategic Needs Waste Assessment
- Ensure policy reflects the Energy Strategy in order to achieve reduced emissions targets.

## **ISSUE 4**

## ENVIRONMENT AND CLIMATE CHANGE

# Let's make our Island more resilient to climate change.....

#### Key references in Our Island Plan

- To consciously and proactively invest in the Climate Change Action Plan, placing sustainability at the heart of the economy.
- That social and environmental factors are fully embedded in economic policy-setting.
- Making renewable and green energy available for all Island residents and businesses.
- To revive our urban landscape and improve the public realm in a sustainable way.
- To ensure the attractiveness of brownfield development.
- To bring forward a Town Centre First Model and a Regeneration Strategy.
- To reach an overall reduction of 35% in the Island's greenhouse gas emissions by 2030.
- Minimum 20MW renewable onshore energy
- To update the National Strategy on Sea Defences, Flooding & Coastal Erosion

#### ..... we need to plan for a net zero future

#### The Draft Strategic Plan will....

- Include Renewable Energy Policies
   relating to wind, solar and other renewable energy options.
- Update Policy and guidance on Environmental Impact Assessment
- Set out national policy for Biodiversity Net Gain in all new development as a starting point.
- Provide policy support for the development of a Green Infrastructure Network and a Nature Recovery Network - to actively promote the maintenance and restoration of eco-systems across the Island.
- To include revised policy provision on development in flood risk zones and property flood resilience.
- Set out national policy for the provision of sustainable drainage systems (SuDS) for schemes needing new/replacement surface water drainage (cross-government working is ongoing).

- Set out national planning policy for Active Travel infrastructure ensuring it is considered early in design schemes.
- Include a 'Carbon Sequestration' policy and support ongoing work on a carbon sequestration classification system in support of the Land Management Framework being devised.
- Consider introduction of policy provision for 'whole lifecycle carbon assessments' for new development - including approaches to minimise the use of imported construction materials and encourage ethical sourcing standards.
- make policy provision for proper sequencing and co-ordination of new development so that planned and anticipated investment in infrastructure and utilities is effective and sustainable.
- Strengthen Policy on Urban Design requirements.

#### Facing the Climate Change Challenge

#### The Climate Change Act 2021

The Climate Change Act 2021 (CCA 21) received Royal Ascent on the 14th December 2021. Within the accompanying Schedule, Section 6 requires that the Town and Country Planning Act be amended to ensure that the development Plan takes into account the following climate change policies –

(a) the maximisation of carbon sequestration;

(b) the minimising of greenhouse gas emissions;

(c) the maintenance and restoration of ecosystems;

(d) biodiversity net gain;

(e) the need for sustainable drainage systems; and

(f) the provision of active travel infrastructure.

Cabinet Office is anticipating these elements coming into force during the Strategic Plan period.

#### The Climate Change Action Plan 2022

In accordance with S. 17 of the CCA 21, the Climate Change Action Plan 2022 was approved by Tynwald in October 2022. The Plan contains the policies and proposals to reduce emissions over the next five years, to keep us on track for the interim target of 35% reduction by 2030, 45% reduction by 2035 and net zero by 2050.

Key takeaways from the plan include decarbonised electricity on the Island by 2030, and a minimum of 20MW of locally generated renewables – to be installed by 2026. The Plan also aims to protect and enhance our natural carbon stores and biodiversity, by planting more trees, restoring more peatland, and delivering carbon restoration project for seagrass and saltmarsh.

Notably, the Plan requires that public bodies undertake an independent assessment of climate impacts – to meet their climate change duty.

#### Future Adaptation to Climate Change

Cabinet Office have undertaken a first iteration of a Climate Change Resilience Appraisal for the Draft Plan for the North and West, and a summary of the key findings that are relevant to the Strategic Plan are set out below.

In respect of guiding future strategic planning policies, the findings of the Climate Change Resilience Appraisal include:

- Protection of carbon sequestration sites;
- Support for whole life cycle carbon impact assessments;
- Need for biodiversity net gain;
- Net zero design, and
- The incorporation of green travel policies within transport policies.

In addition to these measures, the need for further policy measures has been identified, as below -

**Sequenced Development** - future development should be sequenced to align with planned investment in infrastructure and utilities, to avoid a situation where increased energy consumption exceeds the available supply of energy and causes disruption to energy supply regionally. The delivery of future development should also align with planned public sector investment.

**Property Flood Resilience** - new policy could be inserted into the Strategic Plan to ensure that property flood resilience is built into future development schemes for vulnerable uses.

**Sustainable Urban Drainage** - adequate policy provision for sustainable urban drainage systems within the Strategic Plan is required. There will need to be an agreed planning process in place to implement future SUDS policy provisions.



Maughold Head, Maughold, Isle of Man

# 5. Summary of supporting evidence papers

The fundamental contribution of planning to integrating infrastructure provision is its focus on place which has the potential:

"...to ensure that individual developments come to be planned as part of a broader picture, rather than in isolation from each other. This means that the overall value of what is created, to both the local community and developers, exceeds what would otherwise have been the sum of its individual components"

(Adams and Watkins, 2014, p. 23). Adams, D and Watkins, C. (2014). The Value of Planning. RTPI Research Report No.5, Royal Town Planning Institute, London

#### 5.1 A New Island Spatial Strategy

The Spatial Strategy approved in 2007 and which remains valid today is based on the core principles of Centres, Links and Gateways as a focus for future development and growth, with a presumption against development in the countryside. The scale of development directed to each settlement is proportional, dependent on the `tier' in which it sits in the settlement hierarchy.

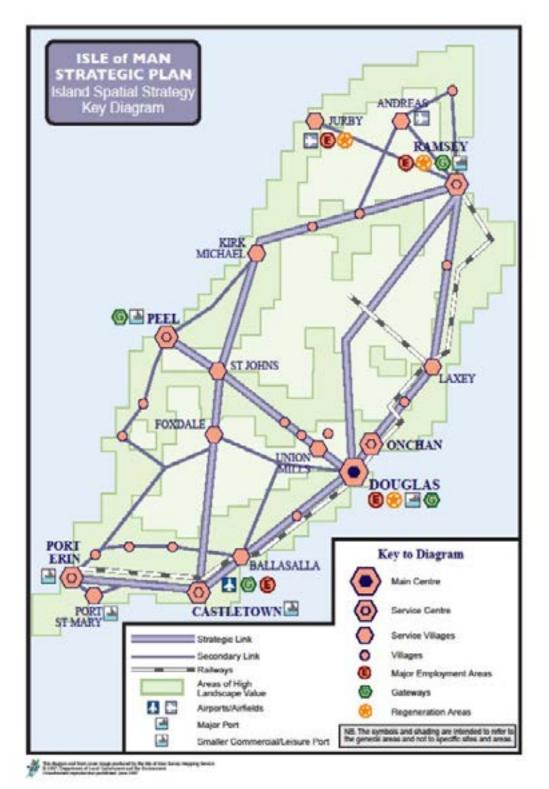
The spatial strategy was depicted diagrammatically by a 'Key Diagram' (overleaf).

What will a new spatial strategy look like? There are a number of basic principles that are likely to be embedded in the approach taken for the Draft Plan. It shall be assumed that:

- The spatial strategy will give clear policy guidance for the overall pattern of development on the Island;
- There will be a Vision Statement and an updated Key Diagram;
- There will be a focus on the regeneration of urban areas;
- Broad housing need will be set out. It will be based on projected household growth (calculated using the Census), but with an allowance made for market review/affordability assessment. Findings from the 'Objective Assessment of Housing Need' Study will be factored in;
- Government policy set out in Our Island Plan incorporating the Economic Strategy will influence the spatial strategy in the Strategic Plan;
- Douglas will continue to have a dominant effect on the whole of the Island since it is the major source of housing and employment, and
- There will be resistance to new isolated dwellings in the open countryside.

#### **Options for Growth - Where should new development go?**

- **Option 1** Growth should be based on the same method as now i.e. proportional using the same hierarchy of settlements
- **Option 2** Growth should be based on Douglas and the East
- **Option 3** Growth should focus on a dispersal of new development across the Island



#### 5.2 How will we calculate housing need in the future?

**Changing to the Standard Method Approach -** The Standard Method is a tried and tested approach to calculating housing need adopted by many Local Planning Authorities in England.

#### **Step 1: Setting the baseline** - the baseline:

- uses projections of household growth, and
- calculates projected average annual household growth over a ten year period

#### Step 2: Making an adjustment to take account of affordability - the adjustment:

- recognises household growth on its own is insufficient as an indicator of need;
- recognises that there may be a constrained supply of available properties;
- takes into account the affordability of the area by comparing median house prices to median earnings;

**Step 3: 'Capping' the level of adjustment increase** - a market adjustment alone could lead to a significant increase in local housing need. A cap is therefore used and is set according to how up to date an area's housing policies are.

So, elsewhere:

- i. If a plan was approved in the last five years, the annual housing need figure is capped at 40% above the annual housing need figure set out in the plan.
- ii. If a plan is older than 5 years, the annual housing need figure is still capped at 40% unless either the projected household growth over 10 years or the existing plan's annual housing requirement is higher. In that case, the higher of those figures is used.

**Step 4: Sense Check and Consideration of Other Policy Goals** - this step can take into account the economic aspirations of Government Policy and Cabinet Office has applied this step (see Evidence Paper P.EP 02 for further explanation of future housing need based on different assumptions).

#### An example of calculating gross housing need given certain assumptions

Worked Example: Future gross housing need (100,000 people by 2037) Average household size: 2.16	
The purpose of the standard method is to find the minimum housing need figure. However, any planning authority can plan for higher economic growth.	
The Economic Strategy embedded in Our Island Plan states that we should plan to provide the infrastructure for a population of 100,000 residents by 2037.	
Assumptions: 100,000 residents by 2037 Average household size: 2.16	
Figures:	
1. Total Residents 2. Residents in private households (2,000 in 'institutions') 3. Average household size	100,000 98,000 2.16
(98,000 / 2.16) – Existing households 37,220 = 8150 /15 X 10 = 10 year household growth =	8,150 5,433
Median House price for the year 2021 = Median Salary to Median House Price Ratio as a decimal = 9.97 – 4.0 = 5.97 / 4 x 0.25 =	£349,950 9.97 0.373125
10 year household growth =	5,433
5433 x (1+ 0.373125) =	7460
<b>Applying a Cap:</b> A. 5433 X 1.4 = B. (322 x 10) X 1.4 =	7,606 4,508
As the figure produced at step 2 (7460) is less than the higher of A. or B.	Gross need remains 7,460

н

**The Impact of Changing the Assumptions -** If the average household size (AHS) stayed at 2.22 (2021 Census), how would housing need change?

Worked Example: Future gross Housing need (100,000 people by 2037) Average household Size: 2.22	
1. Total Residents	100,000
2. Residents in private households (2,000 in institutions)	98,000
3. Average household size	2.22
(98,000 / 2.16) – Existing households 37,220 =	6,924
8150 /15 X 10 = 10 year household growth =	4,616
Median House price for the year 2021 =	£349,950
Median Salary to Median House Price Ratio as a decimal =	9.97
9.97 – 4.0 = 5.97 / 4 x 0.25 =	0.373125
10 year household growth =	4,616
5433 x (1+ 0.3775) =	6,338
Applying a Cap:	
A. 5433 X 1.4 =	6,462
B. (322 x 10) X 1.4 =	4,508
As the figure produced at step 2 is less than the higher of A. or B.	

**Arriving at Net Housing Need from Gross Figures -** Taking into account the existing land supply (including Strategic Reserves) and valid planning approvals for housing already granted, the net need going forward is **1,847** new dwellings.

#### 5.3 How will we Calculate Employment Land Needs in the Future?

Assessment of employment land need takes into account the Employment Land Review 2015 (as updated in 2017), and the Government's approved Economic Strategy which forms part of Our Island Plan.

**Gross Land Requirement** - need has been calculated to be **62.41 hectares** (for manufacturing general and food and drink) less that which has been developed since Q3 2014 (which is only minor development in Jurby).

**Net Land Requirement** - there is land available for employment uses in all areas but it varies significantly between north and west, the east and the south. It is calculated that 56.15 ha of land is available now leaving a need for **6.26 ha**.

However, this figure is likely to grow once further evidence is available and analysed and is translated to the Draft Plan.

#### 5.4 Rural Change and Housing Issues - Teasing Out the Critical Issues

**Rural Housing and acceptable land uses in rural areas -** One of the fundamental issues the Strategic Plan will need to address is how development is to be spread across the Island. The Spatial Strategy and general development considerations will determine the future broad approaches and demands on our existing rural areas including any housing growth. The extent to which additional housing is supported outside of Douglas and our larger towns and villages will, in turn, influence the Spatial Strategy that is put forward. This early stage in the Strategic Plan is an opportunity to consider all of these issues.

Key topic areas to be examined further include:

- Vacancy issues including reasons for vacancy (short terms lets, second homes etc.);
- What, if any, are the resultant impacts of vacancy on the local economy, facilities and services? What are the policy options?
- Should there be a retention of the policy limiting development in the open countryside unless exception criteria are met? What should this criteria be?
- Is a policy allowing for agricultural workers' dwellings still needed?
- Should there be a design code for rural development?
- Should support remains to allow conversion of redundant buildings to residential purposes? What should be the test for redundancy?
- What should the policy be for replacement dwellings in the countryside?
- Is affordability an issue? Is there a case for allowing more affordable properties which should be retained as affordable units in the longer term?
- How do we get the balance right between new development types in rural communities?

The Objective Assessment of Housing Need will provide evidence to answer some of the questions set out above. Alongside further analysis of available and procured data, this will help to inform future policy decisions on these topic areas. **Rural Community Services and Facilities** - All rural schools in the North and West are currently operating at below available capacity levels (Andreas, Ballaugh, Dhoon, Jurby, Sulby, Foxdale, Michael, and St. Johns. Data collection for the rest of the Island will shape policy proposals going forward.

Further work will focus on:

- educational needs in our rural areas and how these might change;
- health and social care needs in our rural areas and how these might change; and
- ensuring sufficient provision for sports and play space.

**Employment Opportunities** - The Census data suggests that Douglas is a key employment location for workers who reside in rural locations. Workers who live in rural settlements closer to Douglas appear to be more reliant on Douglas for employment, and show stronger commuting patterns. These rural settlements experience high pressures for growth. Data also suggests that residents in more remote rural locations, such as Andreas and Bride are tapping into employment opportunities associated with rural industries or self-employment, in addition to employment opportunities in major settlements.

Further work will focus on:

- expected employment sector growth in rural locations and implications for land use and spatial planning;
- the trend for working from home and likely changes in housing demand in rural settlements, and
- Acceptability or otherwise of small scale rural businesses and industries in rural locations and how policy can support or limit that development.

**Renewables** - The Strategic Plan will need to address the issue of renewable energy, particularly in respect of wind and solar farms. The recent announcement of two potential sites on Island which will now be subject to additional assessment highlights the progress being made to decarbonise the energy network by 2030 and the possible significant infrastructure that may be built in our rural areas.

#### 5.5 The Climate Change Act 2021 and Biodiversity Net Gain

The Climate Change Act requires that the Town and Country Planning Act 1999 is amended to ensure that the development plan takes into account biodiversity net gain (BNG).

The work being undertaken in other jurisdictions is helping policy makers on Island work out what is the best fit for the Island and how it will work in practice.

In terms of the broad planning policy, the Strategic Plan will play a significant role in a successful introduction of Biodiversity Net Gain. It will help deliver it across the Island through the planning process.

The next steps are to work with stakeholders to explore:

- **Possible methodologies** In order to arrive at the best solutions to achieve BNG, whether on-site or off-site;
- Whether BNG should be proportionate to the size of the scheme so as not to place an undue burden on smaller developments, this could involved a tiered approach and qualifying criteria;
- Other guidance required alongside the Strategic Plan including the status of such documents and the issues to be addressesd (such as targets, tarrifs and other matters);
- **The potential of Nature Recovery Networks** and what would be needed to make this happen as part of any BNG model?
- How best to monitor the effectiveness of BNG policies and guidance
   to ensure any elements that are ineffectual are refined in a timely manner.

It is accepted that the Strategic Plan may not be the right place for detailed methodology; this is more likely to be set out in a Planning Policy Statement and/ or other policy/planning application guidance.

#### A Biodiversity Net Gain Model - England and Wales

England has now imposed a legal requirement to deliver biodiversity net gain, through the Environment Act 2021. It will apply to small sites from April 2024. The Environment Act stipulates the use of the UK Biometric Assessment Tool for larger schemes. The biometric helps to objectively establish a baseline measure for existing biodiversity and quantify the uplifit required to achieve **biodiversity targets** (currently set at 10% gain) and inform decision making. There is also a requirement to manage and maintain the site for 30 years, with a legal charge placed on the land. Exceptions apply for development brought forward under a Development Order and urgent Crown developments.

The National Planning Policy Framework (currently NPPF Policy 4) makes a general policy provision for biodiversity net gain (paragraphs 180 - 182), and a Biodiversity Gain Plan has to be prepared for submission with a planning application.

Under the Environment Act 2021, BNG can be delivered

- on site;
- via a combination of on-site and off-site measures; or
- via a combination of on-site delivery together with a tariff being charged for the delivery of BNG on an identified strategic project.

Any Isle of Man model will take into account the experience of others and any areas of accepted best practice.

#### Meeting the Challenge to Introduce BNG into Planning Policy -

Cabinet Office is working with other stakeholders to address the challenges of introducing Biodiversity Net Gain into the planning process. This needs to be done in such as way as to be effective in the long term.

Ahead of the publication of the Draft Plan, more work across different disciplines and with different stakeholders will make the future Isle of Man approach a measured an effective response to the requirements of the Climate Change Act 2021.

**Further Study Areas** - It is important that any Manx Biodiversity Net Gain Policy and delivery mechanisms through the planning process are fit for purpose, clear, and straighforward to implement. Additional work is essential and this is listed in the Evidence Paper P.EP 03.

**Cabinet Office** 

Main Preliminary Publicity Paper P. EP Main