

Lezayre Parish Commissioners

Response to Ramsey Town Commissioners Boundary Proposal

December 2022

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1. Introduction

In September 2020 Ramsey Town Commissioners (“RTC”) advised Lezayre Parish Commissioners (“LPC”) that their Policy Committee had identified “...the need to undertake an exercise to review the town boundaries...”.

On 16 November 2020 LPC were invited to a meeting to discuss the RTC plans. During this meeting the RTC Chairman, Mr Cowie, explained various documents and maps to those present, and advised that the proposed extension was to consider the long-term development requirement of Ramsey Town, thus avoiding the necessity for further boundary extension applications in the future. No explanation was given as to what the long-term development requirements would be.

On 20 November 2020 LPC wrote to RTC asking them to consider delaying the application for a boundary extension pending the outcome of the Area Plan for the North and West. Doing so would ensure that not only were the areas being considered deemed suitable for development, but also that adequate consideration was given to the development requirements in the North of the Island.

On 27 April 2021 LPC were advised by the Local Government Unit (“LGU”) that RTC had submitted an application on 13 December 2020 seeking to apply, under Section 6 of the Local Government Act 1985 (the “Act”), to extend the boundary of the Town of Ramsey. The department confirmed that they were content with the application to be considered further. At this time the LGU advised RTC that they required clarification and further detail as it was felt that certain information was lacking from the application which would be required to enable a draft order to be produced.

On 7 May 2021 LPC responded to correspondence from LGU in connection with the boundary extension. A copy of this letter is attached as Appendix 1.

On 24 October 2022 LPC received a copy of the document “RAMSEY TOWN COMMISSIONERS Proposed Boundary Extension September 2022” (“the Proposal”).

2. Background

1992 boundary extension

The Proposal is similar to the 1992 boundary extension application in which RTC created a line around the then boundary of 1969-70, which included land to the North of Ramsey, land to the West of Ramsey, Glen Auldyn and Maughold.

Three specific areas in that application were rejected by the Chair of the Public Enquiry Deemster AC Luft, these were Glen Auldyn, a section in the north that retained Lezayre’s coastline, and Maughold.

In his report the Chair commented:

“13.2 Applying those principles particularly paragraphs (a) (b) and (d) I find no justification for the area of Glen Auldyn being taken within the boundary of Ramsey. 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.”

13.3 It seems to me that the Vice-Chairman of the Maughold Parish Commissioners was right in her contention that the Ramsey Town Commissioners had not shown any justification or good reason why the area in the parish of Maughold that they seek to include within the Town boundary should be so included. There is no significant building on the land, neither is it zoned for residential development. Part of the Ramsey Golf Course occupies a large part of the area. None of the criteria (a) to (f) assist in the case of the Ramsey Town Commissioners, with respect to this area. I therefore recommend that the whole of the area of the Parish of Maughold which is sought to be included in the town of Ramsey should be excluded.

13.4 Lezayre Parish has only one mile and a half of shoreline and half a mile of this shoreline is sought to be included in the Town of Ramsey. There was no evidence to justify this. I therefore recommend that the existing Ramsey boundary line at the north end of the town from the mean high water mark to Bride Road should remain as it is."

It is Lezayre Parish Commissioner's contention that since 1992 there have been no significant changes that would make the decisions of the Chair of the previous enquiry in respect of these three areas any different today. The previous boundary review has proven to be, and continues to be, adequate for the town.

2022 boundary extension

The current Proposal seeks to extend even further north than the 1992 application, eroding more of Lezayre's coastline, stretching as far as The Dhoor on the Andreas Road, as far as the Mountain View Innovation Centre on the Jurby Road, close to Sky Hill on the Lezayre Road, all of Glen Auldyn and a large chunk of Garff (Maughold).

Section 4 of the Proposal refers to the previous boundary extension being almost 30 years ago, and a desire to establish a boundary which will be relevant for a similar period in the future. It does this without providing any evidence of a need to extend the current boundaries due to a requirement for land for development.

Both LPC and Garff Parish Commissioners advised RTC that it would be sensible to wait until the Area Plan for the North and West (the "Area Plan") had been published before proceeding with this application.

Section 5 of the Proposal refers to the Area Plan which is expected to be published in 2023. The Proposal also refers to a single All Island Area Plan which the Government will produce to replace the Area Plans for the South, East, North and West, and which should be in operation before 2026. For this plan to be in operation before 2026, there will have to be very clear guidance from central Government regarding the future development requirements for the whole Island within the next 2-3 years.

At section 1.7.3 of the Area Plan, it states that there are no strategic reserves proposed in its drafting as there is no requirement to hold sites in abeyance pending future developmental needs. This would appear to suggest that all sites on which development is considered necessary have already been identified.

These documents will define the Government's plans for the Island including significant information relating to future development locations and opportunities. It seems nonsensical that RTC wish to apply for a boundary extension that will be relevant for 30 years but are doing so with no reference to the overall strategic plans for the Island which should be known within the next 2-3 years. The Proposal gives no thought to the overall level of development that may be deemed necessary for the Island, no thought to how much development may be required in Ramsey, no thought of how much development in the North may be in other locations such as Jurby, and no thought of the impact of any development on the infrastructure in the North.

The Proposal states that Ramsey's boundaries currently encompass an area of approximately 905 acres. If this boundary extension were to proceed, the size of Ramsey would be approximately 1,883 acres, more than double its current size.

3. Criteria for consideration

The Criteria for Consideration were debated in Tynwald on 16 March 2004 and are based on a Report by the Council of Ministers entitled Local Government Boundary Extensions ("the COMIN Report"). This report was produced because of a deemed requirement following The Peel Boundary Inquiry 2002-2003 for the applicable criteria at a boundary enquiry to be clearer for all concerned and was based on the report of Professor T St J n Bates dated 21 January 2003 ("the Bates Report").

In preparing his report Professor Bates stated:

"The applicant must first establish that the boundary alteration sought is necessary on a broad developmental basis...and may thus serve to preserve the balance of rural and urban areas in our small island by ensuring that there is not a faster absorption of rural areas into urban areas than is developmentally necessary."

The Bates Report commented that criterion (iv) of the criteria used previously was of little assistance in a boundary enquiry. This criterion was *"that public opinion, where rightly expressed and fairly directed is in favour of the proposals, or alternatively, that it is not at all unanimously against, or if heavily against, is influenced mostly by fear of paying the same rates as the promoters' area."* Professor Bates appeared to believe the fear of paying more rates if the rates were higher in the promotor's area would unduly heavily influence public opinion.

The COMIN Report also noted that one of the features of inquiries over recent years was the amount of time taken discussing the relative merits of the authorities involved, and the difference in the levels of rates payable.

The six criteria (which are a fine-tuning of the previous criteria) were attached as Appendix C to the COMIN report and are:

- (1) That the promoter's area and the area/s sought are really one community.
- (2) That there is community of interest in all or most public services, social agencies (for example schools, doctors' surgery/ies recreation areas and community halls and communal requirements of the future.
- (3) That the area sought is an overspill or outgrowth of the promoter's area.
- (4) That, wherever possible, clear physical boundaries are followed.
- (5) That there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby.
- (6) That the balance of advantage lies in the acceptance of the scheme, though it may be generally admitted that the area sought may be valuable in various ways to the local authority by whom they are now governed.

In addition to the six criteria, Appendix C also stated that one matter that should not be considered by an inquiry was:

- The financial impact on an Authority either beneficially or negatively through the rateable income of a boundary application.

Reading Hansard from 16 March 2004, when the criteria now being used was debated, the Chief Minister said:-

"...it is quite invalid, in my view, for an authority to go for a boundary extension simply because it is a territorial land grab, and that is why, at the bottom of the criteria, we make it quite clear that the financial impact on an authority, beneficially or negatively, is something that should be put to one side. A boundary extension should not be a means of altering the rate income and fiddling around with the way the rates are set for people in that area."

If the land sought by Ramsey did not have any properties, there would be no financial impact. RTC however wish to take land that does include properties. This is particularly relevant for Glen Auldyn as by taking Glen Auldyn it is altering the rate income (for both authorities) and fiddling around with the way the rates are set for the people of that area. This is also true for properties in Bride Road, Andreas Road, Jurby Road, Lezayre Road, but to a much lesser extent due to the smaller number of properties in those areas.

In the absence of any evidence that additional land is required for the building of houses within the Ramsey Town boundary, the driving reason for this application would appear to be to gain an increase in the rateable income of the Town.

We believe that the reason for not including the financial impacts on an authority, as referred to in 2004, are based on excessive time and consideration being given in previous inquiries to any increase in rates payable by ratepayers, rather than focusing on the wider merits or otherwise of an application.

We do not believe the intention of Tynwald when excluding the impact of rateable income on being referred to in an inquiry are applicable to this situation. As such Tynwald should modify the terms of reference for rate and financial consequences at any inquiry regarding boundary extensions.

Furthermore, we do not consider that now is the time to pursue a boundary extension due to the current cost of living crisis. Any rate increase, should this application be successful, will add a significant rate burden, increasing over a ten-year period, to each property taken by RTC. The potential loss of rates for LPC would also be so significant that all rate payers within the Lezayre boundary would face an immediate increase in rates of 20-25%.

In responding to the Proposal we have considered these six criteria and, whilst we refer to each of them in detail throughout this response, we consider initially that there are significant flaws in the Proposal as:

1. Ramsey and the areas sought are not one community.
2. Ramsey is considered the service centre for the north of the Island and so it is inevitable that the Town has the majority of public services and social agencies in the north, but this in itself does not equate to a community of interest.
3. The areas sought are not an overspill or outgrowth of Ramsey.
4. The current physical boundaries are considerably clearer than those included in the Proposal.
5. The existing town boundaries provide more than adequate development opportunities for the realistic growth requirements of Ramsey.
6. The lack of genuine reasons for the acceptance of the scheme means that there is no balance of advantage in doing so.

4. Ramsey

A significant proportion of the Proposal sets out the services available in Ramsey. RTC are quite correct to state that the Town has many amenities. However, only a very few of these are run /

operated by the Commissioners, the vast majority have no direct connection to RTC at all, they are privately run using private or Government owned facilities.

The Town of Ramsey

Ramsey is a town that has developed over the years around a harbour for the benefit of the North of the island. With changes in peoples habits due to technology and transport, the communities around the town have become more mobile. This is clearly reflected, not only in the closure of small businesses such as shops and local post offices, but also in the decline of Ramsey town centre, being similar to that of Peel, Port Erin and even Douglas.

Ramsey has not been immune from the decline of the high street. An economically mobile community can choose where and when they shop. It is clearly more efficient for retailers such as petrol stations, charity shops, craft shops, and supermarkets to be in the town where the larger foot fall is. The whole North enjoys this benefit of choice. A retailer will not operate in an area where it is not financially viable to do so. Small retailers will generally focus on small towns, whilst the likes of Marks & Spencer and Tesco would not open in Ramsey as there is insufficient demand in the North, and they know Island residents will travel to Douglas to shop there.

When speaking to people in the North of the island there is concern about the decline in Ramsey town centre, suggesting that the *"major retail offering"* referred to in the Proposal is far from the reality of what is happening in the town. Several public houses and restaurants have also closed in Ramsey.

It is well documented there is a decline in previously traditional settings for worship, Lezayre and Ramsey have not been immune from this decline. Modern places of worship rely on a whole Island network to survive, including making use of spaces large enough to accommodate their congregation. Meanwhile traditional places of worship have closed their larger venues and rationalised to ensure they retain their focal points of worship to survive for their reducing and ageing congregations. The only Roman Catholic church which serves the North has always been based in Ramsey.

Sports facilities / Youth / Play:

The North has many facilities that benefit active and mobile families and young people. Many, but not all, of these facilities are based in Ramsey. The facilities that are based in Ramsey only survive because people come into Ramsey from the surrounding areas to use them. It should be stressed that parents from the North also transport their children to use other facilities such as gym clubs, dance studies, swimming pools etc all around the Island.

Historically Lezayre and other country communities would have had a band, youth clubs, sports teams such as football, but again such community pursuits ceased due to low numbers due to such a variety of other clubs and different activities being available all around the Island.

The Northern Swimming Pool board has funded and operated a swimming pool in the North for over 50 years. The board has only ever built two pools which were both funded and underwritten by the Isle of Man Government. The board have a 30-year loan on the current pool for which all Northern ratepayers bore a £5m loan. The pools were naturally located where most of the Northern population live. Building outside of the town or even a second pool was never considered viable. The site dictates that Ramsey residents have easiest access to the swimming pool.

The Northern Pool is run as a commercial operation and is required to generate as much income as possible from its users. Ratepayers from all of the Northern Parishes contribute to the running costs of the pool, although the majority of its funding comes from Government.

Education

Both the grammar and primary schools are very flexible in their allowance of children from other areas to attend them. Likewise, children from Ramsey can attend other schools in the area, for

example, 60% of pupils at Sulby school are from outside its immediate catchment area. The grammar school's catchment area encompasses the entirety of the north of the island. Primary schools are key in ensuring communities give Island residents a choice where their children be educated. Sulby School is extremely well run and a great nurturing hub for a young person's start in education.

Naturally the Government will not build a secondary school in rural areas when traditionally, and appropriately, secondary education is provided in the main towns in the north, south, east and west. The Island has other secondary schools and University College that all students can use and interchange with to achieve the best outcomes for them individually.

In a freedom of information question to the Department of Education Sport and Culture, LPC learned that currently Ramsey Grammar School has space for 45 pupils, Bunscoill Rhumsaas has space for 198 pupils and Sulby Primary School has space for 55 pupils.

Ramsey Town Hall and Library

The Town Hall was built at great expense to the Ramsey ratepayer. The Police station located to the rear of the new Town Hall was part of a deal in which RTC took control of the Old Police Station/Courthouse and which included a loan, again at great expense to the Ramsey ratepayer.

In the Proposal RTC suggest that the Ramsey and Northern District Housing Committee (Elderly Persons Housing), and the Northern Civic Amenity Site, are administered from the Town Hall. Whilst this is correct, the RTC accounts for March 2021 state that a fee of £112,314 was charged to the Housing Committee for these services. Furthermore, accounts are distributed to the contributing authorities of the Northern Civic Amenities Site at regular meetings. An amount of £7,000 is charged as an expense in these accounts, which reflects the work undertaken by administration staff of RTC.

It is assumed that all of the services that RTC provide from the Town Hall, such as Civil Registry, Benefits Office, Job Club, and the Office of the Coroner for Ayre and Garff, provide a level of income for RTC and it is right that rather than duplicate such services they be focused in one place, being the town where most people that are using the services actually live.

The Islands Police force has scaled back any physical presence in the North as they have been so efficient at crime prevention. It is also logical that the police station be based in the town.

Lezayre has a hall that is used for many different pursuits daily as do most of the other parishes in the North.

Health services

In terms of doctors' surgeries, the North of the Island is covered by the Ramsey Group Practice and its satellite surgery at Jurby Community Centre. Residents in the North have no other choice. Dentists are slightly different, as due to the shortage of dentists, people from all over Island travel from one area to the next to obtain a permanent dentist. People of the North do not necessarily use the dentist services in Ramsey.

Chemists are also shops. It makes sense for a chemist to be in a town or larger village, such as is mentioned, Kirk Michael or Laxey.

Community of interest

The final paragraph of page 8 of the Proposal states:

"The Commission would state that a much greater community of interest presently exists between the town and properties in the surrounding area, including Glen Auldyn, than that which was evident when the last Ramsey Town boundary review was undertaken".

LPC believe that when voicing their concerns about this proposed expansion, those currently living in these areas would state the exact opposite, that they are both a community of interest and a community of space in Lezayre, not Ramsey.

5. Availability of Land

RTC are correct to identify that available land for development has reduced due to the indicative flooding maps produced by the DOI flood team. It is very sensible not to build on these areas. LPC would say though, that some properties have been built in the region east of the Glen Auldyn River and north of the old railway line which have flooded, which is a shame for the residents of these properties.

RTC state that they have lost up to 50 acres of potential housing land due to the risk of flooding. Properties in Ramsey, in the area of the Sulby River and the Glen Auldyn River maybe should never have been built. LPC believe that the situation of flooding will only get worse.

Development land is available on the "Vollan Fields" which is to the north-west of the Bride Road. This area was transferred to Ramsey at the last boundary extension but has not been progressed. This area could potentially hold in the region of between 165 to 330 houses at medium density. We note that this land was put forward under the call for sites for the North and West Area Plan, but at the second stage it was not included. LPC wrote to the Cabinet Office, asking for it to be reinstated as development land. We do not know the status of this land or if it has or will be included going forward.

LPC note that the Vollan Fields have been the subject of discussion between the landowners and a local developer and that development proposals for this land are being prepared in advance of a planning application. It is encouraging to read that progress is being made on this site. As mentioned in the above paragraph, we hope that this land is reinstated into the North and West Area Plan for housing development.

LPC are aware that areas that were put forward at the call for sites for the North and West Area plan did not succeed to the next stage. There are however several areas within the existing town boundary of greenfield sites which are at present being developed and brownfield sites that can be developed in the future.

6. Constituency Boundaries

LPC have read and understand the information provided by RTC on constituency numbers. If however any agreed boundary only allows for land that is not currently built on then the status quo will remain.

7. The Island's Population and its Housing Needs

Referring to The Isle of Man Government Preliminary Publicity for the Area Plan for the North and West – Housing Need 2011-2026 Paper No. PP5, it is noted that projections indicated an Island population by 2026 of 93,526. The proposal of this document was that in order to accommodate such a population, there would be a requirement for 770 new homes in the North. Out of 770 homes which were proposed within this document, LPC understand that upwards of 600 of them have already been built.

In very simple terms, if there are to be 6,474 more new residents (100,000-93,526), which require 2,590 new homes (assuming an average of 2.5 people per house), and 15% of them were to be in the North, this would require 389 new homes in the North. By adding these 389 new homes to the 770 already identified in the Strategic Plan 2016, this gives a total requirement of 1,159 homes, of

which approximately 600 have already been built, leaving 559 to be built. With existing and planned developments in Ramsey and Jurby alone, there is no indication at present that any further significant development in Ramsey will be required.

We believe that within the current town boundary there is more than sufficient land for these houses to be built, especially if part of that housing need is met by initiatives such as those currently being developed by the Manx Development Corporation in Douglas.

Section 5.2.4 of the draft Area Plan refers to the settlement hierarchy and policy approach and confirms that the Area Plan will define the development boundaries of Ramsey so as to provide a range of housing and employment opportunities at a scale appropriate to the settlement. It is therefore unclear to LPC why this application is currently being considered when the Area Plan is so close to completion.

8. NORTH RAMSEY AREA

North (land to the north of the existing boundary going anti clockwise towards the North of Jurby Road).

Looking at the proposed map for the North there has been no development beyond the current boundary line since the last boundary extension. The town is built up to the boundary line along most of its path, apart from a piece of land known as the Vollan Fields, north of the Bride Road.

Beyond the current boundary there is a generous green belt. In the area of Jurby Road there is a smaller green belt that clearly defines the boundary.

Some areas of land were unsuccessfully put forward at the call for sites for the North and West Plan, including the land at the Vollan Fields. LPC have asked for this piece of land to be reinstated into the North and West Area Plan as this area could potentially hold in the region of between 165 to 330 houses at medium density.

There is no overspill or outgrowth in this area.

When referring to this area to the north of the town, RTC have mentioned the Balladoole Sewerage Treatment Plant and also the Balladoole Civic Amenity Site. The wording in relation to the Civic Amenity Site emphasises that Ramsey is the biggest contributor to the site, especially when comparing it to the contribution from Lezayre. This information should bear no relevance in the Boundary Extension. Ramsey contribute more because they are the bigger authority with more residents. (Ramsey 8,288 – Lezayre 1230 as at 2021 census). The siting of these sites was determined by the DOI when suitable land was sourced for their construction. The land at Balladoole was deemed to be suitable and therefore purchased by the Government from the landowner.

The Civic Amenity Site is operated by a Committee including the RTC and the Northern Authorities of Andreas, Ballaugh, Bride, Jurby, Lezayre and Garff (Maughold). The site is managed by RTC. Staff are employed by RTC. Employees sign up to a Local Agreement, due to the working patterns and the site operating over 7 days a week. It is only when there is staff sickness and holidays that staff are used from the RTC workforce to cover these periods.

The site is in essence managed by RTC, by agreement of the Committee, as they are the larger authority with access to resources to manage the site. They are rewarded financially for providing this service. It should be noted the Committee is looking for other interested parties to run the site and remove this burden from RTC. This would of course be made with the agreement with the other constituent authorities. As RTC manage the day to day running of the site, enquiries regarding the site will be made to them. Decisions may be taken on site, say bad weather, the staff

would advise RTC and RTC will pass this information out to the public via their website and social media.

Balladoole Sewerage Treatment Plant is part of the "all Island sewerage treatment system". It is not Ramsey Town Sewerage System.

RTC acknowledges that there is clear agricultural land between the Dhoor and the Town and that the Dhoor does not present itself as either overspill or a natural extension of the Town. LPC agree with this statement as the word overspill is the action or result of spilling over or spreading into another area. Since the last boundary extension, no properties have been built in this area, the land has remained unchanged.

With reference to the proposed extension around the cluster of houses at the Dhoor we do question the logic considering a boundary follows a hedge line or natural feature.

LPC do not accept that ribbon development "the building of houses in a continuous row along a main road" exists on the Jurby Road. There are very few properties along this road on the north side and of those that do exist several have long driveways taking the property away from the roadside. The town boundary is abundantly clear as signs are displayed for the Parish of Lezayre and for Ramsey town. The town boundary stops at the green belt.

RTC suggest that the new proposed boundary should extend to the Mountain View Innovation Centre, (which is to the south of the Jurby Road) and a considerable distance from the existing town boundary within the green belt area.

Within the Parish of Lezayre, at The Garey, there is a field of allotments which are used by residents from all over the North of the island.

Dhoor Chapel was closed in 1979, and subsequently converted to a residential dwelling. It now forms one of many houses as you approach the hamlet of the Dhoor. RTC appear to have the opinion that the only place as an alternative is in Ramsey. There is a church in Andreas which people can attend.

The North Ramsey Area is prime agricultural land and it should only be developed when all the brownfield sites and other options have been exhausted. This area has been rural farmland since the middle ages. These are good quality fields used for dairy herds which support the Isle of Man's food security initiative. The land is the exact opposite of urban townscape!

NORTH RAMSEY AREA – THE SIX CRITERIA

<p>1) that the promoter's area and the area/s sought are really one community;</p>	<p>RTC acknowledges that there is clear agricultural land between the Dhoor and Ramsey Town and that the Dhoor does not present itself as either overspill or a natural extension of the Town. However, they claim that any development in this area would "undoubtedly be seen as an extension of the community of Ramsey". Why? The meaning of undoubtedly is "not open to doubt or challenge" which LPC believe it clearly is.</p> <p>LPC would suggest that actually any developments in this area would be seen as developments in Lezayre, quite separate from the town.</p> <p>During the Tynwald debate relating to these criteria, the then Chief Minister commented that:</p> <p><i>"Now, we obviously know that people in the rural areas of the Isle of Man gravitate naturally in one direction or another, depending on historical factors and social factors that are long held, and it is the job of the chairman, in my view, to try and understand – which is why I think it is sensible to have someone of local background, independent, but local, who understands some of the natural demographics that go on within the Isle of Man, where people socially gravitate – not just where they go shopping, but where they actually live – and these are all aspects to do with community."</i></p>
<p>2) that there is community of interest in all or most public services, social agencies (for example schools, doctors' surgery/ies, recreation area and community halls) and communal requirements of the future;</p>	<ul style="list-style-type: none"> • Schools and education: <ul style="list-style-type: none"> - the catchment area for Sulby school covers the whole area of the Parish, but also extends to the north along the Jurby Road as far as St Judes Crossroads and towards the Lhen Trench. In a freedom of information request by LPC to the Department of Education we have established that 60% of the children attending Sulby School are from outside the catchment area. - All of the schools in the North appear to be flexible accommodating children depending on family circumstances. - RTC believe there is sufficient capacity in the Ramsey Schools for any new residents with children to attend. This may be true for the infant and Junior age range, but not true for the Grammar School age children. In a freedom of information request, LPC were advised that there are currently only 45 spaces available. - There is only one registered child day care centre in Ramsey, whereas there are three in Lezayre. • Youth clubs etc, play facilities, sports facilities: <ul style="list-style-type: none"> - The North has many facilities that benefit active and mobile families and young people. Many, but not all, of these facilities are based in Ramsey. It should be stressed that parents from the

	<p>North also transport their children to use other facilities such as gym clubs, dance studios, swimming pools etc all around the Island.</p> <ul style="list-style-type: none"> - Historically Lezayre and other country communities would have had a band, a youth club, sports teams such as football, but participation in such community pursuits have declined as the population becomes more mobile and have more choice of pursuits. - There are several play areas within the parish of Lezayre such as the large recreational area of Sulby Claddagh. The Claddagh is regarded as the only true common land left on the Isle of Man since large areas were handed over to the crown in 1860. Since 1949 the land was put under the control of the Government Property Trustees and later the Department of Agriculture Fisheries and Forestry. The land was once used to pasture animals but is now mainly used as a camping and recreational ground. There are panoramic views which include Cronk Sumark and Gob y Volley as well as a sparkling river. - Lezayre also has a small play park at Ballabrooie Estate in the centre of Sulby, which is provided for and maintained by the Public Estates and Housing Division of Government. This park is not only for the enjoyment of the nearby estate, but to any residents further afield. - Lezayre has a hall used for badminton, yoga, dance etc, all which are also used by people from Ramsey and the Sulby Rifle Club is also based in Lezayre. <ul style="list-style-type: none"> • Drainage: <ul style="list-style-type: none"> - If there was to be development in this area it would be ideally located to link into the main sewer network that serves the Isle of Man, to be treated at the Balladoole Treatment works that are located in Lezayre on land owned by the IOM Government, and to be discharged through the Island's sewerage system into the Irish Sea. • Churches: <ul style="list-style-type: none"> - It is well documented that there is a decline in attendance at previously traditional settings for worship, Lezayre and Ramsey have not been immune from this decline. The decline could be contributed to a mobile and self aware community. Modern places of worship rely on a whole Island network to survive, including for example making use of the Secondary School within the Ramsey Boundary as it is large enough to accommodate one congregation. Meanwhile the traditional places of worship have closed their larger venues and rationalised to ensure they retain their focal points of worship to survive for their reducing and ageing congregations. Ramsey have the Roman Catholic church which has always served the North and respectively we are not aware of any other Roman Catholic place ever been outside of Ramsey. • Retail and other accessible Government Services: <ul style="list-style-type: none"> - Ramsey Town has a wide range of independent shops along with supermarkets which are an asset to the town. These shops pay rates to the town authority for the services provided to them. The visiting public who frequent the shops, including those from outside the town,
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	<p>support the shops by purchasing their goods and services. Without the wider community accessing the shops, they would not succeed and would have to close down.</p> <ul style="list-style-type: none"> - Ramsey has not been immune from the decline of the high street, an economic and mobile community can choose where and when they shop. It is clearly more efficient for retailers such as petrol stations, charity, craft shop's, takeaways, public houses, butchers to be in the Town where the larger foot fall is. The whole North enjoys this benefit and choice as due to supply and demand a retailer would only operate in one area if it is not be financially viable to have a chain of stores dotted around the North. Likewise, the likes of Marks and Spencer and Tesco have not opened in Ramsey or Lezayre as they know Island residents will drive to their stores in Douglas. - Most if not all government services can be accessed online or through a telephone call. • Health services: <ul style="list-style-type: none"> - In terms of Doctors Surgery, the North of the Island is covered by the Ramsey Group Practice and its satellite surgery at Jurby Community Centre. Residents in the North have no other choice. - Dentists are different as due to the shortage of dentists people from all over the island travel from one area to the next to obtain a permanent dentist. People of the North do not necessarily use the dentist services in Ramsey. - Some secondary healthcare is available at Ramsey Cottage Hospital which is seen as a whole island facility for minor injuries and clinics.
<p>3) that the area sought is an overspill or outgrowth of the promoter's area:</p>	<p>The area sought is not an overspill or outgrowth of the promoter's area. No properties have been built in the proposed boundary extension since the last Boundary extension in 1992.</p> <p>RTCs description of the proposed boundary as a "natural extension to the town boundary" is quite ridiculous!</p>
<p>4) that, wherever possible, clear physical boundaries are followed;</p>	<p>All existing greenbelt boundaries should be maintained as they were established for a reason.</p> <p>With reference to the draft map view, the lines of the existing boundary already follow natural topography of hedges and public right of ways, enclosing potential building spaces that would still leave an open space or green buffer of the countryside.</p>
<p>5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is</p>	<p>We believe Ramsey as a Town does still have sufficient areas for development to create further housing within their current boundary. The area known as The Vollen along with other brown field sites are yet to be utilised in the town. There are numerous sites within Ramsey both greenfield which are at</p>

<p>suffered thereby;</p>	<p>present being developed and brown field sites which can be developed in the future. Land abutting the Sulby river in the west is noted for being a flood area and not suitable for sustainable housing.</p>
<p>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.</p>	<p>RTC were asked by LPC to wait for the outcome of the North and West Area Plan before submitting the Proposal. They did not do so. Instead, whilst acknowledging that the land to the North of Ramsey is not zoned for development, they appear to be hoping that there is a balance of advantage in accepting the scheme just in case there may be a requirement for more development at some point in the future and just in case the area to the north is subsequently zoned for development. This is quality farmland and should remain so.</p>

9. WEST RAMSEY AREA

West (land to the west of the existing boundary going anti clockwise towards the north of the Lezayre Road).

Again, when looking at the proposed map for the "West", there has been no development beyond the current boundary line since the last boundary extension.

The town is built up to the east of Gardeners Lane, and to the north-west, towards the Glen Auldyn River. To the west of Greenlands Avenue there is an industrial area.

To the north-west there is a large green open space where Lower Milntown Farm stands. Much of the land at this location is prone to flooding and therefore not suitable for building houses. The flood maps indicate high risk flood zones, showing flooding south of the Sulby River up to the Old Railway Line. North of the River, some of this land is prone to high-risk Tidal flooding.

Accordingly, the only land that may be available for development is around the Mountain View Innovation Centre. However, as referred to above, none of the land in this area has been put forward in the Area Plan for housing, although a small field of 3.6 acres, has been put forward for open space/recreation sports space, ref LO001.

There is no overspill or outgrowth in this area.

The southern section of the west map is land that is mostly prone to flooding, particularly to the north of the railway line. In fields immediately to the south of the railway line there is currently a planning application, which was refused at planning committee based on the following reasons.

Copied from the Decision Notice for 20/01080/B for 138 dwellings.

1. The development would result in unacceptable environmental impacts in relation to loss of trees and biodiversity (in particular in relation to identified protected birds), the location of the proposed access unacceptable impacts on the land to be preserved to the East of the site, the provisions for movements by pedestrians/public transport (especially school children) are considered to be inadequate and it has not been demonstrated that the area to be provided for formal open space and children's play area would be capable of being levelled and drained to be of sufficient quality for those purposes. It is therefore considered that the development is contrary to the following policies of the Isle of Man Strategic Plan (2016) - Strategic Policy 10, General Policy 2, Environment Policy 3, Environment Policy 4, Recreation Policy 3, Transport Policy 2 and Transport Policy 6. It is acknowledged that the site is allocated for development in the Isle of Man Development Plan 1982 Order, but the more recent census information and emerging evidence base for the Area Plan for the North & West suggests that there is no requirement for additional housing within Ramsey at this scale, further it is noted that the site is greenfield and there are objections from both Local Authorities. On balance, when taken together, it is considered that the detailed concerns about the site and more recent information outweigh the site allocation and as such the development should be refused.

LPC understand this application is currently awaiting a decision from the DEFA Minister.

The northern section of the west Map includes the land south of the Jurby Road.

As stated by RTC there is very little existing development in this area. No land in this area has been put forward for development in the North and West Area Plan, apart from the application mentioned above, and to which RTC objected along with LPC. LPC have asked for this land to be removed from the North and West Area Plan should it fail at the appeal stage.

Lezayre Church still operates a Church and Arts Centre. It is a charity run by a committee of local residents at Kirk Christ Church, Lezayre. The church is available for special services such as weddings and funerals, as well as concerts and art exhibitions. We believe it to be quite well used.

In terms of other services, all houses are joined to networks at some point, particularly for electricity. Sewerage and gas are slightly different, as the network does not cover all the area. Some people are on septic tanks. The IOM Government created the IRIS system, which was to be island wide. This has not succeeded in some locations and smaller independent treatment plants have been created around the island. It is an island system, not a Ramsey system. There are sufficient spaces in both Sulby School and the schools within Ramsey.

The boundary at this location has remained unchanged since the last boundary extension and no further properties have been built. Currently there is a small band of green belt that exists, creating separation.

RTC claim that "*Ribbon development exists on both sides of the Jurby Road which by its nature may be seen as an extension of the Town*". Ribbon development has not taken place on the Jurby Road. There are 10 or 11 properties along this road, many with long driveways taking the property away from the roadside. The houses on the Jurby Road are architecturally distinct to those in Ramsey.

RTC suggest that "*...it is not abundantly clear where the boundary is and a person without knowledge going west on Jurby Road might not perceive the transition from Town to Country until beyond the entrance to the Mountain View Innovation Centre*". However, there is a parish sign, when travelling west and a large town sign when travelling east. The boundary is very well signposted.

The Mountain View Innovation Centre, formally the Island Film Studios was built to support a then emerging film industry. Sadly this declined leaving an empty unit. The current owners relocated their business to this location and have expanded and developed a vibrant setting for many business units for themselves and others. It has a large gathering point for functions for the whole island to use. It is some considerable distance outside the present green belt and existing Ramsey Town Boundary.

Since the last boundary extension, no properties have been built in this area, the land has remained unchanged. At the point of the current boundary on the Jurby Road, to the north-west of the boundary, there exists an area of green belt, which LPC believe creates separation from the town.

RTC refer to the West Ramsey Development Framework 2004. Looking at the plan for the development of this area (see Appendix 2), all of which is already included within the Town of Ramsey. They are numbered 1 to 7.

Area 1 labelled Ballachrink, is for mixed industrial and business use. There is currently an application being considered for this site. Hybrid Planning application on 7.38 hectare of land for a residential led development seeking full planning permission for the erection of 66 dwelling/houses and 12 flats, site access, Spine Road through the site, drainage, car parking and associated landscaping (Phase 1). Outline Planning permission for development of up to 127 new residential units in the form of dwellinghouses and flats, flexible commercial space, a new public house and new retail space. All matters reserved save for access. So in total if approved potentially 205 new properties.

Area 2 has been developed.

Area 3 We believe to be removed due to flooding.

Area 4 Under development currently.

Area 5 We believe to be removed due to flooding.

Area 6 We believe to be removed due to flooding.

Area 7 (to the north of the railway line) - We believe to be removed due to flooding.

Area 7 (to the south of the railway line) – Application submitted by Dandara currently waiting for outcome of appeal.

The same area as described above is identified in the 1982 Development Plan as “predominately residential use”

All of the proposals set out in these documents will not come to fruition. We can see that some areas now fall within the flooding area identified by DOI flooding maps.

There should be no further building in this area.

RTC mention three plans.

- Isle of Man Planning Scheme (Development Plan) Order 1982
- The Isle of Man Planning scheme (Ramsey Local Plan (No 2) Order 1998
- The West Ramsey Development Framework 2004.

In some cases these plans are up to 40 years old, with the most recent being 18 years old. LPC believe this information to now be out of date. The only land put forward for the Area Plan which is mentioned above (area 7 south of the railway line) is currently awaiting the outcome of the appeal. LPC confirm that we have asked for this land to be removed from the North and West Area Plan if it fails.

It is odd that RTC base their undisclosed current needs on plans that are 18-40 years old but give no thought to an up-to-date plan that will most likely be finalised in the next 12 months.

WEST RAMSEY AREA – THE SIX CRITERIA

<p>1) that the promoter's area and the area/s sought are really one community;</p>	<p>The land in this area is predominantly un-developed and again RTC claim that any development in this area would "undoubtedly be seen as an extension of the community of Ramsey". Why? The meaning of undoubtedly is "not open to doubt or challenge" which LPC believe it clearly is.</p> <p>There is an area of land that has been put forward in the Area Plan. This land is 100m beyond the Ramsey boundary on the Lezayre Road. The field between the two sites creates a "green belt". An application to build 138 houses on this land is currently on a journey through the planning system. It has been through the appeal process after it was refused, and a decision awaits from the DEFA Minister. Both RTC and LPC raised objections to this development. LPC would point out that there is no pedestrian access from the site to the town, other than walking into Ramsey along the Lezayre Road. To confirm the site is 100m away from the current boundary, not a "few metres" as mentioned by RTC.</p> <p>During the Tynwald debate relating to these criteria, the then Chief Minister commented that:</p> <p><i>"Now, we obviously know that people in the rural areas of the Isle of Man gravitate naturally in one direction or another, depending on historical factors and social factors that are long held, and it is the job of the chairman, in my view, to try and understand – which is why I think it is sensible to have someone of local background, independent, but local, who understands some of the natural demographics that go on within the Isle of Man, where people socially gravitate –not just where they go shopping, but where they actually live – and these are all aspects to do with community."</i></p>
<p>2) that there is community of interest in all or most public services, social agencies (for example schools, doctors' surgery/ies, recreation area and communal community halls) and communal requirements of the future;</p>	<ul style="list-style-type: none"> ● Schools and education: <ul style="list-style-type: none"> - the catchment area for Sulby school covers the whole area of the Parish, but also extends to the north along the Jurby Road as far as St Judes Crossroads and towards the Lhen Trench. In a freedom of information request by LPC to the Department of Education we have established that 60% of the children attending Sulby School are from outside the catchment area. - All of the schools in the North appear to be flexible accommodating children depending on family circumstances. - RTC believe there is sufficient capacity in the Ramsey Schools for any new residents with children to attend. This may be true for the infant and Junior age range, but not true for the Grammar School age children. In a freedom of information request, LPC were advised that there are currently only 45 spaces available. - There is only one registered child day care centre in Ramsey, whereas there are three in Lezayre.

- Youth clubs etc, play facilities, sports facilities:

- The North has many facilities that benefit active and mobile families and young people. Many, but not all, of these facilities are based in Ramsey. It should be stressed that parents from the North also transport their children to use other facilities such as gym clubs, dance studios, swimming pools etc all around the Island.
- Historically Lezayre and other country communities would have had a band, a youth club, sports teams such as football, but participation in such community pursuits have declined as the population becomes more mobile and have more choice of pursuits.
- There are several play areas within the parish of Lezayre such as the large recreational area of Sulby Claddagh. The Claddagh is regarded as the only true common land left on the Isle of Man since large areas were handed over to the crown in 1860. Since 1949 the land was put under the control of the Government Property Trustees and later the Department of Agriculture Fisheries and Forestry. The land was once used to pasture animals but is now mainly used as a camping and recreational ground. There are panoramic views which include Cronk Sumark and Gob y Volley as well as a sparkling river.
- Lezayre also has a small play park at Ballabrooie Estate in the centre of Sulby, which is provided for and maintained by the Public Estates and Housing Division of Government. This park is not only for the enjoyment of the nearby estate, but to any residents further afield.
- Lezayre has a hall used for badminton, yoga, dance etc, all which are also used by people from Ramsey and the Sulby Rifle Club is also based in Lezayre.

- Drainage:

- If there was to be development in this area it would be ideally located to link into the main sewer network that serves the Isle of Man, to be treated at the Balladoole Treatment works that are located in Lezayre on land owned by the IOM Government, and to be discharged through the Island's sewerage system into the Irish Sea.

- Churches:

- It is well documented that there is a decline in attendance at previously traditional settings for worship, Lezayre and Ramsey have not been immune from this decline. The decline could be contributed to a mobile and self-aware community. Modern places of worship rely on a whole Island network to survive, including for example making use of the Secondary School within the Ramsey Boundary as it is large enough to accommodate one congregation. Meanwhile the traditional places of worship have closed their larger venues and rationalised to ensure they retain their focal points of worship to survive for their reducing and ageing congregations. Ramsey have the Roman Catholic church which has always served the North and respectively we are not aware of any other Roman Catholic place ever been outside of Ramsey.
- Lezayre Church still operates a Church and Arts Centre. It is a charity, run by a committee of

	<p>local residents at Kirk Christ Church, Lezayre. The church is available for special services such as weddings and funerals, as well as concerts and art exhibitions. We believe it to be quite well used.</p> <ul style="list-style-type: none"> • Retail and other accessible Government Services: <ul style="list-style-type: none"> - Ramsey Town has a wide range of independent shops along with supermarkets which are an asset to the town. These shops pay rates to the town authority for the services provided to them. The visiting public who frequent the shops, including those from outside the town, support the shops by purchasing their goods and services. Without the wider community accessing the shops, they would not succeed and would have to close down. - Ramsey has not been immune from the decline of the high street, an economic and mobile community can choose where and when they shop. It is clearly more efficient for retailers such as petrol stations, charity, craft shop's, takeaways, public houses, butchers to be in the Town where the larger foot fall is. The whole North enjoys this benefit and choice as due to supply and demand a retailer would only operate in one area if it is not be financially viable to have a chain of stores dotted around the North. Likewise, the likes of Marks and Spencer and Tesco have not opened in Ramsey or Lezayre as they know Island residents will drive to their stores in Douglas. - Most if not all government services can be accessed online or through a telephone call. • Health services: <ul style="list-style-type: none"> - In terms of Doctors Surgery, the North of the Island is covered by the Ramsey Group Practice and its satellite surgery at Jurby Community Centre. Residents in the North have no other choice. - Dentists are different as due to the shortage of dentists people from all over the island travel from one area to the next to obtain a permanent dentist. People of the North do not necessarily use the dentist services in Ramsey. - Some secondary healthcare is available at Ramsey Cottage Hospital which is seen as a whole island facility for minor injuries and clinics.
<p>3) that the area sought is an overspill or outgrowth of the promoter's area:</p>	<p>The area sought is not an overspill or outgrowth of the promoter's area. No properties have been built in the proposed boundary extension since the last Boundary extension in 1992.</p> <p>RTCs description of the proposed boundary as a "natural extension to the town boundary" is incorrect. The land here is not suitable for development due to flooding. Land north of the river is good agricultural land.</p> <p>RTC refer to the North and West Area Plan and state that the area to the south of this area is the only</p>

	<p>development opportunity within Ramsey. They go on to say that the land sits just a few metres outside the current boundary. To confirm the site is 100m away from the current boundary, not a "few metres" as mentioned by RTC. The land at the Vollen Fields is available for development.</p> <p>The land to the north of this area, around the Mountain View Innovation centre is not an overspill of the town. The Mountain View Innovation Centre is promoted on many platforms as "Ramsey", possibly to encourage visitors from around the island.</p>
<p>4) that, wherever possible, clear physical boundaries are followed;</p>	<p>All existing greenbelt boundaries should be maintained as they were established for a reason.</p> <p>With reference to the draft map view, the lines of the existing boundary already follow natural topography of hedges and public right of ways, enclosing potential building spaces that would still leave an open space or green buffer of the countryside.</p>
<p>5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;</p>	<p>We believe Ramsey as a Town does still have sufficient areas for development to create further housing within their current boundary. The area known as The Vollen along with other brown field sites are yet to be utilised in the town. There are numerous sites within Ramsey both greenfield which are at present being developed and brown field sites which can be developed in the future.</p> <p>Land abutting the Sulby river in the west is noted for being a flood area and not suitable for sustainable housing.</p>
<p>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.</p>	<p>RTC were asked by LPC to wait for the outcome of the North and West Area Plan before submitting the Proposal. They did not do so.</p> <p>Instead, whilst acknowledging that the land to the west of Ramsey is not zoned for development. They appear to be hoping that there is a balance of advantage in accepting the scheme <i>just in case</i> there may be a requirement for more development at some point in the future and <i>just in case</i> the area to the west is subsequently zoned for development.</p> <p>The land being considered for the extension is a flood plain of the Sulby River with very little possibility for building and certainly insufficient to meet a significant housing need were one to exist in the North. It is likely that the majority of new residents will locate to Douglas and the West being closer to the main employment areas.</p>

10. GLEN AULDYN AREA

Glen Auldyn - the extended boundary line is drawn well beyond the line of residential properties in both a westerly and easterly direction. To the east, the line encompasses Ramsey Golf Club which at present sits within three Local Authority areas, with the club house and a few holes in Ramsey, a few holes in Garff (Maughold), whilst most of the course in Lezayre.

Glen Auldyn has had its own identity for a number of years. Glen Auldyn, although close in geography to Ramsey's current boundary, does have a natural separation through the golf course to the East.

The properties in Glen Auldyn are quite distinct. They each have their own style and LPC believe that no two properties are the same, giving a feeling of being out of town, where the vast majority of developments have identical properties on both sides of the roads.

The Milntown Estate is also located in Glen Auldyn. The entrance to the site is off the Lezayre Road, and within the Lezayre Boundary, not within Ramsey as stated by RTC. The boundary sign is placed on the western wall of the entrance, (maybe for convenience), but the boundary is immediately before the eastern wall.

LPC and many Glen Auldyn residents do not accept that there is a community of interest between Ramsey and Glen Auldyn. A large number of residents have indicated that they are strongly against any boundary extension.

To say Glen Auldyn's identity is merely down to a rate variation and that they already enjoy Ramsey's retail areas and facilities suggests that RTC only see Glen Auldyn as another income once brought into the Town. The residents do see themselves being separate and not feel joining Ramsey will bring them any more benefits than they already enjoy.

RTC mention that substantial development in Ramsey has reached as far as the existing boundary along Lezayre Road and the Auldyn River, so that there is now virtually no separation between the town and Glen Auldyn. LPC do not agree with this statement. There have been no further development of houses near the area of Glen Auldyn and the Town. All current and previous (since the last boundary extension) properties have been developed in Ramsey north of the railway line, nowhere near Glen Auldyn. Glen Auldyn is separated from the town by the Milntown Estate and the golf course. There is a very clear greenbelt between Glen Auldyn and Ramsey.

Glen Auldyn is separate from Ramsey and should not be seen as an extension of the Ramsey Community. LPC do not agree that the town is within walking distance from Glen Auldyn, which is 1.5 miles from Lezayre Road at its furthest point to the main road.

RTC state that properties in the area are marketed as Ramsey. We believe this is due to the UPRN numbers that are given to addresses, which are determined by the post office. If a particular property is included in a route that also includes Ramsey addresses, then the property will have Ramsey as part of its address, rather than Lezayre. AFD also provide postal software, and we understand they use information also provided by the postal service.

LPC do not accept that the new proposed development at Milntown Fields, North of the Lezayre Road and west of the Glen Auldyn River, (although part of the West Ramsey Development Plan) should become part of Ramsey, should the application succeed through the appeal stage, following its refusal. As mentioned earlier in this document, there is a field, which creates a greenbelt between the town and the potential site.

RTC claim that this estate (if built) should become part of Ramsey under the above-mentioned development plan. They claim the road into Glen Auldyn would discharge within the town area and no longer be outside the boundary. This is not correct.

LPC would like to remind RTC regarding the outcome for Glen Auldyn in the previous boundary extension from 1992. Although the criteria was slightly different then, LPC believe it is relevant as a reminder. The Chairman of the inquiry was Deemster Luft. For ease of reference, the following criteria are mentioned in the quote below:

- a. That the promoters' area and the areas sought are really one;
- b. That the area sought is an overspill or outgrowth of the promoters' area;
- d. that there is community of interest in all or most public services, social agencies and communal requirements of the future, and that there should be an equal distribution of the burden by common rating;

Quote from the report of the Chairman of the Public Inquiry. Point 13.2:

"Applying those principles particularly paragraph (a) (b) and (d) I find no justification for the area of Glen Auldyn being taken within the boundary of Ramsey. 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. 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."

It is the opinion of LPC that nothing has changed since the last boundary extension and that Glen Auldyn should remain within Lezayre.

Attendance of school is set out by catchment areas although all schools in the north are considered to be flexible when it comes to accepting children from other parishes.

Glen Auldyn is connected to the main sewer network that serves the Isle of Man. Sewerage is treated at the Balladoole Treatment works that are located in Lezayre on land owned by the IOM Government, and to be discharged through the Island's sewerage system into the Irish Sea.

GLEN AULDYN AREA – THE SIX CRITERIA

<p>1) that the promoter's area and the area/s sought are really one community;</p>	<p>The Miintown Estate is part of the natural buffer that separates Lezayre from Ramsey Town, and so Glen Auldyn is a village itself within Lezayre. Furthermore, the exit onto Lezayre road joins the A3 road within the Lezayre parish, the Ramsey boundary is further down the road.</p> <p>During the Tynwald debate relating to these criteria, the then Chief Minister commented that:</p> <p><i>“Now, we obviously know that people in the rural areas of the Isle of Man gravitate naturally in one direction or another, depending on historical factors and social factors that are long held, and it is the job of the chairman, in my view, to try and understand – which is why I think it is sensible to have someone of local background, independent, but local, who understands some of the natural demographics that go on within the Isle of Man, where people socially gravitate – not just where they go shopping, but where they actually live – and these are all aspects to do with community.”</i></p>
<p>2) that there is community of interest in all or most public services, social agencies (for example schools, doctors' surgery/ies, recreation area and communal community halls) and communal requirements of the future;</p>	<ul style="list-style-type: none"> ● Schools and education: <ul style="list-style-type: none"> - the catchment area for Sulby school covers the whole area of the Parish, but also extends to the north along the Jurby Road as far as St Judes Crossroads and towards the Lhen Trench. In a freedom of information request by LPC to the Department of Education we have established that 60% of the children attending Sulby School are from outside the catchment area. - All of the schools in the North appear to be flexible accommodating children depending on family circumstances. - RTC believe there is sufficient capacity in the Ramsey Schools for any new residents with children to attend. This may be true for the infant and Junior age range, but not true for the Grammar School age children. In a freedom of information request, LPC were advised that there are currently only 45 spaces available. - There is only one registered child day care centre in Ramsey, whereas there are three in Lezayre. ● Youth clubs etc, play facilities, sports facilities: <ul style="list-style-type: none"> - The North has many facilities that benefit active and mobile families and young people. Many, but not all, of these facilities are based in Ramsey. It should be stressed that parents from the North also transport their children to use other facilities such as gym clubs, dance studios, swimming pools etc all around the Island. - Historically Lezayre and other country communities would have had a band, a youth club, sports teams such as football, but participation in such community pursuits have declined as the

	<p>population becomes more mobile and have more choice of pursuits.</p> <p>There are several play areas within the parish of Lezayre such as the large recreational area of Sulby Claddagh. The Claddagh is regarded as the only true common land left on the Isle of Man since large areas were handed over to the crown in 1860. Since 1949 the land was put under the control of the Government Property Trustees and later the Department of Agriculture Fisheries and Forestry. The land was once used to pasture animals but is now mainly used as a camping and recreational ground. There are panoramic views which include Cronk Sumark and Gob y Volley as well as a sparkling river.</p> <ul style="list-style-type: none"> - Lezayre also has a small play park at Ballabrooie Estate in the centre of Sulby, which is provided for and maintained by the Public Estates and Housing Division of Government. This park is not only for the enjoyment of the nearby estate, but to any residents further afield. - Lezayre has a hall used for badminton, yoga, dance etc, all which are also used by people from Ramsey and the Sulby Rifle Club is also based in Lezayre. - RTC note that in order to play golf at Ramsey golf course you must leave the other parishes and enter Ramsey. However it surely follows that to play a full round, you must leave Ramsey and enter the other parishes! • Drainage: <ul style="list-style-type: none"> - Glen Auldyn is connected to the main sewer network that serves the Isle of Man. Sewerage is treated at the Balladoole Treatment works that are located in Lezayre on land owned by the IOM Government, and to be discharged through the Island's sewerage system into the Irish Sea. • Churches: <ul style="list-style-type: none"> - It is well documented that there is a decline in attendance at previously traditional settings for worship, Lezayre and Ramsey have not been immune from this decline. The decline could be contributed to a mobile and self aware community. Modern places of worship rely on a whole Island network to survive, including for example making use of the Secondary School within the Ramsey Boundary as it is large enough to accommodate one congregation. Meanwhile the traditional places of worship have closed their larger venues and rationalised to ensure they retain their focal points of worship to survive for their reducing and ageing congregations. Ramsey have the Roman Catholic church which has always served the North and respectively we are not aware of any other Roman Catholic place ever been outside of Ramsey. - Lezayre Church still operates a Church and Arts Centre. It is a charity, run by a committee of local residents at Kirk Christ Church, Lezayre. The church is available for special services such as weddings and funerals, as well as concerts and art exhibitions. We believe it to be quite well used. • Retail and other accessible Government Services: <ul style="list-style-type: none"> - Ramsey Town has a wide range of independent shops along with supermarkets which are an
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	<p>asset to the town. These shops pay rates to the town authority for the services provided to them. The visiting public who frequent the shops, including those from outside the town, support the shops by purchasing their goods and services. Without the wider community accessing the shops, they would not succeed and would have to close down.</p> <ul style="list-style-type: none"> - Ramsey has not been immune from the decline of the high street, an economic and mobile community can choose where and when they shop. It is clearly more efficient for retailers such as petrol stations, charity, craft shop's, takeaways, public houses, butchers to be in the Town where the larger foot fall is. The whole North enjoys this benefit and choice as due to supply and demand a retailer would only operate in one area if it is not be financially viable to have a chain of stores dotted around the North. Likewise, the likes of Marks and Spencer and Tesco have not opened in Ramsey or Lezayre as they know Island residents will drive to their stores in Douglas. - Most if not all government services can be accessed online or through a telephone call. • Health services: <ul style="list-style-type: none"> - In terms of Doctors Surgery, the North of the Island is covered by the Ramsey Group Practice and its satellite surgery at Jurby Community Centre. Residents in the North have no other choice. - Dentists are different as due to the shortage of dentists people from all over the island travel from one area to the next to obtain a permanent dentist. People of the North do not necessarily use the dentist services in Ramsey. - Some secondary healthcare is available at Ramsey Cottage Hospital which is seen as a whole island facility for minor injuries and clinics.
<p>3) that the area sought is an overspill or outgrowth of the promoter's area:</p>	<p>The area sought is not an overspill or outgrowth of the promoter's area.</p>
<p>4) That, wherever possible, clear physical boundaries are followed;</p>	<p>All existing greenbelt boundaries should be maintained as they were established for a reason. Glen Auldyn is part of a large valley, and therefore already has clear physical boundaries which make it a village (the bottom of the valley). It is also prone to flooding.</p>
<p>5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;</p>	<p>There is ample developmental land within Ramsey and to the north of Ramsey.</p>

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.

RTC were asked by LPC to wait for the outcome of the North and West Area Plan before submitting the Proposal. They did not do so.

Instead, whilst acknowledging that the land to the west of Ramsey is not zoned for development, they appear to be hoping that there is a balance of advantage in accepting the scheme **just in case** there may be a requirement for more development at some point in the future and **just in case** the area to the west is subsequently zoned for development.

The encompassing of Glen Auldyn by Ramsey is simply a wish to acquire rate payers. The residents of Glen Auldyn are hidden and isolated and so constitute a hamlet or village of some 70 houses in their own right.

11. SOUTH RAMSEY AREA

The reason for the inclusion of such a significant area within the boundary extension proposal to the south of Ramsey is unclear.

There is no development land within this area. The golf course land which is in the three Local Authorities area, must never be zoned for development.

It is worth mentioning the Ramsey Forest Project is a good idea and is helped by the Manx Wildlife Trust. Though what work has been undertaken is not in the Lezayre Parish, there is some tree planting in a small area above the Crossags.

There is no overspill or outgrowth in this area.

LPC agree with the Garff Parish Commissioners that no compelling rationale has been provided for the proposed extension, leaving it to be assumed that the proposed boundary line drawn around Glen Auldyn may have been arbitrarily extended to include the Maughold lands in an attempt to justify the acquisition of the Lezayre lands. The whole matter has left the Commissioners of both Parishes perplexed and puzzled.

SOUTH RAMSEY AREA – THE SIX CRITERIA

<p>1) that the promoter's area and the area/s sought are really one community;</p>	<p>The promotor's area is not one community with Garff or the residents who live here.</p> <p>During the Tynwald debate relating to these criteria, the then Chief Minister commented that:</p> <p><i>"Now, we obviously know that people in the rural areas of the Isle of Man gravitate naturally in one direction or another, depending on historical factors and social factors that are long held, and it is the job of the chairman, in my view, to try and understand – which is why I think it is sensible to have someone of local background, independent, but local, who understands some of the natural demographics that go on within the Isle of Man, where people socially gravitate – not just where they go shopping, but where they actually live – and these are all aspects to do with community."</i></p>
<p>2) that there is community of interest in all or most public services, social agencies (for example schools, doctors' surgery/ies, recreation area and communal requirements of the future;</p>	<ul style="list-style-type: none"> • Schools and education: <ul style="list-style-type: none"> - Primary education is provided at Sulby school and Maughold school. - All of the schools in the North appear to be flexible accommodating children depending on family circumstances. - RTC believe there is sufficient capacity in the Ramsey Schools for any new residents with children to attend. This may be true for the infant and Junior age range, but not true for the Grammar School age children. In a freedom of information request, LPC were advised that there are currently only 45 spaces available. - There is only one registered child day care centre in Ramsey, whereas there are three in Lezayre. • Youth clubs etc, play facilities, sports facilities: <ul style="list-style-type: none"> - The North has many facilities that benefit active and mobile families and young people. Many, but not all, of these facilities are based in Ramsey. It should be stressed that parents from the North also transport their children to use other facilities such as gym clubs, dance studios, swimming pools etc all around the Island. - Historically Lezayre and other country communities would have had a band, a youth club, sports teams such as football, but participation in such community pursuits have declined as the population becomes more mobile and have more choice of pursuits. - There are several play areas within the parish of Lezayre such as the large recreational area of Sulby Ciaddagh. The Ciaddaghs are regarded as the only true common land left on the Isle of Man since large areas were handed over to the crown in 1860. Since 1949 the land was put under the control of the Government Property Trustees and later the Department of Agriculture Fisheries and Forestry. The land was once used to pasture animals but is now mainly used as a

camping and recreational ground. There are panoramic views which include Cronk Sumark and Gob y Volley as well as a sparkling river.

- Lezayre also has a small play park at Ballabrooie Estate in the centre of Sulby, which is provided for and maintained by the Public Estates and Housing Division of Government. This park is not only for the enjoyment of the nearby estate, but to any residents further afield.
- Lezayre has a hall used for badminton, yoga, dance etc, all which are also used by people from Ramsey and the Sulby Rifle Club is also based in Lezayre.
- RTC note that in order to play golf at Ramsey golf course you must leave the other parishes and enter Ramsey. However if surely follows that to play a full round, you must leave Ramsey and enter the other parishes!

- Drainage:

- Properties in the area have septic tanks, there is no mains drainage.

- Churches:

- It is well documented that there is a decline in attendance at previously traditional settings for worship, Lezayre and Ramsey have not been immune from this decline. The decline could be contributed to a mobile and self aware community. Modern places of worship rely on a whole Island network to survive, including for example making use of the Secondary School within the Ramsey Boundary as it is large enough to accommodate one congregation. Meanwhile the traditional places of worship have closed their larger venues and rationalised to ensure they retain their focal points of worship to survive for their reducing and ageing congregations.

Ramsey have the Roman Catholic church which has always served the North and respectively we are not aware of any other Roman Catholic place ever been outside of Ramsey.

- Lezayre Church still operates a Church and Arts Centre. It is a charity, run by a committee of local residents at Kirk Christ Church, Lezayre. The church is available for special services such as weddings and funerals, as well as concerts and art exhibitions. We believe it to be quite well used.

- Retail and other accessible Government Services:

- Ramsey Town has a wide range of independent shops along with supermarkets which are an asset to the town. These shops pay rates to the town authority for the services provided to them. The visiting public who frequent the shops, including those from outside the town, support the shops by purchasing their goods and services. Without the wider community accessing the shops, they would not succeed and would have to close down.

- Ramsey has not been immune from the decline of the high street, an economic and mobile community can choose where and when they shop. It is clearly more efficient for retailers such as petrol stations, charity, craft shop's, takeaways, public houses, butchers to be in the Town where the larger foot fall is. The whole North enjoys this benefit and choice as due to supply

	<p>and demand a retailer would only operate in one area if it is not be financially viable to have a chain of stores dotted around the North. Likewise, the likes of Marks and Spencer and Tesco have not opened in Ramsey or Lezayre as they know Island residents will drive to their stores in Douglas.</p> <ul style="list-style-type: none"> - Most if not all government services can be accessed online or through a telephone call. • Health services: <ul style="list-style-type: none"> - In terms of Doctors Surgery, the North of the Island is covered by the Ramsey Group Practice and its satellite surgery at Jurby Community Centre. Residents in the North have no other choice. - Dentists are different as due to the shortage of dentists people from all over the island travel from one area to the next to obtain a permanent dentist. People of the North do not necessarily use the dentist services in Ramsey. - Some secondary healthcare is available at Ramsey Cottage Hospital which is seen as a whole island facility for minor injuries and clinics. <p>As there are very few residents in this area that may choose to use the services mentioned, LPC believe that these points do not apply at present.</p>
<p>3) That the area sought is an overspill or outgrowth of the promoter's area:</p>	<p>The area sought is not an overspill or outgrowth of the promoter's area.</p> <p>The only advantage to Ramsey in having the golf course within its boundary would be to change the use of the golf course for other purposes, eg developmental land. As long as the golf course stays under the control of the three Local Authorities there is certainty that it's use will not change.</p>
<p>4) That, wherever possible, clear physical boundaries are followed;</p>	<p>All existing greenbelt boundaries should be maintained as they were established for a reason.</p>
<p>5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;</p>	<p>There are no development sites within this area.</p>
<p>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</p>	<p>The golf course is part in Garff, Ramsey and Lezayre (adjoining the Milntown estate) these three parts gives certainty to the future of the golfing land. It has been a club since the late 1800s and remains a popular and important feature of the North and of the Island. A championship golf course like Ramsey Golf Club attracts many players. It is also a money generating activity within Ramsey from visitors who</p>

to the local authority by whom they are now governed.

secure accommodation and restaurants. It is an important woodland and rural landscape which brings beauty and character to the surrounding urban area.

12. Conclusion

In preparing his report Professor Bates stated:

“The applicant must first establish that the boundary alteration sought is necessary on a broad developmental basis...and may thus serve to preserve the balance of rural and urban areas in our small island by ensuring that there is not a faster absorption of rural areas into urban areas than is developmentally necessary.”

During the Tynwald debate on 16 March 2004, the Chief Minister, Mr Corkhill, stated:

“I think by the very nature of development, planning, zoning, those sort of inquiries come first; the development, if any, comes along secondary; people live in a particular area, it grows, then, into a situation where the community is changed, or the community has become bigger, or added to. At that point, it is correct that the neighbouring authority – which tends to be the urban area, which tends to have more direct needs – has then the requirement to expand.

It is quite clear from these comments alone that a RTC’s application for a boundary extension is premature. RTC have offered absolutely no evidence that they now, or in the future, have a developmental need to extend the town’s boundaries.

On 16 August 2022 RTC were invited to meet with LPC to discuss their proposals. During this meeting they were asked to confirm their plans, their “business case”, to justify to LPC the need for the proposed extension. They could not do so. As far as we can ascertain, RTC have no plan, just a desire to expand.

It is highly likely that the Area Plan will be finalised and published within the next 12 months. The Area Plan will include information on central Governments plans for development, including housing needs, of the service centres, service villages, and villages across the North and West of the Island.

As previously stated, the Area Plan will define the development boundaries of Ramsey to provide a range of housing and employment opportunities at a scale appropriate to the settlement.

The Area Plan will also have a significant focus on the regeneration of Jurby in line with the Jurby Study. The Area Plan will define the development boundaries of Jurby to maintain and where appropriate increase employment opportunities. Housing will be provided to meet local needs and in appropriate cases to broaden the choice of location of housing.

It is very possible that a significant portion of any developmental requirements in the North will be focused in Jurby. Within the Area Plan there is also land put forward for development in other Parishes in the North. LPC believe that any future requirements for development in Ramsey can be satisfied within the current town boundary.

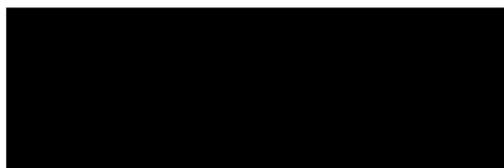
Given the lack of evidence of any current need for the expansion of Ramsey Town’s boundary, and the timing of the application which would appear to be a deliberate attempt to pay no regard to the Area Plan, it is the opinion of LPC that this application could be considered an abuse of process. It can only be assumed that this is a deliberate ploy to focus on “what-ifs” and “maybes” in the hope of achieving a valuable “land-grab”. RTC appear to be asking for a huge expansion to their boundaries, possibly in the hope that by asking for so much, they may still achieve their primary target which LPC believe to be the income from rates from Glen Auldyn.

The present boundary of Ramsey Town has a well-defined and established green belt which needs to be retained because it marks a boundary between the Manx countryside and the urban development of Ramsey town.

If there is to be any repositioning of the boundary, it would seem sensible that the agricultural fields, which are presently in Ramsey Town and bordered by the Sulby and Auldyn rivers, should be returned to Lezayre. These fields are on a flood plain which was only fully appreciated when the indicative flood maps were produced, meaning the fields are unusable for any buildings or development of any kind. Lezayre Parish Commissioners govern a rural parish. They are best suited and experienced in rural matters and should be left to continue what they already govern in the Parish of Lezayre.

Appendix 1

7th May 2021



Sea Terminal Building
Douglas
IM1 2RF

Dear Steve

Proposed Boundary Extension Application

The Commissioners are in receipt of the recent correspondence from your Department in connection with the above and would like to make the following observations.

The Commissioners believe that the application for the Boundary Extension is premature.

In their opinion the proposed boundary extension and the area plan for the North and West, especially the North are linked. In light of the Area Plan for the North and West, land sought by Ramsey Town Commissioners may not become available for building, so would it be advisable to wait until after the Area Plan for the North and West is finalised?

Our research shows that there are approximately 27 acres of greenfield available development land and approximately 3 acres of brownfield sites within the current town boundary. At the usual rate of progress this would accommodate building needs for the next 3-4 years.

In the Housing Need 2011/2026 document prepared for the North and West Area Plan, page 15 illustrates that there is no further housing required up to the end of the Plan Period of 2026, but strategic Reserves may be required. There are of course pending applications which we understand are not included in the calculations made in this document.

The Commissioners cannot see the urgency of this boundary extension application.

Dealing with this process, including the appointment of the inspector and engagement of lawyers by the Local Authorities is an expensive procedure for all parties.

Again would it be prudent to wait and only incur any expense once the land available has been identified and a development plan put forward.

The Commissioners also believe the process is unfair, in that financial impacts for the affected authority cannot be taken into account. As a small authority, the loss of income will have a detrimental consequence for Lezayre.

The Commissioners request that this application is put off until such time Tynwald debate the injustice of the present system, where financial implications cannot be taken into account.

The Commissioners did approach the Ramsey Town Commissioners and ask them to delay the process until after the area plan was complete. An initial response was received from the Clerk, Mr Whiteway, advising that he would canvass the members at their next meeting, but no further response was received from them in relation to our request.

Is the Local Government Unit able to ask Ramsey Town Commissioners to retract their application until a later date when the Area Plan is completed?

In general terms my Commissioners wonder if extending the town boundary is the correct policy for the Isle of Man. We had a rural community with strong community spirit within the village / settlements. Instead of expanding our towns should we not be encouraging the growth of some of our local villages, making them community centres rather than commuter dormitories.

My Commissioners believe it would be in everyone's interest to delay the proposed boundary extension until the North and West Area Plan is completed.

Yours sincerely

A solid black rectangular box redacting the signature of the Lezypare Parish Commissioners.

Lezypare Parish Commissioners

