

Proposed Ramsey (Boundary Extension) Order 2023

- Name: Philip and Diana Dunne *email 1/8*
- [REDACTED]
- Responding on behalf of Philip and Diana Dunne
- You may publish my response in full
- [REDACTED]
- I live within the Glen Auldyn proposed extension
- I object to the proposal
- I wish to attend the inquiry
- I am happy to expand further on these comments at a public enquiry

letter 1/8

1 Context

Ramsey Town Commissioners (RTC) have made an application to the Department of Infrastructure for an Order under Section 6 of the Local Government Act 1985 seeking to extend by Order, the boundary of the town of Ramsey Town.

The boundary extension seeks to bring Glen Auldyn into Ramsey Town.

As residents of Glen Auldyn we have an interest in the proposal and categorically oppose the proposal in the strongest possible terms

2 Precedence

RTC made a similar application in 1992 which was rejected by the Public Inquiry. The Chair of the inquiry was dismissive of RTC's proposal in respect of Glen Auldyn stating:

"Glen Auldyn is a separate settlement or hamlet which by no stretch of the imagination can be described as being in community with Ramsey Town or to be an overspill or outgrowth of Ramsey Town. I cannot accept that there is a community of interest between this area and the Town of Ramsey. The balance of advantage certainly does not lie in the acceptance of the scheme from the point of view of Glen Auldyn. Practically all the residents of Glen Auldyn appear to me to be unequivocally opposed to the scheme. Further in my view the Ramsey Town Commissioners seek to take into the town an excessively large area of the parish of Lezayre. I recommend that Glen Auldyn be excluded from any extended area."

In doing so the inquiry dismissed items 1), 2), 3) and 6) of the current criteria for consideration of local government boundary extensions.

We intend to show that if anything there is now even less reason than there may have been in 1992 to permit a boundary extension that incorporates Glen Auldyn.

3 Criteria for the Consideration of Local Government Boundary Extensions

3.1 The promoters' area and the area/s sought are really one community

3.1.1 Green Gaps

Shown below are two illustrations of Glen Auldyn and Ramsey area, one is from 1995 another from 2021. It is clear that on both maps, contrary to RTC's claims, Glen Auldyn and Ramsey are separated very clearly by what the Isle of Man Strategic Plan 2016 defines as a "Green Gap".

Green gaps (see Spatial Policy 7)

In the context of Spatial Policy 7, "green gap" means an open area which serves to maintain the distinction between settlements; prevents the coalescence or merging of settlements; and may provide recreational opportunities.

Helpfully, as if to emphasise the point, this Green Gap is made up of very specific recreational facility, Ramsey Golf Club.

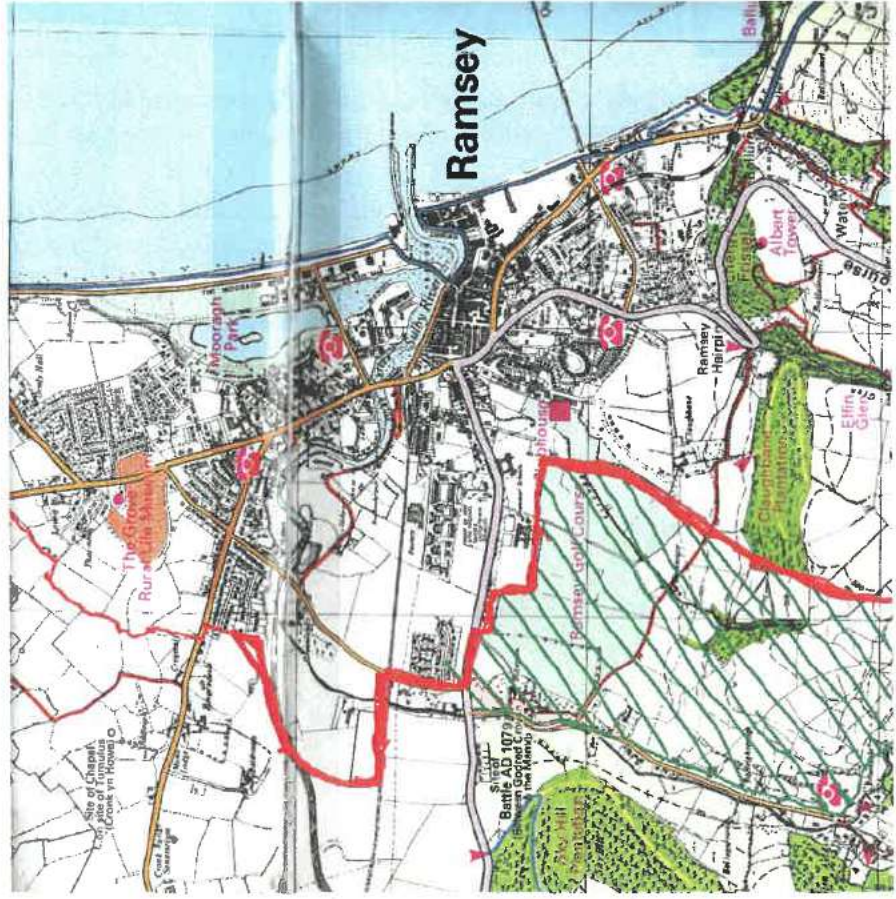
It is very difficult for an example of a Green Gap being much clearer, moreover its very purpose is to "prevent the coalescence of settlements".

Not only is it patently clear from the maps shown but from the definition above Glen Auldyn and Ramsey are two distinct settlements separated by a Green Gap.

In the 1992 the inquiry concluded "by no stretch of the imagination can Glen Auldyn be described as being in community with Ramsey Town". By viewing the two maps side by side from 1995 and 2021, there can be no doubt that nothing has changed in the intervening period, the two settlements continue to be just as separate now as they were then.

3.1.2 Green Gaps (hatched green area) Between Glen Auldyn and Ramsey has not changed since previous 1992 review

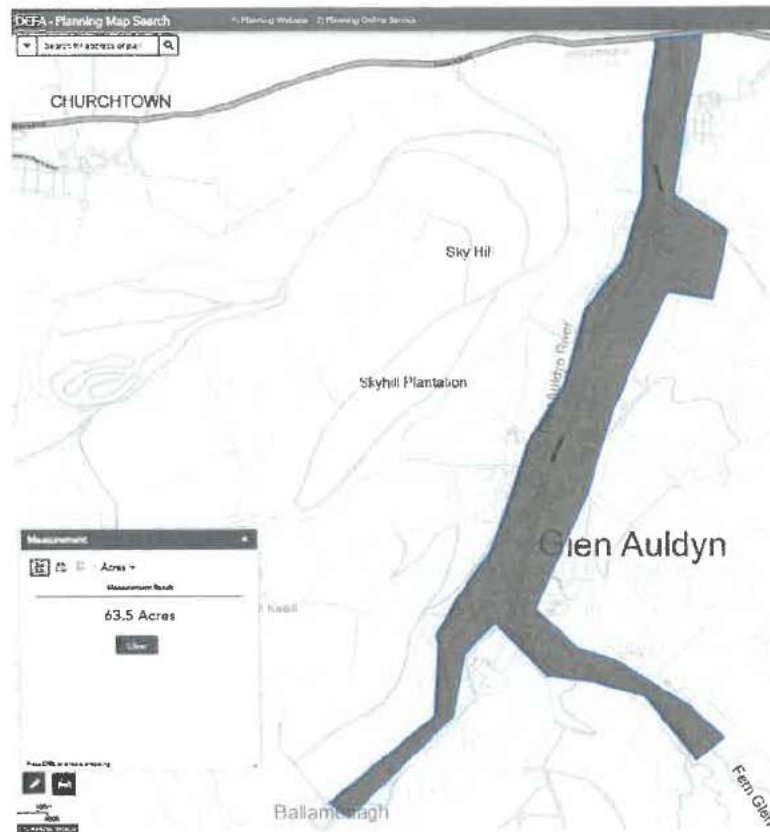
OS Map 1995



3.1.3 Population Density

Not only are the two settlements separated geographically, they are separate in nature.

Ramsey Town had, at the last census, 8,288 residents in an area that RTC happily tell us in their submission is 905 acres. That translates as a population density of 9.2 people per acre. Glen Auldyn by contrast is composed of 70 properties and assuming an average household size of 2.3 people per house (as specified in table 8.3 of the Isle of Man Strategic Plan 2016) has 161 residents. Glen Auldyn is approximately 63.5 acres in area. Consequently population density is approximately 2.5 people per acre.



	Population	Area	Population Density
Ramsey	8,288	905	9.2
Glen Auldyn	161	63.5	2.5

Glen Auldyn's population density is much more akin to the rural hamlet that it is, than it is to much higher population density of a town such as Ramsey.

It is clear from this and the maps above that Glen Auldyn and Ramsey are not one community but are distinct, both as a consequence of the physical separation between the two and the nature of the communities, Glen Auldyn rural and Ramsey urban.

3.2 Community of Interest

3.2.1 Service Centres

The Island's Strategic Plan 2016, in its chapter on "Island Spatial Strategy" makes clear the distinction between "Service Centres" such as Ramsey and smaller settlements such as Glen Auldyn. It says:

"The CENTRES comprise a hierarchy of service provision with Douglas, the capital of the Island, seat of Government and headquarters for most of the Island principal businesses and retail stores, as the MAIN CENTRE. Ramsey, Peel, Onchan, Castletown and Port Erin act as SERVICE CENTRES for their respective hinterlands. Below these are a series of SERVICE VILLAGES made up of Laxey, Jurby, Andreas, Kirk Michael, St Johns, Foxdale, Port St Mary, Ballasalla and Union Mills. Finally, there are a number of smaller settlements with little or no service provision which rely on the other centres for various services. These comprise Bride, Glen Maye, Sulby, Dalby, Ballaugh, Ballafession, Glen Mona, Colby, Baldrine, Ballabeg, Crosby, Newtown, Glen Vine and Strang."

In doing so it makes clear that smaller settlements rely on the Service Centres for "various services".

It is illogical therefore for RTC to list a set of services available within Ramsey and suggest because they are available and used by the residents of Glen Auldyn it then follows that there is a "Community of interest."

If that was the case then Bride, Sulby, Ballaugh and Glen Mona (to name just the few examples sited in the Spatial Strategy) would also share a Community of Interest. Is it RTC's ultimate intention to extend their boundaries to include these settlements?

On the contrary the Spatial Strategy acknowledges that smaller settlements will rely on Service Centres for services. It is disingenuous of RTC to resort to this.

3.2.2 Rural Community

On the contrary Glen Auldyn's Community of Interest is a rural one. Where Ramsey have urban interests (shops and bowling alleys), Glen Auldyn has stables, a farm, a cattery, pheasant shooting, river fishing, hiking and mountain biking.

It is patently clear that the two areas do not share the same Community of Interest and the illustration shows how the communities differ and how Glen Auldyn falls much more readily into the rural Lezayre than into the urban Ramsey.

3.2.3 Internet

It is perhaps worth pointing out at this point that the use of Ramsey as a Service Centre is in decline. Residents of Glen Auldyn are just as likely to buy goods online from supermarkets in Douglas as they are to buy them from Ramsey, to have hardware delivered from the large hardware suppliers in Douglas, to have TV's and electrical goods from Currys in Douglas or online. It is not surprising therefore to see the empty shop fronts in Ramsey.

If anything, since the previous consideration in 1992, residents of Glen Auldyn have less of a reason to use Ramsey as a Service Centre but to look elsewhere and within for its own Community of Interest.

3.3 That the area sought is an overspill or outgrowth of the promoters' area

This is perhaps the simplest item to rebut.

If Glen Auldyn was an overspill or outgrowth from Ramsey, it would surely have seen an influx of people in the 30 years since the last review.

This simply is not the case.

One new house has been built in Glen Auldyn in the last 20 years, housing 2 people.

It is notable in RTC's submission that they claim that Glen Auldyn is an overspill because of the "proposed plans for development to the west of Ramsey". The argument is that a future development that may or may not happen in an area that is completely distinct from Glen Auldyn in some way shows that Glen Auldyn is an overspill of Ramsey.

It is clear that is simply untrue and is emblematic of the whole of RTC's argument.

RTC cannot be unaware of how disingenuous such a claim is and how irresponsible it is for them to squander tax payers and rate payers' money on a public inquiry. It is little wonder they are so materially in debt and for the most part have failed to fix their interest rate exposure. It is perhaps this parlous financial position that has triggered this unnecessary inquiry rather than any rational argument.

3.4 That, wherever possible, clear physical boundaries are followed

3.4.1 Landscape Character Assessment Report (2008)

In considering physical boundaries the logical place to seek guidance is in the IOM Government Landscape Character Assessment Report (2008).

This report states specifically of Glen Auldyn, under its heading Overall Character Description:

The narrow valley bottom begins to widen with larger flatter fields of pasture and having a more regular pattern with hedgerows containing mature trees around Cronk Aalin. This area of open fields abuts the Ramsey Golf Course to the south and runs alongside the edge of the deciduous woodland of Claghbane Plantation, where the lower slopes of the Northern Uplands meet the urban edge of Ramsey.

It describes under "Key Views":

Channelled views framed by steep valley slopes.

Under "Evaluation of landscape sensitivities" it lists:

- *Ecological value of the aquatic ecosystem and riparian habitats.*
- *Valley bottom and riverside woodland in the lower valley.*
- *Small-scale nature of buildings, within well wooded, intimate valley landscape.*
- *Vernacular character of buildings and bridges.*

Indeed the "Landscape Strategy" described for this area is:

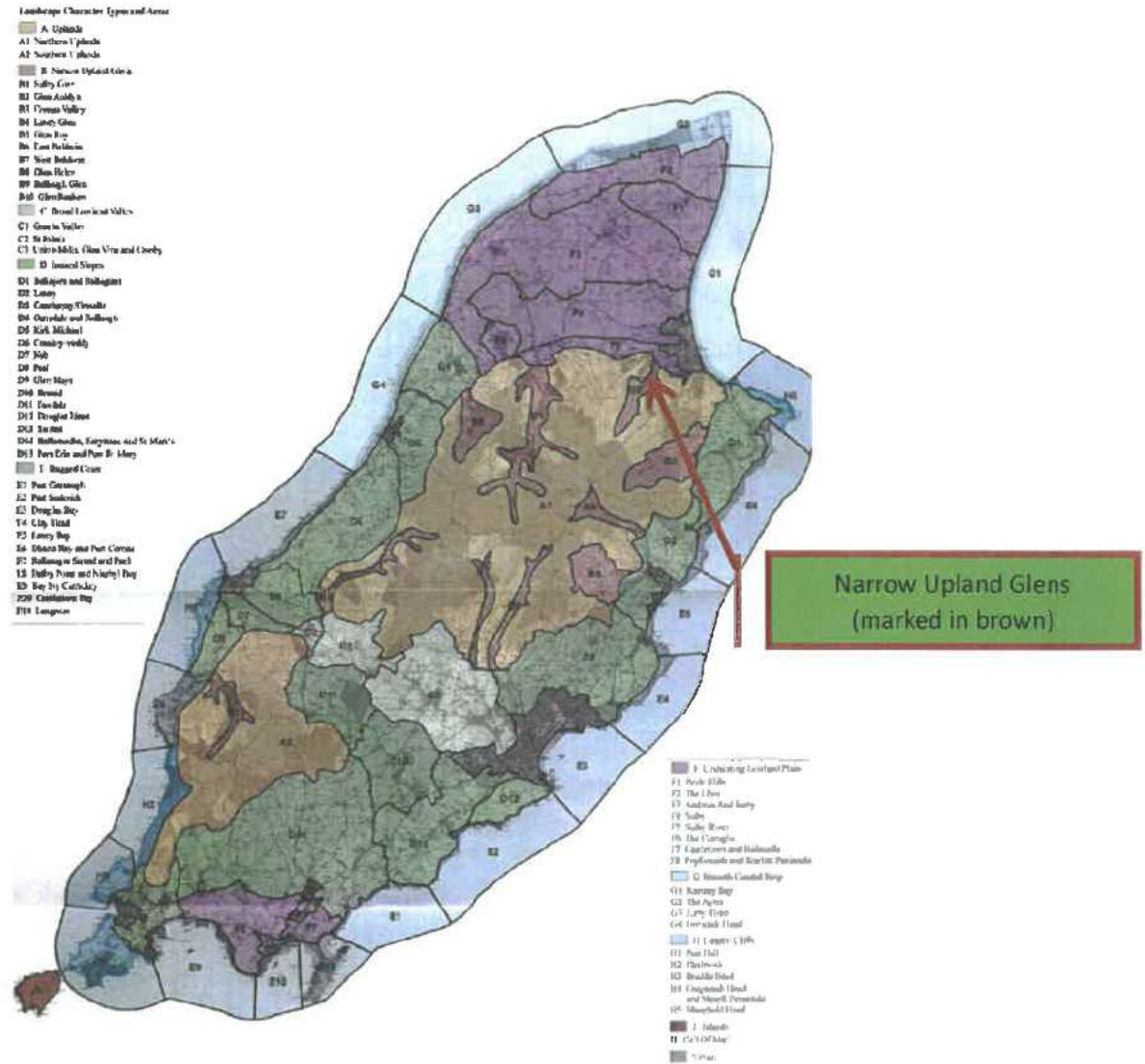
The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of wooded valley bottom with housing sensitively located alongside the ecologically valuable riparian corridor.

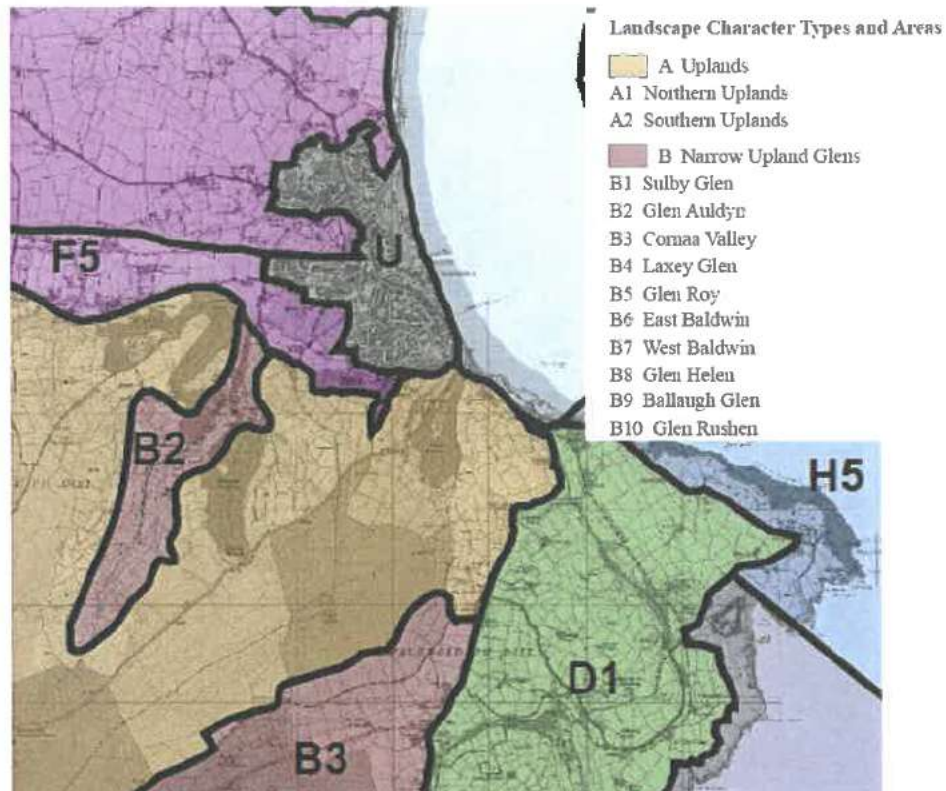
The physical boundary distinctions could hardly be any more clearly stated.

Glen Auldyn is a "riverside woodland" in a "well wooded, intimate valley landscape", a very distinct and separate rural physical area than that of the urban townscape of Ramsey.

3.4.2 Narrow Upland Glen

In the Landscape Character Assessment Report, Glen Auldyn is identified as one of only 10 Narrow Upland Glens marked (B) in dark brown on the map below.





The document describes Narrow Upland Glens as:

Narrow Upland Glen (Type B)

- *Steep sided deeply incised V-shaped valleys cut by upland streams with stretches of white water with some large boulders and small waterfalls in places.*
- *Down stream of the headwater the valley floor widens with wet meadows developing along side a more sinuous river with stretches of smooth flowing water over gravel beds as tributaries join and widen the river.*
- *Interlocking spurs can prevent otherwise continuous views up the valley.*
- *Bracken, heather and rough grass cover the steeper upland slopes with fragmented deciduous woodland cover dominating lower down the valleys with a variety of planting around settlements and scattered large houses / large estates.*
- *Variety of Manx hedges, slate stone walls and grassy banks with wild flowers enclose and contain the various steep winding often single-track roads.*
- *Some small nucleated settlements are located at river crossing points or at road junctions with the majority of dwellings isolated and stretched out along the valley roads that run along valley sides and parallel to the river's course.*
- *Numerous bridges and fords where roads cross rivers.*

It is very clear how Glen Auldyn features as a “small nucleated settlement”, with “the majority of dwellings stretched out along the valley road”.

It is difficult to see how a clear physical boundary can be more clearly illustrated than in the map above, a map contained within the Isle of Man Government’s own documents.

There is a clear physical boundary between Glen Auldyn and Ramsey.

3.5 That there is insufficient acreage left for the development of the promoters' area within its borders and injury is suffered thereby

3.5.1 Glen Auldyn

There is a significant amount of uncertainty in respect of the additional requirements for housing in the North of the Island (see below) and even more uncertainty about remaining acreage within Ramsey Town. However, irrespective of that uncertainty, it is clear that Glen Auldyn will not provide any meaningful area for additional development. RTC say that themselves:

"There is limited opportunity for future development in Glen Auldyn although development approval exists for some infill plots it is not considered that the area provides the opportunity for widespread development"

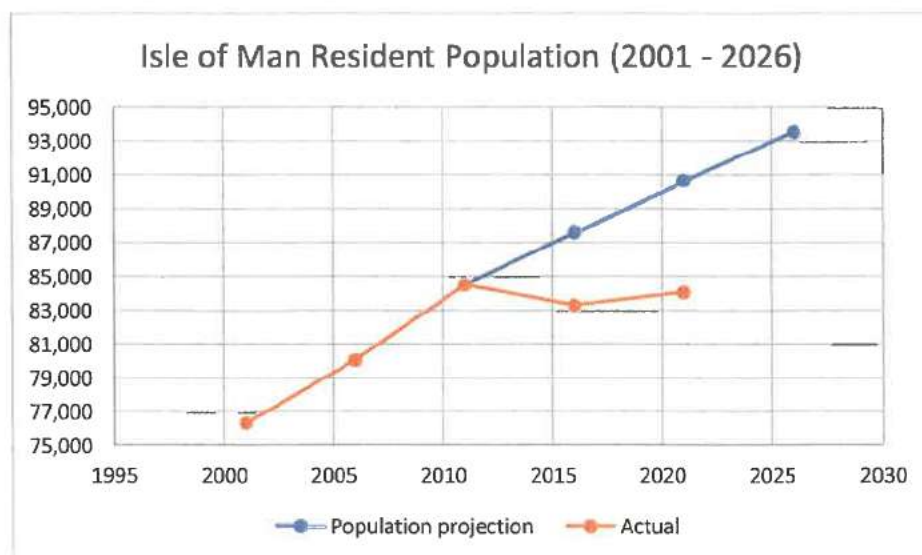
It is clear that this point is simply untrue in respect of Glen Auldyn and adds irrefutably to the case for Glen Auldyn to remain in Lezayre.

3.5.2 Premature and Unreliable Proposal

In the Isle of Man Strategic Plan (2016), an increase of 770 houses was envisaged in the North of the Island

Area	Spatial distribution of housing requirement 2011 to 2026
North	770
South	1120
East	2440
West	770
Total	5,100

The numbers were predicated on population growth as detailed below (again taken from the Isle of Man Strategic Plan).



It is fair to say that the Strategic Plan materially overestimated the number of residents of the Isle of Man against what the census data has subsequently revealed.

Accordingly there is a material degree of uncertainty as to subsequent housing requirements on the Island and this may be somewhat mitigated by the publication of North and West Area Plan in respect of Ramsey and the North. It is understood that RTC were asked to wait for the publication of this report before they went to the expense of a public inquiry. They did not do this and consequently they make all their assertions on inaccurate and out of date data. Their proposal therefore in respect of this point should be dismissed as simply being (knowingly) unreliable.

3.5.3 Containment

The Island Strategic Plan states that:

Spatial Vision

5.7 The Strategic Objectives and Strategic Policies direct that the focus of new development should be within existing towns and villages or in sustainable urban extensions, avoiding coalescence of settlements and maintaining their local identity.

It is clear from this that it is the intention that development is contained within the urban environment and not to be allowed to spawl outwards as is the envisaged in RTC's proposal.

RTC are mistaken when they suggest that because the Strategic Plan suggests that most housing in the North should be focused on Ramsey that they should seek to build annex land to build a bigger Ramsey.

The very reason the Plan suggests most housing is focussed on Ramsey is to contain urban sprawl. The Plan states:

"Having regard to the Strategic Objectives in Chapter 3 and the Island Spatial Strategy in Chapter 5, the Department proposes that, whilst development opportunities should be distributed within the Island in accordance with the distribution described at paragraph 5.22, there should be a general policy of containment of built development rather than dispersal and where development should be contained within specific areas within the Island rather than scattered randomly within it.

Containment minimises the visual intrusion of development in undeveloped areas, thus protecting the significant and unique beauty of the unspoiled areas of the Island and maintaining the majority of the Island for the benefit of agricultural production and nature conservation;"

3.5.4 Built Environment Reform Programme

Indeed the development of Built Environment Reform Programme in July 2022 is directly at odds with RTC's desire to develop greenfield sites. In their proposal RTC has shown no details of its efforts to develop brownfield sites. Indeed brownfield developments are entirely absent from their statistics. This again is clearly indicative of the fragility of their proposal and is a shining example of why their claims in respect of insufficient remaining land cannot be taken seriously.

3.6 That the balance of advantage lies in the acceptance of the scheme, though it may generally be admitted that the area sought may be valuable in various ways to the local authority by whom they are now governed

3.6.1 Balance of Advantage

RTC have to show that the balance of the advantage lies in their proposal. It is abundantly clear that on all points above they have failed to do that.

3.6.2 Environment

RTC's proposal does not make a single reference to their proposals effect on the environment. The Island's Strategic Plan by contrast is very specific about the countryside and the environment. Environment Policy 1 states:

The countryside and its ecology will be protected for its own sake. For the purposes of this policy, the countryside comprises all land which is outside the settlements defined in Appendix 3 at A.3.6 or which is not designated for future development on an Area Plan. Development which would adversely affect the countryside will not be permitted unless there is an over-riding national need in land use planning terms which outweighs the requirement to protect these areas and for which there is no reasonable and acceptable alternative.

The settlements defined in Appendix 3 are:

Settlement	Area Plan	Settlement	Area Plan
Bride	1982 Development Plan	The Strang	Braddan Local Plan 1991;
Andreas	1982 Development Plan	Onchan	Onchan Local Plan 2000
Jurby	1982 Development Plan	Douglas	Douglas Local Plan 1998
Ballaugh	1982 Development Plan	Glen Maye	1982 Development Plan
Sulby	Sulby Local Plan 1999	Dalby	1982 Development Plan
Ramsey	Ramsey Local Plan 1998	Foxdale	Foxdale Local Plan 1999
Glen Mona	1982 Development Plan	Newtown/Mount Murray	1982 Development Plan
Laxey	Laxey and Lonan Area Plan approved 2005	Ballasalla	1982 Development Plan
Baldrine	Laxey and Lonan Area Plan approved 2005	Castletown	Castletown Local Plan 1991
Kirk Michael	Kirk Michael Local Plan 1994	Ballabeg	Arbory and East Rushen Local Plan 1999
Peel	Peel Local Plan 1989	Colby	Arbory and East Rushen Local Plan 1999
St John's	St John's Local Plan 1999	Ballafesson	Arbory and East Rushen Local Plan 1999
Crosby	1982 Development Plan	Port St Mary	1982 Development Plan
Glen Vine	1982 Development Plan	Port Erin	Port Erin Local Plan 1990
Union Mills	Braddan Local Plan 1991		

Consequently, the countryside comprises all land outside of these areas or on an Area Plan for development. Glen Auldyn is not on an Area Plan for development, so consequently is defined here as countryside.

To that end it must be protected for its own sake. Unless RTC have shown "an over-riding national need" then "development will not be permitted." RTC have singly failed to do that on any of the above 6 counts and their proposal should be dismissed.

