

IN THE MATTER OF the Application of the Ramsey Town Commissioners under
Section 6 of the Local Government Act 1985 to extend the boundary of
Ramsey Town. (the “Application”)

Report of Peter J Taylor BEng, CEng, LLB, MRINA
Chairperson of the Public Inquiry held at The Ramsey Park Hotel, Ramsey on the
22,23,24 January 2024 (the “Inquiry”)

To: The Honourable Minister of the Department of Infrastructure

Executive Summary

1. Having considered all the evidence submitted to the Inquiry both through the consultation hub and presented at the Inquiry, I do not recommend accepting any of the proposed Application for the expansion of the Town boundaries of Ramsey.
2. I have found that Ramsey has sufficient land within its boundaries to accommodate its predicted growth of 500 or so people between 2021 and 2031.
3. I did not have sufficient evidence on the projected growth of Ramsey beyond 2031 and certainly nothing to estimate the population growth up to 2050, the time frame which Ramsey Town Commissioners were asking to be considered in their Application. In any event the Central Government aim is for the infrastructure for a population of 100,000 to be in place by 2037 and the Inquiry highlighted that there are infrastructure issues to be addressed in Ramsey. In particular the stone bridge and flood defences that are issues affecting population and economic growth in Ramsey.
4. Moving the political boundaries of Ramsey Town Commissioners into areas where large scale residential development has not yet been identified is outside the remit of a boundary expansion inquiry and in my opinion puts the cart before the horse.
5. It is for Central Government to determine where housing needs and developments are required and then for boundary issues to be considered during the planning process for any such developments.
6. Ramsey is now a service centre for its hinterlands but the funding of a service centre falls on the residents of Ramsey. It is therefore readily apparent that the Application has been

driven by the need for Ramsey Town Commissioners to be able to fund itself as a service centre and that requires Ramsey Town Commissioners to increase its rateable income to meet those needs.

7. That burden cannot fall solely on the residents of Ramsey, nor should it fall on the shoulders of the residents of the hinterlands closest to Ramsey. The costs of a service centre should fall equally on the shoulders of all the residents of the hinterlands that rely on Ramsey as a service centre.
8. As Mr Cowin, Chief Executive of Ramsey Town Commissioners stated, the rating system is long overdue for reform.
9. It would seem inevitable in these challenging economic times that similar boundary expansion applications will be made by other service centres to fund the requirements they have as service centres for their hinterlands.

Introduction

10. Under Section 6 (1) of the Local Government Act 1985 ("The LGA 1985") Ramsey Town Commissioners ("RTC") made an application ("The Application"), to the Department of Infrastructure, ("The Department") dated 22 September 2022, requesting the Department extend, by Order, the boundary of Ramsey Town.
11. The Application received is set out at Appendix 1, which includes maps of the areas into which RTC seek to extend its boundaries.
12. The Application was divided into four distinct areas, which are appendices in the Application at Appendix 1.
 - a. **North Ramsey Area-** Land part of the Parish of Lezayre situated between the North East coastline of the island and the Jurby Road.
 - b. **West Ramsey Area-** Land in the Parish of Lezayre situated between the Jurby Rd and the Lezayre Rd to include the field North of Glen Auldyn Rd below Sky Hill.
 - c. **Glen Auldyn Area-** Land part of the Parish of Lezayre which comprises land around the settlement of Glen Auldyn.

- d. **South Ramsey Area-** Land in the Parishes of Lezayre and Garff, situated between the settlement of Glen Auldyn and the coastline South of the existing boundary of Ramsey.
13. In the Application RTC sought to establish a boundary which will be relevant for a period of 30 years, thereby avoiding repeated smaller piecemeal boundary review requests. The primary drivers for the Application were the extension of community through development and the availability of future development lands.
14. Whilst the application was split into the four areas it was still one application. I was not bound to only consider these areas in isolation or determine where any new boundaries were to be drawn based only on the outer proposed boundaries in each area. However, I only had the authority / powers to inquire into the boundaries as set out in the Application and could not consider any extensions beyond what had been set out in the Application.
15. Lezayre Parish Commissioners, (“LPC”) had provided a detailed response opposing the Application in December 2022, (Appendix 2) though they had made their opposition know as far back as May 2021. Their main objections were that the Application was premature as development land had not been identified in the Area Plan for the North and West ¹.
16. Garff Commissioners (“Garff”) provided similar detailed submissions in December 2022 (Appendix 3) opposing the Application and again suggested that the Application was premature until the Area Plan for the North and West was finalised.
17. There is no power in the **LGA 1985** for the Department to delay an application under **Section 6** and so the Department commenced the process under **Section 6(2) LGA 1985**.
18. On the 2 June 2023, I was appointed by the Department under **Section 6(2) LGA 1985** to chair the Inquiry into the Application.
19. The terms of reference were to chair the Inquiry, to take evidence from those persons or bodies wishing to be heard and / or who have made written submissions.

¹ Area Plan for the North and West—Draft Plan Cabinet Office June 2022
<https://www.gov.im/categories/planning-and-building-control/planning-policy/development-plan/draft-area-plan-for-the-north-and-west>

20. On the 21 June 2023 the Department opened the consultation hub and Notice was given by public Notice on the same day². The consultation hub closed on the 9 August 2023.
21. The Public Consultation received an excellent response;
334 submissions, 51 in favour, 272 against and 11 neutral.
143 people indicated they will attend the Public Inquiry and 39 indicated they wanted to speak at the Public Inquiry.
22. The numbers were further analysed and as far as could be determined from the information the respondents identified as being in the following areas;
18 North / 10 West / 3 South / 102 Glen Auldyn
196 not in the proposed area and
5 unknown.
23. With such a large response and such a large number of persons wishing to speak, I felt it was felt necessary to hold a pre-Inquiry meeting to ensure that interested party status was granted under **Section 3 of the Inquiries (Evidence) Act 2003** to those that wished to speak and that all parties who wished to speak were given the opportunity to provide their evidence to the Inquiry.
24. The initial submissions of RTC, LPC and Garff included planning terms and planning issues as well as arguments relating to the draft Area Plan for the North and West of the Island. None of the authorities provided any expert evidence on those technical points in their submissions.
25. I therefore sought advice from the Attorney General's Chambers regarding consideration of the "six criteria" (As set out in the Council Of Ministers' 2004 paper "Criteria for the Consideration of Local Boundary Extensions 2004" (Appendix 4), ("the Six Criteria") and how issues regarding, the status of the Draft North / West Area Plan in respect of the application, planning related matters from the Island Strategic Plan 2016³ and The Our Island Plan 2023⁴ regarding population growth aspirations, would need to be considered by the Inquiry.

² <https://consult.gov.im/infrastructure/proposed-ramsey-boundary-extension-order-2023/>

³ Town and Country Planning Act 1999 The Island Development Plan THE ISLE OF MAN
STRATEGIC PLAN 2016 Towards a Sustainable Island The Cabinet Office (Statutory Document No. 2016/0060)

⁴ Our Island Plan: Incorporating The Delivery Of The Economic Strategy Building A Secure, Vibrant And Sustainable Future For Our Island: January 2023 GD No. 2022/0095

26. Mr Kieron Murray, Director of Civil Litigation, H. M. Attorney General's Chambers, suggested seeking this advice from Planning Policy at the Cabinet Office and he very helpfully asked Mrs Dianne Brown Head of Plan Policy at the Cabinet Office to provide assistance to me and the Inquiry on planning policy, strategic plans and planning terms as used on the Island. I was very grateful that Mrs Brown agreed to provide assistance in the form of a witness statement and to take up interested party status and be available to speak at the Inquiry.
27. On the 19 September 2023 RTC requested access to the submissions made to the consultation hub. There were difficulties with this request as a large number of the submissions had requested to be anonymous and some did not want their response published at all. These could not be available before the pre-Inquiry meeting.
28. I gave Public Notice of my intentions to hold a public meeting on the 15th September 2023 and a pre-Inquiry meeting was duly held at the Mountain View Innovation Centre, Lezayre on the 2 October 2023. After the public meeting I made an inspection of the areas subject to the Application with representatives of the local authorities.

Pre Inquiry Meeting 2 October 2023

29. Despite e-mails being sent by the Department to the 39 persons who had expressed a wish to speak at the Public Inquiry only 4 responses had been received from the public seeking Interested Party Status. RTC, LPC and Garff had advised The Department that they were seeking interested party status.
30. At the meeting it became apparent that the public had not appreciated the requirement that in order to speak at the Inquiry they had to be granted interested party status.
31. I set out that I would extend the deadline to apply for interested party status to the 18 October 2023 and that any members of the public wishing to speak at the Inquiry had to make an application to me and provide a proof of the evidence they proposed to give to the Inquiry by that date. On being satisfied that it was appropriate to do so I would then grant interested party status to them.
32. I also advised the meeting that I had granted interested party status to Mrs Diane Brown Head of Planning Policy at the Cabinet Office to advise the Inquiry on matters of planning

and planning policy. She would also be submitting a statement to the Inquiry by the 18 November 2023, which would be made available to the local authorities.

33. I granted interested party status to the three Local Authorities.
34. RTC having requested to have access to the submissions stated that as this was a “once in a generation application” the proposed hearing dates in November 2023 were too soon to allow RTC to consider the submissions.
35. Given the importance of the Application to RTC and indeed to LC and Garff it was considered in the interests of fairness that they were all given access to the submissions and to submit any further submissions / evidence that they required to be considered at the Inquiry by 17 November 2023.
36. Due to logistical issues in redacting the submissions made through the consultation hub, the deadline for the Local Authorities to provide additional evidence was extended to the 8 December 2023.
37. Given the uncertainty regarding the possible numbers of persons speaking it was not possible to set dates for the Inquiry at the pre-Inquiry meeting and I advised the meeting that I would provide a timetable and dates once I had a full picture of the number of interested parties and the availability of venues to cater for the numbers anticipated.
38. The meeting adjourned and I undertook the inspection of the boundaries as follows.
 - a. From the Mountain View Innovation Centre, I had a good view of the western area along the Jurby road and across the fields towards the Lezayre Rd.
 - b. We then drove to the Dhoor and then to the edge of the North area past the amenity site.
 - c. We then returned through Ramsey along the Mountain Road past the Water Works to the entrance / turning area so that the extent of the proposed extension to the south was seen.
 - d. We then returned back through Ramsey along the Lezayre Rd and then along Crossags Lane.
 - e. We then went into Glen Auldyn and saw both arms of the settlement to the end of the roads.
 - f. We then continued along the Lezayre Rd to the edge of the West area.

- g. Then returned back through Ramsey to the Mountain Innovation Centre.

Evidence Received through the Consultation Hub
and from those persons Granted Interested Party Status

39. In addition to the documents at Appendices 1-3, as of the 8 December 2023 the Inquiry had received the following additional documents;
- a. Appendix 5- Submissions through the consultation hub which could be published in full.
 - b. Appendix 6 Submissions through the consultation hub which could only be published anonymously
 - c. Appendix 7 is my summary of the submissions made through the consultation hub where no permission was given to publish their submissions.
 - d. Appendix 8 the applications and the proofs of evidence of those granted interested party status
 - e. Appendix 9- The Statement of Mrs Diane Brown Head of Planning Policy at the Cabinet Office
 - f. Appendix 10 The further submissions of Lezayre Parish Commissioners
 - g. Appendix 11 The witness statement of Tim Cowin – Chief Executive of Ramsey Town Commissioners
 - h. Appendix 12 the witness statement of Mr Robert Cowell – Deputy Chair of Ramsey Town commissioners
 - i. Appendix 13 The statement of Mr Lloyd Davies – Owner / Director of Cornerstone Architects. Appointed by Ramsey Town Commissioners to give expert evidence on planning issues.

Public Inquiry

40. Having received all the evidence and canvased availability and agreement to the proposed venue, Ramsey Park Hotel. A Public Notice was issued 5th January 2024 that the Public Inquiry would be held on the 22, 23, 24 January 2024 at the Ramsey Park Hotel.
41. I provided a timetable for the Inquiry (Appendix 14) which gave each area of the Application an allocated time slot which would allow persons in those areas to attend at those time rather than having to attend every day.

Pre-Hearing Applications and Determinations of those Applications

42. Prior to the Inquiry commencing I received two applications;
- a. From RTC, to amend the Application to include all Properties in Glen Auldyn as two houses had been omitted due to an error in drawing the boundary on the final maps submitted with the Application.
 - b. From LPC to refuse to allow the evidence of Mr Lloyd Davies to be heard at the Inquiry.
43. My Determinations are set out in full at Appendix 15, In summary;
- a. I declined to amend the Application to include all the Properties in Glen Auldyn. The only powers I had as the Chair of the Inquiry were those under **Section 6 of the LGA 1985** and **The Inquires (Evidence) Act 2003**. Neither of those Acts allowed me to do anything more than to consider the Application as presented to me and consulted on.
 - b. I admitted the evidence of Mr Lloyd Davies under RTC's interested party status. However, I did not consider him to be an independent expert and required him at the Inquiry to confirm his area of expertise and to only give expert evidence on matters he was competent to do so.

The Six Criteria to be considered

44. All the Interested Parties in their evidence addressed the Six Criteria in some detail. It is however important to set out the issues that I felt had changed since 2004 and how the Island Strategic Plan 2016 and the Our island Plan 2023 regarding population growth aspirations, affected those criteria.
45. For convenience I have grouped the criteria in the logical order that I considered them.
46. **“that the promoters’ area and the area/s sought are really one community;. 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;”**

Whilst Community remains a matter of Judgment, the community of interest category is clearly affected by the “Spatial Visions” as set out in the Island Strategic Plan 2016.

This sets out the hierarchy of service centres and at Para 5.8 Ramsey is identified as a service centre for its hinterlands with service villages of Jurby and Andreas (Appendix 16). Which includes all the examples in the criteria.

Therefore, at the time of the Application, Ramsey was clearly a service centre for the properties and communities in the North, West, South and Glen Auldyn Areas which RTC consider to be in a community of interests with as well as to the Dhoor, which RTC did not think was in RTC's community of interests.

Since the 1992 Application much of the infrastructure such as sewage is now under national rather than local government control.

In my opinion I now had to address the criteria by considering what "additional" services RTC provides to the areas in the Application that it does not supply or provide to the other parts of its hinterlands.

47. **"that the area sought is an overspill or outgrowth of the promoters' area; that there is insufficient acreage left for the development of the promoters' area within its borders and injury is suffered thereby";**

The Application in a nutshell was that Ramsey has reached its capacity and needs land to expand.

What had to be considered is what is the potential level of growth of Ramsey Town and over what period should growth be assessed to determine the outgrowth / overspill and when or even if RTC will suffer injury.

RTC were looking at a time frame of thirty years (time between the last boundary extension application and this one 1992-2022). They also wanted to avoid piecemeal applications to increase the boundary for individual applications for large scale developments.

Censuses have a 10 year time frame, the strategic plans also look at 10 year time frames (2016 – 2026) and the Our Island Plan 2023, regarding the provision of services and Infrastructure for a population of 100,000 by 2037.

Whilst I did point out that this was not a planning inquiry nor was it pre determining any of the issues to be addressed in the North / West Area plan Inquiry, I clearly had to consider the potential growth of Ramsey Town and when or if it would outgrow its current boundaries with regards to available developable land within its existing boundaries. The time scale of potential growth and applicability of current government policies were also factors to be considered.

48. **“that, wherever possible, clear physical boundaries are followed”;**

The Department considers this to be entirely a matter of judgement and that remains so.

49. **“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”;**

I had taken this criteria to be a casting vote provision if the competing arguments were finely balanced. It was suggested to me that it could be read as a status quo provision. I believe the wording of the criteria clearly indicates that if all things are equal then the balance falls in favour the application being recommended even if there are strong competing arguments to maintain the status quo.

50. I was aware that the above criteria are not exhaustive and RTC did invite consideration of other issues such as Bio Diversity Net Gain.

51. The Bio Diversity point as set out was that if you have the green spaces within your boundaries, then they can be used as an offset to allow development. If you did not have them within your political boundaries then you had to purchase them from the authority who had the green spaces within its political borders. Open green spaces would now seem to have a value to the existing authority as a source of income that developers purchase to allow developments elsewhere on the Island. In my opinion this falls so close to financial impacts, though not necessarily rateable income, that I declined to consider this under other issues.

52. Similarly access to green spaces and continuity of cycle and walking routes can be achieved by cooperation between local authorities and does not depend upon location of political boundaries or such areas being solely in one authority.

Financial Impact

53. Whilst it is a criteria that I am NOT allowed to consider it is important to report to the Minister the submissions made to the Inquiry on the following point.

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

It was readily apparent that the financial criteria and rateable income was incredibly important to all the Local Authorities involved in the Application and to nearly all those who made submissions to the Consultation Hub.

54. Submissions from the Consultation Hub

The feelings from the majority of these submissions was that the Application was a land grab for the rateable income that the properties in the areas of expansion would provide to RTC. Even those in favour of the application were of the opinion that everyone should pay for the services provided by RTC, which are used by everyone outside Ramsey but more particularly the residents of Glen Auldyn.

55. Submission of the Authorities

Mr Tim Cowin Clerk/Chief Executive to RTC in his opening address to the Glen Auldyn area part of the application stated that it was only the variation of rates charged that separated the areas. If the rates in the North of the island were the same or comparable then there would be a ready recognition of our neighbours.

“All Island rates reform was long overdue, it was antiquated and no longer fit for purpose. The reform had been in the too difficult pile for far too long. It was a nettle that had to be grasped but that it would be political suicide for anyone who did so”.

LPC expressed deep concern that without the rateable income from Glen Auldyn they would have to increase rates for the remaining residents to meet the fixed costs that LPC already incur.

56. It did appear on the face of the Application that the application of the criteria to the Crossags and Glen Auldyn, given that nothing had changed since the overwhelming rejection of the similar application in 1992 by Deemster Luft, that the only logical explanation on the face of it was an attempt to gain rateable income immediately.
57. Ramsey is designated a service centre and charged with providing services for all its hinterlands. If I were to apply the two of the Six Criteria at paragraph 46 above, then the

Boundaries of Ramsey would have to extend to cover most of the North of the Island as they clearly apply to every settlement that rely on Ramsey for services.

58. Whilst I cannot consider the financial effects of the Application, it is in my view, formed from the submissions, that the Application in respect of some of the areas sought is motivated by financial considerations and that under the current rating system more applications under **Section 6 of the LGA19 85** will be made by designated service centres / service villages to fund the services they provide to their hinterlands.

The Public Inquiry Hearing

59. The Public part of the Inquiry went ahead as planned commencing on the 22 January 2024 and conclude on the 24 January 2024.

60. The Local authorities were represented as follows

Ramsey Town Commissioners

Tim Cowin - Chief Executive

Robert Cowell- Deputy Chair of the Commissioners

Advocate – Michael Jelski of Dickinson Cruikshank

Lezayre Parish Commissioners

Julian Teare - Chair of the Commissioners

Karl Brew - Vice Chair of the Commissioners

Advocates Sally Bolton and Camilla Rand – Corlett Bolton

Garff Parish Commissioners

Marinda Fargher Vice-Chair of the Commissioners

Stan Ryzak Chair of the Commissioners

61. The Inquiry also had the benefit of Mrs Diane Brown, Head of Planning Policy in the Cabinet Office, being in attendance every day.
62. I stated at the start of the hearing that I would take all evidence under oath and that after hearing general opening remarks for the Local Authorities, I would then consider each area in turn starting with the South, then Glen Auldyn, then the North Area and finally the West Area.

63. I was requested by LPC to make the witnesses giving evidence on behalf of RTC available for questioning. I agreed to this and I allowed time for RTC's witnesses to be asked questions on their evidence.
64. As it was likely that Mrs Brown and Mr Lloyd Davies would be required to answer questions on the specific criteria of overspill and outgrowth, issues of planning and available land during each of the different areas, they were both sworn in before the Inquiry started to hear evidence on the South Area.

Evidence Presented to the Inquiry

Opening statements

65. I have listed my considerations of the Six Criteria at paragraphs 44-58 above but I also set out the particular issues that I felt needed to be addressed by those submitting oral evidence at the hearing;
- a. Population growth and the period I should be considering that growth over.
 - b. Land available for development inside the current Ramsey Town boundary and Land available for development on the edge of the settlement of Ramsey.
 - c. Role of the service centre and differentiating between the services offered to other areas in the Ramsey hinterlands and those areas the subject of the application.
 - d. Boundary issues –
 - i. The exclusion of two properties in Glen Auldyn and
 - ii. The issues with the boundary line drawn in the North area separating dwellings from their gardens into different local authorities.
66. I invited the authorities to provide opening statements. I described these statements as their "road map" for me to follow to reach my decision. Copies of the opening statements provided are at Appendix 17.

The Opening Statements of the Applicants

67. Mr Tim Cowin provide the opening statement for RTC. His submissions are at Appendix 17. These are summarised as follows;
- He set out that this was not a land grab, but a catch up to allow Ramsey Town to expand as it has outgrown its current boundaries.
 - The remaining land within its current boundary has been developed or is subject to flooding restrictions and undevelopable.

- Ramsey needs to expand and accommodate the development that will be needed in the future.
- The areas now sought to expand into are in reality now one community with Ramsey. They sit just outside the Town boundary and should now be part of one community. Uniting common areas, uniting communities and providing Ramsey an opportunity to expand successfully in the future
- There was also a suggestion that the Application would correct an Historical anomaly that the Albert Tower part of the Town's crest was not actually in Ramsey.

Opening Statements of the Objectors

Garff

68. Mrs Miranda Fargher, vice chair of the commissioners set out the objections on behalf of Garff. Her submissions are at Appendix 17. These are summarised as follows;
- She relied upon her experience of objecting to the 1992 boundary extension application ("the 1992 application") by RTC and that no justification was found to extend the boundaries of Ramsey into the South Area and there was still no justification.
 - She stated that she felt part of the Northern Community and used the services offered by Ramsey but was not part of the Ramsey community.
 - She used the services offered by Ramsey but as a service centre and Garff was providing services to the properties in the South area
 - The area could not be an overspill or an outgrowth as the Crossags farm had existed long before Ramsey Town Commissioners came into being.
 - The Land in the South area is farm land, rural countryside. It also contains three of the national glens and RTC have shown no plans for the future use of the land if it comes within their boundaries. The land is being developed by DEFA and Manx Wildlife trust for the nation.
 - The physical boundaries have long been established and the boundaries proposed do not follow natural features. In the 1992 application, Deemster Luft rejected the application to include Lhergy Frissell as the forested area was the natural, distinctive boundary.
 - The area now comprising the golf course falls into three authorities because the stream that runs through the golf course formed the physical and ancient boundary between the parishes.
 - She questioned whether the lines drawn on the maps for the areas were to link in the Glen Auldryn part of the application, she set this out quite succinctly;

“We questioned how it was drawn up? Here was a line drawn on a map we were told in the boardroom, following we now know unclear mapping, following random field hedges across the hillside, straddling Maughold and Lezayre hilltops. “

- She also challenged the assertions regarding the Albert Tower and set out that It was conceived in 1847 and built by 1849 many years before RTC came into existence.
- She also believed that there was sufficient acreage left in Ramsey to be developed and that there is no suitable land to be developed in the South area part of the Application
- She referred to the statement of Mrs Diane Brown, which will be referred to later, in respect of the danger of including small settlements within in settlement boundaries and the dangers of incursions of developments into the countryside.

LPC

69. Advocate Mrs Sally Bolton set out the objections of LPC. These are summarised as follows;

- LPC questioned the purpose of the Application and that the Application is predicated on a hope for growth rather than actual growth.
- There is no evidence to support the overspill or that Ramsey has outgrown itself.
- The Application was predicated on the Lower Milntown development being granted planning permission, which has been refused
- RTC do not have a statutory or legal obligation to provide housing and it is a hope for growth not an actual outgrowth
- LPC believe that Ramsey has the largest number of vacant properties on the Island and that there is sufficient land within the Ramsey Town boundaries to develop and planning opportunities to be taken up.
- LPC also stated that there was no evidence that the golf course was suffering being in three political areas.
- That nothing that had been submitted that fulfilled the Six Criteria and that there is nothing RTC want to do that they can't do at the moment.

Evidence presented at The Inquiry for the separate areas of the Application

South Area

70. This part of the Application comprises woodland glens, the upland heath, farmland, and the golf course. It is not an area viewed for development but a logical extension of Ramseys current boundary and land it owns.

Submissions of the Applicants

71. Mr Cowin again set out RTC's position on this part of the application. His submissions are at Appendix 17 and these are summarised as follows;

- He set out that this is not an area for the development of housing or infrastructure but an area for the development of nature and natural habitats. That Towns need such areas within their boundaries.
- He acknowledge that the Woodland Park at the Hairpin was being developed by Manx Wildlife Trust and Douglas Rotary Club as part of the larger project "The Ramsey Forest".
- As part of the whole Application this Area formed part of the environmental areas across the north of the Island giving nature pathways through and across the land. RTC had the staff and resources to supplement and enhance the works of the other organisations.
- He believes that it is a common misconception that the area is already part of Ramsey Town and that RTC owns some of the land in this area. He also set out that The Albert Tower forms an important part of the crest of Ramsey, but it sits outside the current Town boundary.
- Ramsey Golf club currently sits in Ramsey, Garff and Lezayre, and the houses at the top of Crossags Lane can only be accessed from Ramsey.
- That the Areas are all obviously now part of the Town of Ramsey.
- Services being delivered to these properties by Garff is inefficient and surprising.

Submissions by Garff

72. Mrs Miranda Fargher, Vice Chair of the Commissioners set out the objections on behalf of Garff. These are summarised as follows;

- Mrs Fargher took time to emphasise the points made in her opening submissions.
- A similar application was rejected in 1992 and nothing had changed since then. The Crossags has been in existence since at least 1861 and has never been thought of as an overspill of Ramsey.
- The area was a national asset and already followed clear physical boundaries.
- The area was accessible by all and not just the residents of Ramsey.
- Garff can help with integrated green routes.
- RTC have not offered any plans for the use of this land.
- The small number of houses in the area are part of the Northern Community but like her are not part of the Ramsey Community.
- The residents were happy with the services offered by Garff.

- The Albert Tower was not a mistake of history but conceived and built well before RTC came into being. Other follies on the Island such as Corrin's Folly featured on crests but not within their respective town boundaries.
- That granting the Application in this part would be a danger to the countryside because of the incursion of the settlement boundary into the countryside.
- She was also concerned that there was little mention of Garff in the Application documents and wondered how serious RTC are in the extension to the South Area with so little legitimate reasoning put forward for the extension

Submissions by LPC

73. Mr Julian Teare the Chair of the Commissioners set out the objections on behalf of Garff. These are summarised as follows;

- He echoed the submissions of Garff but added that to access the Crossags you also had to go through Lezayre as well as Ramsey.

Questions

74. I raised a question about development, Mrs Brown advised that no land had been allocated for development in the South Area of the Application.
75. There was one area at the end of Fairway Drive which was in Garff and I asked about development of that parcel land. Mr Lloyd Davies stated his client had been refused planning permission and Mrs Brown confirmed that the large house was part of the countryside and not in the body of the settlement.
76. Mr Lloyd Davies emphasised that the South Area was not for development but "habitat banking", offsetting the developments in other areas of the Town against this area. He agreed that there was no reason why the nett environmental gains had to be in Ramsey. The people of Ramsey would still have access to the area even if the boundary did not move.

Submissions to the Consultation Hub

77. There were three objections that I identified as being from people in the South Area and only one set out any comments and they were that "*it wasn't fair simple as that*". On resident in Maughold stated it was a land grab.

Glen Auldyn

78. This part of the Application comprised the approximately 100 properties within Glen Auldyn and includes the Milntown Estate. The Area also extends down the Lezayre Rd past some houses and ends at the road to the skyhill plantation.

Submissions of the Applicants

79. Mr Cowin again set out RTC's position on this part of the application. His submissions are at Appendix 17 and these are summarised as follows;

- The entrance to the Milntown Estate is off the Lezayre Road within the existing Town Boundary, although all traffic exits onto the Glen Auldyn Road.
- Mr Cowin set out the history of the development of Glen Auldyn and that since 1992 when a similar application was rejected, substantial development in Ramsey has reached as far as the existing town boundary along Lezayre Road and the Auldyn River so that there is virtually no separation between the Town and Glen Auldyn.
- He contended that the properties in Glen Auldyn benefited from the services provided within the Town, that there is little physical separation between Glen Auldyn and the Town, with town development now reaching the current boundary.
- The Area is effectively now an extension of the Ramsey community in a physical sense in that the area draws on retail and other services provided within Ramsey.
- Residents in the area already identify its association with the town, for example, property is marketed as "Glen Auldyn, Ramsey".
- He described Glen Auldyn as an aspirational suburb of Ramsey
- He again emphasised the divisive nature that rates has had on this part of the Application. If rates were not an issue than the simple fact is that Glen Auldyn and Ramsey would be one community and would come together to make the community (Ramsey including Glen Auldyn) thrive and prosper.

Submissions by LPC

80. Mr Julian Teare the Chair of the Commissioners set out the objections on behalf of LPC and these are summarised as follows;

- Glen Auldyn had its own identity. It is a small community in its own glen setting and separated from Ramsey by the Milntown Estate and the golf course. The area was not an overspill of Ramsey. It has been there longer than RTC and is a distinct community.
- It is a rural community and not in any way similar to Ramsey. The houses are individual and not similar as in a large development in the Town

- The services Ramsey provide to Glen Auldyn are nothing more than already provided as a service centre. Being part of Ramsey would offer them nothing more.
- There was no room for any outgrowth of Ramsey in this Area.
- The Boundaries as they exist are clear and distinct. Green belts surround Glen Auldyn forming a natural boundary between town and countryside and give a clear separation between Glen Auldyn and Ramsey.
- The entrance to the Milntown estate is in Lezayre, the road sign is placed for convenience and not marking the actual boundary.
- Development of Ramsey has not gone further than it was in 1992 towards Glen Auldyn.

Submissions by Garff

81. Mrs Miranda Fargher, Vice Chair of the Commissioners set out the objections on behalf of Garff and these are summarised as follows;
- She referred to her opening submissions and wondered why Ramsey wanted such a large area of Countryside. She reiterated her fears that there will be an incursion of the settlement into the Countryside if there is no longer a distinct boundary.
 - The proposed Boundary just follows random hedge lines to take in the settlement of Glen Auldyn.

Interested Parties – Objections

Mr Phillip Dunne

82. Mr Dunne started his submissions by referring to Deemster Luft's comments in his 1992 report⁵. *"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"*.
83. In addressing the Six Criteria he focused on what had changed so that the imagination was not being stretched or Deemster Luft's powers of imagination would not be exceeded.
84. Community
Glen Auldyn and Ramsey were not one community in 1992 and the communities had not coalesced since then. There still remained "Green Gaps" between Glen Auldyn and Ramsey. He referred to the Government Strategic Plan 2016 and the definition of Green Gaps. *In the context of Spatial Policy 7, "green gap" means an open area which serves to maintain the distinction between settlements; prevents the coalescence or merging of settlements;*

⁵ 1991Report of the Chairman of the Public Inquiry Ramsey Boundary Extension Copy (Appendix 18)

85. He highlighted the difference in population density.

- Ramsey 9.2 people / acre - Urban
- Glen Auldyn 2.5 people /acre – Rural

86. Community of Interest

- Glen Auldyn utilises Ramsey's "amenities" no more than residents of any of the settlements outside Ramsey.
- Glen Auldyn has its own rural amenities, stables, a farm, a cattery, pheasant shooting, river fishing, hiking and mountain biking.
- Ramsey's residents use Glen Auldyn for rural pursuits. These rural amenities emphasise the difference between Glen Auldyn and Ramsey
- Since 1992 people use service centres less and less. The internet provides food, entertainment, shopping and so in modern society the community of interest is even more fractured than in 1992.

87. Overspill

- Nothing had change since 1992 that makes Glen Auldyn an overspill.

88. Physical boundaries

- Remain as they were in 1992.

89. Remaining Criteria

- There is sufficient land available for development in Ramsey.
- The balance does not lie in acceptance as nothing has changed since the last application was rejected.
- He believes that Glen Auldyn is even more distinct than it was in 1992.

Mr Andrew Collins

90. Mr Collin's submissions are summarised as follows

- Glen Auldyn has been a separate and distinct community since 1861 pre dating RTC.
- Identifies Glen Auldyn as houses in the Country and a need to protect Glen Auldyn for its uniqueness.
- Glen Auldyn is colloquially referred to as the Village. It has no shared roads of communication with Ramsey and there is no coalescing of housing or built-up areas and there is green land separation between Glen Auldyn and Ramsey

- Refers to Ramsey as a service centre and that Ramsey offers Glen Auldyn nothing more than other areas of the North. Glen Auldyn provides its own services used by Ramsey.
- Not an overspill or outgrowth of Ramsey, Glen Auldyn has developed overtime within itself as there are no other links to Ramsey other than the road in off the Lezayre Rd.
- Not sufficient land in Glen Auldyn to meet the growth Ramsey are anticipating.
- The existing boundaries follow natural physical boundaries.
- He believes that there is sufficient acreage left in Ramsey to develop.
- The balance at this time lies in preserving the status quo to preserve and protect the existing Glen Auldyn character and settlement within the rural Lezayre countryside.

Mr Graham Allott

91. Mr Allott's submissions are summarised as follows

- He echoed the previous points, Glen Auldyn had its own character not a community with Ramsey, does not rely on Ramsey any more than other parts of the North of the island.
- No land to develop in Glen Auldyn.
- He believes that where he lives in Glen Auldyn it is completely different in character to Ramsey.
- Ramsey provided no services for Glen Auldyn, He was not on main sewerage, he lived on a single track road, and he had no mobile phone coverage. These were not the characteristics of a town.
- Two properties had not been included across the road from his property. He Points out that *"I am not part of their community a few yards from my property but a community with one I have to drive 3 kms to"*.
- Questioned how these boundary lines were drawn so they actually cross the river just to exclude the two properties.
- His House is closer to the Mountain box than Ramsey Town centre.
- Glen Auldyn has a totally different character to Ramsey.
- No reason given for the claims that Glen Auldyn is joined to Ramsey.

Issue of the excluded properties.

92. I asked RTC the reasons for the exclusion of these two properties and Mr Jelski's response is summarised as follows;

- It was never a deliberate omission and that on the original plans in 2020, which were not on government mapping but on a larger plan, the properties were included. However this was not translated to the government maps submitted with the Application.
- It was the original intention to include all properties and not exclude them,
- RTC had to accept that the error was not picked up and that it leaves us in an unsatisfactory position that we can only proceed on what is in the Application but were intended to always be included.

93. Mr Ryzak on behalf of Garff asked if RTC had been given the opportunity to revise the Application. I re-iterated that I could only do what I was asked to do and I had no powers other than to deal with what was before me. The Application could have been withdrawn at any time.

Development Land within GA

94. One of the issues raised in the submissions concerned a lack of development land inside Ramsey and overspill into Glen Auldyn. I asked Mr Lloyd Davies and Mrs Brown to address these issues in respect of the Glen Auldyn Area.

- Mr Lloyd Davies addressed the points by stating RTC were looking at it in the round, that the four areas were one application and that it was not allocation of land. They were looking at emerging policy so that if RTC are to develop Ramsey in the future (many years) there will be a land allocation for open space biodiversity in the greater allocation.
- He also added that the large areas of green land were part of the overall offering in planning terms to the whole of Ramsey in the future, not a few years but planning for a generation.
- RTC do not want to be playing catch up, if land is allocated in the future than it offers a full spectrum of uses to be considered within a zoned area within the boundary of Ramsey, providing the open spaces within the boundary and bio diversity nett gain.
- He agreed that it was not imperative that this bio diversity had to be within the town boundary.
- Mrs Brown advised that the Government were looking to deliver the strategic plans and the North / West area plan. Areas outside Ramsey settlement boundary not allocated for development and many have been allocated as low density housing in parkland.

- She also indicated that the North / West area plan should be available in early 2025 and the strategic plan at the start of 2026 and then an All Island Plan to replace the current area plans after that.

Submissions to the Consultation Hub

95. By far and away the majority of the submissions to the consultation hub concerned the area of Glen Auldyn. The submissions echoed what the three interested parties put forward.
- Glen Auldyn was separate and distinct from Ramsey.
 - It used the services offered by Ramsey as much as any other community in the North.
 - They used services such as schools and GPs in Sulby and Jurby.
 - There was no room for development or any outgrowth of Ramsey in to Glen Auldyn.
 - The existing boundaries have a green gap or green spaces between Glen Auldyn and Ramsey.
 - A large number did touch upon the rates issue and that it was an attempt by Ramsey to grab rating income without doing anything.

North Area

96. This part of the Application comprised land adjacent to the coastline to just past the Northern Civic Amenity Site and before Balladoole Farm. The proposed boundary then extends south west, excluding the Dhoor, before continuing down to meet Jurby Road.

Submissions of the Applicants

97. Mr Cowin again set out RTC's position on this part of the application. His submissions are at Appendix 17 and these are summarised as follows;
- This area at present is predominantly un-developed but it has been identified by RTC as the most likely area that any new development would be.
 - Development in this area would clearly be seen to be an extension of Ramsey and would benefit from the services and community that Ramsey provides.
 - RTC are taking proactive steps with this application to ensure that any future development in this area, would already be included in the Town boundary and would not require a later Boundary Extension application to effectively "catch up" with what has already occurred.
 - The civic amenity site and sewage treatment works to the north of this area effectively delineate the northern most boundary of this development area. The civic amenity site is a joint venture between the northern parishes although it is a subcommittee of

RTC⁶ who oversee both its management by committee and its administration through its staff.

- Although presently in Lezayre the site is viewed as a part of the Ramsey Community with queries and issues with the site being regularly directed to RTC as its operator.
- The boundary line is purposefully brought around the properties at the Dhoor as RTC formed the view that this area sits as its own ribbon settlement and currently separate from Ramsey.
- The key difference between the Dhoor and Glen Auldyn is the geographical location in terms of the development in Ramsey. The Dhoor currently has a distance of undeveloped land between it and the current Ramsey Boundary. It was not felt that they formed one community. The same is not felt of Glen Auldyn where development has already stretched to its entrance road.
- Development along the Jurby Road beyond the properties of Cronk Mayn Beg and Creg Malin, both of which are located within the existing boundary, is seen as ribbon development and an extension of the existing community. This development continues as far as Baldroma Beg and the former film studios, now known as Mountain View Innovation Centre.
- It is usual for development on the outskirts of Towns to provide a transition between the countryside and the urban area through lower density development which it is felt is seen in the existing development on Jurby Road.
- Development in Ramsey has exhausted available sites provided for within the existing Town Plan. Those lands that remain undeveloped are either sites in identified flood risk areas or have current planning applications awaiting determination.
- Any development of this land to the north of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary.
- The land is not currently zoned but may well become zoned for development with the expansion of the Island's population and thus Ramsey's population in the Island Economic Strategy that looks to have 100,000 people living on the Isle of Man.
- The Draft Area Plan for the North and West does not currently include development land in this area.
- This Application by Ramsey Town Commissioners is forward looking and looking forward at a minimum of 30 years. With the Town already built up, this area is the next logical step for the development of the Town of Ramsey in the future.

⁶ This was incorrect. The Civic Amenity Site is a Joint Committee under Section 17 of the LGA 1985 and not a subcommittee of RTC

Submissions by LPC

98. Mr Julian Teare the Chair of the Commissioners set out the objections on behalf of LPC and these are summarised as follows;

- The area is good quality farm land. Food security is an issue and this land should only be developed when all land has been developed in Ramsey.
- There was plenty of land for RTC to develop inside its boundaries to satisfy Ramsey's needs.
- It is not an overspill, the Civic Amenity is a joint venture and not a sub committee of RTC. Whilst RTC are currently operating the site the Board are looking at other persons to run the site.
- The Sewerage is provided by MUA and an all island system. The land is government owned.
- There is no ribbon development and the current boundaries give clear green land between RTC and the Dhoor.
- There are very few properties in this area all with long drive ways off the main road.

Submissions by Garff

99. Mrs Miranda Fargher, Vice Chair of the Commissioners set out the objections on behalf of Garff and these are summarised as follows;

- She was not au fait with the area but again questioned why such a large area of farm land had been included in the Application.
- The boundaries appear to have been drawn to encompass land and then apply for its development.
- The Application was premature and the need for a formal area plan to determine matters was needed and we should wait for the area plan to be adopted.

Interested Parties – Objections

Mr Robert Barden

100. Mr Barden resides in Westhill Farm and stated he supported the comments by Mr Teare of LPC.

- He acknowledged that Ramsey may need to expand but questioned why the Town needs the amount of land that has been requested. He did not think it did.
- He cited that there had only been an inward migration to Ramsey of 5 people.
(Though he corrected this after giving his evidence to say that nett inward migration to Ramsey was 130 which included internal island migration.)
- The actual population growth was now half of what the government predicted.

- He was concerned that large amounts of countryside were included in the Application and that rural areas should be governed by rural commissioners who are attuned to the needs of the countryside, and not by town commissioners who are attuned to the needs of higher density towns.
- Not all development of new residential units in the North have to be built within the curtilage of the Town of Ramsey.
- The Application is premature and should be delayed until the Draft Area Plan for the North and West has been finalized and adopted.
- The high vacancy rate in the Town of Ramsey needs to be addressed.
- Once the area plan is in place then a revised application based on specific plans and appropriate data could be made.
- The current Application is general and too large, possibly in the hopes that some part of it will be granted, much in the way that a used car salesman will name a high price at the start of a negotiation, knowing that he will have to settle for something less by the time the sale has been made.
- He would have made the same points about the Six Criteria as other objectors.
- Community. He had moved to the Island after extensive research and selected his property because he did not want to live in a town and wanted a rural location. His house is surrounded by farm land and accessed like his neighbours along a long driveway and cannot be seen from the road. While it is close to Ramsey, it is in a rural setting in the Parish of Lezayre.
- He did not believe that by moving the boundary he would magically become part of the community of Ramsey. He has attended church in Glen Mona for years, his dentist is in Laxey, and his friends are in Lezayre and Peel. He is as likely to visit his doctor in Jurby as Ramsey.
- He supports his neighbours and friends in Ramsey but is not part of their community in the same way that Ramsey residents are not a member of the Lezayre community just by being his friend.
- He is a part of the community of the North of the island without regard to town boundary line distinctions.
- He wanted the Application to be delayed until the Isle of Man Population Report 2024 or later demonstrates that Ramsey is in need of expansion, and then any expansion should only be what is necessary.

Mr John Evans

101. Mr Evans gave his submissions on behalf of himself and his wife. Both had been granted interested party status but she who was too unwell to attend and give her evidence in person.
102. He read his wife's submissions as she had typed them out.
- Just grabbing green field land to build on without using all brown field sites. Infrastructure does not cater for present demands let alone for more population.
103. His submissions;
- RTC proposal is a land grab opportunity.
 - He made submissions about a regional committee providing views to the Inquiry on what development would be done in a sensible way.
 - He felt the process disenfranchised the voices of Lezayre and Garff.

Questions

104. I posed questions to Mr Lloyd Davies and Mrs Brown about development of greenfield and agricultural land.

Mr Lloyd Davies responded-

- It is a proposal to expand the boundaries and not a determination of the area plan.
- The Area is important as the most likely area for the development of Ramsey as much of the development land in Ramsey is affected by flooding.
- The Area would also provide open spaces for Ramsey accessible from the established highways.
- The various plans create the opportunities for development of land to meet the future generations of Ramsey.
- Need the land to ensure Ramsey can provide the services of a service centre.
- Need to plan and need the land to develop Ramsey.

Mrs Brown responded-

- It would be an expansion of the existing settlement.
- Plan periods, the area plan can only plan up to end of existing strategic plan so North / West area plan can only go up to 2026.
- Draft area plan, published making the most of brown field sites.
- The plan establishes what land is available and there was one large site on the Lezayre Road.

- Planning first had to look at capacity of settlement before looking outside the settlement for new sites.
- Optimises the use of previously developed land.
- Vollar Fields was not in the existing plan. But it is now allocated for development. At the time of the draft plan it was not allocated and not needed to the end of the plan period and that was why the Lezayre Rd site was included.
- She used the term “sustainable urban expansions” rather than overspill.
- The Government were looking at the best sites to form a sustainable expansion. For Ramsey in the hierarchy, it is a service centre and will take the bulk of any developmental needs. Constraints on development flooding is one thing taken into account.
- Housing needs were being considered for the population of 100,000 and Ramsey would have a development requirement in the future. Wanted to avoid speculative development in the countryside.
- The North / West area plan would not be in place before May 2025.

105. I allowed additional questions from those in attendance;

106. Mr Jelski asked Mrs Brown a question about the Area plan for 2026 only being passed in 2025 and a limited period of effect.

She responded;

- Can't plan beyond 2026 and the bulk of the development has been assigned and built on.

He then asked about the population of 100,000 by 2037.

She responded;

- The North / West area plan will not address this.
- The aim of the North / West area plan is to replace all older plans and see the area into the next strategic plan. The North / West area plan is a stop gap bringing everything up to date and where are the next sites to develop.
- She advised that planners think of settlement boundaries and not political ones.

107. Mr Keith Dalrymple (an interested party) asked Mrs Brown to clarify if housing needs in Ramsey have been met in the 2016 strategic plan.

She responded;

- Draft Area Plan for the North and West Written Statement Published 24th June 2022, Page 124 table 19 set out what we have and what we need (Appendix 19).

108. I asked about the Vollan Fields development whether it had been included in the figures above.

- Mrs Brown confirmed that it had not and it would have been an oversupply.
- It was not needed in the draft North / West Area plan and up to 2026.

Interested Party

109. I had mistakenly placed Mr Keith Quane in the West Area when his submissions concerned the North Area. He was given the opportunity to and made the following submissions.

- The majority of the land is farm land and not a community.
- Most of the properties did not feel part of the Ramsey Community.
- The boundaries are such that there is no physical connection to Ramsey.
- The community has its own schools, GP services available outside Ramsey. Dentists are an island issue and emergency care is only available in Douglas.
- Not on mains gas or sewerage.
- Already has adequate refuse collections.
- Do not want street lights in the rural setting.
- Properties have been long in existence and not ribbon development.
- The existing boundaries already follow clear physical boundaries.
- Should wait until all brown field sites have been developed.

Submissions to the Consultation Hub

110. The submissions identified as being within the North Area echoed what the interested parties put forward.

- The North Area is not a community with Ramsey.
- The residents use the services offered by Ramsey as much as any other community in the North.
- They used services such as GPs in Jurby.
- Services offered by Ramsey are poor.
- There should be no development of prime agricultural land.
- There is no overspill of Ramsey, Ramsey has sufficient acreage in its boundaries.
- Raised the issue of their properties at the Dhoor being in Lezayre and having to cross into Ramsey to leave their property. Issues were also raised regarding properties being separated from adjacent land owned by that particular property.
- Boundaries are not following clear physical boundaries.

- Again touched upon rates as an issue.

West Area

111. This area comprised an area bounded at its northern edge along Jurby Road from the existing boundary, past the Mountain View Innovation Centre and meets the proposed North area. It then extends south to the Sulby River before veering slightly West and along the river bank before heading South to Lezayre Road and the Glen Auldyn area.

Submissions of the Applicants

112. Mr Cowin again set out RTC's position on this part of the application. His submissions are at Appendix 17 and these are summarised as follows;

- He believed that this area abuts the existing town boundary with some developments in the northern and southern corners which would undoubtedly be seen as an extension of the community of Ramsey and again would benefit from the services and community that Ramsey provides.
- The area to the north of the Sulby river represents an overspill of Ramsey, particularly with the presence of Mountain View Innovation Centre. RTC believed that many people already view this area as a part of Ramsey and its inclusion in the town would confirm a clear boundary to the Town and regularise people's perceptions.
- RTC also believed that the existing properties on Jurby Road as with the North area can be seen as ribbon development between the countryside and the urban Town. The properties on the Lezayre Rd just outside the Town Boundary are apart of the existing community.
- There has been land allocated for large scale housing development along the Lezayre Rd just outside the Town boundary. However planning for this land was rejected but may well become zoned for development in the future and would provide opportunity for Ramsey.
- Any development of land to the west of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary.

Submissions by LPC

113. Mr Julian Teare the Chair of the Commissioners set out the objections on behalf of LPC and these are summarised as follows;

- The most important residential development of 138 houses on the lower Milntown estate was not approved and failed on appeal, there will be no development on that site.

- No development to the west of Ramsey beyond the existing development since 1992.
- Only land available for development in this area is around the Innovation Centre and to date nothing has been put forward for development.
- The existing Boundary has remained unchanged since the last application in 1992.
- Green belt separation.
- There is no ribbon development. There are only 10 or so properties all with long driveways from the road.
- Houses on Jurby road are architecturally distinct.
- The existing Boundary is clear and distinct with clear distinction of green belts.
- Development plans are out of date and RTC base their needs on old plans and not plans that will be available in a years' time.

Submissions by Garff

114. Mrs Miranda Fargher, Vice Chair of the Commissioners set out the objections on behalf of Garff. These are summarised as follows;

- She again re iterated that regularization and perceptions are not a criteria. It is irrelevant what people think.

Interested Parties – Objections

Brian Corlett

115. Mr Corlett resides in Mona Lodge on the Lezayre Road and made the following submissions;

- He referenced his written submissions and supported the points raised by Mr Barden for the North Area.
- The boundary between the North and West areas has been drawn arbitrarily and shows a lack of coherent thought.
- The group of houses in the North and West areas are all in one area.
- Houses existed at the time Ramsey was incorporated and appear on early maps (1868 and earlier).
- Film studio was built where it was because it was away from Ramsey.
- Little or no new building for the last 150 years.
- The houses exist as houses in parkland.
- Houses not ribbon development. Growth of Ramsey has not affected them.
- Rejection of planning applications has kept the area along the Jurby road outside the town boundary as a mixture of rural housing and farmed countryside. Change in character passing out of Ramsey is marked.

- Develop ability of land in this area not fully considered. Covenants on the fields and areas designated for other purposes.
- Services particularly sewerage is a national service and not a Ramsey service.
- There is no differentiation of services offered to him than those further outside Ramsey.
- Application premature until the various plans approved.

Charles Jennings – through his Advocate Oliver Helfrich

116. Mr Helfrich was happy to be sworn to give evidence in case his submissions strayed into evidence he would give to the Inquiry. His submissions were as follows;

- He adopted the submissions written and oral in respect of the West expansion area.
- He referred to Policy Circular 8/89⁷ and that the houses in the West area are distinguished by being in the countryside and not in developed areas. Not an area for development.
- Balance of convenience test, not convinced the benefit falls in favour of the scheme. Balance of advantage lies in the scheme the benefit of the doubt lies with the status quo.
- When Ramsey are applying the Six Criteria it has not engaged with what is on the ground. Speculative about what might be on the ground. What will happen, not what has happened.
- He personally has not seen any change in the area over the last 20 years. Clear change from an urban development into a rural lung or rural environment.
- Lack of evidence from RTC, regularising people's perceptions as to where they live. People do not see they are part of Ramsey.
- His clients do not see themselves as a Ramsey overspill. It is not an outgrowth and not an area to expand into. Creating an overspill situation that is not there.
- The Innovation Centre is some way out of Ramsey. He referenced the web site of the Mountain Innovation centre⁸, which states the centre is outside Ramsey and the photographs depict it as being in a stunning rural location, not in a town.
- Supports the prematurity of the Application arguments.
- Refers to the Tynwald debate and that the planning inquiries come first before any perceived needs of the community and the boundary inquiries.
- Ribbon development is referred to a sustainable urban development and not sporadic and speculative development.
- If the expansion is granted it could lead to disastrous results down the line.

⁷ Circular No8/89 Isle of Man Planning Scheme (Development Plan Order 1982 "Low Density Housing in Parkland")

⁸ <https://www.mvic.im/>

- Riverdale has the benefit of a modern covenant to prevent development in the adjacent areas to maintain the house in its setting.

David Dorricott

117. Was unavailable to attend and so I read his submissions from the consultation hub and his e-mails to the Inquiry into the record.

- He is the ultimate beneficial owner and operator of the Mountain Innovation Centre.
- The Centre was established and remains a committed part of Lezayre Parish and Community.
- Strong rural parish / agricultural nature of the site – including our biosphere award status.
- Very close affinity with Lezayre Parish, its Commissioners and residents.
- The key requirement not to urbanise and therefore destroy this carefully managed ecosystem.

Questions

118. I then invited any questions regarding what had been raised in the submission. There were no questions and I asked about the land available for development in the area and planning needs, I invited Mr Lloyd Davies and Mrs Brown to assist on this point.

119. Mr Lloyd Davies stated that this is not a inquiry into the area plan or the strategic plan and emphasised the following points.

- Not for RTC to set planning policy, low density housing and tree planting are protected.
- Land is significant for future employment land and community development on the outskirts of the town.
- The area is split north and south by the Sulby river.
- To the north the Mountain Innovation Centre is part of the economic growth activity and an employment hub in the area. Opportunity to develop this area.
- Commercial developments in the south area.
- Refusal of the planning for the housing development in the south area was because of flooding issues.
- Renders the area more suitable for business / industrial development.
- Land is suitable for amenity gain, footpaths and cycle routes.

120. Mrs Brown responded-

- She emphasised this was not a planning inquiry and the public inquiry into the area plan and would address this.
- The Lezayre Road development being refused and whether the area plan needs to be changed will be considered.
- Green belts are not a specific term and in the Isle of Man we use the term green gaps. Aim is to avoid the coalescence of settlements.
- Low density housing in parkland from 1982. From experience of previous area plans this term was not supported and this has not been carried forward and these areas are simply residential areas in the countryside.
- West area is constrained by flood risk and this would be considered in terms of development.

121. Mrs Fargher referred the Inquiry to the written statement in the draft North / West area plan and referred to paragraph 11.1.6. to emphasise the prematurity of the Application.

Evidence on behalf of Ramsey Town Commissioners

122. RTC had provided three witness statements to the Inquiry at Appendices 11, 12 & 13. LPC requested an opportunity to ask questions of the three witnesses. I agreed to the request and the three witnesses were duly called.

123. Mr Robert Cowell – Deputy Chair of Ramsey Town Commissioners, was sworn and adopted his statement at Appendix 12 and responded to questions as follows;

- He stated Ramsey had to be forward thinking and gain some of the population increase of the island to 100,000.
- Ramsey is attractive to families and there is a demand to move to Ramsey. Mainly families and people that are moving back to the island.
- He clarified the 16,000 increase in Ramsey population was not correct that was the hoped for increase in the Island's population and Ramsey would need 900 housing units to meet its projected share.
- He advised that for those vacant sites in private ownership RTC could do nothing.
- Sites owned by RTC would push forward and invest in these brownfield sites.
- RTC want to develop its own brown field sites and is looking for joint ventures and it is likely sites will be developed.
- RTC will develop Albert Road / Mayfield site – 32 housing units for social housing.
- Old River Road is available to develop but RTC cannot access the funding that a private entity can. RTC would look to sell sites with planning permission.

- Number of units available cannot be quantified due to flood risks etc.
- RTC does not want to develop greenfield sites and the application is not a development exercise. It is to bring together and “*make an arm around Ramsey*”.
- He believes Glen Auldyn is part of the Ramsey community but accepted the residents of Glen Auldyn are unanimously opposed to being part of the Ramsey community.
- He did make mention that there were not as many people from Glen Auldyn at the meeting than he expected given the opposition.
- The undevelopable land will be a far larger benefit in the future to the community.
- He was not part of RTC when it was submitted but he supported the Application for the development of Ramsey.
- Mr Cowell responded when asked that he could not answer what the population growth would actually be.

124. Tim Cowin – Clerk/Chief Executive to Ramsey Town Commissioners was sworn and adopted his statement at Appendix 11 and responded to questions as follows;

- He stated that there was no consultation undertaken by RTC directly with the residents of Glen Auldyn.
- He accepted that the residents did not consider themselves part of Ramsey but stated that rates difference was the biggest issue. He did not think it was an advantage or very little advantage to RTC having Glen Auldyn rates.
- He does not think there is a distinction between the communities day to day. It is only when issues like this Application are raised that there is a division.
- There had been changes since 1992, Ramsey had expanded up to its own boundaries and the world is now a different place.
- There have been significant changes, Milntown is no longer a private estate and access is through Ramsey.
- He doubted that Glen Auldyn was a village.
- RTC does not have any rural areas under its control.
- He stated he was from a rural background and understands the issues faced by a rural community and the interest of any rural community would not be subordinate and all issues would be considered.
- He does not think there is sufficient land available for development in Ramsey.
- The land within the Application that cannot be developed is sought for the benefit of Ramsey and RTC can make improvements to those lands because RTC have the finances.
- The Application is about the development not of land but the community as a whole.

- RTC would not offer any additional services to the Crossags than they already enjoy.
- The boundaries as drawn on the Application do follow clear physical boundaries in the South area.
- Perception was not a criteria but does give some indication where people think the boundary already is.
- There is a clear separation with the Dhoor at present and the Application boundary is to reflect that.
- Growth of the community of Ramsey, 5.6% growth on the census data. A growth in houses of 821 since 1996. Ramsey has seen growth since 2016 and the Island needs to grow the economy and increase the population, Ramsey needs to provide it. He believes that there is a desire for people to move to Ramsey.

125. Mr Lloyd Davies – Owner / Director of Cornerstone was giving expert evidence on the development of land and available land within Ramsey for development. He adopted his statement at Appendix 13 and using the large-scale maps he gave a short presentation on the areas available to develop in Ramsey and limitations on the development of land within Ramsey. He then responded to questions as follows;

- He was of the opinion that Ramsey had no available land for large scale development except for the Vollan Fields which would provide 153 houses.
- He believed that the developer of the Vollan Fields had developed their available land at Royal Park and there was a demand for houses on the Vollan Fields.
- There could be 32 Public sector housing on the Albert Road site making 185 houses.
- He did not think this would meet the demand he believes is there. The delays with planning in Douglas opens up a market for houses to be built elsewhere. Ramsey would be foolish not to be in position to provide those houses.
- He disagreed with the projections in the Draft Area Plan which had a short lifespan and there was a need to plan beyond that and make provision for a period of 20 years.
- There is a requirement for houses in Ramsey based on previous growth.
- He has assessed every available site in Ramsey identified for development.

The private sites appear to be uneconomical to develop and there are also constraints on some of the sites which require agreements between parties which is outside the powers of RTC.

- Flood risks are also a constraint on some of the sites and the mitigation of flood risk is a national government issue.
- Ramsey will remain the service centre for the north and must develop and not be reactive. The way to secure the future of Ramsey is to expand and have the land to

do so as a service centre. He believed that without the Application, Ramsey could not meet the aspirations of Central Government to grow the population and Ramsey would be foolish not to be in a position to provide housing.

- He believed that developers are unlikely to apply to develop land outside the settlement boundary until all land has been developed within the boundary. The refusal of developments outside the settlement boundary does not give anyone investing the sums involved any confidence to do so.
- He also believed that constraints on land due to flood risk in the centre of Ramsey and Poyll Dooey may make residential properties built uninsurable and unsaleable.
- There was no site within Ramsey to replace the development rejected at Milntown.

Evidence of Mrs Diane Brown

126. Further to her statement at Appendix 9, Mrs Brown was given the opportunity to respond to issues raised in the evidence given by RTC.

- She advised that the North / West area plan would be finalised after a public enquiry. Although it only had a validity to the end of the current 10 year cycle (2026) it would none the less update area plans that were 40 years old and no longer that relevant. It would still have meaning after that date.
- She reiterated that this was not part of the North / West area plan public inquiry. That the Area plan was more than just planning it addressed other issues including economic issues and services.
- The aim of the Town and Country Planning Act underpins how best to make better places to live. There was no policy to abandon Town centres but there needs to be an understanding of the usages for sites and a balance of risk and costs when plans are proposed.
- Settlement boundaries were what planners used and not political boundaries. Political boundaries were not the primary consideration on the allocation of land.
- Sites within a settlement should be developed before development was allowed on the edge of the settlement. Sustainable urban extensions.
- The protection of the countryside was important but it can be developed.
- Planning were looking at modelling to establish a minimum housing need for various scenarios. For population of 100,000 and an occupancy of 2.16 then an additional 278 houses would be required in the north between 2021 and 2037.
- That this work was on going and not so simple as to put a precise figure on this.
- Planning were constantly updating building land availability and it was not so simple as to take current planning applications as projected figures.

- She also pointed out that planning modelling had a ten year horizon and prediction modelling beyond that was uncertain.

Evidence of other interested parties

127. Evidence was taken from interested parties who did not reside in the areas of the Application, but offered evidence that would assist the Inquiry on the subject matter under consideration.

Mr Tim Johnson MHK-Ayre and Michael

128. Mr Johnson is the political representative of the residents of the North, West, and Glen Auldyn areas. His evidence addressed the concerns of those constituents. He had provided submissions to the consultation hub and provided a letter to the Chair of the Inquiry dated the 15 September 2023. He adopted those as his evidence and was given the opportunity to expand on those documents. His evidence is summarised as follows;

- He is here to represent his constituents and those constituents directly affected by this application. Those he has spoken to have given him their clear views.
- His constituents have told him they do not want to be part of the greater Ramsey community. They do not feel part of that community. They feel distinctly different to Ramsey Town and their uniqueness would be swallowed up if they were brought in to RTC.
- There would be no amenity value by being part of RTC.
- Rural communities accept different levels of service and accept not being on mains sewerage and street lighting. Some even prefer this.
- The areas do benefit from the services of Ramsey but do not need to be part of Ramsey to do so.
- Case for change has not been made, if the issue is RTC needs more land then Glen Auldyn cannot provide that. RTC offer no explanation why they want this land if we disregard rates issues.
- RTC need to develop Ramsey and make the Town better.
- The proposals in the Application are unwanted and unnecessary.

Mr Robert Keith Dalrymple

129. Mr Dalrymple is a resident of Ramsey and his property is at the boundary of the current Ramsey Town boundary. He is a chartered surveyor and Chair of the Northern Chamber of commerce. He provided submissions to the consultation hub and provided an email to the Chair of the Inquiry dated the 18 October 2023. He adopted those as his evidence and

expanded on those. He had attended the first two days of the Inquiry and also responded to issues raised in evidence given to the Inquiry. His evidence is summarised as follows;

- He focused his main submissions on urging RTC to develop the brownfield sites within the Town.
- To attract people, Ramsey has to be attractive. That there is all too visible decay of the Town centre. He wants RTC to revitalise the Town centre first, as that will enhance living in the Town.
- He was pleased to hear that Mr Cowin and RTC were being proactive and have a committee to address this issue.
- The Town is not full there are sites available for development. Issues with developing sites in Ramsey can be overcome. He mentioned a large scale development in the south of Ramsey that was being considered and money invested in that scheme.
- He was of the opinion that greenfield development was an over simplistic approach which would have far reaching consequences on urban regeneration. Developers wanted Greenfield sites and not wanting to develop brown field sites. Encourage local developers of sites in Ramsey Town centre
- He raised an issue in respect of the Vellan Fields development that RTC made an observation in the planning application about access over the stone bridge. Which is the only access to the south without a detour through Sulby.
- The Island's landscape and character are at risk. Green gaps were the only barrier to prevent urban sprawl
- He felt the proposals (the Application) was divisive and running contrary to government plans and strategies.
- The Application should not succeed.

Evidence of Mr Karl Brew- Deputy Chair Lezayre Commissioners

130. After the end of the scheduled evidence, Mrs Bolton on behalf of LPC asked if Mr Karl Brew could give further evidence on behalf of LPC.

131. Whilst it was very late in the day to bring new evidence before the Inquiry. I felt that to comply with my duties under the Section 6(2) of the Local Government Act 1985 "*to consult with every local authority whose district is affected by the proposed order*", I should allow the evidence and for RTC to be able to ask questions.

132. Mr Karl Brew gave evidence on planning applications being considered by Lezayre. He stated that builders and developers had no difficulties in dealing with Lezayre.

133. Mr Jelski asked Mr Brew questions in respect of the planning application for the Lower Milntown development which was refused. He referred Mr Brew to a letter of the 16 July 2021 from LPC refusing the application which seemed to imply that large developments of 140 properties should not be in Lezayre but in Ramsey.

Closing submissions

134. The three authorities were given the opportunity to make closing statements.

Closing Submissions of Garff

135. Mrs Miranda Fargher, vice chair of the commissioners made the following submissions which I have summarised as follows;

- Her main concern overall is that there was no explanation why so much open countryside was in the Application.
- The status quo should be maintained, the areas of the glens are national assets managed by the government.
- The Application offers nothing to the residents of the Crossags except discount at the library.
- The current boundaries follow clear old roads and rights of way. The historical boundaries already show the division between town and country.
- There is no land for development in the South Area and it is only to grab rateable income.
- The application for the South should not be accepted and the status quo maintained as it is.

Closing Submissions of LPC

136. Mrs Bolton on behalf LPC made the following closing submissions which I have summarised as follows.

- She stated that I could only consider the Six Criteria and I would need good reason to go outside them.
- This was not a planning inquiry. The political boundary was not determinative of the settlement boundary.
- There was no evidence that the Application was necessary to secure the future of Ramsey.
- The Application was premature, Area plans are emerging.

- That planning for 30 years is unnecessary and I should not consider such a long time period.
- She asked why such a large area of land required and why it is necessary to secure the future of Ramsey.
- No evidence on how Ramsey would use the land that was not developable.
- The “arm around Ramsey” argument is not a criteria to be considered.
- Perception of what was already in Ramsey is not a criteria that can be considered
- The Application did not follow clear physical boundaries.
- The areas sought in Lezayre did not consider themselves part of the Ramsey community. She referred to the previous report regarding Glen Auldyn and it being unimaginable to consider Glen Auldyn as part of Ramsey.
- Error of omitting the two properties would cause more disjunction if Application allowed.
- Ramsey was a service centre for the North.
- Green gaps are important to prevent the Urban sprawl
- There was sufficient land within Ramsey to develop.
- The Application was premature and should be refused

Closing submissions of Ramsey Town Commissioners.

137. Mr Jelski on behalf RTC made the following closing submissions which I have summarised as follows.

- I was encouraged to not just look at the Six Criteria, that the list was not exhaustive and I should consider other factors that were relevant.
- South Area-
 - There are only four properties in this area and that these properties are part of Ramsey.
 - Only accessible through Ramsey by road.
 - They are dependent on Ramsey and are within walking distance of Ramsey, the first port of call when leaving the properties.
 - The area might not historically have been part of Ramsey but they are clearly now. RTC can more economically and more environmentally friendly, provide services to those properties than Garff can.
 - The area is important in any development of Ramsey because the green space it encompasses and the green offsets that may be required in the future development of Ramsey.
 - Part of the land in the area is owned by RTC as is the Albert Tower and is an overspill of Ramsey. The Tower is synonymous with Ramsey and the most

recognisable symbol of the Town and an overspill and the balance should be that it is part of Ramsey.

- The Golf course being part of three parishes is an anomaly and the whole of the course should be in Ramsey.
- RTC could provide financial support to those recreational areas on the doorstep of Ramsey and used by the residents of Ramsey.
- The boundaries follow natural physical features.

- Glen Auldyn

- Most contentious area of the Application.
- Glen Auldyn and Ramsey are one community. It abuts and adjoins Ramsey and now represent an overspill of Ramsey.
- Glen Auldyn is not that unique and is similar to Ramsey.
- Glen Auldyn resident will seek to rely upon Ramsey.
- The new boundaries follow clear distinct physical features.
- Can take the two properties omitted out and move the boundary to the bridge excluding more houses over the river.
- The expansion of Ramsey over the last thirty years has brought Glen Auldyn closer to Ramsey and a greater reliance on Ramsey.
- The only argument in reality is that residents of Glen Auldyn just do not want to pay more rates.

- North Area

- The Civic amenity site is managed by RTC and uses its wider work force to keep the site open.
- The service is mostly provided to residents of Ramsey and makes it an overspill.
- The new boundaries follow clear physical features and do not, as alleged, divide properties at the Dhoor.
- Properties on the Jurby Road are ribbon development and an overspill of the town and are in one community.
- The area is the natural overspill of Ramsey to allow Ramsey to grow and develop as Ramsey has insufficient acreage in its own boundaries to develop.
- Bringing these areas into the political boundary will allow developers to have confidence in developing the land.

- West

- Properties on the Jurby Road and on the Lezayre road are ribbon development and an overspill of the town and are in one community with Ramsey.
 - Entrance to one property on the Jurby Road access its drive way from Ramsey and that the Mountain View Innovation Centre lists its postal address as “Lezayre, Ramsey”.
 - Clear physical boundaries are followed.
 - Restricted building covenants are not a consideration.
 - Numerous commercial operators in this area show that the area is ripe for commercial development. The flood risk is less for commercial development and is an area for such development.
- Overall
 - He mentioned that whilst there was a large-scale response it was only 6.1% engagement from the households that could have responded.
 - Engagement is only for those who oppose and the silent majority have not engaged.
 - Those who did respond and give evidence were opposed and did not believe the areas were in community with Ramsey. This included the constituents of Mr Johnson MHK. He thought that rates rises were the main issues.
 - The evidence given by RTC was honest, truthful and not designed to mislead and to suggest otherwise was disrespectful both personally and professionally.
 - There is insufficient land within Ramsey to develop and no evidence was provided to contradict this.
 - Greenfield sites are not automatically developed just by the political boundary moving.
 - RTC do not control central government functions such as flood risk and the stone bridge and only central government could deal with these issues.
 - Any large-scale development in the area has to be in Ramsey as Lezayre is a rural parish and not in a position to service large scale developments.
 - The draft area plan is to replace what is already in place. It will remain in place until replaced by the future all island strategic plan.
 - Current population projections by cabinet, though subject to revision, require that as a minimum Ramsey and the North would need 278 additional households between 2021 and 2037
 - Ramsey is full and is being caused injury by not being able to develop and the balance lies in favour of accepting the Application.

Consideration of the Evidence against the Six Criteria.

138. The Application seeks to almost double the area under the political control of RTC.
139. Whilst the Application was divided into four distinct areas, it was one Application.
140. I was not bound by the boundaries as they were drawn in the Application and I could consider granting less than the area sought but I could not grant more than what was sought and consulted on.
141. In coming to my decision, I have considered the Six Criteria and considered additional criteria that RTC have advanced particularly that the areas sought provided amenity land for Ramsey and offsetting carbon credits for developing land within Ramsey in the future.
142. I did consider the arguments that the land in the area sought although undevelopable would be an offset for developing other land to expand Ramsey. As I set out at paragraph 51 above I felt this was too close to considering rateable income of the land and should not be a criteria that I could consider.

Overspill and Outgrowth

143. I was told several times that this was not a planning inquiry. Whilst this was true and I always bore this in mind, the nature of the Application, which I and others had paraphrased as, "*Ramsey had reached its capacity and needed land outside its current boundaries to grow the town*", meant that I had to consider aspects of planning and development of land within Ramsey and on the settlement boundary into which RTC wanted to expand.
144. I therefore had to consider whether;
- (1) *the areas sought were an actual overspill of Ramsey, as was the case in 1992 when large developments on the edge of Ramsey were brought into the political control of RTC. Or*
 - (2) *that the land sought in the Application was required to accommodate what I was advised by RTC would be the inevitable developments required to accommodate the projected increase in the population of Ramsey including land to enable proper facilities or amenities to be provided.*

145. Point (1) above would be determined as a criteria for each of the areas but point (2) above required consideration on its own.
146. There was clearly a requirement for me to consider separately the issues of population growth and land required for that growth. This clearly did touch upon planning issues and the majority of the evidence on day two and three of the Inquiry focused on development of land outside the existing Town boundaries and the availability of developable land inside the Town boundary.

Potential Increase in the Population of Ramsey

147. There was no clear agreement on the potential growth of Ramsey in the next 10 years and certainly no modelling of potential growth for the 30 year time frame RTC were looking at.
148. It is clear from the 2021 census data that Ramsey's population has grown somewhere between 5.6% (2016 – 2021) and 5.97% (2011-2021).
149. If growth was of the same order between 2021 – 2031 it would be safe to estimate that this would equate to about 500 or so people moving to Ramsey and potentially some 200 houses required to accommodate this increase.
150. The Isle of Man Population Report 2023 showed a Net Inward Migration to Ramsey of 130 people (including Internal Migration) over a two year period (2021 -2023) which projected over 10 years would seem to indicate that the 500 or so person growth would be a reasonable assumption for me to make.
151. The Government strategy to provide the infrastructure for a population of 100,000 by 2037 does not identify where the additional housing would be required. Mrs Brown stated that planning had a prediction modelling of at most 10 years.
152. The current population figures⁹ would indicate a much slower growth in population and falling around 50% short of the growth required to achieve the 100,000 population hoped for in 2037. Given this lower than expected growth and with large scale developments proposed elsewhere in the Island I feel I could not consider growth above the 5.6% predicated for Ramsey from the information in the current population figures. It would not

⁹ Isle of Man Population Report 2023, page 3

be proper to consider an as yet unquantified demand that may or may not be required in the next All Island Plan.

153. Whilst I was being asked to future proof RTC. I was given no specific figures on what would be required to future proof Ramsey beyond 2031. There were too many variables and undetermined plans and policies and many issues of infrastructure which were outside the control of RTC, such as flood defence and the stone bridge. It was therefore by no means certain that Ramsey would or indeed could provide the majority of the 278 households projected to be required in the North of the island by 2037 if indeed that many households will be required.
154. Looking at the available Land to be developed within the existing boundaries of Ramsey;
- Possible 30 units at the Albert Road site
 - 14 units at Thornhill
 - 152 units at the Vullan Fields
 - Poyll Dooey was not considered viable by RTC but the developer is pressing ahead with planning. This would create a large number of houses.
 - Mr Dalrymple mentioned a large scale development in the south of Ramsey but gave no specific details of the number of dwellings proposed.
155. Considering an occupancy rate of 2.16, which was one of the scenarios Mrs Brown suggested, there would on balance, with additional vacant properties being brought into use and the development of available sites in Ramsey, be sufficient development land available within the current boundary of Ramsey to meet any projected growth of Ramsey up to 2031.
156. The Central Government aspiration is to develop the infrastructure and services to accommodate a population of 100,000. This was a change in policy from when the Application was drafted. However, RTC themselves indicated that any development North of Ramsey would impact on the stone bridge on the A9 which if it was out of service would require all traffic north of the Sulby river to divert via Sulby. Similarly, the issue of flooding in Ramsey Town was also an issue where the infrastructure needs to be addressed at national level and if this was addressed it would also increase the available land for development within the existing boundaries.

157. One of RTC's main arguments was that they wanted to have land under its political control, so that if in the future development is required on that land, then developers would have to only deal with RTC.
158. There was some force in this argument but at this moment there is no land being offered for large scale development on the outskirts of the Ramsey settlement and indeed the only land available without constraint such as flooding etc. is that in the North area of the Application which is I am told is rich agricultural land.
159. I was made aware that expanding the political boundary does not affect the current settlement boundary. It was pointed out by LPC and Garff that there was a danger that the moving of a political boundary of land from a rural to a town administration could lead to an incursion of development into the countryside, which would be unacceptable.
160. Mr Lloyd Davies stated developers will build where they can best develop and make a profit. Planning permission does not depend on political boundaries. Development depends on the willingness of the land owner to offer the land up for development and planning being granted for that development. This has not apparently happened with the land north of Ramsey.
161. LPC pointed out there is no statutory requirement for Ramsey to provide any further housing developments. Though, understandably Ramsey would want to put itself in the best position to be able to accept any share of any potential increase in population by having land available for development inside its boundaries.
162. I have also noted that if planning is sought to develop lands on the edge of the current settlement then as seems to be the case from the evidence of Mr Karl Brew regarding the Lower Milntown development, any large development would have to be part of Ramsey.
163. If such developments were proposed on the edge of the Ramsey Town settlement and likely to be granted planning permission, then an application to extend the Boundaries should be made at that time when the need has been identified and approved and not as pre-emptive move as is the case in the Application.
164. Whilst settlements need to grow, I do not feel that future proofing Ramsey to the extent requested in the Application is a criteria that I can consider. If I were to do so, even by moving political boundaries, I have concerns that I would trespass into and potentially

prejudice any national policies being considered and create a precedent for other Towns to make speculative applications to expand their boundaries.

165. Any future proofing that RTC say is required may only become apparent after the North / West Area plan is approved, but more likely will be determined after the outcome of the next All Island Strategic Plan due in or around 2026. At that point boundary applications can be made without the need for extensive speculation on what ifs as is the case in this Application.

166. Looking at the two criteria

that the area sought is an overspill or outgrowth of the promoters' area;

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

- I find that there is sufficient acreage within Ramsey for RTC to meet the estimated growth of Ramsey between 2021 and 2031. I do not have sufficient information to consider population growth beyond that date.
- RTC will not suffer injury if the Application is not granted as RTC in their Application show that there is plenty of land available in Ramsey to satisfy the amenity needs of the population and the amenity value of the land subject to this Application will be still available to the residents of Ramsey to enjoy at no cost to RTC.

167. I must now consider whether the Application in respect of the four areas has met the remaining criteria.

South Area

168. RTC have accepted that there will be no development in this area and cannot be an outgrowth of Ramsey.

169. This area is a national asset and used by anyone, island resident or visitor. Nothing prevents the people of Ramsey from accessing this area and indeed RTC at this time do not have to contribute to its upkeep or maintenance.

170. RTC say they could provide man power and equipment to maintain the area but there was no hard evidence of what that would be or even how it was to be costed. At the moment the residents of Ramsey have access to a national asset at no cost to themselves.
171. I accept that as in 1992, the current boundaries follow ancient and physical boundaries and the new proposed boundaries appear to be just lines drawn on maps to accommodate the Glen Auldyn part of the application.
172. There has been no development of this Area since 1992 and it is still not an overspill of Ramsey.
173. The Crossags Farm was established long before RTC was brought into being and whilst RTC has built up to its current boundaries, these buildings are separated from the settlement by green spaces such as the Golf course and Milntown.
174. RTC did raise an issue that the only vehicular access to the Crossags was by passing through Ramsey. It was also pointed out that you must pass through Lezayre as well.
175. RTC did state that it could provide services to the Crossags easier than Garff could do. No evidence was provided that there was any dissatisfaction with the services offered by Garff by the residents of the Crossags or that there were such significant savings to made as to warrant a change in the boundary.
176. It would seem given the rural nature of the Crossags that if there were any issues with Garff providing services then Lezayre would seem to be in a better position to provide those services than Ramsey as the Crossags would seem to be a rural community rather than a town community.
177. As I stated at the outset, I needed to be shown what specific services RTC offers the Crossags which are over and above those that Ramsey as a service centre offers its hinterlands. No specific services were identified beyond a reduced library membership and so on the evidence I cannot find **that the promoters' area and the area sought is really one community and that there is community of interest in all or most public services** above that which Ramsey provides to the rest of its hinterlands.

178. I was urged to consider correcting perceptions that the Albert Tower was in Ramsey and that some of the area was known as the Ramsey Forest. This does not tip the balance towards acceptance or adequately demonstrate the community of interest criteria.
179. Similarly, the ownership of the Albert Tower and the Lhergy Frissell by RTC was not a criteria that I could consider without creating a precedent for future applications by other local authorities owning land in another authority.
180. The owners of the Golf Club did not make any submissions on the course itself lying in three authorities and I must conclude that it does not cause any administrative difficulties by it remaining so.
181. The Applicants have not persuaded me that there is any advantage in granting their application in whole or part and I do not recommend the Application succeeds for the South Area.

Glen Auldyn

182. Again, the land is not suitable for the development of large-scale housing due to the flooding constraints and that the area is only suitable for developments in the same manner as the existing houses, that being low density houses in the countryside. I cannot find that it could be for an outgrowth of Ramsey.
183. RTC highlighted the silent majority who did not take part in the consultation as being an important consideration. However, in the case of Glen Auldyn it was the vocal majority that objected to the Application. They do not believe they are a part of the Ramsey community and maintain a unique identity. They are seeking to have that unique identity recognised in Government plans. It seems to me that practically all of the residents of Glen Auldyn are unequivocally opposed to the scheme.
184. I accepted that the starting point should be to establish what had changed since 1992 and what in Deemster Luft's words would no longer *stretch the imagination*.
185. Nothing in the Application or any of the evidence I received shows that anything has changed to the situation on the ground except that Milntown is now owned by a trust rather than in private ownership. Glen Auldyn is still not an overspill of Ramsey

186. My own personal view has been formed from the two visits I made after being appointed the Chair of the Inquiry. These are the only occasions I have visited Glen Auldyn in the 25 years I have been resident on the Island.
187. The first time, which was my first ever visit to Gen Auldyn was a private visit and I found the transition from the Ramsey Town settlement to be a stark one. Within a few moments of driving towards Glen Auldyn, you did not think you were in what in the words of Mr Cowin was “*an affluent suburb of Ramsey*”, but in a different community entirely. It is not an overspill of Ramsey.
188. My second visit was after the pre hearing meeting and in the company of representatives of the local authorities. I was surprised that there were in fact two arms to the settlement either side of the river and after this visit I was further convinced that Glen Auldyn was not part of the Ramsey Community.
189. The Interested parties giving evidence on this area of the Application pointed out that Glen Auldyn is home to some businesses that offer services to Ramsey and that the distance to the Mountain box was less than that to Ramsey Town centre
190. I was again not shown what specific services RTC offers Glen Auldyn which are over and above what Ramsey as a service centre offers its hinterlands. Glen Auldyn residents can use Sulby School and any services such as GPs and the Hospital are for the North of the island and not just Glen Auldyn / Ramsey residents.
191. I cannot say Glen Auldyn is part of the Ramsey Community and I find that the Application meets none of the criteria and so there is no balance of advantage in recommending acceptance and I do not recommend the Application succeeds for the Glen Auldyn Area.

Houses missed in the Application

192. The issue of the error in the Application of excluding the two houses was raised and discussed. I was advised that the reasons for this omission was just an error on transferring the proposed boundary lines on one set of maps to the set of maps used for the Application.
193. The Application was described by RTC as a once in a generation application. I do note that this Application was one made by the previous Town Clerk and clearly the level of

care given to the Application by the previous Town Clerk was not what one would expect for such an important “once in a generation application”.

194. In his closing submissions, I was urged by Mr Jelski to draw the boundary giving less than the whole area of Glen Auldyn so that the two houses were not isolated. Whilst this was submitted, I found that it would be impracticable to do this as it would be artificially recommending a boundary that compromised the integrity of Glen Auldyn as its own community.
195. If I had arrived at a situation where I was considering the balance of advantage I would have had to reject the Application because of the two houses omitted.
196. No criticism attaches to Mr Cowin and the current Commissioners. They presented their case in a thoroughly professional manner.

West Area.

197. The west area is largely farmland and individual houses well-spaced out with the majority pre dating the formation of RTC. I therefore do not consider that they form a ribbon development from the Town of Ramsey. They are house built in rural land for their own purposes and not as any overspill from the Town.
198. The land in the West area appears to not be suitable for large scale housing development as is seen by the rejection of the Lower Milntown development due to flood risks. Development will be most likely be the same as the existing houses that being low density houses in the countryside. I do not find the area could be an outgrowth of Ramsey.
199. Though RTC identified the land as suitable for commercial development they did not identify what specific commercial interests are wanting to set up in Ramsey and what harm is being caused to RTC by business being unable to locate within the existing boundaries of Ramsey. The Mountain Innovation Centre from the submissions of its owners wants to remain outside Ramsey and develop itself based on its rural location.
200. Those who gave evidence at the hearing and those who made written submission did not identify themselves as being part of the Ramsey community and again no evidence was offered regarding the services Ramsey provides these properties that it does not provide to the adjacent house at the Dhoor or other properties in its hinterlands.

201. The boundaries previously drawn have been built up to. A boundary has to be drawn somewhere. To artificially move a natural boundary to accommodate land within a political boundary which appears cannot be or will not be developed seems to be a move to capture rateable income at no cost or expense to RTC.
202. The southern part of the West Area encompasses land where planning permission for a large scale housing development has been rejected and so I am being asked to extend a political boundary to include land that cannot be developed for no discernible reason.
203. As I have rejected the Glen Auldyn area of the Application then the land either side of the Lezayre Rd will remain in the same position it has been in since the 1992 application was considered. The area is still not an overspill of Ramsey.
204. In this Area there is a clear transition from the existing boundary through low density housing to open fields and I again do not find that RTC have shown that any of the Six Criterial apply and so I cannot find any advantage in recommending the West Area of the Application.

North Area

205. From the evidence provided to the Inquiry any outgrowth of Ramsey is likely to have to be accommodated in this area. If Ramsey had shown that it was being harmed by a lack of development land within its boundary then this area would have to be the area of a boundary expansion.
206. If the application was to future proof Ramsey then the area sought in the North was far too great to be considered reasonable for the expansion Ramsey envisaged even in its most optimistic predictions.
207. As I have set out at paragraphs 143-166 this is not a planning Inquiry and as I cannot with any degree of certainty say whether Ramsey will need to expand beyond its current boundaries in the next 10- 30 years there is no need to consider outgrowth any further.
208. When considering the community of interest criteria, I was always puzzled why the Dhoor was not considered by RTC to be in a community with Ramsey and yet Glen Auldyn, the

Crossags and the houses in the West Area were considered to be so. I was still not any the wiser after the Inquiry.

209. The waste management site is an asset of the whole of the North of the island. It is operated by RTC but that is by tender and RTC gain a revenue for providing the service. It is not itself an argument for the community of interest and indeed I was advised that other providers were now being considered to run the site.
210. Similarly, the sewerage plant is a national asset and not a service provided for by RTC.
211. I am also mindful that it would seem that the development of the infrastructure particularly the stone bridge may well need to be addressed before planning was granted to further large scale development of the Ramsey settlement northwards.
212. The land is used for low-density housing in a rural setting and the majority of the land is rich farm land. I do not find the houses which again are established properties in the countryside are an overspill of Ramsey. These houses only rely on services provided by Ramsey as a service centre. These services are exactly the same services that Ramsey provide to the nearby houses at the Dhoor.
213. I therefore do not find that the RTC has satisfied the Six Criteria and I would not recommend that the Application be granted for the North Area.

Summary and Conclusions

214. I was grateful for the detailed evidence given to the Inquiry and express my sincere thanks to all those who took the time to contribute to the Inquiry.
215. Whilst the Application was a contentious one and emotions did run high in the written submission, all those that give oral evidence at the Inquiry conducted themselves in a very professional manner and the evidence given was truthful and genuinely held opinions on the Six Criteria.
216. I found that the Application was far larger than RTC would ever have required for an outgrowth even on the most optimistic estimates of population growth.

217. I also found that in respect of the South, West and Glen Auldyn Areas nothing had changed since 1992 and these Areas were still not an overspill from Ramsey. Ramsey had developed up to the northern boundary since 1992 but had not overspilled into the North Area.
218. From the evidence I received and considered, I found that Ramsey has sufficient land within its boundaries to develop to meet the expansion that current reasonable estimates of population growth predict and RTC does not suffer any harm by the Application being refused.
219. The Areas that Ramsey seek which are undevelopable open countryside and national Glens are available as amenities for the residents of Ramsey at no costs to RTC and there is no discernible reason why these areas have to be under the political control of RTC.
220. If RTC wants to future proof Ramsey then it clearly needs to ensure that its infrastructure is sufficient to deal with any further increase in population and when the strategic plans identify where the Island needs to build housing and in what number, then RTC can make specific applications to extend the boundary to what is necessary and not far more than what could be considered reasonable for such purposes.
221. The key point which I cannot address but can only make the Minister aware of, is that Ramsey as a service centre needs to be able to fund and provide those services in a way that the people in its hinterlands want to access them.
222. The rating system at present means the burden falls on the residents of Ramsey to provide that service centre for others to use. The burden should also not fall on the properties closest to Ramsey as they do not use the services provided by Ramsey any more than those a few hundred yards further along the road. This situation was highlighted by the Dhoor not being included in this Application.
223. If RTC had access to income from the properties in its hinterlands then it would not have to seek additional rateable income from bringing into its boundaries some of the properties that use those services or have to build more and more houses on the boundary of the settlement to raise rateable income.

224. From the evidence provided it seems that the current rating system has generated this Application and that this needs to be addressed so that speculative boundary applications are avoided in the future.

225. As and when any developments on the boundary of settlements are being considered, then determinations on political boundaries should be highlighted and resolved in that planning process rather than in unsuitable boundary expansion inquiries.

Signed

Peter J Taylor

A handwritten signature in black ink, appearing to be 'PJT', enclosed within a rectangular box.

Date 3 May 2024

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Appendix 2 – response from Lezayre Parish Commissioners (December 2022)

Appendix 3 – response from Garff Parish Commissioners (December 2022)

Appendix 4 – Criteria for the Consideration of Local Boundary Extensions 2004 - Six criteria (Council of Ministers 2004)

Appendix 5- Submissions through the consultation hub which could be published in full.

Appendix 6 Submissions through the consultation hub which could only be published anonymously

Appendix 7 is my summary of the submissions made through the consultation hub where no permission was given to publish their submissions.

Appendix 8 the applications and the proofs of evidence of those granted interested party status

Appendix 9- The Statement of Mrs Diane Brown Head of Planning Policy at the Cabinet Office

Appendix 10 - The further submissions of Lezayre Parish Commissioners

Appendix 11 -The witness statement of Tim Cowin – Chief Executive of Ramsey Town Commissioners

Appendix 12 -the witness statement of Mr Robert Cowell – Deputy Chair of Ramsey Town commissioners

Appendix 13 -The statement of Mr Lloyd Davies – Owner / Director of Cornerstone Architects. Appointed by Ramsey Town Commissioners to give expert evidence on planning issues.

Appendix 14 – Timetable for the Inquiry

Appendix 15 - My Determinations are set out in full

Appendix 16 - Ramsey is identified as a service centre for its hinterlands with service villages of Jurby and Andreas.

Appendix 17 - Copies of the opening statements by all IPS persons provided are at Appendix 17.

Appendix 18 - 1991 Report of the Chairman of the Public Inquiry Ramsey Boundary Extension Copy

Appendix 19 - Draft Area Plan for the North and West Written Statement Published 24th June 2022, Page 124 table 19 sets out what we have and what we need



RAMSEY TOWN COMMISSIONERS
Proposed Boundary Extension
September 2022

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1. Introduction

On 12th January 2021 the Ramsey Town Commissioners [the Commission] applied to the Department of Infrastructure under the Local Government Act 1985, Section 6(1) requesting the Department to extend, by Order, the boundary of Ramsey Town.

The Department of Infrastructure in progressing the Draft Order have determined to deal with the application in four elements reflecting the analysis of areas identified within the Commission's initial submission made in January 2021.

2. Background

In 1865 the Ramsey Town boundaries were established as detailed within the Ramsey Town Act 1865.

Since then, there have been four extensions to the Town Boundary: -

- By resolution of Tynwald on 7 October 1881, approving the transfer of part of the Mooragh and adjacent lands in the parish of Lezayre from the Trustees of the Common Lands to the Ramsey Town Commissioners
- By resolution of Tynwald on 8 February 1884
- By resolution of Tynwald on 22 April 1969 and the Ramsey Town Act 1970
- By resolution of Tynwald on 22 January 1992 and the Ramsey (Boundary Extension) Act 1993.

The present boundaries are shown in the appended plan, Appendix 1, with the Town comprising an area of approximately 905 acres. The area of the 1992 boundary extension is shown in Appendix 2, the areas added at that time have in the main been developed except for land at the Vollan Farm and areas identified as being at flood risk.

The process for boundary extensions is provided for within Section 6 of the Local Government Act 1985, an extract from which is provided as Appendix 3.

The Act details the process to be followed and provides that where the Department has refused to make an Order, the applicants for the Order may present a petition to Tynwald praying that such an Order be made; and Tynwald, if it considers that such an Order should be made, may by resolution direct that the Department make such an Order.

3. Criteria for Consideration

The criteria for consideration of local government boundary extensions were established in 2004 during a Tynwald debate on a proposal to extend the Douglas Town Boundary.

The criteria have since been cited by the Department of Infrastructure in its reports on the proposed Port Erin Boundary Extension in 2019. The criteria are also referenced by G. F. Karran, M.B.E., T.H., Chairperson of a Public Inquiry into the Port Erin Boundary Extension and was the basis upon which that application was considered.

The criteria for the consideration of Local Government Boundary Extensions 2004, are stated below along with commentary thereon (in italics) provided by the Department of Infrastructure as part of the documentation published in relation to the Port Erin Boundary Extension application of 2019.

(1) that the promoter's area and the area/s sought are really one community;

The Department considers this to be a straightforward matter of judgement.

(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;

There may arise situations where those residing in the area under consideration have used the facilities of or located within the Applicant Authority. It may also be, for example, that the catchment area for children's schooling or registration at the local doctors' surgery/ies covers, or will be extended to cover, the proposed area to be included within the boundary extension.

(3) that the area sought is an overspill or outgrowth of the promoter's area;

The Department considers this to be a straightforward matter of judgement.

(4) that, wherever possible, clear physical boundaries are followed;

Whilst the Department regards these as highly likely to be obvious the Chief Minister has said that these include matters of topography such as roads, rivers, hedges and other natural features of an area known or understood locally.

(5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;

This is a further development of (3) in that if it is accepted that the area sought is an overspill or outgrowth then do the boundaries need to extend further in Order to enable proper facilities or amenities to be provided. The Chief Minister of the day stated, "... the people of an area that is expanding need the services and need the space,, and if that is being restricted in some way by the lack of a boundary extension then that is wrong. That might be the requirement to produce playing fields to allow recreational activity, to take control of an area, so that they can develop amenities for the benefit of the majority of people."

(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;

The Department considers this to be entirely a matter of judgement.

Note: Applicant Local Authorities should, in submitting their applications, address each point. Similarly, any affected Local Authority wishing to comment or oppose such application should as far as possible, confine their comments to the above points.

However, applicant Local Authorities should also note that these criteria are not intended to be exhaustive.

The Department considers that all of these points are important and should be addressed but than an Applicant Authority may consider that there are other points or ways of addressing the issues additionally that may support its application and so the criteria are not exclusive to anything further being brought in support of the application.

The following shall not be considered by the Inquiry under s.6 of the Local Government Act 1985:

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

What is being addressed in a boundary extension application is not the relative levels of rates as between one Authority and another or the financial implications or questions of efficiency as between Authorities. These issues are to be ruled Out of Order. The list of criteria has been placed in order of priority, although it is not intended to be exhaustive, or exclusive of any other relevant factors. There is, of course, no requirement that all the above points must be satisfied and one combination or another of them may be used.

4. Discussion

In considering the question of a boundary extension the Commission was conscious that almost 30 years had passed since the matter was last discussed. There is a wish on the part of the Commission to establish a boundary which will be relevant for a similar period into the future, thereby avoiding repeated smaller piecemeal boundary review requests, and which would meet the aspirations of the town and Government in terms of future longer-term development of the Town.

The primary drivers for boundary extensions are the extension of the community through development and the availability of future development lands. Within the Island Spatial Strategy, Ramsey is identified as a service centre for the north and the Strategy states that most housing should be focused on Ramsey in line with the current allocations in the Ramsey Local Plan.

The Town hosts a wide range of sporting and recreational activities and facilities, many of which are unique to the Town, and which provide benefit not only to Town residents but also to residents of the surrounding and wider area, including but not limited to: -

- Two football clubs, both have active youth sections, one of which owns its own grounds and club house, the only other northern club being based in Andreas Village (Ayre United FC)
- Ramsey Rugby Union Football Club, which has developed a playing field and its own club house at the Mooragh Estate, and which operates a very successful youth rugby initiative. There are no other northern based rugby clubs.
- Ramsey Hockey Club which operates from the grounds of Ramsey Grammar School within the existing town boundary. There are no other northern based hockey clubs.
- Ramsey Cricket Club which operates from the grounds of Ramsey Grammar School within the existing town boundary. There are no other northern based cricket clubs.
- The Northern Swimming Pool located on land at Mooragh Promenade, the site of which was provided by Ramsey Town Commissioners for nominal consideration.
- Ramseian swimming club which operates from the Northern Swimming Pool.
- Ramsey Golf Club – the course and club house are accessed from Ramsey, although the playing area is split between Ramsey and both Lezayre and Garff Parishes. The only other northern golf facility is in Bride although this is presently not operating.
- Ramsey Youth Clubs, operating from Waterloo Road Youth Club and Bunscoill Rhumsaa, there are presently understood to be no active youth Clubs in Lezayre or Maughold Ward (Garff), facilities do exist at Andreas and Jurby.
- Army Cadets, Scouts and Brownies are all located in Ramsey. Scouts and Brownies also operate from Ballaugh however this is some distance from Ramsey and the area under consideration.

- Privately operated ten-pin bowling centre.
- Primary, junior and secondary schools located in close proximity to each other - in effect a model educational campus serving the northern area.
- Northern Athletic Club which hosts events at Ramsey Grammar School fields and sports hall and at the Mooragh Park.
- 4 school sports halls
- 1 artificial sports pitch
- Extensive recreation areas at Mooragh Park, Poyll Dooley and Coronation Park, including crown green bowling, tennis, outdoor exercise equipment, BMX, skate park, play areas, boating lake.
- Rowing Club operating within Ramsey Bay and at Mooragh Lake.
- Manx Sailing and Cruising Club.
- 2 crown green bowling clubs, the only other northern club and green being located in Ballaugh
- Ramsey Tennis Club which operates a successful youth policy from courts located at Ramsey Grammar School and the Mooragh Park – there are no other tennis facilities in the north.
- Social Clubs such as Rotary, Freemasons, The Buffaloes, Bridge and Chess all exist within Ramsey and service the north of the Island.
- Grove Museum.
- Town Library located at Ramsey Town Hall.
- The Ramsey Forest Project is working to create the Island's first forest by expanding and linking the glens, plantations and woodlands between Ramsey and Sulby. Launched in 2014, the aim was to increase woodland cover from 20% to 30% over the next 30 years. The project incorporates lands in Ramsey Town Commissioners, Government and private ownership.
- Weekly Farmers Market which operates from the Ramsey Courthouse.
- Adult education and evening classes are available at Ramsey Grammar School and provide an option for adult and further education outside of Douglas.
- The Women's Institute, an educational based charity, has two groups meeting in Ramsey, the Institutes previously meeting in Lezayre and Garff [Maughold] folded some years ago.

In addition the Ramsey Town Commissioners have, through the development in 2000-2002 of the new Ramsey Town Hall and Library, expanded the services provided at the Town Hall. These now include the Northern Neighbourhood Police Station, Treasury Benefits Office, the Job Club – this service ceased during the Covid Pandemic, and the office of the Coroner for Ayre & Garff. The Commissioners' officers provide

administrative services for the Ramsey and Northern District Housing Committee (Elderly Persons Housing); public counter services for public sector and elderly person sheltered housing for the whole northern region including the operation of a combined housing list in collaboration with the Department of Infrastructure; administer and operate the Northern Authorities Civic Amenity Site; and provide Civil Registry services for births, deaths, civil partnerships and marriages at the Town Hall, the latter being undertaken by the Commission since Government had sought to close the regional civil registry office in Ramsey. For many it is the only place where Government facilities can be accessed without having to travel to Douglas either by car or by relying on more than one bus journey.

The Town Hall regularly hosts presentations, training courses for a wide range of government and other interest groups, exercise sessions, and coffee mornings for a number of Town, and rural, church groups and charities. The Town provides the major retail offering for the area with three supermarkets and a wide range of independent shops, it is the northern market Town and, in many respects, now acts as an administrative hub for the north of the Island in all matters except those which are entirely related to parish-based activities. Two fuel stations service Ramsey, the nearest alternatives being in Kirk Michael and Laxey.

The Town hosts the local Doctors Surgery and Dentist Practices both of which provide services to Ramsey and the surrounding area, the Ramsey Group Doctors Practice also operates a rural service located at Jurby. Chemist services for the north are entirely provided within the town with no other chemist facilities closer than Kirk Michael or Laxey Village.

The loss of rural post office services in Sulby Village, the closure of the village shop and petrol station in Glen Mona, and the closure of rural churches at Lezayre and Glen Auldyn, inevitably means that more residents in the surrounding area will be drawn to Ramsey to access those facilities and other services which are delivered in Ramsey along with those Government services made available at the new Town Hall since its opening in 2002.

The pubs, restaurants and cafés in Ramsey add to the social offering of the town, and the surrounding area.

The Town has also since the last review seen the expansion of sports facilities such as the rugby pitch at the Mooragh, all-weather sports pitch and Ramsey Grammar School, the BMX Track, Skatepark, a new regional swimming pool, and improved play areas bringing more residents from surrounding areas into the town to access those sport and recreation facilities.

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.

5. Availability of Development Land

The Ramsey Town Plan was approved by Tynwald in 1998, whilst identifying areas of future development at both the Vollar Fields, and to the west of Ramsey, the majority of this land has been developed, as demonstrated in the overhead photography shown at Appendix 4, with some areas zoned for development now considered potentially unsuitable as a result of revised flood risk mapping shown on the following map.



Source: <https://iomfloodhub.im/>

Since the last boundary extension the area of land available within the Town for future development has been reduced both through actual development of zoned lands and as a consequence of the Isle of Man Flood Risk Mapping. The Commission understands that the areas previously identified within the Town boundary between the former railway line and the Sulby River are now considered unsuitable for development effectively removing approximately 42 acres of potential housing development land to the west of the Auldyn River, together with 7 acres of housing development land to the north of the existing Auldyn Meadow development. Additionally the Tidal Flood Risk predictions call into doubt the potential future development of approximately 9 acres of land at Ballachrink currently zoned for mixed industrial and business use, although this question will be addressed as part of a current planning application which seeks to implement flood protection measures to enable development.

The Area Plan for the North and West is recently in the process of progression [August 2022], the Draft Area Plan for the North and West is out for consultation and will be subject to public inquiry before presentation to Tynwald for approval and adoption, expected to be undertaken late 2023 or early 2024. The Draft Area Plan for the North

and West also elaborates on the broad policies set out in the Isle of Man Strategic Plan 2016, the Draft Area Plan for the North and West will come into force once approved by Tynwald, with the plan period running until 2026. However, it will continue to be valid until it is replaced.

The Isle of Man Strategic Plan itself utilises Census Data from 2011 as the basis for projecting land use need. In its draft form the Area Plan for the North and West removes extensive areas of proposed development land within Ramsey and indeed the north of the island, with any future development opportunity being limited to small areas of Transition Zones most of which are unlikely to be developed for residential purposes.

The impact of the flood risk mapping, together with the recent build out of development lands at Poyll Dooey, The Vullan - Royal Park, and Clifton Drive – Grove Park, means that the only substantial land area now available for Town expansion for housing, industrial or business uses, within the existing boundary, is the land to the north-west of Bride Road at the Vullan Fields identified within the Ramsey Local Plan 1998. The Commission is aware that the Vullan Fields have been the subject of discussion between the land owners and a local developer and that development proposals for this land are being prepared in advance of a planning application. It is also noted that within the Draft Area Plan for the North and West, currently out to consultation, the Ballachrink land together with land at the Vullan is proposed to be removed as development land.

Having regard to the Flood Risk Mapping the two areas which can be identified as having potential for future development, subject to zoning, are the lands between Bride Road and Jurby Road, together with the land to the south of Jurby Road to the Sulby River. Future consideration might be sought to development of the Ramsey Golf Course Lands.

Although the Draft Area Plan for the North and West, in its present form, restricts development land within Ramsey it is the intention of Government to produce a single All Island Area Plan (to replace the Area Plans for the South, East and North and West), and have this in operation before 2026. This All-Island Plan will need to respond to the recently published Isle of Man Economic Strategy (Our Island, Our Future, July 2022) which has established a target to grow the Island population to 100,000 residents by 2037.

The Call for Sites process for the West and North Area Plan generated considerable interest in designation of lands adjacent to the Town boundary for development. It is anticipated therefore that, having regard for the new target population of 100,000, lands identified within the call for sites process will fall to further scrutiny and is highly likely to become designated for development within the lifetime of any revised boundary approval.

The present position is that the town has exhausted the majority of development land within its boundary. Future residential development, to meet the Island's Economic Strategy and meet the needs of the projected future population, will bring into focus those lands suitable for development presently abutting the existing town boundary, and this application seeks to establish that such development, which would be an extension

of the existing community as overspill or outgrowth, should be brought within the town boundary in preparedness for such development.

The Ramsey Town Commissioners also sees advantage in designation of future development lands within a revised Town boundary in that it avoids future conflict where development, which would clearly be an extension or overspill of the Town, might be sought to be drawn into a future revised boundary having already been constructed in an adjacent parish area. Although financial advantage or disadvantage are not considered to be factors for consideration in the boundary extension criteria it is felt prudent and therefore advantageous to avoid such conflict by amending the town boundary to incorporate these areas in advance of actual development taking place.

The present limited amount of development lands, and the constraints proposed to be placed on development under the Draft Area Plan for the North and West is restricting future growth of the town and its ability to respond to the Government's aspirations within the Isle of Man Economic Strategy. This in turn will have an impact of the town's attraction to employers and commercial activity which will rely on population growth to attract new investment and increased economic activity.

This proposed boundary extension is forward looking and there is a wish on the part of the Commission to establish a boundary which will be relevant for a reasonable period into the future. With only 4 changes to the Town Boundary in a 157-year period, it is important to be forward looking and avoiding repeated smaller piecemeal boundary review requests. The boundary review must consider the present and future expansion of the town that would meet the aspirations of the Town and Government in terms of future longer-term development of the Town.

6. Constituency Boundaries

The question of electoral boundaries and levels of proportionate representation within the various areas is noted.

The Office of the Electoral Registrar has provided the number of electors registered to vote in Ayre & Michael, Ramsey and Garff. Data on total population in these areas is taken from the 2016 Census, though this does not split the data by Constituency.

As of 01/07/2020	Registered Voters
Ayre and Michael	4,991
Ramsey	5,998
Garff	5,125

The 2013 Boundary Review assessed constituencies against resident populations based on the 2011 census and determined an average resident population of 7041 for each 2-seat constituency. These figures have been reviewed against the 2016 census figures from which the following table is presented: -

Population by area				
Area	2011		2016	
Ramsey	7,821		7,845	
Andreas	1,426		1,397	
Ballaugh	1,042		1,032	
Bride	401		382	
Jurby	797		776	
Laxey	1,705		1,676	
Lezayre	1,282		1,276	
Lonan	1,533		1,579	
Maughold	977		985	
Michael	1,729		1,591	
Onchan Parish *	426		426	
Garff adjustment *	2,069		2,069	
Area Total	18,713		18,539	
Island Population	84,497		83,314	
Constituency average	7,041		6,943	
		+/- average		+/- average
Ramsey	7,821	780	7,845	902
Ayre & Michael	6,677	-364	6,454	-489
Garff	6,710	-331	6,735	-208
* figures assumed as being as per Boundary Commission Review				
Source Isle of Man Census Report 2016				

The table demonstrates that proportionately the Town is already under-represented in terms of House of Keys seats whereas the constituencies of Ayre & Michael and Garff enjoy better proportionate representation.

Whilst recognising the existing variances in representation, and the further impact of any boundary change, the Commissioners noted that it is impractical to achieve a balance of representation across all Keys constituencies and that Keys boundaries do not always have to follow local authority boundaries. For example in the case of Onchan Local Authority District some residents are within the electoral area of Garff for House of Keys elections; whilst this is not perfect it is a practical solution to achieve proportionate representation within a 12 constituency 2 seat Keys structure. This also retains the ability for residents to have local input, as stakeholders, into the selection of local authority membership.

The question of the constituency boundaries is of course a matter for Tynwald to consider and ought to have no bearing on the outcome of the boundary extension.

7. Boundary Extension Areas

As part of the Commission's consideration the following areas are presented and discussed below.

In each case a narrative assessment of the criteria is provided for discussion. The overall proposed revised boundary area considered has been split into four distinct areas, North Ramsey, West Ramsey, Glen Auldyn and South Ramsey, these are shown on the attached plan at Appendix 5.

Within each area section, in addition to a narrative, the Commission has also provided for ease of reference a tabulated assessment detailing the criteria to be applied and how the Commission sees those criteria applying to the area being discussed. For ease of reference those criteria are repeated as follows: -

(1) that the promoter's area and the area/s sought are really one community;

The Department considers this to be a straightforward matter of judgement.

(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;

There may arise situations where those residing in the area under consideration have used the facilities of or located within the Applicant Authority. It may also be, for example, that the catchment area for children's' schooling or registration at the local doctors' surgery/ies covers, or will be extended to cover, the proposed area to be included within the boundary extension.

(3) that the area sought is an overspill or outgrowth of the promoter's area;

The Department considers this to be a straightforward matter of judgement.

(4) that, wherever possible, clear physical boundaries are followed;

Whilst the Department regards these as highly likely to be obvious the Chief Minister has said that these include matters of topography such as roads, rivers, hedges and other natural features of an area known or understood locally.

(5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;

This is a further development of (3) in that if it is accepted that the area sought is an overspill or outgrowth then do the boundaries need to extend further in order to enable proper facilities or amenities to be provided. The Chief Minister of the day stated, "... the people of an

area that is expanding need the services and need the space,, and if that is being restricted in some way by the lack of a boundary extension then that is wrong. That might be the requirement to produce playing fields to allow recreational activity, to take control of an area, so that they can develop amenities for the benefit of the majority of people."

(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;

The Department considers this to be entirely a matter of judgement.

Note: Applicant Local Authorities should, in submitting their applications, address each point. Similarly, any affected Local Authority wishing to comment or oppose such application should as far as possible, confine their comments to the above points.

However, applicant Local Authorities should also note that these criteria are not intended to be exhaustive.

The Department considers that all of these points are important and should be addressed but than an Applicant Authority may consider that there are other points or ways of addressing the issues additionally that may support its application and so the criteria are not exclusive to anything further being brought in support of the application.

The following shall not be considered by the Inquiry under s.6 of the Local Government Act 1985:

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

What is being addressed in a boundary extension application is not the relative levels of rates as between one Authority and another or the financial implications or questions of efficiency as between Authorities. These issues are to be ruled out of Order. The list of criteria has been placed in Order of priority, although it's not intended to be exhaustive, or exclusive of any other relevant factors. There is, of course no requirement that all the above points must be satisfied and one combination or another of them may be used.

NORTH RAMSEY AREA

For the purpose of this report the area comprises land in Lezayre situated between the north east coastline and the Jurby Road identified in the plan Appendix 6.

At the time of the previous boundary extension a proposal to include land within the area was rejected, the Inspector at the time, His Honour Deemster Luft, was sympathetic with the retention of the only part of Lezayre Parish which comprised the shoreline.

The previous extension did incorporate the Vullan Fields, a section of land to the northwest of Bride Road (approximately 27.25 acres) which had been designated for future development within the Ramsey Local Plan 1998 albeit subject to the completion of development brief for the whole area in similar fashion to that for the West Ramsey Development area. Although the land has been designated for development within the Ramsey Town Plan 1998 no applications for development have been progressed, nor has any development brief been prepared. These fields now comprise the largest single undeveloped area of land designated for development within the Town boundary which is not compromised by flood risk. The Draft Area Plan for the North and West proposes removing this area for development.

To the north of the Town Government has developed Balladoole Sewerage Treatment Plant, this accepts sewerage from Ramsey, Glen Auldyn and Andreas Village areas for treatment and discharge of treated effluent via the sea outfall situated on the north Ramsey beach.

The Northern Civic Amenity Site is adjacent to the sewerage treatment plant; this is operated by a sub-committee of the Ramsey Town Commissioners in collaboration with, and comprising representatives of, the other northern local authorities. The site is effectively managed by Ramsey Town Commissioners' officers and staffed by the Commission utilising its wider workforce to ensure continuity of operation and to provide staff resource during periods of leave or other absence. The site operation is identified by users as being under the management of the Ramsey Town Commissioners, evident from the referral of enquiries related to the site being made through the Town Hall.

The Civic Amenity Site is funded entirely by local authority rates with the contribution of Ramsey Town residents representing 53.27% of the net annual operating estimate for 2022-23 financial year, in comparison with a contribution of 8.16% from Lezayre Commissioners within whose authority area the site is located.

The following table details the funding proportions for the Northern Civic Amenity Site showing rateable values by authority and the percentage of net operating costs met by each authority.

Contributing Authority	Rateable Value (Dec 2021)	% contribution
Andreas	103,065	7.48%
Ballaugh	78,484	5.70%
Bride	204,643	14.86%
Jurby	58,910	4.28%
Lezayre	112,416	8.16%
Maughold	85,985	6.24%
Ramsey	733,671	53.27%
Totals	1,377,174	100%

Community

There is a cluster of residential development within the area in the area of the Dhoor, approximately 330 metres outside the existing town boundary, the Commission recognises that there is clear agricultural land between the Dhoor and the town and that the Dhoor does not at this time present itself as either overspill or a natural extension of the Town.

Ribbon development also exists along both sides of the Jurby Road which by its nature may be seen as an extension of the Town, certainly it is not abundantly clear where the boundary is and a person without knowledge travelling west on Jurby Road might not perceive the transition from Town to country, with reduced density development continuing until the entrance to the Mountain View Innovation Centre where they would encounter open fields.

The Commission feels that development along Jurby Road to Mountain View Innovation Centre is part of the Ramsey community and identifies as such.

Services

Dhoor Chapel was closed in 1979 and converted to a residential property. The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The nearest Church of England and Methodist facilities for congregation members are either St. Paul's Church or St Olave's Church both of which are located within the existing Town Boundary of Ramsey.

It is understood that the majority of property outside the Town boundary is not connected to the main sewerage system and will be served by individual septic tanks, although the Grest Home is connected to the mains sewerage system.

The proximity of the area to the Town is such that residents will use the shops, restaurants and other services provided there.

Overspill

The existing development at the Dhoor does not appear to represent overspill from the main Town, however future take up of land between the Dhoor and the Town, which was been proposed as part of the call for Sites for the Northern Area Plan could result in the areas becoming co-joined at which time it might be argued that overspill exists, and development represents an extension of the Town. At present however the Commission does not feel that property at the Dhoor could be considered overspill from Ramsey.

Development along the Jurby Road beyond Cronk Mayn Beg and Creg Malin, both of which are located within the existing boundary, is seen as ribbon development and an extension of the existing community. This development continues as far as Baldroma Beg and the former film studios. It is usual for development on the outskirts of Towns to provide a transition between the countryside and the urban area through lower density development which it is felt is seen in the existing development on Jurby Road.

Physical Boundaries

See table below.

Acreage for Development

The area to the north of the Sulby River is distinct in that it is not identified as being at flood risk. As such it presents the most suitable direction of development for further housing or other development which might include amenity facilities and employment land (i.e. light industrial/business use). Land between Andreas Road and Bride Road, adjacent to existing development, could be accessed from Andreas Road, Bride Road and Thornhill Park, it has the advantage of being outside the TT course with good transport links to the Town both for private vehicles and by public transport.

Balance of Advantage

See table below

(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;

NORTH RAMSEY AREA

The land identified within this area abuts the existing town boundary although they are predominantly un-developed any new development undertaken would undoubtedly be seen as an extension of the community of Ramsey. Any Development in the North of the Island depends on Ramsey as a service centre. Development in this area would clearly be seen to be an extension of Ramsey and benefit from the services and community that Ramsey provides. Any development in this area would be linked to Ramsey physically and emotionally. The Commission recognises that property at the Dhoor presently is distanced from and unlikely to be seen as part of the Ramsey community.

- Schools – The area is presently within the junior school catchment for Sulby School. All secondary education is provided at Ramsey Grammar School.
- Youth Clubs /Scout/Guide/Army Cadet groups – there are no youth clubs within Lezayre Parish. Youth facilities are provided from the Bunscoill Rhumsaa, and at Waterloo Road in Ramsey, Scout and Guide Groups along with Army Cadets all operate within the Town.
- Play facilities – children play areas and other facilities are in abundance within the Town, there are no easily accessible parish facilities.
- Sports Facilities – There are few sports facilities outside the Town and as such it is highly likely that engagement in formal sporting activity is in the main achieved through utilisation of opportunities provided within Ramsey Town.
- Drainage – This area is ideally located to link into the main sewer network that serves Ramsey and is treated to then discharge through the Town's sewerage system into the north Ramsey Bay.
- Churches - The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The Chapel at the Dhoor closed in the 1970's and is now residential accommodation. St Olave's Church, North Ramsey is the nearest Church of England church. Our Lady Star of the Sea and St Maughold's Church is the only Roman

Catholic church in the north of the Island and Ramsey provides places of worship for Methodist and other denominations.

- Retail and other accessible Government services are provided within Ramsey.
- Doctors, the Cottage Hospital, and Dentists are located with the existing town and will be relied upon by residents of the area and will serve the needs of future development.

(3) that the area sought is an overspill or outgrowth of the promoter's area;

The land in Lezayre to the north of Ramsey's northern boundary is a natural extension to the town boundary. According to the Draft Area Plan for the North and West there is almost no remaining land for development. This land although north of the Sulby river and crossing points represents the natural progression of the town boundary. The Civic amenity site and sewage treatment works to the north of this area effectively delineate the northern most boundary of this development area.

(4) that, wherever possible, clear physical boundaries are followed;

Balladoole farm lane to the north defines the extent of the proposed boundary extension to the north, Jurby Road defines the extent of the boundary to the south. The field boundaries define the intervening boundaries. The boundary line is purposefully brought round the properties at the Dhoor as the ribbon settlement at the Dhoor forms part of its own small settlement.

(5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;

Development in Ramsey has all but been exhausted available sites provided for within the existing Town Plan. Those lands that remain undeveloped comprise either sites in identified flood risk areas, or areas proposed to be excluded for development within the Draft Area Plan for the North and West.

(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

Any development of this land to the north of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary. The land is not zoned but may well become zoned for development and the expansion the Island's population and thus Ramsey's population in the Island Economic Strategy that looks to have 100,000 people living on the Isle of Man. The Draft Area Plan for the North and West does not include development land in this area, there is however to be a

various ways to the local
authority by whom they are now
governed;

new All Island Development plan in place by 2026. This boundary extension is forward looking and
looking forward a minimum of 30 years.

WEST RAMSEY AREA

For the purpose of this report the area comprises land in Lezayre situated between the Jurby Road and Lezayre Road to include the field north of Glen Auldyn Road below Sky Hill, identified in the plan at Appendix 7.

Community

There is little existing development at the present time, however development potential exists and the lands, abutting to the existing town boundary, would require to be serviced by the town's infrastructure and would essentially form an extension of the existing community.

Services

The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The Chapel at St Fingan's (Glen Auldyn) was closed in 2018 due to structural and electrical problems. Services previously held at St Fingan's Chapel, Glen Auldyn are now held at St Olave's Church, North Ramsey. The nearest Church of England or Methodist facilities for congregation members will be either St. Paul's Church or St Olave's Church both of which are in Ramsey.

Development in the area could be linked to mains services provided from the Town including sewerage, water, electricity and gas. The proximity to the Town is such that future residents will use the shops, restaurants and other services provided there. Development of family housing, which is the type in most demand, will mean that children would be directed to the Ramsey schools as being those with the most suitable capacity to accommodate such.

Overspill

Ribbon development exists along both sides of the Jurby Road which by its nature may be seen as an extension of the Town, certainly 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.

There is little other existing development in the area at present; however areas of land are zoned for future development which would be seen to constitute overspill or an extension of the existing Town development. The area comprises lands identified within the West Ramsey Development Framework 2004. The Framework, which was approved by Tynwald, makes reference to the development to the west of the Town Boundary, into the area now proposed to be redesignated as being within the Town, clearly indicating the long term expectation (at that time) that the area would form part of Ramsey once developed as further implied by its inclusion within the overall area covered by the Ramsey Town Plan and the West Ramsey Development Framework 2004, which states:-

5.6 The land in the Parish of Lezayre beyond the Town boundary (as notated "7" on the key diagram) that is zoned on the 1982 Development Plan will, in the long term, form

the edge of the Ramsey. The long-term development of this area should result in the creation of an attractive landscaped transition between the countryside and the urban area.

Physical Boundaries

See table below

Acreage for Development

The area comprises lands identified for future development within the Isle of Man Planning Scheme (Development Plan) Order 1982, the Isle of Man Planning Scheme (Ramsey Local Plan)(No.2) Order 1998, and the West Ramsey Development Framework 2004. The area designated for development directly abuts the existing Town boundary such that it might be considered to be a natural extension of the Town.

Land to the south of Jurby Road running down to the Sulby River has potential for future development extending existing development toward the Mountain View Innovation Centre.

Balance of Advantage

See table below

(1) that the promoter's area and the area/s sought are really one community;

WEST RAMSEY AREA

The land identified within this area abuts the existing town boundary although they are predominantly un-developed any new development undertaken would undoubtedly be seen as an extension of the community of Ramsey. Any Development in the North of the Island depends on Ramsey as a service centre. Development in this area would clearly be seen to be an extension of Ramsey and benefit from the services and community that Ramsey provides. Any development in this area would be linked to Ramsey physically and emotionally.

The Draft Area Plan for the North and West has highlighted a development area to the south of this area, indeed it is the only development opportunity within the Ramsey area but it is in Lezayre. The development land sits just a few meters outside the current town boundary and would be clearly linked to Ramsey by roads and paths leading to a sense of community with the town of Ramsey.

The area to the north of the Sulby river in this West Area is dominated by the former film studios now the Innovation Centre, already this area is in many peoples view part of Ramsey and its inclusion in the town would confirm a clear boundary to the town and regularise people's perceptions.

(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;

- Schools – The area is presently within the junior school catchment for Sulby School. All secondary education is provided at Ramsey Grammar School.
- Youth Clubs /Scout/Guide groups – there are no youth clubs within Lezayre Parish. Youth facilities are provided from the Bunscoill Rhumsaa, and at Waterloo Road in Ramsey, Scout and Guide Groups along with Army Cadets all operate within the Town.
- Play facilities – children play areas and other facilities are in abundance within the Town, there are no parish facilities and therefore existing residents and any future development will benefit from facilities provided within the Town already.
- Sports Facilities – There are few sports facilities outside the Town and as such it is highly likely that engagement in formal sporting activity is in the main achieved through utilisation of opportunities provided within Ramsey Town.

- Drainage –The mains sewer feeds directly into the sewerage system serving Ramsey and did, until recently, discharge through the Town's sewerage system into the north Ramsey Bay. Since the introduction of the Balladoole Sewerage Treatment Plant sewerage from any development abutting the existing town will join into the existing system and be brought through the town to Balladoole for treatment..
- Churches - The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The Chapel at St Fingan's (Glen Auldyn) was closed in 2018 due to structural and electrical problems. Services previously held at St Fingan's Chapel, Glen Auldyn are now held at St Olave's Church, North Ramsey. The nearest Church of England or Methodist facilities for congregation members will be either St. Paul's Church or St Olave's Church both of which are in Ramsey.
- Retail and other accessible Government services are provided within Ramsey.
- Doctors, the Cottage Hospital, and Dentists are located with the existing town and will be relied upon by residents of the area and will serve the needs of future development.

(3) that the area sought is an overspill or outgrowth of the promoter's area;

The land in Lezayre to the west of Ramsey's western boundary is a natural extension to the town boundary. The Draft Area Plan for the North and West has highlighted a development area to the south of this area; indeed it is the only development opportunity within the Ramsey area but it is in Lezayre. This clearly demonstrates that this area would be an overspill and outgrowth of Ramsey. The development land sits just a few meters outside the current town boundary and would be clearly linked to Ramsey by roads and paths leading to a sense of community with the town of Ramsey.

The land to the north of this area dominated by the Innovation Centre is clearly an overspill of the town boundary along Jurby Road.

<p>(4) that, wherever possible, clear physical boundaries are followed;</p>	<p>The northern border to this area is Jurby Road, this is a continuance of the Northern Area of this boundary extension plan. The western boundary follows field boundaries, the Sulby River and once again field boundaries. The southern border of this area is defined by Lezayre Road.</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>Development in Ramsey has all but been exhausted available sites provided for within the existing Town Plan. Those lands that remain undeveloped comprise either sites in identified flood risk areas, or areas proposed to be excluded for development within the Draft Area Plan for the North and West.</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>Any development of this land to the west of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary. The land is not zoned but may well become zoned for development and the expansion the Island's population and thus Ramsey's population in the Island Economic Strategy that looks to have 100,000 people living on the Isle of Man. The Draft Area Plan for the North and West does not include development land in this area, there is however to be a new All Island Development plan in place by 2026. This boundary extension is forward looking and looking forward a minimum of 30 years.</p>

GLEN AULDYN AREA

For the purpose of this report the area comprises land in Lezayre Parish situated within Glen Auldyn identified in the plan at Appendix 8.

Community

There are 97 properties within Glen Auldyn. The area includes the Milntown Estate the entrance to which is taken off Lezayre Road within the existing Town Boundary, although all exiting traffic exits onto the Glen Auldyn Road. The Glen has developed for private housing with the eastern part "Fern Glen" once being operated as a tourist attraction fed by tourists staying in Ramsey during the Victorian heydays of tourism.

At the time of the last boundary extension a proposal to include Glen Auldyn was rejected, the inspector at the time, His Honour Deemster Luft, did not accept that there was a community of interests between these areas, where a large number of residents of Glen Auldyn were opposed to the proposed boundary extension undoubtedly due to the potential impact of rate increase. Since that time substantial development in Ramsey has reached as far as the existing town boundary along Lezayre Road and the Auldyn River so that there is virtually no separation between the town and Glen Auldyn.

Historically Glen Auldyn comprised a special drainage district, in contrast to other rural areas the Glen is served by a mains sewerage system which feeds into the Ramsey Town system where in the past it would have discharged directly to the sea via the Vollan outfall. In recent years all sewerage from the town, Glen Auldyn and Andreas Village are collected for treatment at Balladoole with treated effluent then being discharged to Ramsey Bay at Mooragh Promenade.

In regard to Glen Auldyn it is contended that the properties there already benefit from the services provided within the Town, that there is little physical separation between Glen Auldyn and the Town with town development now reaching the current boundary. The glen and the properties there are well within walking distance of the schools, shops and local amenities offered by the town. Glen Auldyn is no longer separated and is effectively now an extension of the Ramsey community both in a physical sense and in that the area draws on retail and other services provided within Ramsey.

Residents in the area already identify its association with the town, for example property marketed for sale is often identified as being within Ramsey, in practice any perceived separate identity is influenced purely by the variation in rates charges, and not by any other factors.

The extension of the boundary to incorporate the wider development area to the west of the Auldyn River which is zoned for future development within the Isle of Man Development Plan 1982, and referenced within the West Ramsey Development Framework 2004, would impact considerably on this position with Glen Auldyn Road discharging within the town area and no longer outside any boundary.

Services –

- Schools – Glen Auldyn is presently within the junior school catchment for Sulby School. All secondary education is provided at Ramsey Grammar School.

- Youth Clubs /Scout/Guide groups – there are no youth clubs within Lezayre Parish. Youth facilities are provided from the Bunscoil Rhumsaa, and at Waterloo Road in Ramsey, Scout and Guide Groups along with Army Cadets all operate within the Town.
- Play facilities – children play areas and other facilities are in abundance within the Town, there are no parish facilities and therefore residents of Glen Auldyn will be benefiting from facilities provided within the Town already.
- Sports Facilities – There are few sports facilities outside the Town and as such it is highly likely that engagement in formal sporting activity is in the main achieved through utilisation of opportunities provided within Ramsey Town.
- Drainage – Glen Auldyn is serviced by a mains sewer system which was originally established under the Glen Auldyn Drainage District Order 1954, this Order was revoked by the Parish of Lezayre Special Drainage District Order 1997. The mains sewer feeds directly into the sewerage system serving Ramsey and did, until recently, discharge through the Town's sewerage system into the north Ramsey bay. Since the introduction of the Balladoole Sewerage Treatment Plant sewerage from Glen Auldyn is pumped both at Riverside and the Vollen through the Town sewerage system to treatment at Balladoole north of Ramsey.
- Churches - The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The Chapel at St Fingan's (Glen Auldyn) was closed in 2018 due to structural and electrical problems. Services previously held at St Fingan's Chapel, Glen Auldyn are now held at St Olave Church, North Ramsey. The nearest Church of England or Methodist facilities for congregation members will be either St. Paul's Church or St Olave's Church both of which are in Ramsey.
- Retail and other services are in the main provided within Ramsey.
- The Glen Auldyn Road junction is located on Lezayre Road; the existing Town boundary is opposite the junction on the north side of the road, with the boundary on the south side of Lezayre Road being located approximately 1/5 mile (320 metres) to the east. The pedestrian link to the Town centre is serviced with public street lighting on the north side of the road provided by Ramsey Town Commissioners from the Gardeners Lane junction into the Town.

The area is predominantly associated with Ramsey, anyone accessing services, shops etc. will undoubtedly do so within the Town and it is unlikely that anyone from the area would access services which might be provided in Lezayre.

Overspill

Development at Glen Auldyn is separated from the Town by the Milntown Estate and Ramsey Golf Course. Glen Auldyn Road itself discharges onto Lezayre Road from the south alongside the Auldyn River adjacent to the Town Boundary on the northern side of Lezayre Road. Consideration as to overspill to some extent therefore will be further influenced by the status of the zoned development lands at West Ramsey. In the event that those lands fell within the Town Boundary then the Glen Auldyn Road would

demonstrably be discharging within the Town resulting in an argument that the area was effectively overspill or an extension of the Town.

Physical Boundaries

The area is presently adjacent to the Town boundary; its access road adjoins Lezayre Road just opposite the existing boundary to the north of the Auldyn River Bridge.

Acreage for Development

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

Balance of Advantage

See table below

(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;

GLEN AULDYN AREA

In regard to Glen Auldyn it is contended that the properties there already benefit from the services provided within the Town, that there is little physical separation between Glen Auldyn and the Town with town development now reaching the current boundary. Glen Auldyn is no longer separated and is effectively now an extension of the Ramsey community both in a physical sense and in that the area draws on retail and other services provided within Ramsey. Residents in the area already identify its association with the town, for example property market for sale is often identified as being within Ramsey, in practice any perceived separate identity is influenced purely by the variation in rates charges, and not by any other factors.

- Schools – The area is presently within the junior school catchment for Sulby School. All secondary education is provided at Ramsey Grammar School.
- Youth Clubs /Scout/Guide groups – there are no youth clubs within Lezayre Parish. Youth facilities are provided from the Bunscoil Rhumsaa, and at Waterloo Road in Ramsey, Scout and Guide Groups along with Army Cadets all operate within the Town.
- Play facilities – children play areas and other facilities are in abundance within the Town, there are no parish facilities and therefore existing residents and any future development will benefit from facilities provided within the Town already.
- Sports Facilities – There are few sports facilities outside the Town and as such it is highly likely that engagement in formal sporting activity is in the main achieved through utilisation of opportunities provided within Ramsey Town.
- It should be noted that Ramsey Golf Course spans through Ramsey, Lezayre and Garff, however in order to play the course you must leave the other Parishes and enter Ramsey.
- Drainage –The mains sewer feeds directly into the sewerage system serving Ramsey and did, until recently, discharge through the town's sewerage system into the north Ramsey Bay. Sewerage from properties in Glen Auldyn joins the town's mains system and is taken to Balladoole for treatment.

- Churches - The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The Chapel at St Fingan's (Glen Auldyn) was closed in 2018 due to structural and electrical problems. Services previously held at St Fingan's Chapel, Glen Auldyn are now held at St Olave's Church, North Ramsey. The nearest Church of England or Methodist facilities for congregation members will be either St. Paul's Church or St Olave's Church both of which are in Ramsey.
- Retail and other accessible Government services are provided within Ramsey, the proximity of the town to Glen Auldyn makes it the primary local retail location.
- Doctors, the Cottage Hospital, and Dentists are located with the existing town and will be relied upon by residents of Glen Auldyn.

(3) that the area sought is an overspill or outgrowth of the promoter's area;

Glen Auldyn sits on the boundary of Ramsey and it relies upon Ramsey for almost all of its services. As Ramsey has grown from its humble beginnings in 1865 the community of Ramsey and Glen Auldyn have become ever closer. The golf course being the main feature that has stopped development co-joining Glen Auldyn and the Town. With the changes to the town boundary in 1992 and the proposed plans for development to the west of Ramsey on the fields bordering Lezayre Road, Glen Auldyn is now an overspill/ outgrowth area of Ramsey.

The facilities and community facilities are very limited in Glen Auldyn but are plentiful and easily accessible within Ramsey for the residents of Glen Auldyn.

(4) that, wherever possible, clear physical boundaries are followed;

To northern border to this area is the Lezayre Road where development on the border of Ramsey is already planned. The Western and Southern Boundaries are defined by the shape of the valleys that form the Glen. The Eastern boundary to this area is defined by the Garff boundary.

(5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;

Development in Ramsey has all but been exhausted available sites provided for within the existing Town Plan. Those lands that remain undeveloped comprise either sites in identified flood risk areas, or areas proposed to be excluded for development within the Draft Area Plan for the North and West.

The proposed extension will mean that Glen Auldyn is bordered by Ramsey on 2 sides and that access to Glen Auldyn will be through Ramsey.

(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;

Any development of this land to the west of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary. The land is not zoned but may well become zoned for development and the expansion the Island's population and thus Ramsey's population in the Island Economic Strategy that looks to have 100,000 people living on the Isle of Man. The Draft Area Plan for the North and West does not include development land in this area, there is however to be a new All Island Development plan in place by 2026. This boundary extension is forward looking and looking forward a minimum of 30 years.

SOUTH RAMSEY AREA

For the purpose of this report the area comprises land in Lezayre and Garff situated between Glen Auldyn and the coastline south of Ramsey as shown in the map at Appendix 9.

Community

There is little development in the area, other than ribbon development south from the Town Boundary at Ballure Road, which could be considered part of the community.

A small pocket of residential development is present beyond the existing Town boundary on Crossags Lane. The Lane is a "dead end" with vehicular access only available from within Ramsey off Lezayre Road. Refuse collection for these properties is presently provided by Garff Commissioners, access is difficult and remote from the parish area; properties at the lower part of the lane are within Ramsey and serviced by the Ramsey Town Commissioners.

The properties on Crossags Lane, whilst beyond the existing Town boundary, are considered an extension of the community of Ramsey as access to them is physically only possible from the Town, in effect anyone travelling from those properties must enter Ramsey before they can gain access to any other parts of the parish within which they are located or any services provided by the community of those parishes. It follows also that residents in those properties will be more likely to utilise community facilities in the town rather than choose to travel outside the Town.

The area includes part of the afforested land at Lhergy Frissell, this land is owned by the Ramsey Town Commissioners, although located within Garff, as can be seen within the following title plan showing Ramsey Town Commissioners own land to the south of the Mountain Road which is presently outside the Town boundary. The land is presently located in Garff Parish however is in the ownership of Ramsey Town, the area is leased to DEFA as a national glen access to which is taken directly from the Town at Ballure Road, Claghbane Walk and the Hairpin.



This includes the Albert Tower. The tower is inscribed "*This Tower, Erected On The Spot Where H.R.H. Prince Albert Stood To View Ramsey And Its Neighbourhood During The Visit Of Her Most Gracious Majesty Queen Victoria To Ramsey Bay, The 20th September, 1847*". The foundation stone to the tower has beneath it a sealed bottle containing the following inscription "*The First Stone Of A Tower, Erected By The Loyal Lieges Of The Isle Of Man, To Commemorate The Auspicious Visit Of Her Most Gracious Majesty Queen Victoria To The Shores Of This Island, And The Landing Of His Royal Highness The Prince Consort, Albert, At Ramsey, On The 20th Day Of September, 1847, Was Laid By Mrs. Eden, The Lady Of The Honourable And Right Reverend Robert John Eden, D.D., Lord Bishop Of Sodor And Man, On The 24th Day Of April, 1848.*"

The Tower was vested in the Town Commissioners by virtue of the Ramsey Town Act 1970, and subsequently transferred to the safekeeping of the Government Property Trustees (now the Department of Infrastructure) its image is widely associated with the town forming the centre of the Town Crest since the town's incorporation in 1865.

Services

The area is in the majority only accessible from Ramsey, anyone accessing services, shops etc. would have to pass into the Town and it is unlikely that anyone from the area would pass through the Town of Ramsey in Order to access services which might be provided within Garff or Lezayre. It is contended therefore that those properties already benefit from the services provided within the Town.

Overspill

Existing and any future properties on Crossags Lane are considered an extension of, and overspill from, the Town of Ramsey as they are only accessible from the Town itself.

Physical Boundaries

See table below

Acreage for Development

The area of development potential is predominantly Golf Course, plus areas of hill land and afforestation where it is unlikely that development would be permissible. In the unlikely event that if any future development of the golf course were permitted access would only be possible from within the Town and such would clearly be an extension of the existing community.

Balance of Advantage

See table below

SOUTH RAMSEY AREA

(1) that the promoter's area and the area /s sought are really one community;

The area comprises land historically owned by the Ramsey Town Commissioners at Lhergy Frizzell forming part of the recreation areas of Cloughbane and the Ramsey Forest, together with properties and lands accessible only from Crossags Lane. Access to these areas is predominantly taken from the Ramsey Hairpin or Crossags lane both of which are strongly associated with Ramsey. A section of Ramsey Golf Course is in Garff; however the club house and facilities are in Ramsey and play can only start from the club house, rendering this area inaccessible to Garff without first starting in Ramsey.

(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;

It should be noted that there are only approximately 4 residential properties impacted by this change and they are located at the top of Crossags Lane. All vehicular access to these properties is along Crossags Lane and access to Garff is through Ramsey, for completeness:-

- Schools – The area is presently within the junior school catchment for Sulby School. All secondary education is provided at Ramsey Grammar School.
- Youth Clubs /Scout/Guide groups – there are no youth clubs within Lezayre Parish. Youth facilities are provided from the Bunscoil Rhumasa, and at Waterloo Road in Ramsey, Scout and Guide Groups along with Army Cadets all operate within the Town.
- Play facilities – children play areas and other facilities are in abundance within the Town, there are no parish facilities and therefore existing residents and any future development will benefit from facilities provided within the Town already.
- Sports Facilities – There are few sports facilities outside the Town and as such it is highly likely that engagement in formal sporting activity is in the main achieved through utilisation of opportunities provided within Ramsey Town.
- Drainage –it is understood that the properties currently have septic tanks.
- Churches - The former parish church of Lezayre was closed for regular public worship on 1st November 2013 by the Lezayre Pastoral Scheme 2013. The Chapel at St Fingan's (Glen Auldyn) was closed in 2018 due to structural and electrical problems. Services previously held at St Fingan's Chapel, Glen Auldyn are now held at St Olave's Church, North Ramsey. The nearest

Church of England or Methodist facilities for congregation members will be either St. Paul's Church or St Olave's Church both of which are in Ramsey.

- Retail and other accessible Government services are provided within Ramsey.
- Doctors, the Cottage Hospital, and Dentists are located with the existing town and will be relied upon by residents of the area and will serve the needs of future development.

(3) that the area sought is an overspill or outgrowth of the promoter's area;

The area in Garff is a regularisation of land around the southern boundary of Ramsey. A considerable part of the land being in the ownership of Ramsey. It is not proposed that there are any developments on this land but that this land continues to be used for recreation by all residents of the Isle of Man. Likewise, Ramsey Golf Course is currently split between 3 areas Ramsey, Garff and Lezayre this should be regularised. The topography of the land and steep north facing slopes mean that this area is not a development area but naturally part of Ramsey as it is at the base of the hills.

(4) that, wherever possible, clear physical boundaries are followed;

The eastern boundary of the area is defined by the A2 Mountain Road. The southern boundary is defined at its intersection with the Mountain Road by the farm lane (which is a Public Right of Way (No. 502)) this links at a similar level to Elfin Glen and Public Right of Way 355. The proposed boundary encloses Elfin Glen. It then runs almost due west along the tree line before turning south west following field lines to meet with the Glen Auldyn Area boundary.

(5) that there is insufficient acreage left for the development of Plan the promoter's area within its borders and injury is suffered thereby;

Development in Ramsey has all but been exhausted available sites provided for within the existing Town of Plan. Those lands that remain undeveloped comprise either sites in identified flood risk areas, or areas proposed to be excluded for development within the Draft Area Plan for the North and West.

As previously noted this area is about regularisation and creating a sympathetic boarder with the Glen Auldyn area, and not about development land.

(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;

This land is on the very border with Ramsey a significant proportion of which is owned by Ramsey. This area is an important area for Ramsey in terms of forest, glen and leisure. Ramsey Town Commissioners are keen to exploit and use this area of land on its door step for leisure tourism and the enjoyment of the Manx people. With plans to increase the population to 100,000 areas for leisure and must be enhanced and enjoyed.

This boundary extension is forward looking and looking forward a minimum of 30 years.

8. Consultation with Neighbouring Authorities

The process for Boundary Extension includes a requirement to discuss the boundary extension with neighbouring authorities who may be impacted by the proposals. Consideration will therefore need to be given to meeting with both Lezayre and Garff Parish Authorities to explain the Commission's proposals.

The Town Clerk met with the respective Clerks of both Lezayre and Garff and has confirmed those discussions in writing to both authorities by letters dated 29th September 2020 and 30th September 2020 respectively.

The Commission has also met separately with the Commissioners for Lezayre Parish and Garff Parish District. The individual authorities whilst engaged in constructive dialogue have remained opposed to the proposal with Lezayre Commissioners being concerned about the financial impact upon the parish and the combination authorities as a consequence of the proposal to incorporate Glen Auldyn within the revised boundary, and Garff Commissioners opposing the general principle of amending historic boundaries, and the impact on existing Garff residents.

Further meetings with both Lezayre and Garff Commissioners have been held on 16th and 24th August, 2022, respectively, in advance of the Public Inquiry, and following the provisions of draft boundary plans, in 4 areas, by the Department.

9. Physical Boundaries and Balance of Advantage

The criteria for consideration provide that that, wherever possible, clear physical boundaries are followed. *Whilst the Department regards these as highly likely to be obvious the Chief Minister has said that these include matters of topography such as roads, rivers, hedges and other natural features of an area known or understood locally.*

The criteria also seeks 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. The Department indicates in its guidance that it considers this to be entirely a matter of judgement.

In reviewing the Town boundary, having considered the application of all the other criteria to the four areas identified within this report, the Ramsey Town Commissioners have considered the question of land use designation under the Town and Country Planning Acts, and the suitability of lands for future development, the impact of flood risk mapping.

The Commissioners recognise that development opportunity, outside existing land designation, exists primarily to the immediate north and west of the town and have sought to identify and follow clearly physical boundary lines created by rivers, roads, plantation boundaries etc. to establish sufficient capacity to enable a green belt or graduation in future development into the surrounding countryside. The Commissioners recognise that boundaries will not be determined by a sharp start or stop of development and that the transition from town to country should be gradual and have sought therefore to select clear geographic boundary lines which allow for this transition.

The Ramsey Town Commissioners have sought to establish a clear and long-term boundary with minimal impact on existing development, other than areas considered now to constitute an extension or overspill of the Town and its community. The majority

of the area sought to be incorporated within the proposed boundary is land with potential for future development which would if progressed clearly constitute an extension of the existing community.

Having reviewed the areas considered and applying the criteria provided the Ramsey Town Commissioners believe that the balance of advantage lies in accepting the scheme in recognition that the area proposed provides a long-term boundary with capacity for Town growth, transition of development up to the proposed boundary and enabling future planning for expansion and development.

This process has resulted in the proposals for a revised Town boundary as depicted in the plan annexed hereto as Appendix 10. The specific boundary lines are presented with the Appendices area maps having been prepared at an appropriately accurate scale by the Department of Infrastructure's Mapping Service.

10. Summary

The Ramsey Town Commissioners having considered the question of the Town Boundary in accordance with the criteria provided by the Department request that the Department extend, by Order, the boundary of Ramsey Town, in accordance with the provisions of Section 6 of the Local Government Act 1985.

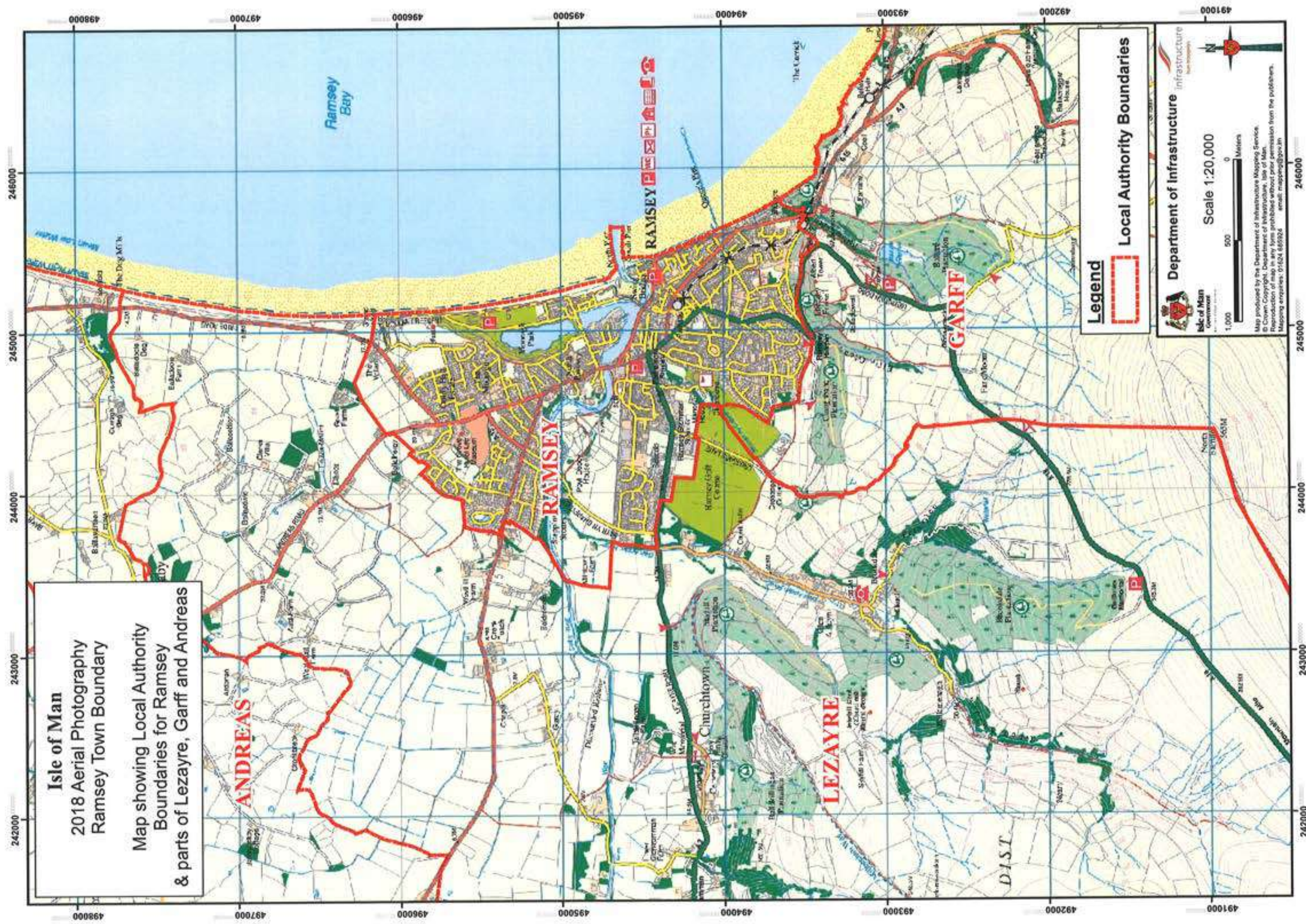
The Commission has sought to consult with neighbouring authorities affected by the proposal and understands that in considering this matter the Department will consult with every local authority whose district is affected by the proposed Order, and that an Inquiry will be held.

In submitting this application, the Commission would like to acknowledge the input of both Lezayre and Garff Commissioners in engaging in discussions on the proposals, and of the Department of Infrastructure for its advice and for the assistance of its Mapping Service in providing maps and aerial photography.

The Commission would be happy to assist in the provision of any further information required.

Appendix 1 – Existing Town Boundary

Isle of Man
2018 Aerial Photography
Ramsey Town Boundary
& parts of Lezayre, Garff and Andreas



Legend

Local Authority Boundaries

Department of Infrastructure

Isle of Man Government

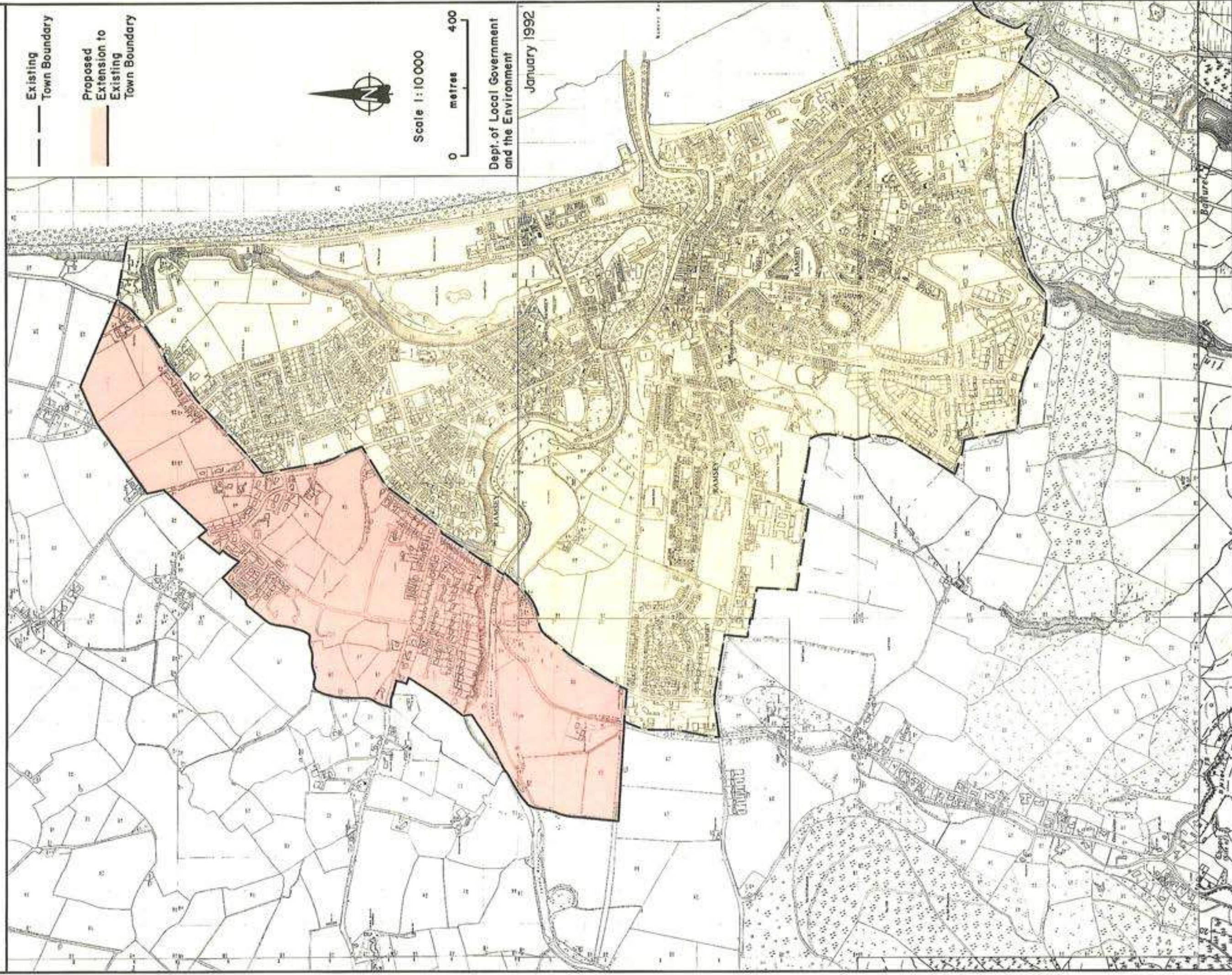
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1,000 500 0 Meters

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Appendix 2 – Area added within 1992 Boundary Extension

**PLAN REFERRED TO
IN THE RAMSEY (BOUNDARY EXTENSION)
ORDER 1992**



Appendix 3 – Extract from the Local Government Act 1985

PART II – ALTERATION OF AREAS ETC.

6 Alteration to boundaries

- (1) The Department may, on the application of the local authority for any district, by Order alter the boundaries of the district.
- (2) Before making an Order under this section, the Department shall consult with every local authority whose district is affected by the proposed Order and shall hold an inquiry.
- (3) An Order under this section may include provision for —
- (a) the number of members of the local authority for any district affected by the Order, and the terms of office of such members;
 - (b) the retirement, election or appointment of members of any existing local authority, joint board, joint committee or other public body in any district or area affected by the Order;
 - (c) the dissolution of any existing joint board, joint committee or other public body in any area affected by the Order;
 - (d) the alteration or abolition of any special district affected by the Order;
 - (e) the vesting in the local authority for any district affected by the Order, of any property, rights, liabilities and obligations of any such body as is mentioned in paragraph (b);
 - (f) the adjustment of any assets and liabilities not provided for under paragraph (e) between any local authorities, joint boards, joint committees and other public bodies in any district or area affected by the Order, in such manner as may be provided for by the Order;
 - (g) the determination by the Department of any matter arising in connection with the subject-matter of the Order;
 - (h) making such incidental, consequential, transitional or supplemental provision as appears to the Department to be necessary or proper for the purposes of the Order.²⁹
- (3A) Without prejudice to subsection (3), an Order under this section may —
- (a) make temporary provision, for such period (not exceeding 10 years) as is specified in the Order, with respect to rates to be levied by any authority mentioned in subsection (3)(f);
 - (b) alter the boundary of any constituency which comprises any district or any part of a district affected by the Order;
 - (c) make transitional provision with respect to the preparation of registers of electors for any constituency, district or ward affected by the Order;
 - (d) cancel or alter any arrangements made for the performance by any authority mentioned in subsection (3)(f) of any functions on behalf of any other public authority;

(e) cancel any contract entered into by any such authority in the performance of any of the functions of the authority, or in pursuance of any arrangements mentioned in paragraph (d), or amend the terms and conditions of such a contract;

(f) provide for any byelaw applying to a district or area affected by the Order to apply to any other district or area so affected, or to any part of such a district or area;

(g) amend or repeal any enactment which appears to the Department to be inconsistent with, or to have become unnecessary or to require modification in consequence of, the Order.

(4) An Order under this section shall not have effect unless it is approved by Tynwald.

(5) Where the Department has refused to make an Order under this section, the applicants for the Order may present a petition to Tynwald praying that such an Order be made; and Tynwald, if it considers that such an Order should be made, may by resolution direct that the Department make such an Order.

Appendix 4 – Town Development to 2021

2021 Aerial Photography

245000

244000

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Isle of Man
Government

Department of Infrastructure



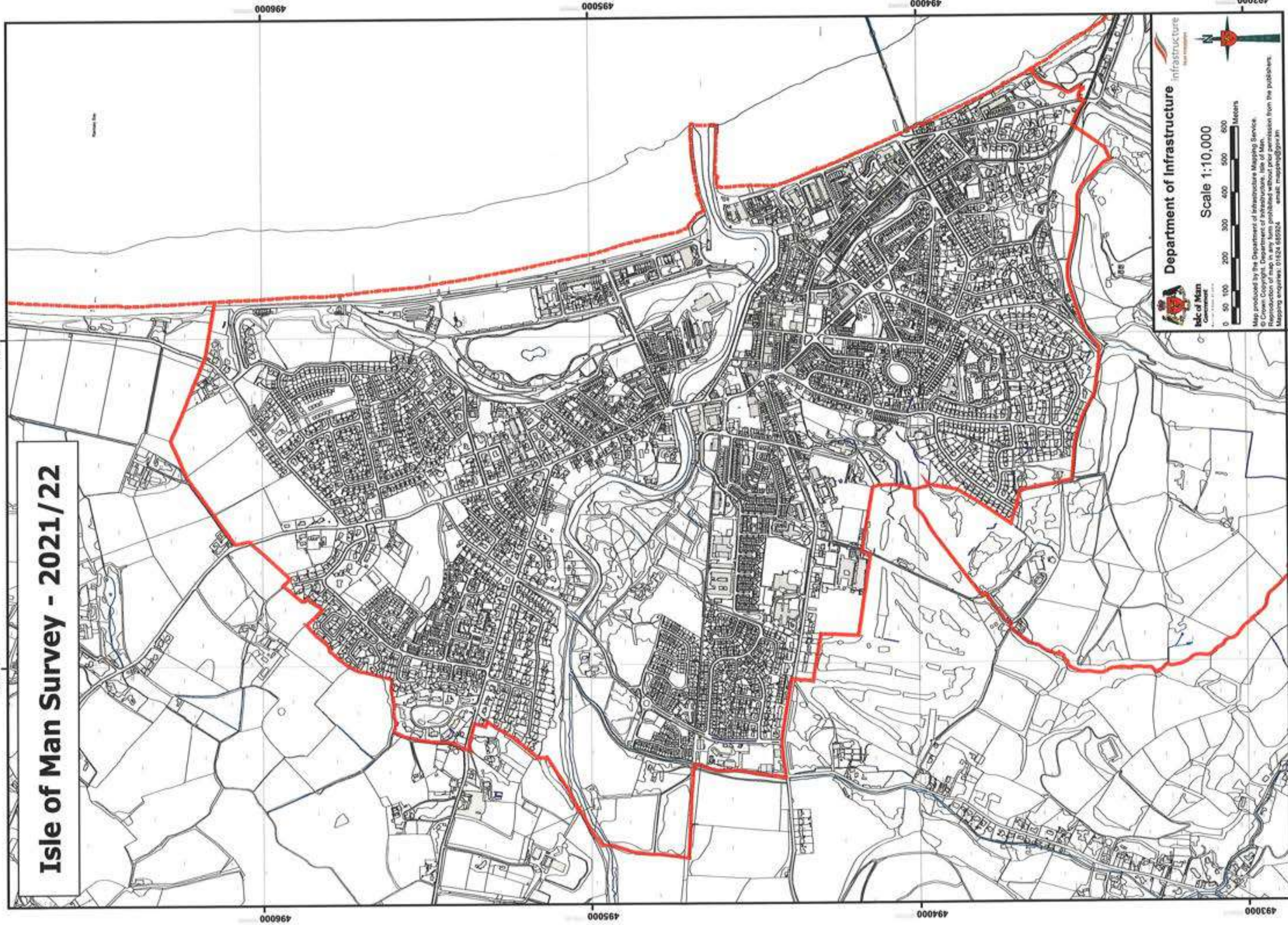
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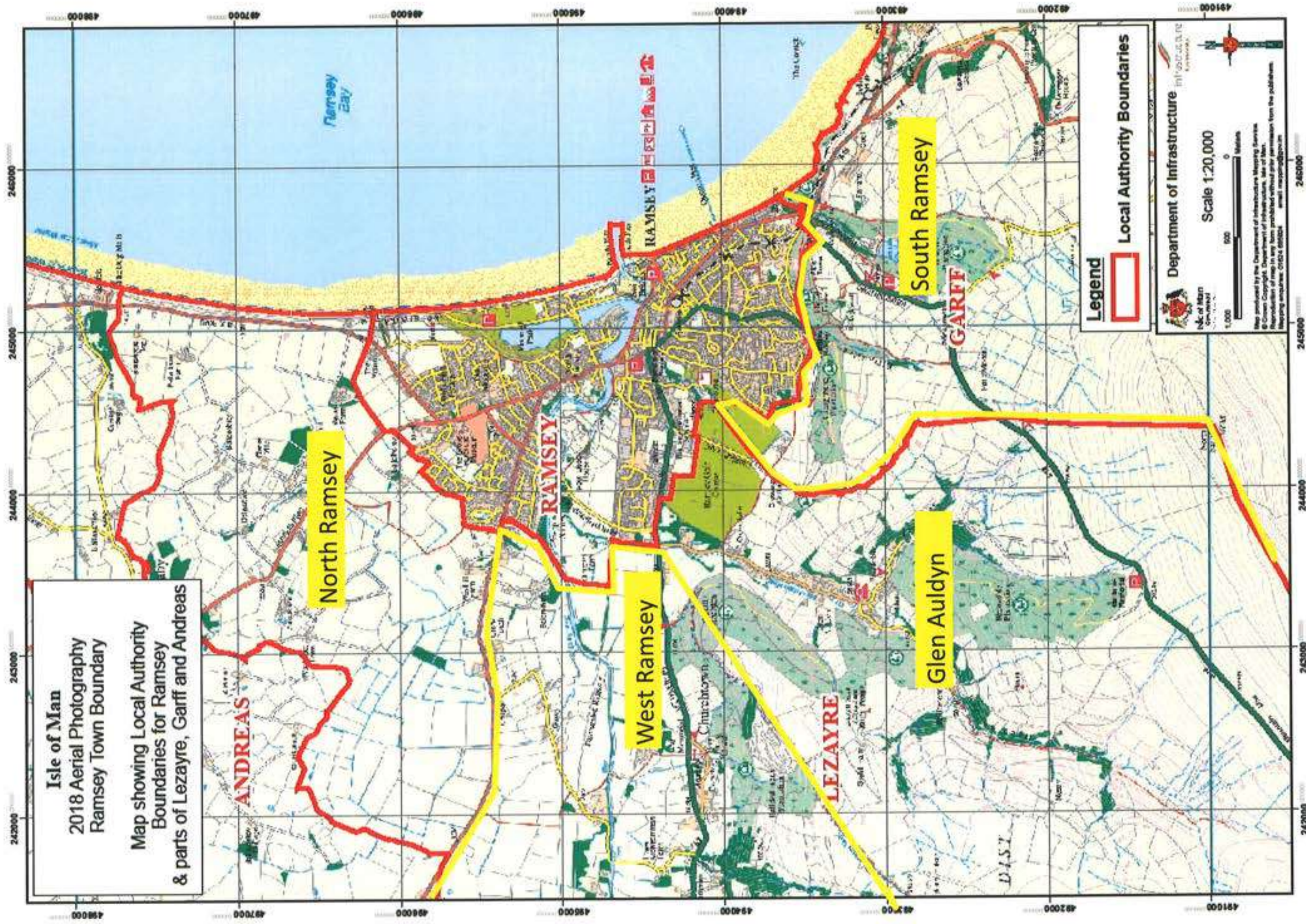
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Isle of Man Survey - 2021/22



Appendix 5 – Areas Considered for Boundary Extension



Appendix 6 – North Area Considered for Boundary Extension

Map Showing:
Proposed Ramsey Town
Boundary Extension Areas

**DRAFT MAP
FOR REVIEW**

North

Legend:
Local Authority Boundaries
Proposed Extension Areas

Department of Infrastructure

Scale 1:4,000

Map Date: 15/03/2024

Map Author: [Name]

Map Reviewer: [Name]

Map Status: Draft

Appendix 7 – West Area Considered for Boundary Extension

Map Showing:
Proposed Ramsey Town
Boundary Extension Areas

DRAFT MAP
CONFIDENTIAL

LEZAYRE

RAMSEY

West

Legend:
Local Authority Boundaries
Proposed Extension Areas
Department of Infrastructure

Scale 1:2,500
North Arrow

Appendix 8 – Glen Auldyn Area Considered for Boundary Extension

Map Showing:
Proposed Ramsey Town
Boundary Extension Areas

DRAFT MAP
CONFIDENTIAL

Glen Auldyn

Legend:

- Local Authority Boundaries
- Proposed Extension Areas
- Department of Infrastructure

Scale: 1:4,000

North Arrow

Appendix 9 – South Area Considered for Boundary Extension

Map Showing:
Proposed Ramsey Town
Boundary Extension Areas

DRAFT MAP
CONFIDENTIAL

South

Legend:
Local Authority Boundaries
Proposed Extension Areas

Department of Infrastructure

Scale 1:1,000

Map Date: 15/05/2024

Map Author: [Name]

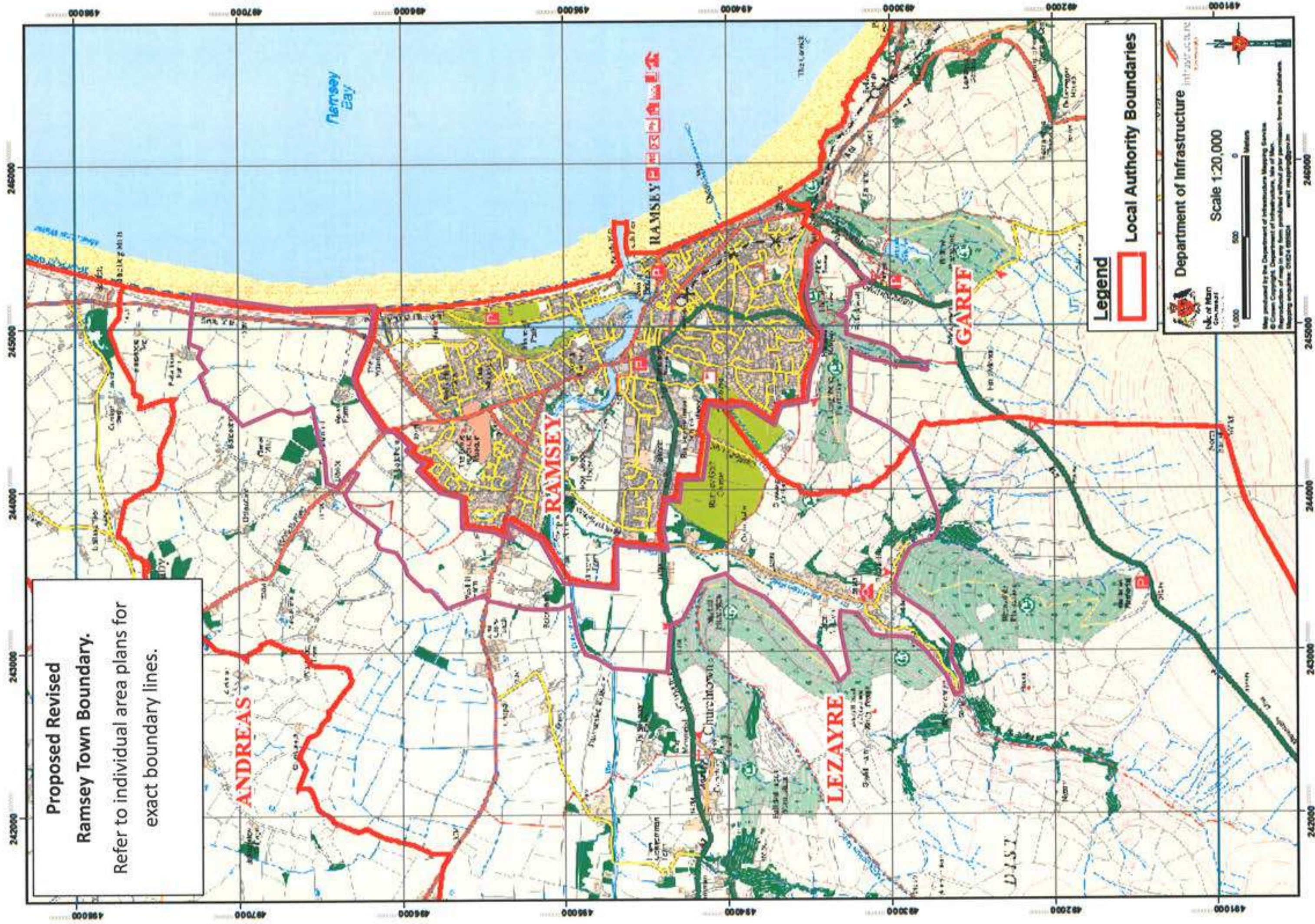
Map Reviewer: [Name]

Map Status: Draft

Appendix 10 – Proposed Revised Ramsey Town Boundary

Note – the boundary is more specifically detailed in the individual areas maps prepared by Department of Infrastructure Mapping as Appendices 6, 7, 8 and 9.

Proposed Revised
Ramsey Town Boundary.
Refer to individual area plans for
exact boundary lines.



Lezayre Parish Commissioners

Response to Ramsey Town Commissioners Boundary Proposal

December 2022

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Appendices:

1. Letter from Lezayre Parish Commissioners to Stephen Willoughby
2. Key diagram of the West Ramsey Framework

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 Auldryn as by taking Glen Auldryn 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 Jukes 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 studies, 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.
3) that the area sought is an overspill or outgrowth of the promoter's area:	<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 "<i>natural extension to the town boundary</i>" is quite ridiculous!</p>
4) that, wherever possible, clear physical boundaries are followed;	<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>
5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is	<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><i>suffered thereby;</i></p>	<p>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 North 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 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 it's 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 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 Jukes 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.

	<ul style="list-style-type: none"> • 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 studies, 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: <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. - Lezayre Church still operates a Church and Arts Centre. It is a charity, run by a committee of
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	<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>
4) that, wherever possible, clear physical boundaries are followed;	<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>
5) that there is insufficient acreage left for the development of the promoter’s area within its borders and injury is suffered thereby;	<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>
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>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 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.</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 Milntown 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 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 Jukes 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 studies, 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> <ul style="list-style-type: none"> - 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. - 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! <ul style="list-style-type: none"> • 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.
3) that the area sought is an overspill or outgrowth of the promoter's area:	The area sought is not an overspill or outgrowth of the promoter's area.
4) That, wherever possible, clear physical boundaries are followed;	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.
5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;	There is ample developmental land within Ramsey and to the north of Ramsey.

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 community halls) 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 studies, 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 Claddaghs 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

	<p>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 if surely follows that to play a full round, you must leave Ramsey and enter the other parishes! <ul style="list-style-type: none"> • Drainage: <ul style="list-style-type: none"> - Properties in the area have septic tanks, there is no mains drainage. • 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 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
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	<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>
3) That the area sought is an overspill or outgrowth of the promoter's area:	<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>
4) That, wherever possible, clear physical boundaries are followed;	<p>All existing greenbelt boundaries should be maintained as they were established for a reason.</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>There are no development sites within this area.</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>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 Auldryn.

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

Mr Stephen Willoughby
Isle of Man Government
Department of Infrastructure
Strategy, Policy and Performance
Local Government Unit
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.

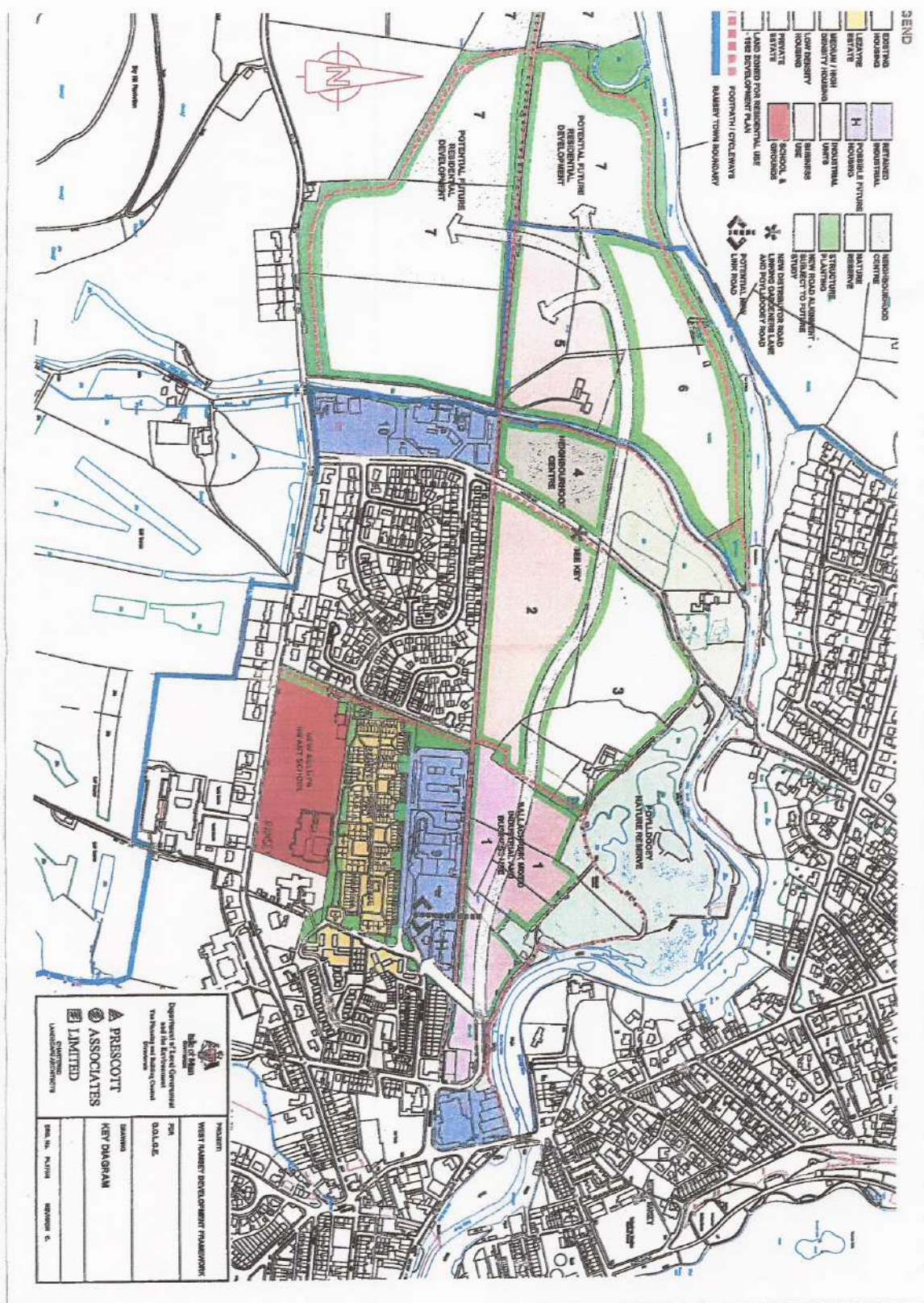
Yours sincerely

M J Rimmer

Maureen Rimmer (Mrs)

Clerk

Lezayre Parish Commissioners



Mr Stephen Willoughby
Local Government Unit
Central Support and Change Division
Department of Infrastructure
Sea Terminal Building
Douglas
IM1 2RF

7th December 2022

Dear Mr Willoughby

Ramsey Town Commissioners - Proposed Boundary Changes and their Applicability to the Six Criteria

Introduction

Garff District Commissioners have considered the report issued by Ramsey Town Commissioners updated in September 2022 and, as requested by the Department wish to submit the following comments which are directly related to the six Criteria as set out in 2004 during the Tynwald debate on the extension of Douglas Town Boundary. Whilst responding in relation to these criteria, Garff District Commissioners wish to state that, in their opinion, these criteria are incomplete and hence somewhat unbalanced; their efficacy would benefit from additional criteria that sought to better include social and community aspects in terms of lifestyle and identification with their rural landscape and surroundings.

In respect of the criteria, it is also the view of the Commissioners that financial matters in relation to local authority rate setting and collection should be considered even though the chosen criteria appear to seek to exclude such matters. The financial implications for individual ratepayers in the communities of Ramsey, Lezayre, and Garff are potentially very significant. The Garff Board feels that without considering the financial implications there is danger that any outcome will be partial, incomplete, and not in the public interest. This is because, in reality, the financial implications will have a long-lasting impact in several areas: on individual ratepayers; the various communities involved; and the operational functioning of each local authority.

It is also the view of the Commission that the timing of Ramsey's application for expansion into both Maughold and Lezayre is premature in view of the ongoing preparation of an Area Plan for the North and West being undertaken by Cabinet Office.

Notwithstanding these opinions, the Commission wishes to proceed and participate fully in the current process and in any subsequent Public Inquiry if the Department deems such progression appropriate and justifiable. The Board of Garff Commissioners wish to submit the following comment.

Consideration of the proposal in terms of the Criteria Set

Criteria (1) & (2)

The reference to "community" in this clause infers the presence of people, whether now or in the future. In the area of the proposed boundary extension into Garff District, there are just two properties situated at the Crossags. Otherwise, the land is extensive open countryside, mainly hill land grazed by sheep, fields, some wetland, and the forested areas (National Glens). This land forms an integral part of dramatic countryside which is continuous, rising from the Crossags to the south-east and south through Claughbane, Lhergy Frissell on to the slopes of North Barrule, its ridge to Clagh Ouyr, and beyond. To appropriate the large area of countryside that Ramsey propose on the basis that there are two properties appears, to the Commissioners, to be stretching the terms and intentions of Criteria (1).

In terms of the 'in-process' Area Plan for the North and West, there are only two fields to the south of Crossags Barn and campsite which have been proposed for assessment and designated residential use as a result of the call for sites: these are referenced GR003 and GR006 in the recently published documents. It is to be noted that these fields are isolated from Ramsey Town and could be termed sites that are sporadic and, in development terms, remote. It should also be noted that even these sites have been rejected in the Area Plan for the North and West-Draft Plan (*Document 'EPD2 All Sites List, Cabinet Office, dated 24 June 2022 – link below*)

<https://www.gov.im/media/1376843/epd2-all-sites-list-final.pdf>

It is the Commissioners opinion that residential development in land in any area of the proposed Garff boundary extension would fail to meet the assessment criteria, e.g. incompatibility with adjacent land uses, failing to maintain the landscape character, impact in visual amenity, and lack of accessibility: there is currently a narrow lane that exits at the Maughold/Ramsey Hairpin on the A2 but any upgrade/development of this would be clearly detrimental to the unique charm and character of the surrounding rural landscape.

Whilst acknowledging the argument put by Ramsey Town Commissioners that a range of services are provided in the town that other communities access, it is worth noting that there are aspects of facility and provision in other areas that residents from elsewhere (including Ramsey) access: this includes businesses, beaches and their facilities, National Glens, etc. The argument could be extended for example to suggest that Ramsey residents have a 'community of interest' with Braddan as they at times access the Island's hospital and with Douglas for the many larger businesses, services and facilities that are provided there. It is to be noted that all the northern local authorities including Ramsey pay a proportionally similar charge for services such as the Northern Swimming Pool and the Civic Amenity site in Lezayre. It is also to be noted that central bodies and organisations fund and administer health and education services and that in terms of the latter primary schooling is provided in both Maughold and Lezayre. Irrespective of which local authority the current properties of Maughold and Glen Auldyn are counted in, the only significant additional burden that will fall (on school and GP provision for example) will be initiated by brand new development in the north.

Conclusion on the applicability of Criteria (1) & (2)

In regard to these criteria, it is, in the opinion of the Commissioners difficult to find direct applicability or justification for the proposed boundary change in the terms and intentions of Criteria (1) and (2).

Criteria (3)

Ramsey themselves state (at Section 4, on page 5 of their report submission dated December 2020) that, "The primary drivers for boundary extensions are the extension of the community through development and availability of development lands."

It is the view of the Commissioners that the wording of Criteria (3) demonstrates that it is intended to address cases where expansion is needed for built development. Notwithstanding

this, it is noted that Ramsey Town Commissioners have included hill and country land in Maughold that is unsuitable and inappropriate for development in their boundary change proposals. In terms of the land, they advise that access is taken to the afforested land directly from the Town, at Ballure Road, Claughbane Walk, and the Maughold/Ramsey Hairpin. Garff Commissioners note, however, that many people from both Ramsey Town, Maughold, Garff District, and from across the Island also access these areas and public footpaths from Ballure or the Hairpin, *both of these access points being in Maughold* and remote from Ramsey Town. The only other access point is from Glen Auldyn in Lezayre: in short, no change will occur to the experience of members of the public entering the area.

By their very rural nature the areas identified for expansion are more compatible with the countryside of Maughold than the built environment of Ramsey, and it is the view of Garff Commissioners that the transition point from countryside to built environment is very well demarcated at the current boundary line. As stated above, the Commissioners have noted that the areas of Maughold hill-land and countryside that Ramsey have expressed interest in appropriating are inconsistent with any development criteria: it is highly unlikely that the Town's built environment would be permitted to be extended into any of the areas of Maughold in which Ramsey have expressed interest.

Conclusion on the applicability of Criteria (3)

It is the view of the Garff District Board that the land cannot be regarded as potential '**development land**' in the terms of Ramsey's own statement above or 'overspill' or 'outgrowth' as stated in the terms of Criteria (3). As with Criteria (1) & (2), it is difficult to find direct applicability or justification for the proposed boundary change in the terms and intentions of Criteria (3).

Criteria (4)

The proposed extension demarcation appears to follow the southern edge of the forested area of Claughbane and Lhergy Frissell, diverting, in the view of the Commissioners, randomly, sporadically and partially, to include land around the Albert Tower, and then turning south halfway along the Claughbane plantation boundary and west across fields, to provide a link with the top of Glen Auldyn. Garff Commissioners question whether these are clear physical boundaries that are of any significant merit or validity. There is a suggestion in the report issued by Ramsey that the boundary extension should progress on the grounds that they own some land in the vicinity. The Commissioners know of no instances where ownership of land has had a bearing on boundary changes and feel that the suggestion is misapplied and is short in terms of relevance to the extensions they propose.

Conclusion on the applicability of Criteria (4)

It is the view of the Commissioners that the more natural boundary line between Ramsey Town and Garff District is predominantly at the current boundary line: these already provide the clearest physical boundaries as required by the terms of Criteria (4); and in any case it is likely that it would not be possible in terms of planning policy, etc to develop the hillside and landscape of the land in Maughold that has been identified by Ramsey Town Commissioners. Thus, the current boundary is a clear and effective transition point as it stands between the townland of Ramsey and the rural landscape of Maughold: to move the transition line and divide the countryside would indeed provide *a more artificial* boundary between Maughold and Ramsey. It is clear that the areas of Maughold have an entirely rural character, and it should also be noted that the properties in Glen Auldyn have a definite rural context rather than town-like character.

It is also interesting to note that the independent body, the Manx Wildlife Trust, have initiated and are undertaking a project in Claughbane Plantation and other rural areas of Maughold

under the ownership of DEFA. It is MWT's intention to create spaces in these areas for the enjoyment of the people of the whole island, and the project is a joint collaboration between the Trust and the Department of Environment, Food, and Agriculture as is indicated in this extract from the MWT Annual Report for 2022:

"In June we had two big breakthroughs. The first was the long-awaited signing of the 99 year lease of Claughbane Plantation. A big thanks to our partners in DEFA who have put in so much effort to make this happen. We now have just two years to turn Claughbane Plantation and our existing adjacent reserve 'Crossags Coppice' into our flagship public engagement site 'MWT Hairpin Woodland Park'. To get this site fully running in two years will be a daunting task, but we have some wonderful partners in DEFA, Milntown, and Douglas Rotary Club to help us".

Garff District Commissioners have expressed themselves very willing to assist the MWT and the Department as they undertake this ongoing project. The Commissioners have undertaken many projects with DEFA throughout Garff and have also undertaken liaison, obtained advice, and completed other undertakings with the Trust itself.

Criteria (5)

This criteria intends to address cases where "there is insufficient acreage left for the development of the promoters' area within its borders..."

In the opinion of Garff Commissioners (and Cabinet Office it seems – through the Area Plan process) that the proposed land is not suitable for development in the future (housing, industrial or business use); which it is stated is the *"primary driver"* for boundary extensions. It should be noted that the land identified has such high landscape value that the intrusion of built or landscaped amenity facilities would be detrimental to the area and not accord with planning policy. It is also unlikely that development of this landscape would be permitted by the Planning Authority on policy grounds; except perhaps sporadically and not in any extended way that would be beneficial to Ramsey Town or its residents; or indeed to any of the Island's residents.

At two inconclusive meetings held with Ramsey Commissioners (in 2020 & in August 2022), Garff Commissioners queried if Ramsey required this land for any purpose. Ramsey were unable to offer any plan for future use of the land, whether for development, for additional amenity, or for any further recreation opportunities: indeed they seemed to make reference to land in Lezayre each time a question was asked.

The inclusion of the land into the boundary of Ramsey Town will provide no further access opportunities to the 'out of town' land which is already used for public enjoyment by residents from all across the Island and whose access points are from Maughold and Lezayre: certainly, there are currently no barriers or restrictions whatsoever on Ramsey residents entering or accessing the large areas of public land that are within the areas that are the subject of the boundary change proposal. Nothing in the experience of visitors to the area will change as a result of the proposals.

Conclusion on the applicability of Criteria (5)

It is the view of the Commissioners that the terms and intentions of Criteria (5) are not applicable to the land into which Ramsey Town Commissioners seek to extend the Town's boundary: the land could not be used to provide any meaningful 'overspill' or 'outgrowth', etc.

Criteria (6)

As stated above, at the meeting held to discuss the proposals Ramsey Town Commissioners were unable to put forward any adequate or clear justification for the acquisition of the land in Maughold. Similarly, there was no adequate clarification of why the land is valuable to the Town Authority; and, perhaps more importantly, what benefits the transfer of the land would provide for Ramsey residents, Maughold residents, or residents from across the Island.

Conclusion on the applicability of Criteria (6)

It is the view of Garff Commissioners that when measured against the terms of Criteria (6) the proposal should be rejected by the Department. This is due to the insufficient explanation of any justification for the transfer of the land, any expression of the benefits to residents, and the general inapplicability of the proposals; there is no '*balance of advantage*' that would presume for '*acceptance of the scheme*'.

Concluding Remarks

Garff District Commissioners do not feel that the request from Ramsey to extend the Town's boundary into rural Maughold can be justified when the terms of the six criteria (and other discounted, but practically relevant, criteria) are considered.

One question asked by the Commission at the August 2022 meeting was in regard to the advice Ramsey Commissioners had taken in terms of expanding town boundaries, identifying other boundary markers, 'redistricting', assessing demographics, etc. As stated above, the current boundary demarcation which is based on the clear definitions set by townscape and the rural landscape remains the most sensible option. Clearly, if Ramsey have need to expand in order that the town's built environment can be extended that is a matter to consider. It must be borne in mind, however, that for the reasons given above, the land in Maughold is unsuitable for development and any application for any meaningful development in the Maughold lands would very likely be rejected by the Planning Authority.

In these circumstances in which no compelling rationale has been provided, the Commissioners are left to speculate 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 perplexed and puzzled.

In terms of the process of setting the proposed boundary, Ramsey Commissioners advised Garff at the August 2022 meeting that the proposed boundary lines had been drawn up at the Town Hall by the former Town Clerk and then Chair using a map. They advised that no professional consultancy research has been undertaken nor any cartographer, landscape specialist, etc, consulted. This factor coupled with the inability of Ramsey to provide any compelling rationale for the need for the changes leaves Garff Commissioners in a position where they question the proposals. In the vacuum created, the Garff Board have been left to assume that the proposal is prompted by rational that lie outside of the set criteria.

Garff Commissioners advise, however, that there are no significant financial implications for them as a local authority: the consequence of the loss of rate income from two properties is negligible. They note, however, that the rates for the residents of these few properties are likely to rise significantly, with no additional services in return, if the rural area becomes designated as a part of the town.

Members also note that there will be a much greater financial effect on Lezayre Commissioners which may have a destabilising consequence on that Authority and all their ratepayers: this influence will particularly affect those who may become Ramsey residents in areas such as Glen Auldyn whose payments to Ramsey would rise significantly with negligible gain in additional services: the Commissioners also believe that residents should not be penalised for the efficiencies of their current local authorities.

It is also a telling factor that none of the rural/forest land Ramsey seek to expand into in Maughold has been identified by Cabinet Office in the Area Plan for the North and West documents as suitable for development. This follows extensive investigation and consideration of a range of developmental factors. It should also be noted that once accepted the Area Plan will be in place for many years, perhaps more than several decades, certainly well into the future.

Garff District Commissioners believe that there is nothing in the boundary change proposal put forward by Ramsey Town Commissioners that could be deemed to be beneficial to residents of Lezayre, Garff, and even Ramsey itself: in that sense the proposed changes could not be considered to be in the public interest.

The Commissioners thank the Department and the appointed Inspector for considering their views on this matter.

Yours sincerely



Martin Royle
Deputy Clerk
On behalf of Garff Parish District Commissioners

Criteria for the consideration of Local Government Boundary Extensions 2004

- (1) that the promoters' area and the area/s sought are really one community;**

The Department considers this to be a straightforward matter of judgement.

- (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;**

There may arise situations where those residing in the area under consideration have used the facilities of or located within the Applicant Authority. It may also be, for example, that the catchment area for childrens' schooling or registration at the local doctors' surgery/ies covers, or will be extended to cover, the proposed area to be included within the boundary extension.

- (3) that the area sought is an overspill or outgrowth of the promoters' area;**

The Department considers this to be a straightforward matter of judgement.

- (4) that, wherever possible, clear physical boundaries are followed;**

Whilst the Department regards these as highly likely to be obvious the Chief Minister¹ has said that these include matters of topography such as roads, rivers, hedges and other natural features of an area known or understood locally.

- (5) that there is insufficient acreage left for the development of the promoters' area within its borders and injury is suffered thereby;**

This is a further development of (3) in that if it is accepted that the area sought is an overspill or outgrowth then do the boundaries need to extend further in order to enable proper facilities or amenities to be provided. The Chief Minister of the day² stated, "... the people of an area that is expanding need the services and need the space,, and if that is being restricted in some way by the lack of a boundary extension then that is wrong. That might be the requirement to produce playing fields to allow recreational activity, to take control of an area, so that they can develop amenities for the benefit of the majority of people."

- (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;**

The Department considers this to be entirely a matter of judgement.

¹*Debate in Tynwald Court on Tuesday 16th March 2004, page 977 T121*

² *ibid*

Note: Applicant Local Authorities should, in submitting their applications, address each point. Similarly, any affected Local Authority wishing to comment or oppose such application should as far as possible, confine their comments to the above points. However, applicant Local Authorities should also note that these criteria are not intended to be exhaustive.

The Department considers that all of these points are important and should be addressed but then an Applicant Authority may consider that there are other points or ways of addressing the issues additionally that may support its application and so the criteria are not exclusive to anything further being brought in support of the application.

The following shall not be considered by the Inquiry under s.6 of the Local Government Act 1985:

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

What is being addressed in a boundary extension application is not the relative levels of rates as between one Authority and another or the financial implications or questions of efficiency as between Authorities. These issues are to be ruled out of order.

List of criteria has been placed in order of priority, although it's not intended to being exhaustive, or exclusive of any other relevant factors.

There is, of course no requirement that all the above points must be satisfied and one combination or another of them may be used.

Appendix 5

Submissions submitted through the Consultation Hub which could be published in full can be found via the following link

<https://consult.gov.im/infrastructure/proposed-ramsey-boundary-extension-order-2023/>

Appendix 6

Submissions submitted through the Consultation Hub which could only be published anonymously can be found via the following link

<https://consult.gov.im/infrastructure/proposed-ramsey-boundary-extension-order-2023/>

The submissions of those that did not want their responses published were in line with the rest of the submission that are being published.

I have set out below a brief summary of the submission that are not being published.

Many of the submissions focused on the financial aspects of the application and the inefficiency of Ramsey Town Council.

In Favour

There were 10 respondents who did not want their responses published. Five did not make any submissions that could have been published.

Of those that made submissions, there was an identified need for more housing, but the infrastructure in Ramsey needs addressing first. One respondent qualified this by saying that including Glen Auldyn in the application was a step too far.

One respondent believed that if you use Ramsey services you should pay and wanted an all Island rate.

Not In Favour

There were 61 respondents who did not want their responses published. 13 did not make any submissions that could have been published.

22 of the respondents identified themselves to be in the Glen Auldyn Area. Where they provide a response they strongly identified with Glen Auldyn and did not consider themselves to be in a community with Ramsey.

They also identified that there was no land available in Glen Auldyn to accommodate any overspill.

On the issue of services, some pointed out they used Sulby School and did not use services Ramsey Town Council offered and did not benefit from any services such as street lighting.

Many respondents made submissions that Ramsey Town Council could not manage what it already provided services for, that Ramsey was in a run down state and the application was a land grab.

They also felt that there was sufficient land inside the current boundaries for Ramsey to develop.

One identified as being in the North Area and their submissions were on the development of agricultural land.

One identified as being a Ramsey resident and wanted Ramsey Town Council to sort out what they had first.

One identified as being in the West Area and responded that there was sufficient land within the boundaries of Ramsey to use first. They did not consider that they were in a community with Ramsey.

31 of the respondents were not in any of the areas the subject of the application.

Where they provided a response, their submissions focused on the same issues as those from Glen Auldyn.

The application being a Land Grab, the areas were not in a community with Ramsey, Ramsey Town Council could not manage what it already provided services for, that Ramsey was in a run down state.

They again also felt that there was sufficient land inside the current boundaries for Ramsey to develop.

Submissions also mentioned the houses omitted from the Glen Auldyn area and some houses being split from the adjacent land they owned in the application.

The remaining submissions that were not identified with an area made similar submission as above.

Neutral

There was only one submission and they just focused on the financial aspects of the application.

Katsaiti, Nadia (CSC)

From: Graham Allott [REDACTED]
Sent: 22 September 2023 15:15
To: DOI, Local Government
Subject: FAO Mr Peter Taylor
Attachments: IMG_20230922_134044.jpg; IMG_20230922_134051.jpg; IMG_20230922_142750.jpg; IMG_20230922_134055.jpg

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

I wish to have Interested Party Status.

I would like to speak regarding Glen Auldyn.

I would like to add the following points - and attached photographs - to be considered in addition to my earlier submission ID ANON-E2PZ-XAAF-1:

I live at the end of a 900m long single track cul-de-sac, which does not have any street lighting. I do not want street lighting as I appreciate the dark skies here.

There is no mains drainage at my property.

There is no mobile reception at my property.

There is no television signal at my property.

I live 3.4km from Parliament Square, and 2.3km from the nearest houses in Ramsey at the junction of Lezayre Road and Gardeners Lane.

There is a significant gap between Ramsey housing and Glen Auldyn housing.

The group of seven houses along the Far End branch are separated from the next house by 350m. This is not characteristic of Ramsey.

Of these seven houses, five have been included in the proposed boundary extension, yet for unknown reasons two have been excluded. As shown in the attached photographs, one has a driveway directly opposite ours, and the other is only 20m away.

The annotated photographs attached clearly show this, and also show the lack of any discernible logic in proposing to form the Ramsey town boundary between close neighbours of houses with similar characteristics. The only natural feature between these houses is the river, however other properties on the South East side of this river have been included in the proposals, and the line of the proposed boundary crosses the river to exclude these two properties.

My property does not have the characteristics of a Ramsey property, it has the typical characteristics of a property in Lezayre.

Graham Allott
[REDACTED]

A photograph of a golf course green and a large tree. A red arrow points from a text box to a bush. The text box contains the text "Claimed to be part of Ramsey".

Claimed to be part of Ramsey

Claimed to be part of Ramsey



Claimed to be part of Ramsey



Wildwood - not claimed as part of Ramsey

Wildwood drive

Glen Auldyn Lodge - not claimed as part of Ramsey

Far End Barn property - attempted to be claimed as part of Ramsey

Sewage system as there is no mains drainage



Proposed Ramsey (Boundary Extension) Order 2023

Response ANON-E2PZ-XAAF-1

141

Name: Graham Allott

Analyst notes:

Tags:

Email:

Analyst notes:

Tags:

organisation yes / no : No

Organisation:

Analyst notes:

Tags:

Consent publishing: Yes, you may publish my response anonymously

Analyst notes:

Tags:

Yes/no - Reside in the local Yes

authority area of either

Ramsey or Lezayre or Garff

(Maughold Ward):

Analyst notes:

Tags:

Yes/no - Live within the Yes,

proposed extension area:

Analyst notes:

Tags:

Select one - Support/Don't I object to the proposal

Support the proposal:

Analyst notes:

Tags:

Yes/no - Wish to attend the Yes

inquiry:

Analyst notes:

Tags:

Select one - Further expand

on the comments at the public inquiry or content to rely on the written

submissions:

Analyst notes:

Tags:

Comments box - Additional

comments/suggestions:

I am strongly opposed to Ramsey Town's boundary being extended to include Glen Auldyn.

Glen Auldyn is distinct from Ramsey, with a totally different character. It is a separate community.

Glen Auldyn is not part of "Ramsey overspill", it has developed over centuries as a separate entity.

I have never used, and have no "interest" in any Ramsey public services, such as the schools, library, GP or pool

My property, like many others in Glen Auldyn, is not connected to any public sewer

Ramsey Commissioners give future development as a reason for boundary extension, yet there is no area in Glen Auldyn which is suitable for further development

Analyst notes:

Tags:

Response ID: ANON-E2PZ-XAAF-1

Created Date: 2023-07-09 09:19:30.909329

Submitted Date: 2023-07-09 09:38:20.996250

Last Modified Date: 2023-07-09 09:38:16.881890

IP Address: 84.246.200.187,127.0.0.1

Browser Identification: Mozilla/5.0 (X11; Linux x86_64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/114.0.0.0 Safari/537.36 OPR/100.0.0.0 (Edition beta)

Analysed: No

Activity State: open

Citizen Space Version: v7.25.0

Visited Pages: ('intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401')



Mr Peter Taylor, Chairman
Local Government Team
Central Support and Change Division
Department of Infrastructure
Sea Terminal Building
Douglas IM1 2RF

Ref: LA/Ramsey Boundary Extension

Via Email

Re: Confirmation of Interested Party Status
Proposed Comments

Dear Mr Taylor

Following my email to Ms. Katsaiti on 21 September and her response on 25 September, I would like to reiterate and confirm my desire to be considered an Interested Party and to be given the opportunity to speak at the Public Inquiry once it has been scheduled. I live in the area known as Ramsey North in the Expansion Proposal map.

I have objected to the Proposed Ramsey Boundary Extension. My objection is based on:

- The need for a doubling in the size of Ramsey has not been demonstrated using appropriate data, but rather on a general sentiment that the Town would like to have more rather than less so that they do not have to come back again for a further adjustments over the next 30 years (Ramsey Boundary Extension Report 2022, page 6). While a laudable sentiment, there is no data presented to support a doubling in size as opposed to an increase of 50%, or 25%, or 10%.
- It should be noted that both the Draft Area Report for the North and West 2022 and the Isle of Man Economic Strategy (Our Island, Our Future, 2022) were prepared for time horizons of 15 years. It is highly uncertain to try to prepare detailed plans for a 30 year future; the longer the time horizon, the more uncertainty in the outcome.

- The Boundary Extension Report cites the Draft Area Plan for the North and West, which contains specific recommendations for action by Ramsey, none of which has been addressed in the Boundary Extension Report (more below). Moreover, the Draft Area Plan for the North and West has not yet been adopted and might well be amended before adoption. That suggests that the Boundary Extension Report is premature and its consideration should be delayed until the Area Plan for the North and West has been finalized and adopted.
- The Draft Area Plan for the North and West states several times and in several different ways that “development should primarily be located in the towns and villages...” (see for example, Key Issue 5 on page 24, Plan Objectives 1 and 2 on page 56 and paragraph 8.4.1 on page 57 that states, “...it is important to fully utilize **available land within existing settlement boundaries.**” - emphasis is mine). And yet the proposed lands within the proposed extension are largely arable agricultural land currently in use.
- I live on a small farm that now primarily has a small orchard. I am surrounded by productive agricultural land that is actively farmed. The Town of Ramsey has a government that is adapted for providing town services: marina and port management, parking provision, street sweeping and the like. In this rural area, a rural commission looks after our rural needs. Under the proposal, my property would become part of the Town of Ramsey and there would be a mismatch between my needs and service provision offered. I would rather continue to be under the catchment area of Lezayre.

A more detailed discussion of the key data follows:

The Ramsey Boundary Extension Report 2022 outlines an increase in the size of Ramsey from its current 905 acres to 1,883 acres, more than doubling in size. Without providing numbers, the reason given for this increase is to support the growth of the town; the Isle of Man Economic Strategy (Our Island, Our Future, July 2022) is cited to establish demand. The Isle of Man Economic Strategy sets an aspirational target (not a projection) of an island population of 100,000 by 2037, an increase of about 15,000 residents over 15 years. This translates to a pro-rata increase in Ramsey’s population from 8,288 (2021 Census) to 9,859 (Ramsey’s population was 9.9% of the islands population in the 2021 Census). This in turn translates to a need for 734 new residential units in that same time frame (from the 2021 Census, 2.1 people per household).

Currently, Ramsey’s Gross Population Density (including the land set aside for amenities, retail and services) is 9.2 people per acre (using a population of 8,288 and a land area of 905 acres). Using this same density and applying it to the target of 1,571 new people by 2037, an upper limit of the additional land needed for housing the increase in population would be 171 acres. The Lezayre Commissioners office has suggested to me that Ramsey currently has approximately 27 acres of greenfield and 3 acres of brownfield available for development (private communication). If that is true, then the **upper limit of additional required land over the next 15 years is 141 acres.**

However, that is a worst-case view. The Draft Area Plan for the North and West states that Ramsey has a high property vacancy rate of 16%. It further notes that "Bringing un-occupied sites and buildings back into re-use will Increase the number of residential dwellings." (Draft Area Plan for the North and West, page 58) Furthermore, if new residences were built on expansion land, amenities such as the Mooragh Park, the swimming pool, and others would not be replicated in the new residential area, having the effect of housing more people per acre than the Gross people per acre cited above, so less land per person would be needed to support the population expansion. Applying a suitable adjustment to density of newly occupied land, using existing development land within Ramsey and re-occupying half of the vacant dwellings yields a **lower limit of additional required land over the next 15 years of 8 acres.**

So if the Island meets its aspirations for 15,000 new residents over the next 15 years and an upper limit of the additional land needed around Ramsey for housing is 141 acres, while a lower limit might be 8 acres, why has the Boundary Extension Report asked for an additional 978 acres of existing agricultural land for expansion?

Summary and Recommendations

The Ramsey Boundary Extension Report 2022 has been presented without appropriate supporting data. It asks for an additional 978 acres to be included in Ramsey's boundaries, doubling the size of the town. I have presented data based on the Isle of Man Census 2021, the Draft Area Plan for the North and West 2022 and the Isle of Man Economic Strategy that demonstrate a need for additional land, based on various assumptions, with a lower limit of 8 acres and an upper limit of 141 acres over the next 15 years. My conclusion is that the Town has asked for too much land without supporting data.

It is recommended that the Ramsey Boundary Extension be delayed until the finalization and adoption of the Area Plan for the North and West.

It is recommended that the Town or Ramsey use the extra time gained to both address the concerns about the high vacancy rate in Ramsey cited in the Draft Area Plan for the North and West 2022, and to prepare a revised Boundary Extension request based on specific plans and appropriate data. This may include reducing the land requested and prioritizing the parcels to be acquired.

It is recommended that a formal survey be conducted of those residents of other jurisdictions who will be affected by boundary extension to find out if they would rather live in their current jurisdictions or within the limits of Ramsey.

Thank you for this opportunity to express my views on the proposed Ramsey Town Boundary extension. I would be pleased to answer any questions.

Very truly yours

Robert Barden

Proposed Ramsey (Boundary Extension) Order 2023

Response ANON-E2PZ-XANH-G

Name: Robert Barden

Analyst notes:

Tags:

Email:

Analyst notes:

Tags:

organisation yes / no : No

Organisation:

Analyst notes:

Tags:

Consent publishing: Yes, you may publish my response anonymously

Analyst notes:

Tags:

Yes/no - Reside in the local Yes

authority area of either

Ramsey or Lezayre or Garff

(Maughold Ward):

Analyst notes:

Tags:

Yes/no - Live within the Yes,

proposed extension area:

Analyst notes:

Tags:

Select one - Support/Don't I object to the proposal

Support the proposal:

Analyst notes:

Tags:

Yes/no - Wish to attend the Yes

inquiry:

Analyst notes:

Tags:

Select one - Further expand on the comments at the public inquiry or content to rely on the written submissions:

Analyst notes:

Tags:

Comments box - Additional comments/suggestions:

I live on an active farm, and I am surrounded by farm land; I do not want to be governed by a town government. A town government makes decisions on the supply of services and their priorities based on the needs of their constituents, and the services and priorities of town residents often do not conform with needs of rural residents. My property is currently governed by the Parish of Lezayre, primarily a rural community, and I am happy with their administration; changing my governance to the Town of Ramsey would be detrimental to me. I neither need nor want additional services that might be offered by the town (sewer? gas? more frequent bin collection?).

Surely a basic tenet of modern democratic government is that the government is in place to serve and at the invitation of the people it governs. If a change in governance is contemplated, should there not be a vote held by the people whose lives will be affected; in this case perhaps there should be four votes, one for each geographic area identified.

Analyst notes:

Tags:

Response ID: ANON-E2PZ-XANH-G

Created Date: 2023-08-08 12:16:50.847893

Submitted Date: 2023-08-08 18:39:46.165587

Last Modified Date: 2023-08-08 18:39:25.675989

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Analysed: No

Activity State: open

Citizen Space Version: v7.26.0

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Katsaiti, Nadia (CSC)

From: Oliver Helfrich [REDACTED]
Sent: 16 October 2023 16:32
To: Katsaiti, Nadia (CSC)
Subject: Proposed Ramsey (Boundary Extension
Attachments: Office Copy and Filed Plan 10-01126 Ed 1.pdf 04_10_2023 18_12 - __.pdf 16_10_2023 11_36 - __.pdf

Dear Ms Katsaiti

We write on behalf of our client Charles Jennings, the owner of Riversdale, Jurby Road, Lezayre, IM7 2EA; a property which is situated within the Proposed Ramsey Town Extension - West Area (see Draft Map at Appendix 7 of the Report 2022 (the "Draft Map")).

Our client's property enjoys the benefit of a covenant that restricts any building on a significant portion of the land to the North of the Sulby River that is identified edged red on the Draft Map.

Please find attached Office Copy and Filed Plan. We would specifically draw your attention to Burden 5 on page 5 of the Office Copy.

The existence of the covenant clearly negatively impacts the deliverability of any development within the area to which it relates.

We would be grateful if you could grant our client interested party status so that we / his authorised agent can speak at the inquiry and produce the Office Copy and Filed Plan which will be material to the proceedings.

Thank you.

Kind regards, Oliver

Oliver Helfrich*

[REDACTED]

[REDACTED]

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(* Solicitor (England and Wales) non-practising)

Isle of Man Land Registry
Oik-Recortyssee Thalloyn Ellan Vannin

Title No 13-01126
Edition No 1

OFFICE COPY

Title opened on 02 August 2011
by application no 201100008
Last amended on
by application no

Title Status Open

Tenure **FREEHOLD**

Parish **LEZAYRE**

Local Government **LEZAYRE**
District

PART 1: Description of Land & Appurtenances

Title Address

Land at Cronk Mayn
Jurby Road
Lezayre
IM7 2EA
Isle of Man

Parcel(s) of Land

There is 1 parcel of land registered in this edition of title.

Land Parcel 1

Registered on 02 August 2011
by application no 201100008

The land shown edged red on the Filed Plan known as Cronk Mayn Jurby Road Lezayre

Map Grid Reference

EASTING: 243522 NORTHING: 495189

Appurtenances

There are no appurtenances of land registered in this edition of title.

Transfer of Part

No Transfers of Part have occurred prior to this edition of title

End of Part 1

gh allo

Edition first issued on 02 August 2011 at 10:55

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Printed on 16 July, 2021 at 10:39

Page 1 of 6

Isle of Man Land Registry
Oik-Recortyssee Thallooyn Ellan Vannin

Title No 13-01126
Edition No 1

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PART 2: Description of Owners and any Cautions, Inhibitions, Priorities or Restrictions

Class of Title

Classified on 02 August 2011
by application no 201100008

Absolute

Consideration

£90,000.00

Market Value

£90,000.00

Value of Share Transferred

Registered Owners

There are 2 owners registered in this edition of title.

Owner 1

Registered on 02 August 2011
by application no 201100008

Mr. Adrian Mark Black

Acquisition Date

15 November 2010

Index of Names No. 6162

Service Address 1

Huntersfield
Jurby Road
Lezayre
IM7 2EA
Isle of Man

Class of Ownership

Full

Co-owner Type Joint Tenant

Other Particulars relating to ownership

There are no other particulars registered in this edition of title.

Owner 2

Registered on 02 August 2011
by application no 201100008

Miss Joanne Louise Nicholls

Acquisition Date

15 November 2010

Index of Names No. 6163

Service Address 1

Huntersfield
Jurby Road
Lezayre
IM7 2EA
Isle of Man

Class of Ownership

Full

Co-owner Type Joint Tenant

Other Particulars relating to ownership

There are no other particulars registered in this edition of title.

Edition first issued on 02 August 2011 at 10:55

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Page 2 of 6

Isle of Man Land Registry
Oik-Recortyssee Thallooyn Ellan Vannin

Title No 13-01126
Edition No 1

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Cautions	<u>There are no cautions registered in this edition of title.</u>
Inhibitions	<u>There are no inhibitions registered in this edition of title.</u>
Priorities	<u>There are no priorities registered in this edition of title.</u>
Restrictions	<u>There are no restrictions registered in this edition of title.</u>

End of Part 2

Edition first issued on 02 August 2011 at 10:55

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Printed on 16 July, 2021 at 10:39

Page 3 of 6

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PART 3: Description of Burdens

There are 9 burdens registered in this edition of title.

Burden 1

Registered on 02 August 2011
by application no 201100008
Creation date 02 August 1994
Document reference

Easement or Profit

A Wayleave Agreement dated 2 August 1994 and recorded as 1994/446 made between (1) Manx Electricity Authority and (2) Barry William Nicholls and Marcia Nicholls created "that right or easement of placing, laying, maintaining and operating the overhead electricity cable" [as shown in the approximate position being delineated blue on the filed plan]

Burden 2

Registered on 02 August 2011
by application no 201100008
Creation date 20 December 2001
Document reference

Easement or Profit

A Wayleave Agreement dated 20 December 2001 and recorded as 2002/501 made between (1) Manx Electricity Authority and (2) Barry William Nicholls and Marcia Nicholls created "that right or easement of placing, laying, maintaining and operating the underground electricity cable" [as shown in the approximate position being delineated dark green on the filed plan]

Burden 3

Registered on 02 August 2011
by application no 201100008
Creation date 15 September 1951
Document reference

Easement or Profit

A Deed of Conveyance dated 15 September 1951 and recorded as September 1951/34 between (1) Mary Gell (the Vendor) and (2) Norman Robert Smith (the Purchaser) contained the following:- "The right at all times to enter on the property of the Vendor [(inter alia) the land edged red on the filed plan] "for the purpose of executing repairs or renewals to the building or shed erected on the southern boundary of the Scheduled Property [hatched pink on the filed plan] "subject to the condition that the Purchaser shall do no unnecessary damage in the exercise of such right and shall make good to the Vendor her heirs and assigns and tenants all damage done to growing crops"

Burden 4

Registered on 02 August 2011
by application no 201100008
Creation date 15 November 2010
Document reference

Easement or Profit

A Deed of Conveyance dated 15 November 2010 and recorded as 2010/4433 between (1) Barry William Nicholls and Marcia Nicholls (the Vendors) and Adrian Mark Black and Joanne Louise Nicholls (the Purchasers) contained the following:- "(a) the right for the Vendors and their successors in title the owners and occupiers for the time being of the Retained Hereditaments" [hatched orange on the filed plan] "to retain in their present position within the Scheduled Property" [edged red on the filed plan] "all drains sewers wires cables and conduits as now serve the Retained Hereditaments together with the right to enter upon the Scheduled Property from time to time to inspect maintain and repair and when necessary to replace all such drains sewers pipes wires conduits and cables and to receive the same and to discharge there through (as appropriate) the electricity gas telephone signals waters surface waters soil and effluent subject to the Vendors or other the owners or occupiers for the time being of the Retained Hereditaments making good all damage caused in the exercise of the said reserved rights as soon as is reasonably practicable so to do (b) the right for the Vendor and their successors in title the owners and occupiers for the time being of the Retained Hereditaments to enter upon the Scheduled Property with or without workmen equipment and materials for the purpose of laying (within the period of 80 years for this date which shall be the perpetuity period applicable hereto) and thereafter maintaining repairing and renewing such pipes wires conduits cables and all other conducting media (hereinafter referred to as "the new services") as may be required for drainage sewerage

Edition first issued on 02 August 2011 at 10:55

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OFFICE COPY

and for the supply of electricity gas water telephone and other data services to the Retained Hereditaments or any part thereof as to connect the new services to the nearest practicable part of such of the main sewers drains water mains electricity gas telephone and other supply lines as are situate in the Scheduled Property the Vendors owners or occupiers for the time being of the Retained Hereditaments constructing maintaining and connecting the new services and making good all damage and disturbance to the Scheduled Property by the exercise of these rights at their sole cost and expense to the reasonable satisfaction of the Purchasers and (C) the right for the Vendors and their successors in title the owners and occupiers for the time being of the Retained Hereditaments or any part thereof or alter any adjacent or neighbouring building in any manner whatsoever in such manner as the Vendors think fit notwithstanding any interference with the access of light or air to the Scheduled Property"

Burden 5

Registered on 02 August 2011
by application no 201100008
Creation date 23 June 1980
Document reference

Covenant or Condition

A Deed of Covenant and Release dated 23 June 1980 and recorded as July 1980/116 between (1) Norman Robert Smith (Mr Smith) and (2) John Stowell Kenyon (Mr Kenyon) contained the following:- Mr Kenyon to the intent and so as to bind so far as may be the Land and each and every part thereof into whosoever hands the same may come and to benefit and protect the Riversdale Property" [hatched pink on the filed plan] "and each and every part thereof DOTH HEREBY for himself and his successors in title covenant with Mr Smith and his successors in title that Mr Kenyon and those deriving title under him will not at any time hereafter erect place or permit to stand on the Land" [(inter alia) the land edged red on the filed plan] " or any part thereof any building structure or other erection whatsoever"

Burden 6

Registered on 02 August 2011
by application no 201100008
Creation date 12 August 1982
Document reference

Covenant or Condition

A Deed of Conveyance dated 12 August 1982 and recorded as December 1982/90 between (1) Barbara Jane Beauclair (Mrs Beauclair) and (2) John Stowell Kenyon (Mr Kenyon) contained the following:- And Mr Kenyon doth hereby covenant with Mrs Beauclair that Mr Kenyon will forthwith at his own sole cost and expense construct and forever hereinafter maintain a stockproof boundary fence or hedge between the points marked A-B and B-C on the plan hereto annexed" [marked A-B-C on the filed plan]

Boundary Descriptions

Boundary A B

See Burden created by Deed December 1982/90

Label C

See Burden created by Deed December 1982/90

Burden 7

Registered on 02 August 2011
by application no 201100008
Creation date 15 September 1951
Document reference

Covenant or Condition

A Deed of Conveyance dated 15 September 1951 and recorded as September 1951/34 between (1) Mary Gell (the Vendor) and (2) Norman Robert Smith (the Purchaser) contained the following:- "the Vendor and her aforesaid will not erect without the written consent of the Purchaser or his heirs and assigns any buildings on the property of the Vendor [(inter alia) the land edged red on the filed plan] "Provided However that this covenant shall not prevent the Vendor and her heirs and assigns from erecting a shed or building for the sheltering or feeding of cattle"

Burden 8

Registered on 02 August 2011

Covenant or Condition

A Deed of conveyance dated 15 November 2010 and recorded as 2010/4433 between (1)

Edition first issued on 02 August 2011 at 10:55

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by application no 201100608
Creation date 15 November 2010
Document reference

Barry William Nicholls and Marcia Nicholls (the Vendors) and Adrian Mark Black and Joanné Louise Nicholls (the Purchasers) contained the following:- "(1) Not to do or permit to be done anything in or upon the Scheduled Property" [edged red on the filed plan] "that may be or may grow to be a nuisance or disturbance to the Vendors or their successors in title the owners or occupiers for the time being of any part or parts of the Retained Hereditaments" [hatched orange on the filed plan] "(2) Not to raise objection or oppose any application by the Vendors or their successors in title to the Retained Hereditaments or any agents on their behalf to the Planning committee of the Department of Infrastructure or any other Planning or local or other statutory authority for approval in outline or in detail for future development of the Retained Hereditaments or any part thereof (3) to forthwith erect at their sole expense a boundary wall or close boarded fence between the points represented on the plan annexed hereto and marked A-B-C-D-E" [not identified on said plan] "and thereafter such boundary wall or fence shall be a party boundary maintainable at the joint expense of the Purchasers and their successors in title and the Vendors and their successors in title"

Burden 9

Registered on 02 August 2011
by application no 201100008
Creation date 21 December 1998
Document reference

Covenant or Condition

A Deed of Conveyance dated 21 December 1998 and recorded as 1999/443 between (1) John Edward Crellin and Celia Elizabeth Llewellyn Kilner (the Trustees) and (2) Barry William Nicholls and Marcia Nicholls (the Purchasers) contained the following:- "the Purchasers for themselves and their successors in title to the Scheduled Property" [hatched purple on the filed plan] "do hereby covenant with the Trustees and their successors in title to the retained hereditaments" [hatched orange on the filed plan] "the Purchasers must not do or permit to suffer to be done anything in or upon the Scheduled Property that may be or may grow to be a nuisance annoyance or disturbance to the Trustees and their successors in title the owners or occupiers for the time being of any part of the retained hereditaments"

End of Part 3

Edition first issued on 02 August 2011 at 10:55

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Printed on 16 July, 2021 at 10:39

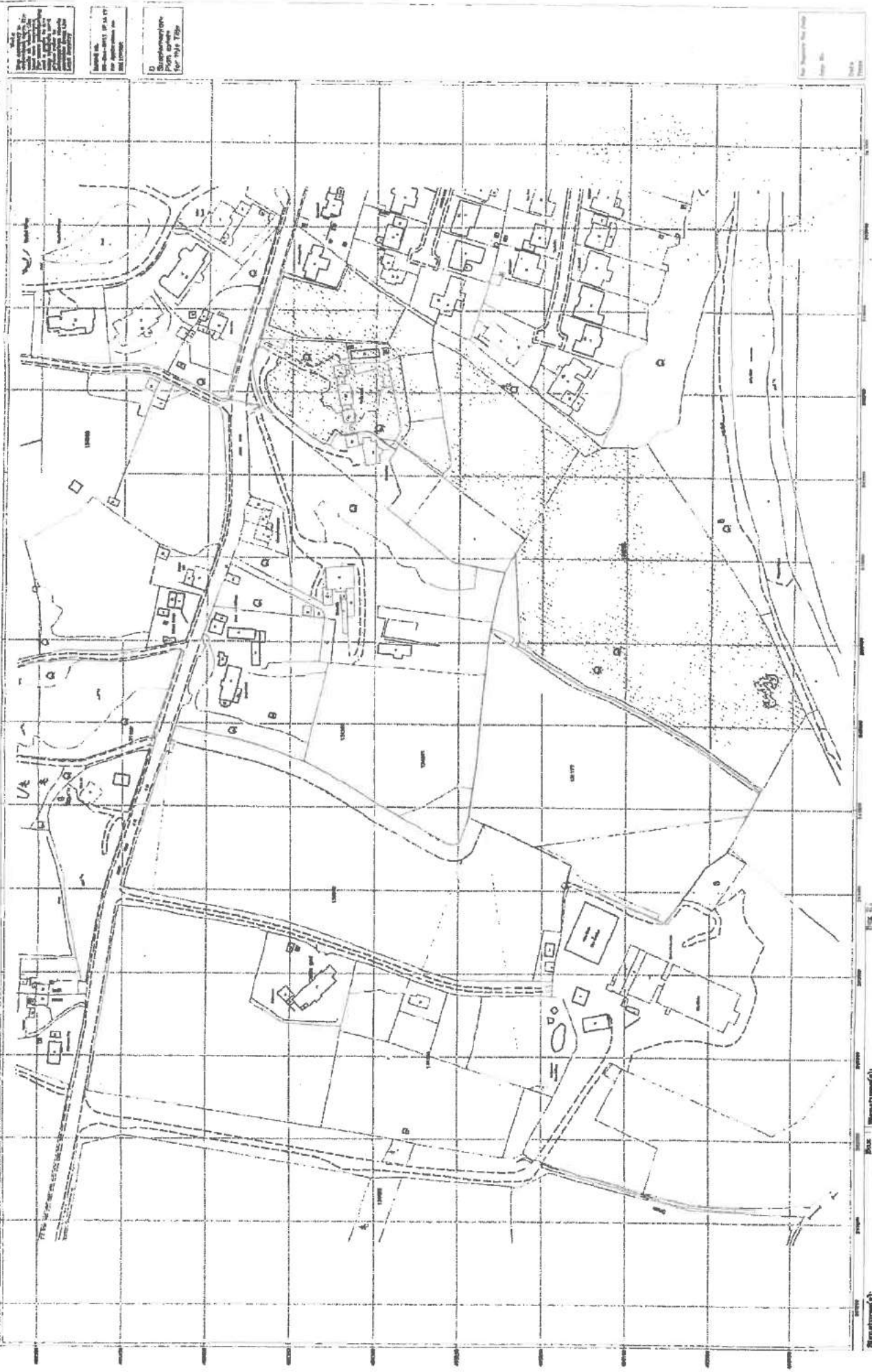
Page 6 of 6

Plot Scale: 1:1000
Survey Scale: 1:1500

Tenure: Freehold

Isle of Man Land Registry
FILED PLAN

Plot No.: 13-01126 Edition No.: 1
Landscape: Land at Cooks Bay, Jersey Road, Lesayre, DT1 8BA



Signature(s):	Date:	Signature(s):	Date:
Witness(es):		Witness(es):	

File No. 13-01126

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Response ANON-E2PZ-XAND-C

672

8/8

1/9

letter

Letter 1/1

organisation yes / no : No

Analyst notes:

Consent publishing: Yes, you can publish my response in full

Tags:

authority area of either

(Maughold Ward):

Tags:

Yes, I live within the Glen Auldyn proposed extension area

Analyst notes:

Select one - Support/Don't | object to the proposal

Analyst notes:

Yes/no - Wish to attend the "Yes

Analyst notes:

Tags:**Select one - Further expand****on the comments at the
public inquiry or content to
rely on the written****submissions:****Analyst notes:****Tags:****Comments box - Additional****comments/suggestions:**

Yes, I intend to further expand on these comments at the public inquiry

1. That the promoters area and the areas sought are really one community...

Ramsey Town Commissioners (RTC) the promoters/content that Glen Auldyn (GA) residents benefit from the services provided within the town, that there is little physical separation i.e. Town boundary has now reached the Glen boundary – so becoming an extension of the Ramsey Community. Furthermore that the Glen residents already identify its association with the town.

On the first point, from my own experience managing a shop within Ramsey, I would agree that Glen residents use and participate in town services however this is mutually beneficial given that town/high streets/commerce/services need wider footfall and activity to survive. Also this is not exclusive to the Glen, with the Town being the commercial centre for the whole of the North of the Island. Additionally it is a fact that Glen residents also use a range of services provided by their own/current Lezayre Commissioners (LA) and travel wider for retail/services/recreation to both Laxey and Douglas. There is no case here that the two populations are or have become the same community.

On the physical separation point GA remains separate and distinct from the Town. It has grown and developed over time having its own history which is well documented dating back to the earliest settlements (ref imuseum.im – archives).

Furthermore this has been recognised in the recent past by independent assessment IOM Government Landscape Character in Development Assessment Report (ref section B2 page 35). This report identifies GA as being 'One of Ten Narrow Upland Glens' and provides an Overall Character

Description:

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

Key Views:

- Channelled views framed by steep valley slopes.

Evaluation of landscape sensitivities:

- Ecological value of the aquatic ecosystem and riparian habitats.

- Valley bottom and riverside woodland in the lower valley.
- Small-scale nature of buildings, within well wooded, intimate valley landscape.
- Vernacular character of buildings and bridges.

Landscape Strategy:

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

The physical differences from a Town/Urban environment could not be better stated; GA is a riverside woodland, with well spaced buildings set in an intimate valley landscape.

In terms of separation the following is true today and for the foreseeable future:

The Lower Milintown development, which would have effectively seen an extension of Ramsey to the west into the countryside on the northern side of Lezayre Road failed at Planning Appeal ref 20/01080/B. A significant point here being this development was opposed by the very promoters of this boundary extension RTC. Hence even though this land had been zoned the promoters no longer see development to the west as viable.

There is no shared road network or direct lines of communication between the two communities. GA is accessed solely from its own junction on Lezayre Road.

There is no conjoined/coalescing housing developments or built up areas. The Golf Course, woodland plantations and agricultural fields providing for clear separation from the Town.

GA is assessed as countryside and should be protected for its own sake, underpinned by the prevailing legal framework within the Island Development Plan, Strategic Plan 2016:

Environment Policy 1 states:

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

This is further supported in the draft North and West Area Plan, where it has been suggested that GA should form a settlement in its own right – under new criteria Group of Houses in the Countryside (ref Draft Area Plan page 8) an update to the existing Low Density Housing in Parkland (ref 1982 Development Plan Circular No. 8/89).

In respect of the final point, I know of many Glen residents both near neighbours and wider that do not see themselves as Ramsey residents, but members of a separate village/countryside settlement.

Simply on a matter of fact argument, the balance of advantage must be to preserve this independent community.

2. That there is community of interest, public agencies, recreation and communal requirements...

As the first point, from my own experience managing a shop within Ramsey, I would agree that Glen residents use and participate in town services and activities. However this is mutually beneficial given that town/high street/commerce/sports need wider support to survive. Again this is not exclusive to GA, with the Town being the commercial centre for the whole of the North.

This said, the Glen also provides for unique recreational activities itself, with many persons/visitors from across the Island travelling in and parking at the lower levels/near to Milintown Estate:

- Milintown Estate itself being a visitor attraction and event base.
- Mountain bike runs both in Brookdale Plantation and Skyhill.
- Variety of walking paths both along the course of the main river stream and also Skyhill and the nearby Millennium Path.
- Green lane driving/riding for suitable off road motor vehicles.
- An outdoor shoot (seasonal).

There are no similar activities provided by RTC.

3. That the area sought is an overspill or outgrowth of the promoters area...

In their own submission RTC acknowledges that the Golf Course has prevented the joining of the Town to the Glen. I would add further that there is also agricultural fields and Milintown Estate also part of Lezayre that provides further separation and that none of this land is zoned for development. Furthermore as per my earlier comment at point 1. RTC themselves opposed a recent planning application ref 20/01080/B Lower Milintown a housing development of some 138 new build properties on greenfield to the west. Hence RTC have come to realise development in this direction is not viable.

GA is most clearly not an overspill or outgrowth, but has developed within its own boundaries alongside the river stream over time, indeed it could be argued that settlements here – pre-date the establishment of Ramsey (ref imuseum.im – archives). Additionally all development within the Glen under

both previous and prevailing legislation/guidance has provided for 'Low Density Housing in Parkland' (ref 1982 Development Plan Circular No. 8/89) a set of criteria established to preserve the existing rural feel/natural environment.

4. That wherever possible, clear physical boundaries are followed...

As per point 3, no further development is proposed to the west, the most recent planning application 20/01080/B failed at all stages of the process and The Minister for Environment, Food & Agriculture Hon C Barber MHK decision letter included this crucial observation: 'There would be harm, in this regard, to the established character and appearance of this rural area'.

The Glen has grown within its existing valley which is solely accessed from the Lezayre Road, it does not have any physical links with the Town and there are none projected.

5. That there is insufficient acreage left for development of the promoters area...

All existing land so zoned/deemed suitable for development within GA has now been exhausted, so this location does not provide for any significant potential for new housing. Additionally there are no remaining sections of land that would appear suitable topography to be so zoned.

I would proffer that in accordance with prevailing legislation RTC must consider developing brown field sites of which there are several see (ref draft plan North and West Area page 12) within its existing area before considering further greenfield expansion.

This being the directive of all existing legislation and policy guidance.

6. The balance of advantage lies in acceptance of the scheme...

Glen Auldyn simply does not provide any significant land area/or prospective currently un-zoned land to provide for urban growth. RTC themselves have flagged that the draft Area Plan for the North & West does not signpost this area as suitable for development. Indeed the contrary is true that GA should become a recognised independent Group of Houses in the Countryside (ref Draft Area Plan page 8).

Overall the proposal is poorly timed and ill conceived, coming ahead of the imminent North and West Area Plan and the All Island Plan 2026, where an informed overview of population needs and development for the longer term will be considered both Regionally and Nationally. It should fail on this point alone.

Simply on a matter of fact argument, the balance of advantage must be to preserve this independent community.

Analyst notes:

Tags:

Response ID: ANON-E2PZ-XAND-C

Created Date: 2023-08-08 16:07:00.831895

Submitted Date: 2023-08-08 16:09:30.291733

Last Modified Date: 2023-08-08 16:09:17.809708

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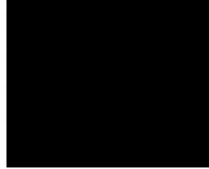
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Activity State: open

Citizen Space Version: v7.26.0

Visited Pages: ('intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401')

Mr Andrew Collins



by email 9/8

1. That the promoters area and the areas sought are really one community...

Ramsey Town Commissioners (RTC) the promoters contend that Glen Auldyn (GA) residents benefit from the services provided within the town, that there is little physical separation i.e. Town boundary has now reached the Glen boundary – so becoming an extension of the Ramsey Community. Furthermore that the Glen residents already identify its association with the town.

On the first point, from my own experience managing a shop within Ramsey, I would agree that Glen residents use and participate in town services however this is mutually beneficial given that town/high streets/commerce/services need wider footfall and activity to survive. Also this is not exclusive to the Glen, with the Town being the commercial centre for the whole of the North of the Island. Additionally it is a fact that Glen residents also use a range of services provided by their own/current Lezayre Commissioners (LA) and travel wider for retail/services/recreation to both Laxey and Douglas. There is no case here that the two populations are or have become the same community.

On the physical separation point GA remains separate and distinct from the Town. It has grown and developed over time having its own history which is well documented dating back to the earliest settlements (*ref imuseum.im – archives*).

Furthermore this has been recognised in the recent past by independent assessment IOM Government Landscape Character in Development Assessment Report (*ref section B2 page 35*). This report identifies GA as being 'One of Ten Narrow Upland Glens' and provides an Overall Character Description:

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

Key Views:

- ⑩ Channelled views framed by steep valley slopes.

Evaluation of landscape sensitivities:

- ⑩ Ecological value of the aquatic ecosystem and riparian habitats.
- ⑩ Valley bottom and riverside woodland in the lower valley.
- ⑩ Small-scale nature of buildings, within well wooded, intimate valley landscape.

⑩ *Vernacular character of buildings and bridges.*

Landscape Strategy:

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

The physical differences from a Town/Urban environment could not be better stated; GA is a riverside woodland, with well spaced buildings set in an intimate valley landscape.

In terms of separation the following is true today and for the foreseeable future:

The Lower Milntown development, which would have effectively seen an extension of Ramsey to the west into the countryside on the northern side of Lezayre Road failed at Planning Appeal ref 20/01080/B. A significant point here being this development was opposed by the very promoters of this boundary extension RTC. Hence even though this land had been zoned the promoters no longer see development to the west as viable.

There is no shared road network or direct lines of communication between the two communities. GA is accessed solely from its own junction on Lezayre Road.

There is no conjoined/coalescing housing developments or built up areas. The Golf Course, woodland plantations and agricultural fields providing for clear separation from the Town.

GA is assessed as countryside and should be protected for its own sake, underpinned by the prevailing legal framework within the Island Development Plan, Strategic Plan 2016:

Environment Policy 1 states:

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

This is further supported in the draft North and West Area Plan, where it has been suggested that GA should form a settlement in its own right – under new criteria Group of Houses in the Countryside (*ref Draft Area Plan page 8*) an update to the existing Low Density Housing in Parkland (*ref 1982 Development Plan Circular No. 8/89*).

In respect of the final point, I know of many Glen residents both near neighbours and wider that do not see themselves as Ramsey residents, but members of a separate village/countryside settlement.

Simply on a matter of fact argument, the balance of advantage must be to preserve this independent community.

2. That there is community of interest, public agencies, recreation and communal requirements...

As the first point, from my own experience managing a shop within Ramsey, I would agree that Glen residents use and participate in town services and activities. However this is mutually beneficial given that town/high street/commerce/sports need wider support to survive. Again this is not exclusive to GA, with the Town being the commercial centre for the whole of the North.

This said, the Glen also provides for unique recreational activities itself, with many persons/visitors from across the Island travelling in and parking at the lower levels/near to Milntown Estate:

- ⑩ Milntown Estate itself being a visitor attraction and event base.
- ⑩ Mountain bike runs both in Brookdale Plantation and Skyhill.
- ⑩ Variety of walking paths both along the course of the main river stream and also Skyhill and the nearby Millennium Path.
- ⑩ Green lane driving/riding for suitable off road motor vehicles.
- An outdoor shoot (seasonal).

There are no similar activities provided by RTC.

3. That the area sought is an overspill or outgrowth of the promoters area...

In their own submission RTC acknowledges that the Golf Course has prevented the joining of the Town to the Glen. I would add further that there is also agricultural fields and Milntown Estate also part of Lezayre that provides further separation and that none of this land is zoned for development. Furthermore as per my earlier comment at point 1. RTC themselves opposed a recent planning application ref 20/01080/B Lower Milntown a housing development of some 138 new build properties on greenfield to the west. Hence RTC have come to realise development in this direction is not viable.

GA is most clearly not an overspill or outgrowth, but has developed within its own boundaries alongside the river stream over time, indeed it could be argued that settlements here – pre-date the establishment of Ramsey (*ref imuseum.im – archives*). Additionally all development within the Glen under both previous and prevailing legislation/guidance has provided for 'Low Density Housing in Parkland' (*ref 1982 Development Plan Circular No. 8/89*) a set of criteria established to preserve the existing rural feel/natural environment.

4. That wherever possible, clear physical boundaries are followed...

As per point 3, no further development is proposed to the west, the most recent planning application 20/01080/B failed at all stages of the process and The Minster for Environment, Food & Agriculture Hon C Barber MHK decision letter included this crucial observation: 'There would be harm, in this regard, to the established character and appearance of this rural area'.

The Glen has grown within its existing valley which is solely accessed from the Lezayre Road, it does not have any physical links with the Town and there are none projected.

5. That there is insufficient acreage left for development of the promoters area...

All existing land so zoned/deemed suitable for development within GA has now been exhausted, so this location does not provide for any significant potential for new housing. Additionally there are no remaining sections of land that would appear suitable topography to be so zoned.

I would proffer that in accordance with prevailing legislation RTC must consider developing brown field sites of which there are several see (*ref draft plan North and West Area page 12*) within its existing area before considering further greenfield expansion.

This being the directive of all existing legislation and policy guidance.

6. The balance of advantage lies in acceptance of the scheme...

Glen Auldyn simply does not provide any significant land area/or prospective currently un-zoned land to provide for urban growth. RTC themselves have flagged that the draft Area Plan for the North & West does not signpost this area as suitable for development. Indeed the contrary is true that GA should become a recognised independent Group of Houses in the Countryside (*ref Draft Area Plan page 8*).

Overall the proposal is poorly timed and ill conceived, coming ahead of the imminent North and West Area Plan and the All Island Plan 2026, where an informed overview of population needs and development for the longer term will be considered both Regionally and Nationally. It should fail on this point alone.

Simply on a matter of fact argument, the balance of advantage must be to preserve this independent community.



Proposed Ramsey Boundary Extension order 2023

Glen Auldyn

Andrew Collins

Point One – Community of interest/extension of Town

.Community – mutually beneficial Town is Commercial/Service Centre for the North and requires indeed needs to encourage wider footfall, activity to prosper – Ramsey is identified as a Service Centre for its associated hinterland – Isle of Man Strategic Plan 2016 (SP 2016) ref chapter 5 para 5.8 i.e. basically doing exactly what it says on the tin!

.Chapter 4 SP 2016 - para 4.3.3 *‘Each of our towns and villages has an individual character arising not only from its geographical position and existing fabric, but also from its historical, cultural, and social*

background. This character should be protected and



Point Two – Community of interest, public services/social agencies, recreation

.I feel its key to differentiate Public services/agencies IOM Gov i.e. centrally provided: Health, Education, Police v RTC locally: Parks, Library, Refuse Collection

.Retail and some government services are provided as part of Ramsey Service Centre role, this said GA population has the choice and does travel to use other outlets Douglas, St Johns - Tynwald Mills, Laxey to name a few

.Recreational activities Town v Glen

.Many of the Town clubs and sports activities like the

Glen are private enterprises and individuals attending



Point Three – overspill or outgrowth

.GA is CLEARLY NOT an overspill or outgrowth, but has developed over time – FACT there is a documented history going back over centuries regarding human occupation within the Glen refs: imuseum.im archives, Milntown Trust Archives, Manx National Heritage document MS 12560/4 timeline

.RTC acknowledge that the Glen is not joined to the Town and is clearly separated by green space the Golf Course, however they have failed to mention Milntown and several agricultural fields which are not zoned for development



Photo 1. Looking east from Sky Hill, GA in foreground, Ramsey in distance



Point Four – that wherever possible clear physical boundaries are followed

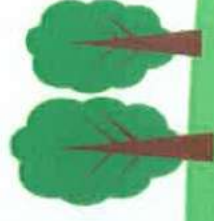
.The boundary to the north of GA is provided by Lezayre Road and beyond this open country to the west of the GA stream. Following the rejection of 20/01080/B Lower Milntown, there is no likelihood in the near to mid future of development extending further to the west i.e. along the Lezayre Road into this open countryside

.The West and Southern boundaries are indeed defined by the shape of the Glen, the Glen paths extending miles into the hills of Lezayre via Sky Hill

interconnecting The Millennium Way. To the South



Photo 2. GA from Sky Hill properties in
Valley bottom



Point Five – insufficient acreage left for development

• This appears to be a major component in terms of RTC wishes i.e. They have exhausted all existing possibilities within current boundary to grow and develop and are seeking a change to support longer term

• However, they have jumped the gun here. The latest projection for population increase has now slipped to 2037, with the IOM Gov prioritising infrastructure and services first. Population growth target has now been downgraded in the IOM Gov strategy - ref Gov.im



Point Six – that the balance of advantage lies in acceptance of the scheme

• As outlined in detail at point 3, no further development is proposed to the west, the most recent planning application 20/01080/B failed at all stages of the process. Additionally there is significant flood risk associated with this area as per the latest IOM Gov flood risk mapping - ref IOM Flood Hub, that will have to be considered in future land use zoning

• GA simply does not provide any significant land area/or prospective currently un-zoned land to provide for urban growth – so why does RTC seek this

location?



Reference documents:

•To be completed...



Comments on Ramsey Town Commissioners Boundary Extension Proposals

by Brian and Barbara Corlett, [REDACTED]

12th October 2023

My wife and I have been residents of Lezayre for over 25 years. Our property, [REDACTED] is on the South side of [REDACTED] the section between the existing town boundary and the entrance to the Mountain View Innovation Centre (MVIC). We would be directly affected by both the Western and Northern areas in the RTC proposal which are separated by Jurby Road. Our property is immediately South of Jurby Road, fronting onto it.

We have always regarded ourselves as residents of the community of Lezayre, and not Ramsey, and have considered the long-established group of houses in which we live as separate from the town. We are very happy with the level of services offered by Lezayre Commissioners and their delivery and would like our property to retain its historic association with the parish.

The way in which Ramsey Town Commissioners (RTC) present their arguments in their submissions are not particularly coherent or logical. For example, they effectively suggest that anyone living outside the town who uses facilities within the town should be a resident of the town. This is ridiculous. Many of the facilities which they cite are either funded by the Isle of Man's central Government (e.g. the schools, the hospital, policing, drainage and other utilities, etc.) or jointly funded (e.g. the swimming pool funded by parish as well as town rates, and the library for which non town residents pay double for membership compared to town residents). Ramsey also benefits from the increased footfall of non-residents such as us in shops, cafes and restaurants, garages, etc. helping those businesses to pay their rates and fund RTC without RTC having to provide any services to us.

RTC make reference to the Draft Area Plan for the North and West, noting that it will be replaced in the near future by a strategic review and an Island wide plan. However, RTC appear not to have read or considered the assessments of proposed development land that go with the Draft Plan. On page 10 they note that the Draft Plan removes some land within the existing town boundary from future development but ignore the fact that it also effectively removes some of the development land which was proposed, which is outside that boundary and which they want available for future development. Bringing land within the town boundary will not change any planning constraints on that land.

For example, in respect of the areas of the proposed extension of the town boundaries which are of particular concern to us,:

- They refer several times to the land South of Jurby Road between it and the Sulby River, ignoring the fact that some of it is shown on their own extract from the Government flood risk map as having a significant flood risk. RTC have included an extract from the Government's flood risk mapping on page 9 of their submission but choose to ignore the fact that this shows fluvial flood risk North of Sulby River immediately to the East of the film studio.
- The assessment for LR0011 in the Draft Area Plan for the North and West, which covers a significant part of the area which RTC refer to, concludes that "Housing need does not overcome constraints identified"; the constraints included the fluvial flood risk, referred to above, and the assessment concluded that "The site is not developable". In addition, there is a legal constraint on any development of the fields immediately to the South of Riversdale and Mona Lodge in the form of a covenant held by the owners of Riversdale.
- The land identified for the Northern extension of the Ramsey boundaries includes most of Westhill Farm, North of Jurby Road. The assessment for LR0015 in the Draft Area Plan for the North and West, which covers this land, concluded that "Site is detached from Ramsey and there is no housing need which suggests expansion into this area is a potential option. It is not a sustainable site" and again it is concluded that "The site is not developable".

Apart from the construction of the film studio on the site of a range of agricultural barns, there has been no new development along this stretch of Jurby Road outside the Ramsey town boundary for a very long time. Planning applications for such development have been turned down (e.g. application 94/00936/A, 99/02317/A and 11/01676/A). Contrary to RTC's assertion on page 21, ribbon development has been avoided and the essentially rural nature of the area has been maintained.

RTC characterise the properties on Jurby Road between the existing town boundary and the entrance to MVIC variously as "overspill" and "ribbon development", e.g. pages 16 and 21. Many of the properties on this stretch of road appear on the 1870 Ordinance Survey map including Riversdale and its cottages, Mona Lodge, Balleigh, Balldromma Farm (the site of MVIC), etc. Ramsey has grown towards the historic group of houses rather than vice versa as RTC try to suggest.

It is ironic that the presence of the MVIC is effectively cited as evidence of ribbon development along Jurby Road (it is a considerable distance back from the road). It was built as a film studio with substantial government financial support and an important justification for using the site was that it was not in Ramsey and was physically separated from it. Using its presence as a justification for

extending Ramsey is an insult to those who pointed out that such a development in a rural location was inappropriate. The current owners have gone to some lengths to maintain and enhance its rural surroundings, e.g. planting large numbers of trees.

In addition, and again contrary to RTC's assertion on page 21 that the current town boundary is not obvious, there are significant changes in character to the West of the current town boundary with much of the housing set well back from the road, a lower housing density, intervening fields, etc.

There seems to be an inordinate haste about the process which RTC have initiated, to the extent that they try to ignore or deflect from the fact that a major Island wide replanning exercise is to take place, looking at both strategic and development plans. Surely it would be more logical to have that in place and housing need better identified before consideration of adjustments to the town's boundaries. We are not aware that the alleged limitations of the existing boundaries have prevented any development being proposed or taking place. The suggestion on page 11 that their current proposal would avoid future conflict with the parishes is disingenuous since any issues would in practice only affect new developments in the intervening period and could anyway be addressed at the time they arose. Should a new Island wide strategic or development plan identify areas within the proposed boundaries that are not allocated for development, it seems very unlikely that RTC would offer the areas and any rateable properties in them, back to the parishes.

The illogicality of the RTC proposals is further illustrated by the bite taken out of the boundary line at the Dhoor covering the houses at the South end of the settlement, to the West of the Andreas Road. If acquisition of all the land out to the Dhoor is justified to provide potential future development land (there can be no other justification even if it wrong or unnecessary), on RTC's plans the Dhoor would eventually be joined to Ramsey removing its separateness. It would mean that RTC would be back asking for boundary changes again.

It is difficult to understand RTC's proposals as anything but a pre-emptive land grab, without the application of proper and logical consideration, strategic or otherwise.

Katsaiti, Nadia (CSC)

From: Keith Dalrymple - [REDACTED]
Sent: 08 September 2023 10:17
To: [REDACTED]
Subject: Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023.

FAO Peter Taylor, Local Government Team, Department of Infrastructure.

Dear Sir,

Further to prior correspondence I request 'Interested Party Status' with an opportunity to speak at the forthcoming Public Inquiry.

My name is Robert Keith Dalrymple.

My address is : [REDACTED]

My home is at the current western Town Boundary adjacent to and abutting land encompassed by the proposed extension.

My comments will be centred upon the following :

- Proposed land use,
- Environmental and Ecological Considerations,
- Nebulous, inadequately defined justification for the proposal,
- Implications of proposals are at variance with and contrary to IOM Government Published Policies, these will be specifically referenced and detailed.
- Adverse impact upon already over-stretched medical and other services,
- An overly simplistic approach to housing provision negating opportunities for much needed Urban Regeneration within a Town that is visibly decaying from the centre.

I appreciate that there will be time constraints and will ensure that my contribution is succinct, concise and relevant.

Yours Faithfully,

Keith Dalrymple, FRICS.

Sent from Outlook for iOS

Katsaiti, Nadia (CSC)

From: Keith Dalrymple - [REDACTED]
Sent: 18 October 2023 09:41
To: Katsaiti, Nadia (CSC)
Subject: Fwd: Request for Interested Party Status at Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023
Attachments: Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023..eml

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

Dear Nadia,

I attach my previous email, dated 8th September 2023, addressed to Mr. Peter Taylor wherein I requested 'Interested Party Status' with permission to speak at the forthcoming Inquiry.

I now repeat that request and append more specific details about my objection to the proposal.

My name is Robert Keith Dalrymple.

My address is [REDACTED]

I am a Ramsey Resident, Ratepayer and Chartered Surveyor.

The rear boundary of my home abuts the current Ramsey Town Boundary, sharing a party boundary (an ancient sod-hedge) with adjoining land, indicated on the Ramsey North Map submitted with Ramsey Town Commissioners' proposal, as being within the proposed Boundary Extension.

Having attended and listened carefully to all speakers at the Pre-Inquiry meeting, especially the extensive discussion about Town & Country Planning, the delayed North West Area Plan and the Review of the IOM Strategic Plan, from the various comments, together with the reasoning and justification in the text of RTC's proposal, it is apparent that extension of the town boundaries would be a precursor to more greenfield development on the periphery of the town.

Conscious of the guidance from the Inquiry Chairman that submissions could be combined I have endeavoured to avoid detailed duplication and repetition of points made by others, however, I strongly contend that the RTC proposal is majorly at variance with numerous publicly stated IOM Government Policies, Plans and Strategy documents which are formulated to deliver sustainable benefits to our Environment; Ecology; Economy; Biodiversity, the protection of the Island's Landscape, character and appearance together with our cultural heritage and historic environment. Despite which the RTC proposal, centred upon greenfield land for house-building, totally ignores alternative options and other evident and longstanding needs of the town - Specifically Urban Regeneration and Brownfield Development. Greenfield Development is an overly simplistic approach with potentially far-reaching adverse implications which do not appear to have been given due, if any, consideration by RTC.

In normal circumstances Greenfield and Brownfield Development would not be mutually exclusive, but these are unusual circumstances presenting a unique opportunity for RTC to be imaginative and innovative. Instead of pursuing blinkered proposals that are directly opposed to so many of Government's laudable strategies and aspirations, RTC could and should take advantage of the combination of factors which may be utilised to address not only a need for housing but also the evident consequences of decades of neglect. Ramsey has been decaying from the centre for generations. Ramsey is not alone in this, but Ramsey is alone in actively seeking to create conditions that would be a major disincentive to Brownfield

Development within the town. If only considered on grounds of financial viability Greenfield Development is easier and less expensive than Brownfield, were this not the case Greenfield would not be the Speculative Developer's methodology of choice, and it is !

Therefore, the availability of Greenfield sites would be a deterrent to Brownfield on a straightforward cost basis.

The advantages and desirable outcomes of Urban Regeneration and Brownfield Development are obvious, currently Government has spelled them out in the Built Environment Reform Programme and the Review of the IOM Strategic Plan. A Town and Village Regeneration Scheme has been introduced to assist with funding and incentivise appropriate projects, Government is referencing 'Town Centre First Models' that have been successfully introduced in other areas and jurisdictions, and the IOM Strategic Plan Review lists 14 'Key Issues', 13 of which relate directly to potential short, medium and long-term wide ranging benefits accruing from the adoption of Urban Regeneration policies.

The RTC proposal states that : "The present position is that the town has exhausted the majority of development land within its boundary."

"Development land in Ramsey has all but been exhausted (sic) available sites provided for within the existing Town Plan."

And, under 4.Discussion - "and which would meet the aspirations of the Town and Government in terms of the future longer-term development of the Town."

It is patently incorrect to say that there are no potential development sites within the town, there are many, in both public and private ownership, suitable for development, re-development or re-purposing.

Tower Street, Water Street, Parliament Street, Old River Road and Gladstone Avenue have examples of readily manageable sites with more on the Quayside and Albert Road.

It is also difficult to reconcile the claim to "meet the aspirations of the Town and Government" when the proposal is the direct opposite of Government's published policies, plans and strategy, not mere aspirations, and the most often voiced aspiration of the majority of townspeople is to see the all too visible decay and semi-dereliction addressed.

RTC have not provided adequate justification for approval of their proposal. A shortage of developable land within the current town boundaries is cited but the actual areas available are not quantified.

Removal of those green, predominantly agricultural areas at the current town boundary would be to perpetuate the mistakes of the past, are we never to learn the lessons of history ? The Island's Landscape and Character are at risk, and that would be irretrievable, consider the example of Douglas, Onchan and Braddan, they are virtually indistinguishable from each other, preservation of the green land is the only physical barrier to further urban sprawl. This, I suggest is particularly pertinent to this proposal as there is an attractive, viable alternative. Greenfield Development may produce the housing that RTC feel they need, but that's all it produces, with attendant damaging impact.

Regeneration can produce the housing with the added value of improving, enhancing and revitalising the living heart of our town.

Therein lies the challenge, to facilitate and enable positive renewal within our town, ensuring that future development is in the best locations whilst preserving those rural aspects that make the Island a special place to live or just build on green fields.

Yours Sincerely,

Keith Dalrymple.

Sent from Outlook for iOS

Katsaiti, Nadia (CSC)

From: David Dorricott [REDACTED]
Sent: 05 October 2023 09:17
To: DOI, Local Government
Cc: Lezayre Commissioners
Subject: RE: Proposed Ramsey Boundary Extension - Public Inquiry

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

As the ultimate beneficial owner and operator of the 25 acre site of Mountain View Innovation Centre, Jurby Road, Lezayre, IM7 2DZ, I would like to apply for interested party status.

Amongst other matters we wish the enquiry:

1. To be properly aware of the strong rural parish / agricultural nature of the site – including our Biosphere award status.
2. Our very close affinity with Lezayre Parish. its Commissioners and residents.
3. The key requirement not to urbanise and therefore destroy this carefully managed ecosystem.

Regards

David Dorricott
[REDACTED]

From: Katsaiti, Nadia (CSC) <Nadia.Katsaiti2@gov.im>
Sent: Wednesday, October 4, 2023 2:59 PM
To: Willoughby, Stephen <Stephen.Willoughby@gov.im>
Cc: DOI, Local Government <LocalGovernment@gov.im>
Subject: FW: Proposed Ramsey Boundary Extension - Public Inquiry

Dear All

Please find attached a further reminder email.

In order to appear and be heard at the Inquiry you will have to be granted Interested Party Status under Section 3 of the Inquiries (Evidence) Act 2003

If you do not have Interested party status, you will not be permitted to speak.

If you intend to speak then you cannot remain anonymous.

If you wish to appear and speak at the hearing, You **Must** apply by **4pm** on the 18 October 2023.

Your application should cover the following points which we ask that you provide by either e-mail or letter.

- Name
- Address –confirming which area you are speaking about (including Ramsey).
- If you don't live in one of the areas affected or in Ramsey then you must state what information you have that is of interest to the application and why you should be given interested party status.

Proposed Ramsey (Boundary Extension) Order 2023

Response ANON-E2PZ-XAYK-X

Name: David Dorriceott

Analyst notes:

Tags:

Email:

Analyst notes:

Tags:

organisation yes / no : Yes

Organisation:

Analyst notes:

Tags:

Consent publishing: Yes, you can publish my response in full

Analyst notes:

Tags:

Yes/no - Reside in the local Yes

authority area of either

Ramsey or Lezayre or Garff

(Maughold Ward):

Analyst notes:

Tags:

Yes/no - Live within the Yes, I live within the West proposed extension area

proposed extension area:

Analyst notes:

Tags:

Select one - Support/Don't I object to the proposal

Support the proposal:

Analyst notes:

Tags:

Yes/no - Wish to attend the Yes

inquiry:

Analyst notes:

Tags:

Select one - Further expand

Yes, I intend to further expand on these comments at the public inquiry

on the comments at the public inquiry or content to rely on the written

submissions:

Analyst notes:

Tags:

Comments box - Additional

The Mountain View Innovation Centre is mainly situated in the West Extension of the proposals - but was established, and remains a committed part of the Lezayre Parish and community.

As the site is managed as a whole, there is no merit in its transfer from one authority to another.

Analyst notes:

Tags:

Response ID: ANON-E2PZ-XAYK-X

Created Date: 2023-06-26 12:29:54.174758

Submitted Date: 2023-06-26 12:35:20.427609

Last Modified Date: 2023-06-26 12:35:17.038266

IP Address: 37.18.143.88,127.0.0.1

Browser Identification: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/114.0.0.0 Safari/537.36 Edg/114.0.1823.43

Analysed: No

Activity State: open

Citizen Space Version: v7.24.0

Visited Pages: ('intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401')

Katsaiti, Nadia (CSC)

From: Philip Dunne [REDACTED]
Sent: 18 October 2023 15:58
To: Katsaiti, Nadia (CSC)
Cc: [REDACTED]
Subject: RE: Proposed Ramsey Boundary Extension - Public Inquiry

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

Hi Nadia,

In response to your questions below I can confirm:

Name: Philip Dunne

Address: [REDACTED]

Points on which I wish to speak:

- Separate Communities – I would like to illustrate that the two communities are separate and in particular are divided by “Green Gaps” and have different population densities.
- Communities of Interest – I would like to illustrate that the two communities have different communities of interest – Ramsey an urban one and Glen Auldyn a rural one
- Physical Boundaries – I’d like to reference the IOM Government Landscape Character Assessment 2008 report to show how Glen Auldyn is considered to have a separate and distinct physical boundary to Ramsey
- Insufficient Acreage – I’d like to show that there is insufficient acreage for any development in the Glen for development
- Environment - I would like to speak on the absence within the Ramsey Commissioners proposal of any reference to the Environment and how their plans are at odds with the Strategic Plans view on the Environment.

Yours

Philip Dunne

From: Katsaiti, Nadia (CSC) <Nadia.Katsaiti2@gov.im>
Sent: 04 October 2023 14:59
To: Willoughby, Stephen <Stephen.Willoughby@gov.im>
Cc: DOI, Local Government <LocalGovernment@gov.im>
Subject: FW: Proposed Ramsey Boundary Extension - Public Inquiry

Dear All

Please find attached a further reminder email.

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If you wish to appear and speak at the hearing, You **Must** apply by **4pm** on the 18 October 2023.

Your application should cover the following points which we ask that you provide by either e-mail or letter.

- Name
- Address –confirming which area you are speaking about (including Ramsey).
- If you don't live in one of the areas affected or in Ramsey then you must state what information you have that is of interest to the application and why you should be given interested party status.
- You must also set out the Points in reasonable detail which you intend to address in your oral submissions.

We will be issuing a timetable for the Inquiry and there will be specific times when each area is discussed and also a time for general submissions. This means that you will not have to attend every day of the inquiry to be able to speak.

The email address that you should use to request Interested Party Status is LocalGovernment@gov.im. The address is in the signature below.

Kind regards

Nadia

Nadia Katsaiti | Administrative Officer | Local Government Team

Central Support and Change Division | Department of Infrastructure
Sea Terminal Building | Douglas | IM1 2RF | Tel 685900



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DOI Values: Communication; Respect; Teamwork; Recognition; Trust; Customer Service.

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From: Katsaiti, Nadia (CSC)

Sent: 01 September 2023 13:32

To: Willoughby, Stephen <Stephen.Willoughby@gov.im>

Cc: 'Ramsey' <tim.cowin@rtc.gov.im>; 'Lezayre Parish Commissioners' <lezayrecom@manx.net>; 'Admin' <Admin@Garff.im>; 'Peter Taylor' <peter.taylor@kellyluft.com>

Subject: Proposed Ramsey Boundary Extension - Public Inquiry

Dear Sir/Madam,

Please find attached a letter for your attention in regards to the above subject.

Kind regards

Nadia

Nadia Katsaiti | Administrative Officer | Local Government Team

Central Support and Change Division | Department of Infrastructure
Sea Terminal Building | Douglas | IM1 2RF | Tel 685900

Proposed Ramsey (Boundary Extension) Order 2023

- Name: Philip and Diana Dunne
 - [REDACTED] *wait 1/8*
 - Responding on behalf of Philip and Diana Dunne
 - You may publish my response in full
 - Address: [REDACTED]
 - I live within the [REDACTED]
 - I object to the proposal
 - I wish to attend the inquiry
 - I am happy to expand further on these comments at a public enquiry
- Letter 1/9*

1 Context

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

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

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

2 Precedence

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

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

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

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

3 Criteria for the Consideration of Local Government Boundary Extensions

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

3.1.1 Green Gaps

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

Green gaps (see Spatial Policy 7)

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

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

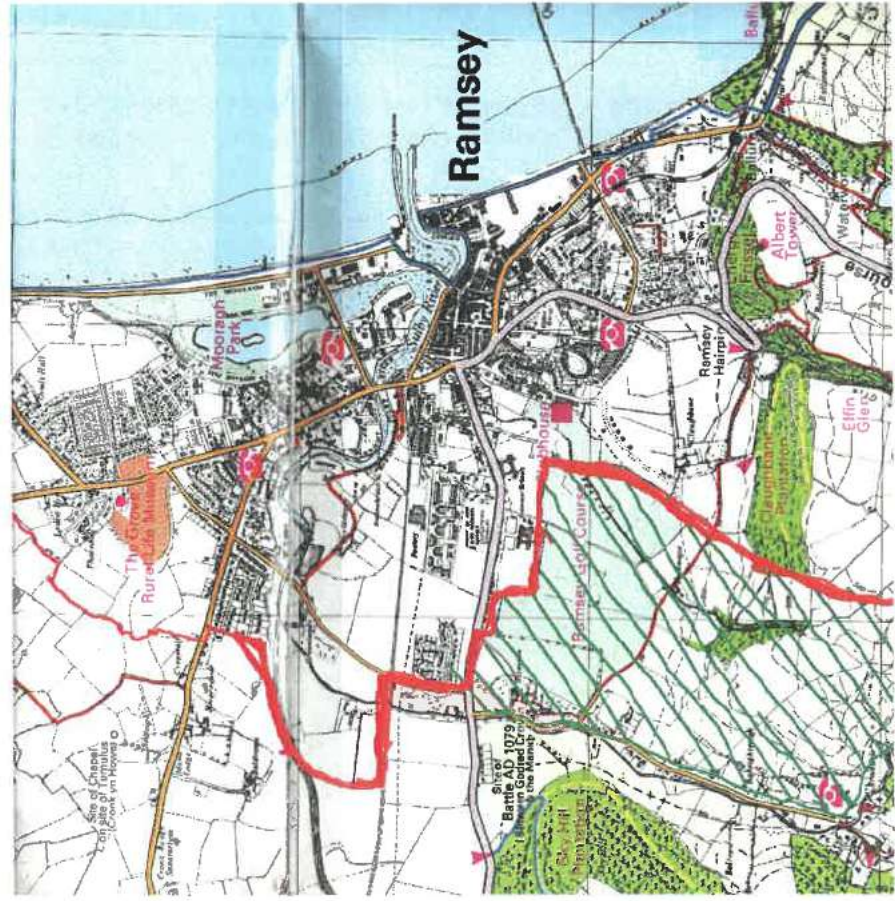
It is very difficult for an example of a Green Gap being much clearer, moreover its very purpose is to "prevent the coalescence of settlements".

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

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

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

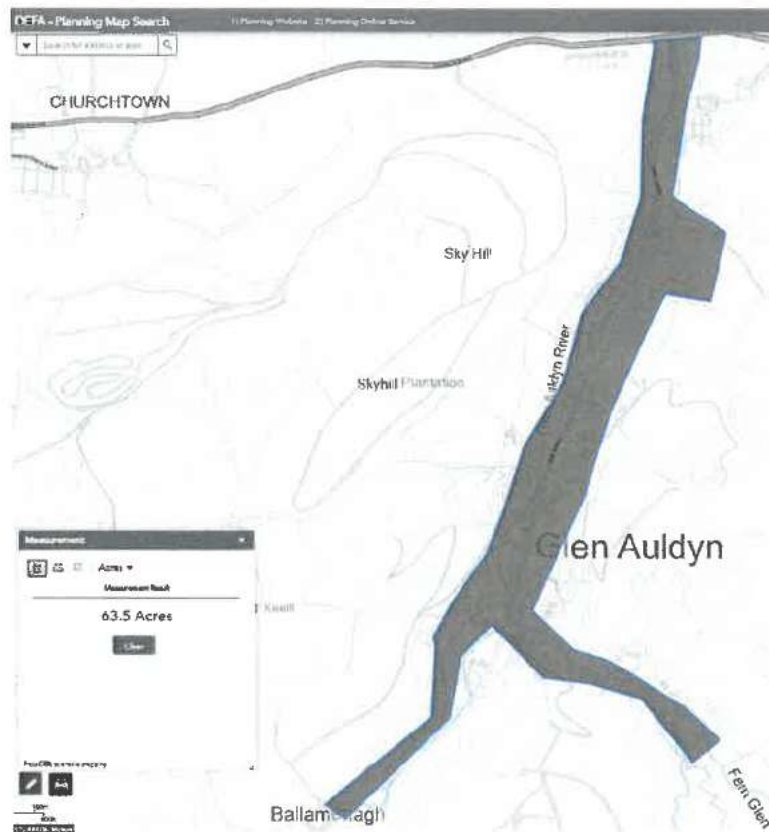
OS Map 1995



3.1.3 Population Density

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

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



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

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

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

3.2 Community of Interest

3.2.1 Service Centres

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

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

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

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

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

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

3.2.2 Rural Community

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

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

3.2.3 Internet

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

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

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

This is perhaps the simplest item to rebut.

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

This simply is not the case.

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

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

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

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

3.4 That, wherever possible, clear physical boundaries are followed

3.4.1 Landscape Character Assessment Report (2008)

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

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

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

It describes under "Key Views":

Channelled views framed by steep valley slopes.

Under "Evaluation of landscape sensitivities" it lists:

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

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

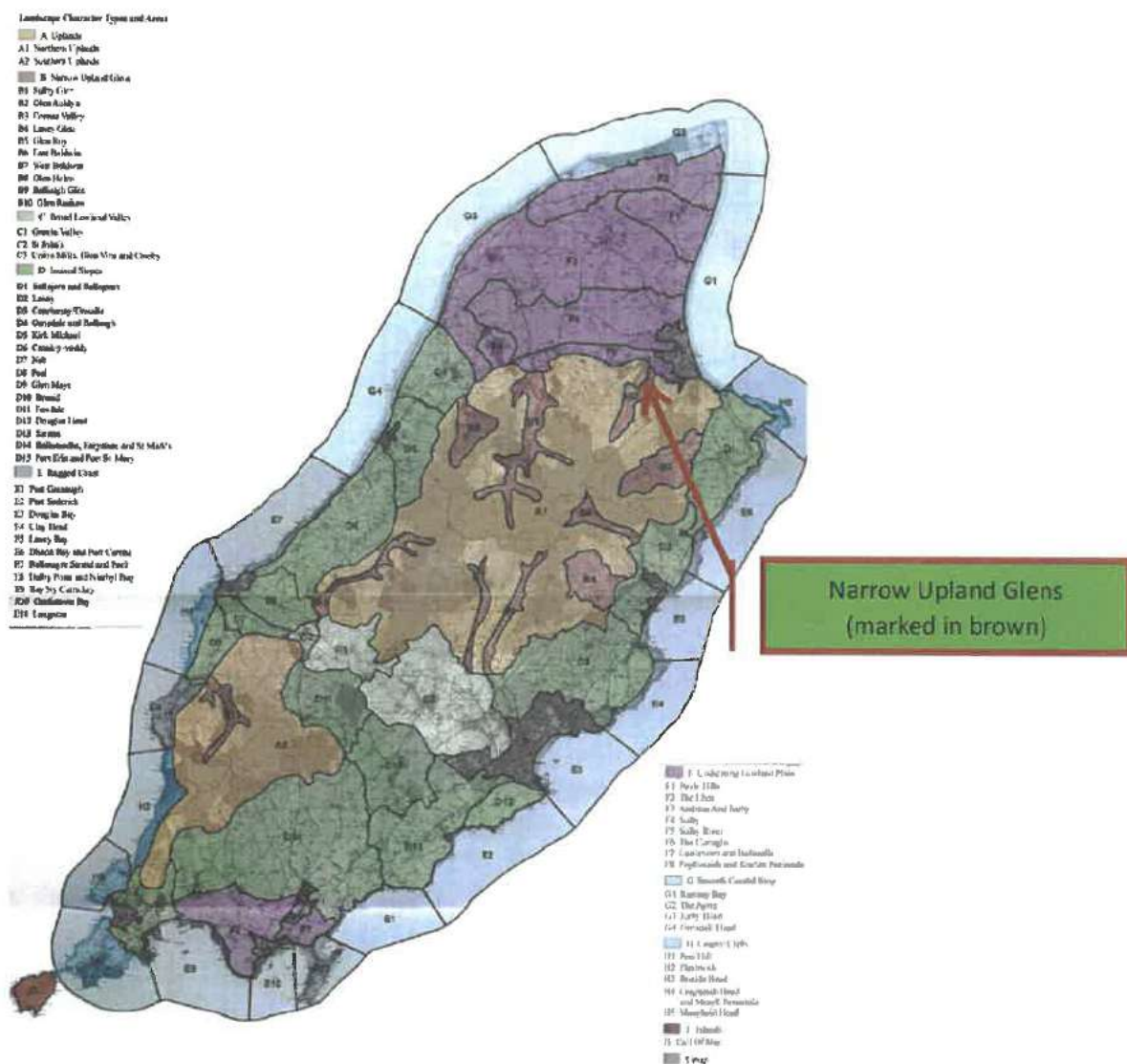
The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of wooded valley bottom with housing sensitively located alongside the ecologically valuable riparian corridor.

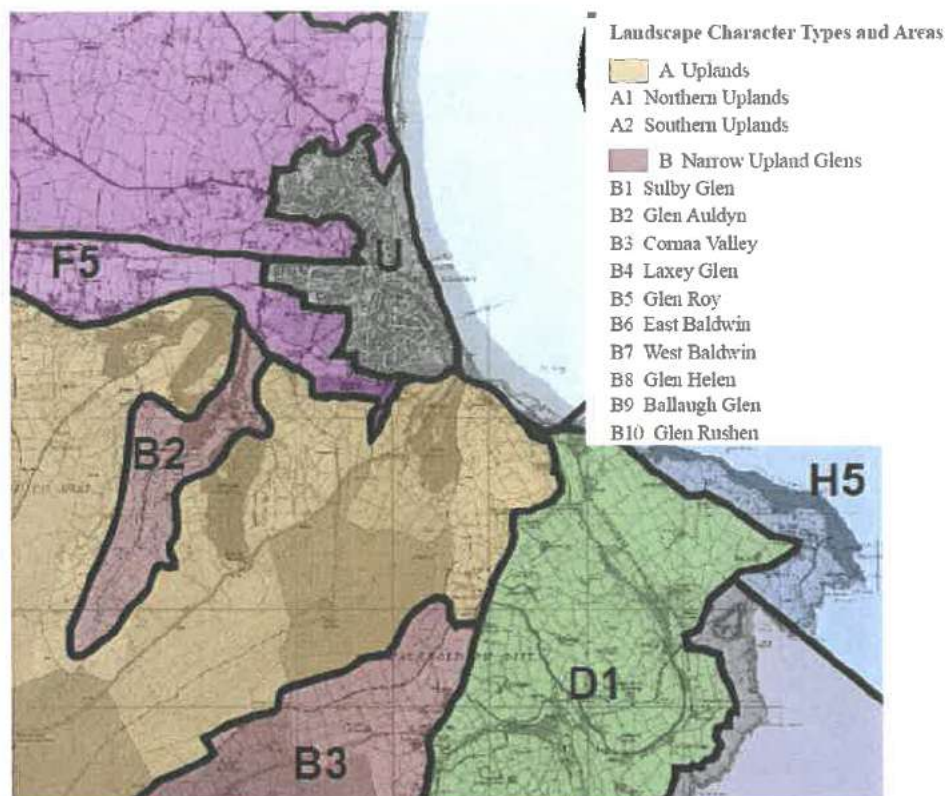
The physical boundary distinctions could hardly be any more clearly stated.

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

3.4.2 Narrow Upland Glen

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





The document describes Narrow Upland Glens as:

Narrow Upland Glen (Type B)

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

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

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

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

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

3.5.1 Glen Auldyn

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

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

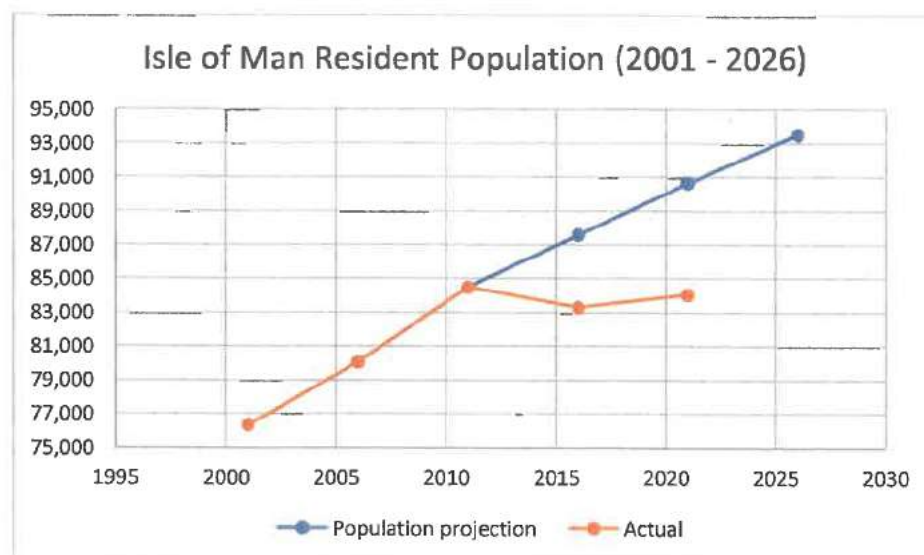
It is clear that this point is simply untrue in respect of Glen Auldyn and adds irrefutably to the case for Glen Auldyn to remain in Lezayre.

3.5.2 Premature and Unreliable Proposal

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

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

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



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

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

3.5.3 Containment

The Island Strategic Plan states that:

Spatial Vision

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

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

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

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

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

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

3.5.4 Built Environment Reform Programme

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

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

3.6.1 Balance of Advantage

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

3.6.2 Environment

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

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

The settlements defined in Appendix 3 are:

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

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

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

Proposed Ramsey (Boundary Extension) Order 2023

Response ANON-E2PZ-XAK1-P

290

Name: jill evans

Analyst notes:

Tags:

Email: [REDACTED]

Analyst notes:

Tags:

organisation yes / no : No

Organisation:

Analyst notes:

Tags:

Consent publishing: Yes, you may publish my response anonymously

Analyst notes:

Tags:

Yes/no - Reside in the local No

authority area of either

Ramsey or Lezayre or Garff

(Maughold Ward):

Analyst notes:

Tags:

Yes/no - Live within the Yes,

proposed extension area:

Analyst notes:

Tags:

Select one - Support/Don't I object to the proposal

Support the proposal:

Analyst notes:

Tags:

Yes/no - Wish to attend the Yes

inquiry:

Analyst notes:

Tags:

Select one - Further expand

on the comments at the

public inquiry or content to

rely on the written

submissions:

Analyst notes:

Tags:

Comments box - Additional

comments/suggestions:

I strongly object to the proposed Ramsey Boundary. The rates are to high in Ramsey (example 1 bedroom link detached on the boundary edge of Ramsey is £1050 a year, a detached 2 bedroom cottage in Garff cost £352, this is a reasonable price for a two bedroom property and they are both a similar distance from town.

We do not have sufficient local resources now and with more housing the situation will be further exacerbated. We have a shortage of Doctors and Dentists now, and the Smile practise has only one dentist for the whole of Ramsey (NHS)

This looks like a land grab to build houses in green belt areas and just turn a blind eye to viable alternatives. We have many run down properties which should be renovated or knocked down and built new. There are also many brown field sites that could be developed how do these feature in your development program?

Analyst notes:

Tags:

Response ID: ANON-E2PZ-XAK1-P

Created Date: 2023-08-09 10:10:12.405949

Submitted Date: 2023-08-09 14:34:23.320725

Last Modified Date: 2023-08-09 14:34:08.069688

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Analysed: No

Activity State: open

Citizen Space Version: v7.26.0

Visited Pages: ('intro', 'intro', 'intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401', 'mappingsubpage.2023-06-12.8494518763', 'intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401')

This is my request to speak at the public meeting on the Ramsey Boundary Proposal

Points I would like to raise.

I do not see any point in the Ramsey Boundary Proposal because

- 1) I see this as acquiring land to extend their boundaries in order to build on green field areas, have all brown field sites been fully considered. The proposed Royal Park development is huge so infrastructure is a mayor factor.
- 2) the present infrastructure does not cater for present demands on the system let alone for an expansion of new houses, as there are not sufficient NHS Doctors or Dentists to accommodate the current population of Ramsey which only around 8,288 Population [2021] – Census.
- 3) A significant number of people I feel were unable to attend the pre inquiry meeting which was held at the Innovation Centre in Ramsey in September It was held on a work day so the attendance was poor. A public inquiry should be held on a weekend or evening to maximise attendance.

I have spoken to many people and get the same answer we are supposed to be a Democracy but as residents we do not seem to have a say that counts.

Regards Jill Evans [REDACTED]

Proposed Ramsey (Boundary Extension) Order 2023

Response ANON-E2PZ-XAKE-A

Name: John Evans

Analyst notes:

Tags:

Email:

Analyst notes:

Tags:

organisation yes / no : No

Organisation:

Analyst notes:

Tags:

Consent publishing: Yes, you may publish my response anonymously

Analyst notes:

Tags:

Yes/no - Reside in the local Yes

authority area of either

Ramsey or Lezayre or Garff

(Maughold Ward):

Analyst notes:

Tags:

Yes/no - Live within the Yes, I live within the North proposed extension area

proposed extension area:

Analyst notes:

Tags:

Select one - Support/Don't I object to the proposal

Support the proposal:

Analyst notes:

Tags:

Yes/no - Wish to attend the Yes

inquiry:

Analyst notes:

275

email 9/8

left 19

09/08/2023, 13:33

Tags:

Select one - Further expand

on the comments at the
public inquiry or content to
rely on the written

submissions:

Analyst notes:

Tags:

Comments box - Additional

comments/suggestions:

SAFEGUARD THE FUTURE

put freedom to flourish into practice

It is essential that Planning development doesn't overrun Planning policy.

Not all of the proposed areas within the new proposed Ramsey Extension are earmarked for housing development. Therefore agreement to go ahead with a scheme must come after due consideration of all environmental issues as the First Minister has pointed out.

A BALANCE BETWEEN REGIONAL AND ISLAND WIDE/
LOCAL ENCLAVES OR STRUCTURED POPULATION EXPANSION

The Island is small and has a steady population of around 85K, services and provisions are spread Island wide. It is paramount that the best administrative use of available resources be used evenly and fairly. By changing and empowering different commissioners what does this say about those who would be losing those responsibilities in those areas? A willing workforce is a great asset, a lot of complaint has been voiced in respect of undermanning. This bears out also in the private sector in respect of employing trades people for property work of all sorts, the waiting times are now seriously unacceptable.

WHAT IS THE GRAND VISION

Discerning comments can prevent hasty decisions

A centralised approach in this regard would coordinate skills and abilities on a higher level of effectiveness to plan strategically not just for pockets of development but rather to be government orchestrated from a grand vision, also why not invite ideas, have an Island wide competition "How do you see the Island developing and improving (show drawings)" you'll get great ideas and people will catch the inclusiveness and get excited and feel part. Its important for the Island to keep its identity but also guard against becoming too introspective and defensive in its thinking?

THE BEST TOWNS AND CITIES VISITED

On the tourist route in the UK the Cotswolds are high on the must visit list. The Isle of Man has great natural beauty and diverse interest with

mountain, sea and land. We must consider its future development seriously, the Douglas promenade has been tastefully improved to match its status as the capital. What are the tourist destinations on the Island? how can they be enhanced and others brought up? We are listed in the top 10 economies of the world what we do or don't do will effect the Island's appeal and its best positioning for the future.

There is going to be an enquiry, clarification on the wording from the following paragraph from the governments notes on procedure would be appreciated.

The Act details the process to be followed and provides that where the Department has refused to make an Order, the applicants for the Order may present a petition to Tynwald praying that such an Order be made, and Tynwald, if it considers that such an Order should be made, may by resolution direct that the Department make such an Order.

Analyst notes:

Tags:

Response ID: ANON-E2PZ-XAKE-A

Created Date: 2023-08-09 10:10:12.710911

Submitted Date: 2023-08-09 10:53:57.523580

Last Modified Date: 2023-08-09 10:53:27.880421

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Browser Identification: Mozilla/5.0 (Macintosh; Intel Mac OS X 10_13_6) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/13.1.2 Safari/605.1.15

Analysed: No

Activity State: open

Citizen Space Version: v7.26.0

Visited Pages: ('intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401')

Katsaiti, Nadia (CSC)

From: johnevans [REDACTED]
Sent: 18 October 2023 12:37
To: DOI, Local Government
Subject: Ramsey Re boundary Proposal. Interested Party Status

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

Ramsey Public Inquiry Questions

The Publics Perception

At the pre planning meeting, The Chair made a statement, "If you don't ask you don't get." The general public perception seems to be that the Ramsey proposal is a land grab opportunity.

Fair Treatment

As the Ramsey Re Boundary draft is yet a proposal, proper opportunity has to be afforded the public and their representatives to give written comment. However the public's individual replies do not constitute or provide a platform for a Public Inquiry. The public recognise a large disparity of information. They rightly see "The Public Inquiry" as a very important matter, that requires thorough examination.

A Regional Public Committee

A Regional Public Committee is required to Legitimise The Public Inquiry, in order to present the "Publics View". The committee would consult on legitimate questions and matters arising with findings and recommendations presented to Mr Taylor.

Regards

J M EVANS [REDACTED]

My observations are largely of a general nature.

Proposed Ramsey (Boundary Extension) Order 2023

Response ANON-E2PZ-XA44-2

Name: Tim Johnston MHK

Analyst notes:

Tags:

Email: [REDACTED]

Analyst notes:

Tags:

organisation yes / no : No

Organisation:

Analyst notes:

Tags:

Consent publishing: Yes, you can publish my response in full

Analyst notes:

Tags:

Yes/no - Reside in the local Yes

authority area of either

Ramsey or Lezayre or Garff

(Maughold Ward):

Analyst notes:

Tags:

Yes/no - Live within the No, I don't live within any of the proposed extension areas

proposed extension area:

Analyst notes:

Tags:

Select one - Support/Don't I object to the proposal

Support the proposal:

Analyst notes:

Tags:

Yes/no - Wish to attend the Yes

inquiry:

Analyst notes:

Tags:**Select one - Further expand**

Yes, I intend to further expand on these comments at the public inquiry

on the comments at the

public inquiry or content to

rely on the written

submissions:

Analyst notes:

Tags:**Comments box - Additional**

comments/suggestions:

As an elected Member for the constituency of Ayre and Michael who has the honour of representing residents in Lezayre who will be directly affected by any proposed boundary extension by Ramsey Town Commissioners I do object to the extension. I can safely say that the clear majority of constituents I have engaged with who would be directly affected are opposed to this expansion and wish to remain residents or Lezayre. I am not going to endorse the reduction in size of my constituency knowing it is opposed by voters who vote in General Elections as constituents of Ayre and Michael. The importance of brownfield over greenfield development, recognising the need to protect valuable farmland, especially at a time when food security and self sufficiency are increasingly important, means that farmland needs to be cherished and protected for future generations. Ramsey Town Commissioners should look to their empty sites within their town boundary for targeted development on their existing open and brownfield sites, fulfilling the needs of environmental and sustainable development. Taking on more ground, much of which is subject to flooding or unsuitable for development generally will not satisfy the needs of expansion.

Analyst notes:**Tags:**

Response ID: ANON-E2PZ-XA44-2

Created Date: 2023-07-18 21:23:46.678401

Submitted Date: 2023-07-18 21:47:11.718417

Last Modified Date: 2023-07-18 21:46:55.080241

IP Address: 217.28.8.91,127.0.0.1

Browser Identification: Mozilla/5.0 (iPad; CPU OS 15_4 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Mobile/19E241

[FBAN/FBIO;FBDV/iPad12,1;FBMD/iPad;FBSN/iPadOS;FBSV/15.4;FBSS/2;FBID/tablet;FBLC/en_GB;FBOP/5]

Analysed: No

Activity State: open

Citizen Space Version: v7.26.0

Visited Pages: ('Intro', 'mappingsubpage.2023-06-12.8494518763', 'subpage.2023-06-12.1499903401')



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15th September 2023

Mr Peter Taylor

Chair – Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023

Dear Chair,

As one of the elected Members of the House of Keys for Ayre and Michael, I wish to declare Interested Party Status for the North, West and Glen Aldyn sectors of the proposed extension of Ramsey Town boundary, all of which are within the constituency of Ayre and Michael.

I did make a submission to the recent public consultation on the proposed extension and also agreed for my submission to be published at a future public inquiry. I would however like to make some further comments which again I am content to be published as part of any future inquiry. I do not wish to supersede my comments on the public consultation but to add to them following further interaction with constituents directly affected by the proposed extension. I would welcome being given the opportunity to speak to my submissions.

Northern –

Ramsey Town Commissioners quotes in their submission that, “community feels that development along the Jurby Road to Mountain View Innovation Centre is part of the Ramsey community and identifies as such.” Following conversations with constituents potentially affected by the northern boundary extension it is clear to me that residents do not feel part of or identify as part of the Ramsey community in this area in terms of wishing to become part of Ramsey town. Having spent time knocking on doors in the area affected and speaking to the majority of residents, no one who I spoke to wanted this proposed extension. The general message portrayed to me was they were not connected to the Ramsey sewer network, having their own septic tanks which were maintained at their own cost and on the whole did not have any street lighting nor did they want any. They were part of Lezayre Parish, a rural parish which they wished to continue to be part of. Other comments included the absolute need for Ramsey Town Commissioners (RTC) to manage better their current estate and look to develop brownfield sites within the town. If I may note that this particular comment was common from residents in all the three affected areas I identify with.

Katsaiti, Nadia (CSC)

From: keith quane <[REDACTED]>
Sent: 18 October 2023 14:01
To: DOI, Local Government
Cc: keith quane
Subject: Ramsey Town Boundary Extension

Caution: This email is from an external sender. Please take care before opening any attachments or following any links.

Hello

We would like to included in the submissions for the Ramsey Town Boundary Consultation which I understand has been extended until today the 18th of October 2023.

My name is Keith Quane and my Partners name is Sandra Quane.

We live in [REDACTED]

Our property is in side the area sought on the North Map where the proposed boundary crosses the [REDACTED] into the field west of out home(our boundary hedge would be for all intensive purposes is the proposed boundary.

As per the response form:

Yes you can publish our response.

Yes we do reside Lezayre.

Yes, we live within the North proposed area.

We object to the proposal

Yes at least one if not both of us, the enquiry.

Yes we would like expand on these comments at the public enquiry(if so required)

Comments:

1. One Community - no this is not the case, as the majority of the areas sought are open fields, steep hill sides leading to upland fields and a forested areas and open fields leading to a coastline prone to erosion by the sea and land drainage. Most if not all of the properties within the areas sought have no physical connection to Ramsey other than roads that traffic freely flows along in both directions.

2. Community of Interest - the areas sought are not a community of interest as they have their own primary school catchments. Doctors are available from Jurby. Community halls, school buildings and recreational facilities are available. Educational needs are available within the area sought up to and including primary school. After this as with the whole of the island secondary education has been centred by government around or near to the main conurbations of the Isle of Man. Doctors are available out side of Ramsey Group Practice at Jurby which I myself have used. But again medical facilities tend to be focused, island wide, around major conurbations. Dentist are and island wide issue and you are lucky to be able to register at any and there are waiting lists island wide for this service so claiming this service supports the area sought to me is a none starter and if you are in a dire need the emergency dentist is based in Douglas not Ramsey. Recreation for community in the area sought is cover by parish and church halls used for social events, clubs, and annual shows, public areas such Sulby Claddagh, the footpaths, greenways, rivers and reservoirs and places of historic interest and community use of schools.

3. Over Spill - the area sought can not be classed as over spill. Since the last boundary extension in the 1990's there has been no substantial if any development along Ramsey town's boundaries. Every property in the area sought that adjoins the Ramsey town boundary existed there at the last boundary extension so how can it be classed as over spill. And how can fields and hill sides and coastlines be classed as over spill, they are not developments?

The last Planning application that bounded anywhere near Ramsey that possibly could have been thought of as over spill, on fields at Milntown, was refused for the following: flood risk, development in isolation from the Ramsey boundary, environmental

impact, and out of keeping with the area. (See attached/ below image of letter showing reasons for refusal)

4. Clear Physical Boundaries - a quick study of the maps of the area sought and a look at the IOM Government maps on line and the current boundary can be seen to be following Rivers/Streams, field boundaries, Roads, Footpaths, and private property boundaries. No property dissected unlike the new proposed boundary.

5. Insufficient Acreage left for Development - Ramsey has a substantial amount of development area left or poorly utilised. There are two large greenfield developments yet to start: the fields between the Andreas and Bride roads, the land north of the old railway line at Gladstone park.

There are several brown field sites, some of them being the 3 on Ramsey west quay, two in parliament street, 1 in tower street, the old Albert road site, St Olaves Rectory site, and that is with out looking at individual plots and the need to redevelop old housing stock and derelict buildings.

As for the development of recreational areas Ramsey have a substantial amount already with the Coronation park and the Mooragh park with its lake, play area, gym equipment, skate park, BMX track, pitch and put and Rugby Pitch. Ramsey have two bowling clubs with their respective greens, two Football clubs and associated pitches, hockey and cricket clubs, Tennis clubs, they have accessible beaches and piers. Why would they need more?

6. Balance of Advantage - There is no advantage to the residents that would be enveloped by the area sought in the proposal. We would gain nothing more than we have already.

We are not on the mains sewer or gas neither of which would be economically viable to extend to every property in the area sought. We have our bins collected fortnightly and myself and my partner rarely struggle with this service.

Street lights, we are happy with our dark skies but are aware of the orange sodium glow from Ramsey from Twilight to dark and back. I personally do not want to lose the stars to street lights in our rural not urban setting.

To Ramsey I only see disadvantage. The area sought has limited potential for development due to environmental concerns such as rising sea levels flood risks, increased expense to look after more roads and paths. Ramsey already have a £38million debt to service with out more expenses to maintain like hedgerows and drains.

Thank you this opportunity to be part of this consultation.

Best regards

Keith and Sandra Quane



THE TOWN AND COUNTRY PLANNING ACT 1999

The Town and Country Planning (Development Procedure) Order 2019

Dandara Homes Limited
Dandara Group Head Office
IoM Business Park
Cool Road
Braddan
IM2 2SA

In pursuance of her powers under the above Act and Order/Regulations, the Minister of the Department of the Environment, Food and Agriculture, the Hon C Barber hereby in the name of and on behalf of the Department **REFUSE** planning **20/01080/B** by Dandara Homes Limited for Residential development of 138 dwellings with associated drainage, highway works and public open space - Land At Lowe (Fields 134278, 134279, 134280, 134281, 134282, 134283, 134284, 134288) And Strip Of Land Between Auldryn River & Auldryn Meadows, Off Lezayre Road, Ramsey Isle Of Man for the following reason(s):-

REASON(S) FOR REFUSAL:

1. Notwithstanding that the site is allocated for development in the 1982 Development Plan, other material considerations, including the more recent flood risk modelled area, would result in the site being developed in isolation, unrelated both to the envisaged westward extension of Ramsey and to the existing settlement boundary. This would be material harm, in this regard, to the established character and appearance of this rural area. Although mitigated to a large extent, there would also be harm to biodiversity and ecology interests. Those harms are not outweighed by the benefits of the development proposed.

Date of issue 1st March 2023

By Order of the Minister

Sent from my iPad



House of Keys
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Y Chiare as Feed
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Email: tim.johnston@gov.im

15th September 2023

Mr Peter Taylor

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Northern –

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Western –

To again quote from the RTC submission, “would require to be serviced by the town’s infrastructure and would essentially form an extension of the existing community.” This quote is in relation to the proposed Dandara development near Milintown that was turned down and again on appeal. The land is agricultural land of good quality. Prime agricultural land on the Isle of Man is at a premium and the Government is quoted as recognising the importance of food security for our Island. Again, those living in the area do not want to be part of Ramsey, they are surrounded by farmland in a rural parish and wish it to remain so. Of course Lezayre residents in the three affected areas use the amenities and facilities of their local population centre, the reason these amenities exist is because towns have the populations to help make them viable. However, viability is generally helped by economies of scale and others, in rural communities using these facilities help to make them more viable and actually enhance their performance. This is as true for someone living just on the outskirts of a town or several miles away, they do not need to be part of the town for the town to benefit.

Glen Auldyn –

During a previous attempt by Ramsey to extend its boundaries into Glen Auldyn, His Honour, Deemster Luft did not accept that there was a community of interests between these areas where a large number of residents of Glen Auldyn were opposed to the proposed boundary extension. From my conversations with constituents in Glen Auldyn, nothing has changed and strong opposition still exists. Whilst recognising that S.6 of the Local Government Act 1985 states, “the financial impact on an Authority either beneficially or negatively is not to be considered,” it does beg the question why Glen Auldyn would be considered as part of Ramsey’s alleged need to grow as there is little room for much further development. I would ask why RTC believes Glen Auldyn is needed once S.6 of the Local Government Act 1985 is applied as it is for proposed boundary extensions.

To conclude I do not support the notion from RTC that the areas identified in Lezayre Parish are part of a Ramsey ‘community’ in terms that mean and require the amalgamation of the identified areas into Ramsey. Ramsey is an important town, the second largest on the Island and provides many functions and amenities. I do not dispute that but the use of those functions and amenities are enhanced and made more viable by the surrounding rural communities and Ramsey benefits from the patronage of those rural communities, whether they are near the town boundary or several miles away. Does Ramsey need therefore the whole northern plain? Where does it stop? It is surely more desirable to recognise each other’s boundaries and work together which there is much evidence of but to also respect those rural/urban differences.

Kind regards,

Tim Johnston MHK

Ayre and Michael

Statement of the Head of Planning Policy, Cabinet Office to support the Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023

1 Introduction

- 1.1 Cabinet Office has been asked to provide evidence to the Public Inquiry in respect of the Area Plan for the North and West. I, Diane Brown MRTPI, hold the position of Head of Planning Policy and I have prepared this Statement on behalf of Cabinet Office. It shall form the basis for any oral evidence given at Inquiry but I may also make reference to papers already published, namely the Draft Area Plan for the North and West and accompanying Evidence Papers (published 24th June 2022) and published documents relevant to earlier Plan stages.
- 1.2 This Statement sets out background information about the responsibility of Cabinet Office when it comes to plan making, the broad content of the Draft Plan and how this relates to Ramsey and the surrounding area, as well as the stages undertaken so far. It also identifies ongoing work; highlighting the next steps and indicative timetable which would be followed if the plan is taken forward (after its own Public Inquiry) to be adopted (by Order) by Cabinet Office and approved by Tynwald (please see Appendix 1 for the timetable).
- 1.3 It is understood that matters relating to the Boundary Extension Proposal including the Public Inquiry stage are proceeding at their own pace. I note that some submissions to the Inquiry process suggest deferring a decision until the Plan process for the North and West is complete. I can confirm that the progress of the Boundary Extension application has not influenced the North and West Plan process to date. This Statement is offered as professional planning support to the Inquiry proceedings and the Chairperson specifically in their deliberations.

2 Background and the duty to prepare a Development Plan

- 2.1 The Cabinet Office has a responsibility, afforded to it by Section 2 of the Town and Country Planning Act 1999, to prepare the 'Island Development Plan' (IDP). The Development Plan sets out Government's policies for the future development of, and land use in, the Isle of Man, identifying what development is needed, where it should go and what land is protected.
- 2.2 The IDP (which is made up of more than one plan) sets out the general 'Policies' in the form of a Written Statement, and also 'Proposals' which relate to specific places, issues or sites, depending on the particular plan area. The two types of plan which make up the Island Development Plan are:
 - i. a strategic plan (which sets out general policies), and
 - ii. area plans (of which there may be more than one, that set out proposals

including site specific proposals, including sites for development).¹

2.3 The Isle of Man Strategic Plan 2016 ("the Strategic Plan") was approved by Tynwald on 15th March 2016, coming into operation on 1st April 2016. A review of this plan has recently started and the first consultation stage or 'Preliminary Publicity' took place between 21st July 2023 and 29th September 2023.

2.4 All 'proposals' in an Area Plan shall be in general conformity with the Strategic Plan².

3 The weight attached to Existing and Emerging Plans

3.1 In terms of how the Island Development Plan is taken into account in decision making on planning applications, it is listed as one of a number of considerations to be taken into account.³ S10(4) states that "In dealing with an application for planning approval...the Department⁴ shall have regard to – (a) the provisions of the development plan, so far as material to the application." In practice, this means that at the point of a decision being made, the approved development plan is taken into account.

3.2 All development plans take time to complete. This is because of the need to gather and analyse information, the need to ensure sufficient public consultation, the time and resources necessary for a public inquiry and the approval process which follows relating to modifications, adoption and approval. Questions are sometimes asked about the weight decision makers should place on emerging plans. For instance, sites may be allocated for development in an existing plan but might not be allocated in an emerging plan (which would include a Draft Plan). Emerging Plans can be seen as "other material considerations" but this doesn't imply that they should be afforded a specific level of weight in decision making.

3.3 Unlike in England, where the National Planning Policy Framework (NPPF section 48) sets out that "Local Planning Authorities may give weight to relevant policies in emerging plans..." there is no equivalent guidance on the Isle of Man. Plans are recognised as being relevant and in operation until they are revoked, which happens when replacement plans are adopted (by Order) and then approved by Tynwald.

3.4 From personal experience dealing with planning applications on the Island earlier in my career, emerging plans tend to carry little weight until replaced formally by an approved plan. The precise 'weight' remains a judgement made by planners and decision makers determining planning applications and considering the particular circumstances of the case. In practice, there is more certainty about a plan's direction after it has been through Public Inquiry than one which hasn't. While no changes to a plan can be made after an Order has been signed - signalling its

¹ There are some Local Plans still in place in the North and West

² S2(4) Town and Country Planning Act 1999

³ S10(4) Town and Country Planning Act 1999

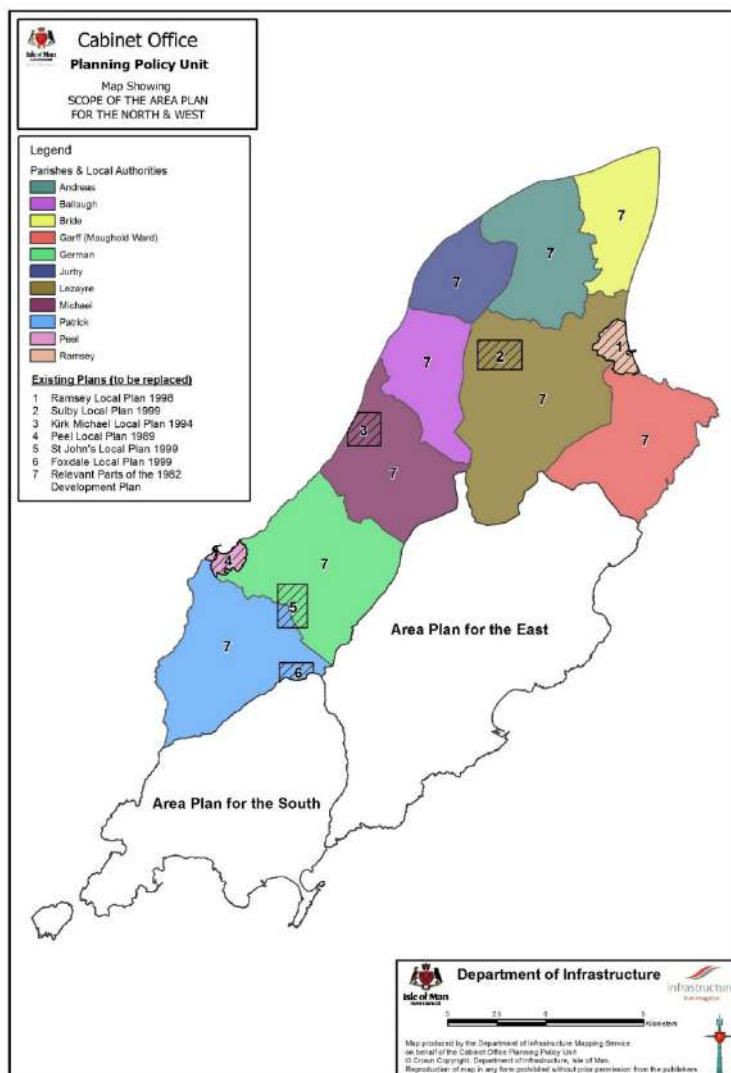
⁴ DEFA in this case

adoption - plans still need to be approved by Tynwald. Tynwald does not have the power to amend an Adopted Plan.

- 3.4.1 The Area Plan for the North and West once approved will replace the Ramsey Local Plan and the 1982 Development Plan which are both relevant plans in and around Ramsey. They do remain the statutory development plans for the time being and so land which is currently allocated on these Plans could come forward for development at any time. For example, an application has been submitted for development at Vollar Fields, between Bride Road and Andreas Road, north Ramsey. The land is allocated in the Ramsey Local Plan but this was not taken forward in the Draft Area Plan for the North and West. It will be for DEFA to determine the application in the knowledge that there is emerging plan.
- 3.4.2 How the current status of the Draft Plan impacts on the assessment for any live planning application will be a matter for DEFA, taking into account many of the points mentioned above.

4 The Area Plan for the North and West

- 4.1 The Plan boundary is shown below (extract from the Draft Plan)⁵. The coloured areas represent separate Local Authorities. Lezayre is shown in brown. The Maughold Ward of Garff is shown in salmon pink. Both border Ramsey (light pink).



- 4.2 The boxes highlight where the extant plans are and the numbers relate to the relevant Local Plan. Any part of the north and west not covered by a Local Plan (largely the rural areas) is covered by the 1982 Development Plan.

⁵ <https://www.gov.im/categories/planning-and-building-control/planning-policy/development-plan/draft-area-plan-for-the-north-and-west/>

5 Key points about the Draft Plan which may help the Inquiry

5.1 The Plan Period and Housing Need

5.1.1 The plan period for the Draft Area Plan is from 2011 to 2026. This matches the plan period for the Strategic Plan 2016. The plan period is important when it comes to identifying land use and development needs. It is particularly relevant to calculating housing need. Broad housing need is set out in the current Strategic Plan as follows:

Housing

Policy 1: The housing needs of the Island will be met by making provision for sufficient development opportunities to enable 5,100 additional dwellings (net of demolitions), and including those created by conversion, to be built over the Plan period 2011 to 2026.

5.1.2 This translated to a housing need distributed on across the four Areas as follows:

Housing

Policy 3: The Island's housing need of 5100 additional dwellings between 2011 and 2026 is to be met by a spatial distribution of housing across the North, South, East and West as follows:

- North 770
- South 1,120
- East 2,440
- West 770
- All-Island 5,100

5.1.3 The 1999 Act makes it clear that plans shall be in "general conformity with the Strategic Plan". Combining the housing need for the North and West provides the gross need. So, the starting point for the Draft Plan is to ensure that by 2026, 1540 new dwellings are built. To plan for a different figure would not be in general conformity with the Strategic Plan.

5.1.4 Ahead of the publication of the Draft Plan calculations were undertaken to identify the residual housing need for the rest of the plan period up to 2026. The supporting Evidence Paper EPD3 'Land Needs and Supply Report'⁶ published at the time of the Draft Plan set out all of the data and analysis.

⁶ <https://www.gov.im/media/1376844/epd3-land-supply-in-the-north-and-west-final.pdf>

5.2 Identification of Sites

- 5.2.1 The submissions by the Local Authorities in evidence to the Boundary Inquiry process refer to some of the sites zoned in the Ramsey Local Plan compared to the Draft North and West Plan. It might be helpful to the Inquiry to explain the background to the site selection process that was undertaken.
- 5.2.1 Ramsey is one of five Service Centres. There is a strategic policy requirement for the Area Plan to define development boundaries such as to provide a range of housing and employment opportunities at a scale appropriate to the settlement.⁷ This is to ensure support for the vitality and viability of each Service Centre. The general approach contained in the Island Spatial Strategy is to direct more housing development to the settlements higher up in the settlement hierarchy, allowing for constraints and taking into account the circumstances of each settlement. It is important that all new housing and existing communities are supported by the right level of (improved where possible) access to services, including sewage treatment, community facilities and green space.
- 5.2.2 In terms of Ramsey, before any sites and proposals were identified/drafted, detailed assessments were undertaken for the town and the surrounding area looking at the critical issues both in the urban area (including the town centre) and in the surrounding rural areas. This enabled the development needs for Ramsey up to 2026 to be identified as part of the Plan Area as a whole. Each site identified as part of the Call for Sites exercise, which took place at the very beginning of the plan process, had a Site Assessment Report completed for it.
- 5.2.3 The qualitative and quantitative data gathered and subsequent analysis showed that even though Ramsey had vacant and underused sites which could be developed and which the Draft Plan could positively support, some new development land was needed to satisfy housing need up to 2026. In order to avoid an oversupply of development land, not all land zoned on the existing Ramsey Local Plan was taken forward. The individual site assessments helped the Department judge which sites – as sustainable urban extensions - would be more deliverable. Part of the process to produce a Draft Plan is to assess the deliverability of sites within the plan period. This is undertaken as part of the site assessment report. Care has to be taken about relying on sites which have limited or no prospect of coming forward. This is why there are broad assessments of how deliverable sites are alongside other queries including how acceptable sites are in planning terms and how developable they are.

⁷ Spatial Policy 2, Isle of Man Strategic Plan 2016

- 5.2.4 In terms of land for other uses, employment land was to be retained in Ramsey where the site assessments concluded it was still appropriate and other industrial areas were to be consolidated i.e. in Jurby and Andreas. The Department judged that this met with the broad objective in the Strategic Plan to focus employment uses in Peel and Ramsey.
- 5.2.5 The Draft Plan did recognise other land uses on the edge of Ramsey but outside of the settlement boundary. These related to land south of the Jurby Road for sports pitches and land north of Ramsey for Regional Sewage Treatment/Civic Amenity Site at Balladoole.

5.3 Residential Need in the short, medium and long term

- 5.3.1 *Future development (short term)* - To meet the housing need set out in the Strategic Plan 2016, as set out above in Housing Policy 1, 1540 new dwelling units were needed between 2011 and 2026. Urban capacity assessments were undertaken and account taken of:
- i. unoccupied sites within the existing settlement boundary without valid planning approval;
 - ii. valid planning approvals;
 - iii. housing built since 2011; and
 - iv. conversion projections.
- 5.3.2 It is only after this work was done and there was an identified housing need, that the potential 'sustainable urban extension sites'⁸ were looked at closely with the most suitable being selected for the Draft Plan. The key objective when looking at settlement expansion is to make sure that development optimises the use of previously developed land and where extensions to settlements are necessary, these are sustainable.
- 5.3.3 Table 18 in the Draft Area Plan identified that the housing need for the remainder of the plan period (2022 to 2026) in the whole plan area was 343 new homes. In terms of Ramsey, Table 19 shows that Ramsey could deliver 63 new homes within the existing settlement boundary on top of homes already completed, planned and projected and that the remaining residual need of 102 units could be satisfied via one site, which the Draft plan identified as RR009 at Lezayre Road (this was subject to a live application at the time of publication).

⁸ As defined in the Isle of Man Strategic Plan https://www.gov.im/media/1350906/the-isle-of-man-strategic-plan-2016-approved-plan-15_03_16.pdf

- 5.3.4 *Future development (medium to long term)* The review of the Strategic Plan has started and the new Strategic Plan will identify housing need between 2021 to 2041 (note: the plan period could change for the Draft Plan). Papers setting out what issues the new Strategic Plan will deal with were published on 21st July 2023. The implications of aiming for a population increase to 100,000 by 2037 were discussed in Paper P.EP01⁹.
- 5.3.5 The Paper identified that taking in to account existing land supply and planning approvals, the residual need for housing 2021 to 2037 (based on a 10 year housing growth projection for 100,000 people) was 278 additional new dwellings in the North based on all undeveloped land within the extant Local Plans and current spatial distribution. It is likely that Ramsey will remain a higher order settlement and would, along with the other Service Centres be expected to accommodate a high proportion of new development.

6 Development characteristics on the edge of Ramsey

- 6.1 The settlement boundary for Ramsey shown on Map 4 in the Draft Plan defines the edge of the built up area of the town. Part of the purpose of a settlement boundary is to identify where development can take place. It is normal for all land uses to be allocated a land use within the settlement boundary.
- 6.2 Beyond the boundary, this is effectively countryside and applications shall be determined accordingly. Unless development plans indicate otherwise, there is a presumption against development in the countryside. A settlement boundary makes it easier to avoid the spread of sporadic development in the countryside and to avoid 'ribbon' development close to existing settlements.
- 6.3 One of the key goals of the Strategic Plan is to ensure sustainable urban extensions, avoiding the inappropriate encroachment in to the countryside. When looking at where to place the settlement boundary for Ramsey, for some areas this was straightforward for instance where there a housing estate bordered open fields. For other areas, more of a judgement was required, for example where higher density estate development gave way to lower density, more spread out development. Officers often have to assess where the line should go between 'urban' and 'rural'.
- 6.4 In the case of Ramsey, defining the settlement boundary of the town was easier at its northern and southern edges; while more thorough assessment was required to the west of Ramsey along the Jurby Road and the Lezayre Road.

⁹ <https://www.gov.im/media/1380098/pep-1-island-spatial-strategy-paper-final.pdf>

- 6.5 It is noted that ribbon development has been mentioned in the submissions to the Boundary Inquiry from Garff and Lezayre Commissioners. To support the Inquiry on this point, it might be helpful for Cabinet Office to confirm that there is no definition of “ribbon development” in the Strategic Plan. It is, however, often used to describe housing development in a continuous or near continuous row, radiating out from a settlement. Examples tend to be prevalent alongside main roads at the edge of villages, towns or cities or between settlements on main highways. Ribbon development can appear linear when viewed in plan form as it generally hugs the immediate area next to the highway and can be quite visible.
- 6.6 Policy makers tend to want to avoid consolidating existing ribbon development which is often undesirable although there can be circumstances where infilling or ‘rounding off’ of development is acceptable. Built up areas often give way at the edge of settlements to lower density development which have large gardens or are characterised by small enclaves of detached dwellings. Judgements are necessary to ensure the inclusion of such properties into settlements in development plan terms wouldn’t lead to an incursion of development into the open countryside which would be unacceptable.

7 Next Steps for Draft Area Plan for the North and West

- 7.1 A Public Inquiry is currently being arranged. There has been a slight delay in taking the Plan forward but an Inquiry is now anticipated for Spring 2024 (see Appendix 1). All data produced for the Draft Plan will be monitored and updated where necessary. This may affect the data on housing supply and site selection going in to Inquiry. The Schedule of Proposed Changes has not been published at the time of writing but the Department will publish all such proposed changes ahead of the Inquiry and after the analysis of representations has been completed.
- 7.2 Even if the Cabinet Office does suggest amendments in a Schedule of Proposed Changes, the appointed Inspector may not agree. The Inspector’s Report is not binding but Cabinet will have to justify and defend any recommendations it doesn’t agree with. There is no certainty until the Plan is adopted and approved by Tynwald. Any decision to delay determining an application to await the outcome of the plan process would be a matter for DEFA rather than Cabinet Office.

This Statement has been prepared by:

Diane Brown MRTPI

30th October 2023

Appendix 1 – Plan Stages

Date	Stage in Schedule 1	Purpose and Output
31 st May 2019 to 28 th Feb 2020	Call for Sites (not part of statutory process)	Public Consultation. Evidence gathering. Opportunity to submit sites for consideration
16 th April 2021 to 25 th June 2021	Preliminary Publicity	Public Consultation - Setting out of those matters which the plan proposals intend to deal with
24 th Sep 2021 to 10 th December 2021	Additional sites consultation	To make public the addition of 35 sites to the All-Sites List
24 th June 2022	Publication of Draft Plan	Publication of: <ul style="list-style-type: none"> • Draft Written Statement • Draft Maps • Supporting Evidence Papers • Response to earlier representations
Spring 2024	Inquiry (Preparation ongoing)	To examine the Draft Plan in public
Normally 2 to 3 months after the Inquiry	Publication of Inspector's Report	To make available the original report as drafted by the appointed Inspector
Q4 2024	Adoption of Area Plan (by Cabinet Office)	Modifications published and representations/objections considered Plan Adopted 'by Order' Plan made up of: <ol style="list-style-type: none"> 1. A Written Statement 2. A set of Maps
Q1 2025	Publication of Area Plan after approval ¹⁰	Adopted Area Plan put to Tynwald for approval and thereafter published

¹⁰ To take effect, the Plan must be approved within 3 months of the date of the Order

Proposed Ramsey (Boundary Extension) Order 2023

1. Background

- a. Ramsey Town Commissioners (**RTC**) have made an application to the Department of Infrastructure for an order under section 6 of the Local Government Act 1985 (the **LGA 1985**) seeking to extend the boundary of Ramsey, by moving the boundaries between the districts of Ramsey, Lezayre and Garff (Maughold Ward) to essentially remove areas from Lezayre and Garff and to include them within Ramsey's boundary (the **Application**).
- b. Lezayre Parish Commissioners (**LPC**) and Garff Commissioners object to the Application as do the vast majority of the 265 published responses to the consultation in respect of the Application.

2. The Criteria

- a) The following six factors are to be considered when an application is made for a boundary extension:
 - that the promoters' area and the area/s sought are really one community;
 - 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;
 - that the area sought is an overspill or outgrowth of the promoters' area;
 - that, wherever possible, clear physical boundaries are followed;
 - that there is insufficient acreage left for the development of the promoters' area within its borders and injury is suffered thereby; and

- 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.

(together, the **2004 Criteria**).

- b) When Port Erin Commissioners applied to extend the Port Erin boundary in 2019, a public inquiry was held on 4 March 2019 which was chaired by Geoff Karran MBE., TH., (**Mr Karran**). Mr Karran held on page 9 of his report dated 23 May 2019 (the **Port Erin Report**) that *“The 2004 Criteria did state that the 6 points set out should not appear to be exhaustive or exclusive and other points could not be considered in deciding on the application”*. We will comment on each of the 2004 Criteria and then make some further submissions below.
- c) Furthermore, although the 2004 Criteria prohibits either authority from making an argument about the impact a change in the boundary would have on their incomes from rates, Mr Karran held at page 6 of the Port Erin Report that *“I did allow individual objectors to refer to the impact on themselves if the extension was permitted”* (emphasis added). Although LPC is prohibited from making submissions about the impact the Application, if approved, would have on their rateable income, LPC does support the residents of Lezayre who would suffer financial implications if the Application was approved and their properties were suddenly held to be in Ramsey.

3. LPC’s submissions in respect of the 2004 Criteria

- a) That the promoters’ area and the area/s sought are really one community
 - i. It was noted within the Port Erin Report that “community” is not defined either in the 2004 Criteria or within the LGA 1985.

- ii. RTC state (within their boundary extension report, at page 18 (in respect of the North Ramsey Area) and repeated on page 23 (in respect of the West Ramsey Area)) that *“Any Development in the North of the Island depends on Ramsey as a service centre”*. In terms of the North Ramsey Area, they state that *“development in this area would clearly be seen to be an extension of Ramsey and benefit from the services and community that Ramsey provides”*. However, notwithstanding this rather broad statement, RTC does accept that *“property at the Dhoor presently is distanced from and unlikely to be seen as part of the Ramsey community”*.
 - iii. We submit that there is no definition of the word community and the mere proximity of the promoter’s area and the area sought is insufficient to argue that the two areas are really one community. If proximity alone was enough to create one community, then why has RTC readily accepted that the Dhoor is not seen as part of the Ramsey community.
 - iv. Furthermore, (and as detailed further below at 4) it is accepted that Ramsey is a service centre for the North of the Island. It logically follows that many services and infrastructure are provided in and from Ramsey and not necessarily by RTC. These services benefit both the residents of Ramsey itself and those who live in the surrounding areas, including the service villages and other settlements situated within the North of the Island, which include far more areas than those sought by RTC in the Application. It does not follow that because residents in the surrounding areas can access services provided in and from Ramsey, then those surrounding areas are simply one community with Ramsey.
- b) That there is community of interest in all or most public services, social agencies and communal requirements of the future:
- i. RTC acknowledge that the North Ramsey Area (page 18), the West Ramsey Area (page 23), the Glen Auldyn Area (page 29) and the South Ramsey Area

(page 34) are all in the catchment area for Sulby School, which is in the parish of Lezayre. The properties in each of the areas sought pursuant to the Application do not fall into the catchment area for the Ramsey primary schools. The properties are however in the catchment area for Ramsey Grammar School, which is the only secondary school in the North and which obviously has a far greater catchment area than Ramsey town and the areas sought by RTC pursuant to the Application.

- ii. RTC state that there are no youth club offerings within the parish of Lezayre but there are youth clubs, Scout Groups and Army Cadet Groups operating within Ramsey. We submit that it would be expected given Ramsey's status as a service centre, that Ramsey has a broader youth club offering than the surrounding service villages and settlements, but this should not be construed as indicative of a community of interest. The provision of such groups in the North is not exclusive to Ramsey alone – for example there is a Scout, Cubs and Beavers unit in Ballaugh and a Rainbows and Brownies unit in Andreas. RTC also state that there are no "*easily accessible parish facilities*" in terms of children's play areas but there are village park recreation offerings in Sulby, Ballaugh, Andreas, Jurby and Bride albeit not on the same scale as the Mooragh Park or Coronation Park in Ramsey, which is not surprising given Ramsey is both a town and the service centre for the North. Please see table 14 in the Draft Area Plan for the North and West which details open spaces and community facilities in the North (page 109).
- iii. RTC state that it "*is highly likely that engagement in formal sporting activity is in the main achieved through utilisation of opportunities provided within Ramsey Town*". Again, we would submit that this is not surprising given Ramsey's status as a town and as a service centre for the North. However, sporting opportunities in the North are not limited solely to Ramsey. For example, there is Ayre United Football Club and Ballaugh Bowling Club to list just two examples. Furthermore, given ease of travel residents in the North are free to travel across the Island to utilise their sport of choice as are residents in

differing areas of the Island who are free to travel to Ramsey to utilise their sport of choice. This point is dealt with succinctly at 13.6.5. of the Draft Area Plan for the North and West where it states that *“it is acknowledged that members of the public who reside in one region, may well be regular users of sporting and recreation facilities in neighbouring areas. This is considered to be particularly true of residents of Parishes and Local Authority Areas which are located in close proximity to the larger settlements within the North and West, such as Ramsey”*. We wholeheartedly agree with this observation and submit that the provision of sporting and recreation facilities in Ramsey does not equate to a community of interest with the areas sought by RTC pursuant to the Application.

- iv. In terms of religious worship, RTC highlights the closure of Lezayre Parish Church, St Fingan’s Chapel at Glen Auldyn and Dhoor Chapel, emphasising there are places of worship for Methodist, Roman Catholic and Church of England faiths in Ramsey. However, it is disingenuous to suggest these are the only options available to worshipers in the North. Andreas, Sulby, Ballaugh and Jurby each have their own (Church of England) parish church under the Parish of the Northern Plain. Furthermore, there are active Methodist churches in Bride, Sandygate and Sulby. It is accepted that Our Lady Star of the Sea is the only Roman Catholic church in the North and that it is situated in Dale Street in Ramsey. Therefore, although residents in the areas sought by RTC pursuant to the Application may choose to worship in Ramsey we submit that this option does not equate to a community of interest.
- v. It is accepted that *“retail and other accessible Government services are provided within Ramsey”*. However, we submit that this is because of Ramsey’s status as the service centre for the North and is not as a direct consequence of there being a significant community of interest between Ramsey and the areas sought by RTC pursuant to the Application. The proximity and accessibility of these services available to all the residents of the North does not automatically equate to a community of interest between Ramsey and the areas sought.

- vi. We submit that it is worth noting that there are a number of community halls, throughout the North, outside of Ramsey, which could be utilised by any social group or private function. These include but are not limited to: Andreas Parish Hall, Sulby Community Hall, St Stephen's Church Hall (Sulby) and, slightly further afield, parish halls in both Ballaugh and Jurby not to mention the Jurby Community Centre. Ramsey does not provide the only available community halls available in the North and although there are community hall options provided within Ramsey we submit that this cannot be argued to reflect a significant community of interest.
 - vii. There is only one doctors surgery in the North, Ramsey Group Practice, which is obviously situated within Ramsey but it is not provided by Ramsey. The same staff provide certain services at the branch surgery situated within the Jurby Community Centre and have done since 2012. There are two dental surgeries in Ramsey, Grove Mount and Smile Dental Care. Again, we submit these are in Ramsey but are not provided by Ramsey. The next nearest dental surgery is situated in Laxey. Again, we submit that the provision of doctor and dental surgeries in Ramsey, as a town and service centre, is not unexpected and it does not imply a significant community of interest between Ramsey and the areas sought by RTC pursuant to the Application.
- c) That the area sought is an overspill or outgrowth of the promoters' area
- i. RTC submit that the land to the north of Ramsey's northern boundary is a "*natural extension to the town boundary*" (page 19) as is the land in Lezayre to the west of Ramsey's western boundary (page 24). We would submit that there is a substantial difference between "*a natural progression*" (page 19) of the boundary and the area sought being considered an overspill or outgrowth of the promoters' area. RTC have already acknowledged that the Dhoor "*forms part of its own settlement*" (page 19) and given the significant agricultural land in this vicinity we submit that this area simply cannot be construed as an overspill or outgrowth of the promoters' area.

- ii. RTC state that *“according to the Draft Area Plan for the North and West there is almost no remaining land for development”* (page 19). Please see below at (5c) in relation to our comments in respect of the Draft Area Plan for the North and West as we submit that there is land available for development within (a) the existing Ramsey town boundary and (b) on the scale that is actually required based on the facts and circumstances known at this time.
- iii. In respect of the West Ramsey Area, some of this area sought does have proximity to the current town boundary but we submit that this cannot be considered an overspill or outgrowth of Ramsey. Development in this area has been explored via an application submitted by Dandara (application: 20/01080/B) in respect of land at Lower Milntown (the **Lower Milntown Application**). This proposal was for a residential development of 138 dwellings which was refused on 4 May 2022 and refused again at appeal on 1 March 2023. In the decision notice dated 4 May 2022 reasons are listed for the refusal which included *“ . . . there is no requirement for additional housing within Ramsey at this scale ”* and that although the site was allocated for development in the Isle of Man Development 1982 Order *“ . . . more recent information outweigh the site allocation and as such the development should be refused ”*.
- iv. Had planning permission for this proposed development been granted, part of the development would have occurred within the Ramsey boundary and part of the development would have occurred in Lezayre. This would have been a similar situation to the one which unfolded at the Ballakilley estate whereby part of the estate was built in Port Erin and part of the estate was built in Rushen, and the subsequent change to the Port Erin boundary was to enable the entire estate to be in Port Erin. However, as the Lower Milntown Application was refused (and refused again on appeal) we submit that this land cannot be considered to be an overspill or outgrowth of Ramsey.

- v. We also suggest that contrary to RTC's assertion on page 24 that "*the land to the north of this area dominated by the Innovation Centre is clearly an overspill of the town boundary along the Jurby Road*" the Mountain View Innovation Centre cannot reasonably be considered part of Ramsey or an overspill thereof. Its own website states it is situated "*outside Ramsey*".
 - vi. In respect of the Glen Auldyn Area, we submit that this cannot realistically be construed as an overspill or outgrowth of Ramsey either. RTC themselves acknowledge that "*development at Glen Auldydn is separated from the Town by the Milntown Estate and Ramsey Golf Course*" (page 27). The Milntown Estate states very clearly on its website that it is "*set in the beautiful parish of Lezayre*".
- d) That, wherever possible, clear physical boundaries are followed
- i. In respect of the North Ramsey Area, the boundary line has been "*purposefully brought round the properties at the Dhoor as the ribbon settlement at the Dhoor forms part of its own small settlement*" (page 19). However, from the responses to the consultation – a resident has objected to the way the boundary line is drawn as it runs along the curtilage of those properties meaning residents would effectively have to enter new Ramsey just to leave their homes (ref Andrew and Wendy Turner). We would submit that clear physical boundaries have not been followed as drawn in the Application.
 - ii. It has been noted in the responses to the consultation that the Application omits two properties in Glen Auldyn from the new proposed physical boundary. Again, we submit that clear physical boundaries have not been drawn in the Application.
- e) That there is insufficient acreage left for the development of the promoters' area within its borders and injury is suffered thereby

- i. Section 5.2.7 of the Draft Area Plan for the North and West states that one of the key elements for the Island Spatial Strategy for the North is most housing in the North should be focused on Ramsey in line with the current allocations in the Ramsey local plan (namely, the current Ramsey Local Plan 1998). RTC state that *“development in Ramsey has all but been exhausted”* (page 19, page 25, page 31 and page 35). However, we submit that this is not the case.
- ii. Section 14 of the Draft Area Plan for the North and West details the residential housing requirement calculations (page 115 onwards). Housing Policy 1 and Strategic Policy 11 in the Strategic Plan set out the projected housing needs of the Island between 2011 to 2026 and state that such needs will be met by making provision for sufficient development opportunities to enable 5,100 additional dwellings to be built between 2011 and 2026, and 1,540 of these will be new units built in the North (770) and West (770).
- iii. There is an outstanding need of 343 houses (see table 18 on page 117) which is proposed to be mainly satisfied by development at *“two specific sites in the Service Centres (one in Peel and one on the edge of Ramsey which is in Lezayre Parish), two smaller sites in the Service Villages of Andreas and St Johns and two sites in the Villages of Ballaugh and Sulby”* which could create 318 houses. This would leave a small deficit of just 25 houses – over both the North and West.
- iv. Presumably, the proposed development described above is the refused Lower Milntown Application (referred to c (iii) above). However we submit there is still no significant disparity between the number of opportunities for additional dwellings to be built and the number which can be delivered. For example, there has been an application submitted by Hartford Homes (application 23/00744/B) for permission to build 153 dwellings at Vollar Fields (the **Vollar Fields Application**). This is currently pending consideration as at the date of these submissions. There is also another pending application submitted by Blythe Church Investments Limited dated 7 June 2022 (application 22/00679/B) for

permission for a combined approval in principle and full approval for a residential development seeking planning permission for 66 dwellinghouses and 12 flats and outline planning permission for up to 127 new residential units at land at Poyll Dooey (the **Poyll Dooey Application**). This is currently pending consideration as at the date of these submissions.

- v. Furthermore, in the decision notice dated 4 May 2022 in respect of the Lower Milntown Application, the Department of Environment, Food and Agriculture found that *“there is no requirement for additional housing within Ramsey at this scale”* which contradicts the assertion by RTC that there is insufficient acreage left within the existing Ramsey boundary.
- vi. At section 8.6.3 of the Draft Area Plan for the North and West it is acknowledged that *“comparably high building densities within the town limit the options for infill development to meet housing need”*. However, *“the 2021 Census shows a high property vacancy rate of 16% and quayside buildings have become un-occupied in some areas. Bringing un-occupied sites and buildings back into re-use will benefit the local economy, enhance the townscape quality and increase the available number of residential dwellings”*. At 9.3.4 it states that *“Under-investment in quayside buildings has resulted in vacant properties and underoccupied urban sites that mar the public face of Ramsey. Consequently, there is a need for regeneration of these sites, together with sympathetic flood risk alleviation measures and public realm improvements, so as to enhance the public face of the town centre and bolster the local economy”*.
- vii. Considering the above, we submit that there is not *“insufficient acreage”* left within the existing Ramsey boundary to satisfy the identified housing need. Furthermore, we submit there is no opportunity for Ramsey to suffer any injury as a consequence of there being insufficient acreage left within the existing Ramsey boundary, nor if the Application was refused.

f) 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.

- i. For the reasons stipulated above we submit that the balance of advantage does not lie in accepting the scheme.
- ii. RTC acknowledge that the land sought in the North Ramsey Area (page 19), the land sought in the West Ramsey Area (page 25) and the land sought in Glen Aulydn Area (page 31) is currently not zoned for development. We submit that none of these areas can therefore be construed as being an overspill or outgrowth of Ramsey and even if RTC could successfully argue they have insufficient acreage left for development within the existing town boundary (which we would argue against for the reasons set out above) we see no merit in RTC trying to remedy this alleged development deficit by taking land that has not, at this time, been zoned for development.

4. Ramsey as a Service Centre

- a) It is accepted that Ramsey is a service centre for the North as detailed in The Strategic Plan at section 5.7 which states:

“A hierarchy of service provision is detailed with Douglas, as the capital, identified as the main centre with Ramsey, Peel, Onchan, Castletown and Port Erin acting as service centres. Under this come a number of service villages, including Andreas and Jurby, and then a number of other settlements with little to no service provision, including Bride, Ballaugh and Sulby”.

- b) It therefore follows that many services, community requirements and agencies are available in Ramsey (in its capacity as both a town and as the only service centre in the North). Consequentially, residents of the surrounding areas will likely travel to Ramsey (as opposed to Douglas or another service centre, due to

its proximity) to avail themselves of these facilities and services. However Northern residents may well choose to travel to Douglas or another service centre as, likewise, people who live in the West, East or South may choose to travel to Ramsey to use certain facilities. The provision of these services and facilities in and from Ramsey should not be construed as all being provided by Ramsey and nor should this be interpreted as Ramsey and the areas RTC seek under the Application as being one community.

5. Timing of the application by RTC

- a) The Application is dated September 2022. RTC refer to their proposed boundary extension as being forward looking with a wish to “*establish a boundary which will be relevant for a reasonable period into the future*”(page 11) with an emphasis on avoiding future conflict where development “*might be sought to be drawn into a future revised boundary having already been constructed in an adjacent parish*” (page 11). We submit, as detailed below, that there is currently a lot of uncertainty in terms of the draft status of the Draft Area Plan for the North and West, the introduction of the All-Island Area Plan and the time left to run in terms of the current Strategic Plan and as such timing of the Application is premature.
- b) The Town and Country Planning (Isle of Man Strategic Plan) Order 2016 was approved by Tynwald on 15 March 2016 and came into force on 1 April 2016. The Strategic Plan sets out the general policies for the development of and use of land across the Isle of Man and, as detailed at section 1.8, has a timeframe of 15 years (2011-2026). We acknowledge that this does not mean the Strategic Plan will terminate at the end of 2026 but rather the Strategic Plan will continue until it is reviewed. However, as we approach the end of 2023, the Cabinet Office has already (between 21 July 2023 and 29 September 2023) undertaken preliminary publicity signalling the start of the review process into the Strategic Plan. We can therefore assume that, in the fullness of time, the existing Strategic Plan will be reviewed, and therefore could be subject to change. We feel the timing of the Application is premature.

- c) Furthermore, the Draft Area Plan for the North and West is just that – it is only a draft and has been since at least the date of the written statement which was 24 June 2022. There was preliminary publicity and a consultation between April and June 2021, and it will be subject to a public inquiry, potentially further amendments and then will be put before Tynwald for approval. We are very conscious that this document may be subject to any amount of change, amendment and clarification which means its contents, as currently drafted, lack certainty. As such, we submit that the timing of the Application by RTC is premature.
- d) In addition, RTC refer to the Isle of Man Economic Strategy within the Application and references the intention to increase the population to 100,000 (page 19). However, this is not quite what the Isle of Man Economic Strategy (now) says – that is to “*plan for an estimate population increase of 15,000 by 2037*”. Again, we submit the Application is premature, there are no formal, approved plans that put RTC under an obligation to deliver housing within Ramsey to satisfy part of any intended population increase at this time.

6. Recent Planning Applications in Ramsey

- a) There have been three recent planning applications made which concern sizeable developments in Ramsey namely:

Date	Description	Status	RTC Consultation
18 September 2020	The Lower Milntown Application	Refused	Objected

29 June 2023	The Vollan Fields Application	Pending consideration	Submit an observation: the impact on the infrastructure of the town (Stone Bridge), provision of tertiary services and flood risk.
7 June 2022	The Poyll Dooley Application	Pending consideration	No objection

- b) We would submit that whilst the Vollan Fields Application and the Poyll Dooley Application are still pending consideration, it would be difficult to argue that there is insufficient acreage left within Ramsey to develop, especially when the actual number of residential properties identified as being required within the Draft North and West Area Plan are considered.

7. The Isle of Man Strategic Plan

- a) The Strategic Plan at section 5.7 states:

“The Strategic Objectives and Strategic Policies direct that the focus of new development should be within existing towns and villages or in sustainable urban extensions, avoiding coalescence [merging or joining – emphasis added] of settlements and maintaining their local identity.

Strategic Policy 2 states:

“New development will be located primarily within our existing towns and villages, or, where appropriate, in sustainable urban extensions of these towns and villages”.

A Sustainable Urban Extension is defined as *“the planned expansion of a city or town and can contribute to creating more sustainable patterns of development when located in the right place, with well planned infrastructure including access to a range of facilities, and when developed at appropriate densities”.*

Strategic Policy 3 states:

“Proposals for development must ensure that the individual character of our towns and villages is protected or enhanced by avoiding coalescence and maintaining adequate physical separation between settlements”.

- b) We submit that the Application contradicts the above. We submit that the Application is not an effort to make a sustainable urban extension of Ramsey but would be a coalescence of settlements, in each of the four areas sought but particularly at Glen Auldyn, together with an erosion of each area’s local identity.

8. Constituency Boundaries

- a) RTC refer to the question of electoral boundaries and levels of proportionate representation at page 11 of their application. They go on to state that the *“question of constituency boundaries is of course a matter for Tynwald to consider and ought to have no bearing on the outcome of the boundary extension”*. We would concur with this statement and submit the current constituency boundaries are an entirely separate issue which are neither relevant nor applicable to this application.

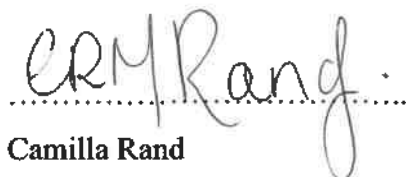
9. Statement of the Head of Planning Policy, Cabinet Office

- a) We note section 3.2 confirms that Emerging Plans (which include a Draft Plan) *“can be seen as ‘other material considerations’ but this doesn’t imply they should be afforded a specific level of weight in decision making”* and at section 3.4 *“... there is more certainty about a plan’s direction after it has been through a Public Inquiry than one which hasn’t”*. The Draft Area Plan for the North and West has not been through a public inquiry as at the date of these submissions and accordingly we repeat our submissions above regarding the timing of this Application by RTC.
- b) We echo the comments made in section 5.1.3 which confirms that 1,540 new dwellings in the North and West are required and to *“plan for a different figure would not be in the general conformity with the Strategic Plan”*. Section 5.3.3 confirms that the housing need for the remainder of the plan period (i.e. to 2026) could be met by 63 new homes within the existing settlement boundary of Ramsey and the remaining residual need of 102 satisfied via one site – the Lower Milntown Application. Notwithstanding, that the Lower Milntown Application was refused (and RTC objected to it) there are two sizeable planning applications, the Vollan Fields Application and the Poyll Dooey Application, which are pending consideration as at the date of these submissions and we repeat our submission that there is not insufficient acreage left within Ramsey to satisfy the housing need identified.
- c) Section 5.3.5 refers to Paper P.EP 01 (Island Spatial Strategy Options) which identifies the residual need for housing between 2021 and 2037 – based on a 10 year housing growth projection for 100,000 people) as being 278 additional new dwellings in the North with Ramsey (as a service centre) expected to accommodate a high proportion but not all of those new dwellings. However, even if RTC intended to plan for this figure, we submit that RTC has not adequately argued within the Application that:

- i. they have insufficient acreage within the existing boundary to enable them to provide land for a proportion of this expected housing requirement;
- ii. by taking the areas sought pursuant to the Application would remedy this alleged land deficit; or
- iii. RTC would suffer injury due to being unable to satisfy an obligation to provide a certain number of additional new dwellings pursuant to an adopted plan which has been approved by Tynwald.

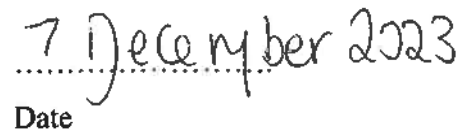
10. Costs

We request that the Chairman orders that the expenses (including legal fees and disbursements) incurred by our client, LPC, in connection with the Application for the purpose of LPC's attendance and legal representation at the inquiry are paid in full by RTC in accordance with section 5 of the Inquiries (Evidence) Act 2003.


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Camilla Rand

Advocate for Lezayre Parish Commissioners


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Date

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Ref: 27362.001/ CR

Statement of Tim Cowin, Town Clerk and Chief Executive of Ramsey Town Commissioners, to support the Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023.

1. Introduction

1.1 Ramsey Town Commissioners are providing additional evidence in respect of the Public Inquiry for the Ramsey (Boundary Extension) Order 2023. I, Timothy Cowin CEng, FIMechE am the Town Clerk and Chief Executive for Ramsey Town Commissioners. I have prepared this statement on behalf of Ramsey Town Commissioners. It will form the basis for any oral evidence given by me at the Inquiry, but I may make reference to papers already published and specifically those contained in the 'Ramsey Town Commissioners Proposed Boundary Extension September 2022' document.

1.2 I will address the following criteria:

1.2.1 (1) that the promoters' area and the area/s sought are really one community

1.2.2 (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

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

1.3 I will also address the consultation and the consultation responses and additional information that has been provided by Garff, Lezayre and the 12 individuals that have registered to speak at the inquiry. As there are some shared subject matter issues in the responses, I will bring together common themes.

1.4 Finally, I will highlight the Ramsey Facilities and Management and briefly outline the Electoral Boundary Review.

2. Criteria

2.1 (1) That the promoter's area and the area/s sought are really one community

What is a *community*?

2.1.1 A *community* is a social group whose members have something in common, such as a shared government, geographic location, culture, or heritage.

2.1.2 *Community* can also refer to the physical location where such a group lives. It can refer to a town, city, village, or other area with a formal government whose residents share a nationality or culture.

2.1.3 The Isle of Man is an Island community; we have many things in common that define us: history, government, society, and language (English and Manx) come together to give the feeling of community and belonging. Community is also like a family within which there may be rivalries, disagreements, and fallings out. However as with a family, communities come together to protect, nurture, and support one another and repel threats that come from outside of the community.

2.1.4 People also belong to many different communities in their lives, be it the school community in early life, the community of work or the clubs, societies, churches, charities, towns, villages, or neighbourhoods that they are part of and associate with.

2.1.5 The Isle of Man is special in that there is a strong sense of National community and belonging; people know each other and have shared history, a parliament that is over 1000 years old and, although the Manx language is not commonly spoken, the dialect and use of language on the Island is unique. With this special strong Island sense of community there exists a very strong local community that is prevalent here on the Island but has ceased to exist in other countries and jurisdictions.

2.1.6 The northern parishes of the Isle of Man have separate identities but a sense of community with shared history be it as basic as many of us attended Ramsey Grammar School.

2.1.7 Our closest neighbours in Glen Auldyn as well as the small number of residents in the North, West and South areas identified in this boundary extension application are very much one community.

2.1.8 Money and rates are not a material consideration in this Boundary Extension process. If all the rates for properties in the north of the Island were equal or very comparable then there would be a ready recognition that our next-door neighbours are a part of one community.

2.1.9 Unfortunately, we have a nettle that is too hard to grasp and would appear to spell political suicide for any MHK who cares to grasp it. That is Island wide rate reform. Our antiquated Rating and Valuation Act 1953 is not fit for purpose, but its revision and update has been in the 'too difficult' pile for far too long. The Ramsey Boundary changes of 1970 and 1993 both make it clear that rate reform is required and long overdue. This is still the case, and there is no apparent plan to address the issue.

2.1.10 Spatially, Ramsey is a service centre; it is the capital of the north of the Island, indeed it is the largest town on the Island. It is the service centre for community, it is the principal community in the north, and it welcomes on a daily basis our friends and neighbours, all island residents, and visitors to this beautiful Island.

2.1.11 Any process such as this is divisive, but the simple fact remains, we are friends, family, business owners, customers, employers, employees, and community members. The utmost priority for Ramsey Town Commissioners is for the town to grow and develop successfully, and for our community to thrive and prosper. To do this we need each other, and we need to come together.

2.2 (2) that there is a 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:

2.2.1 The proverb "all roads lead to Rome" simply means that there are different paths and ways to reach the same goal. It is an age-old saying that has been used throughout history to show the concept of unity and convergence. All roads lead to Ramsey, in the case of this boundary extension, is simply a statement of fact. The Coast Road (A2) the Mountain Road (A18), Crossags Lane, Glen Auldyn Road via Lezayre Road, Jurby Road (A13), Andreas Road and Bride Road all radiate in and out of Ramsey, the largest Town on the Island, and the service centre of the North.

2.2.2 Ramsey is the community of interest for the entire north of the Island, as it provides the majority of the services – most shops, restaurants, pubs, cafes, filling stations, parks and leisure facilities, play equipment, sports fields, sports halls, library services, banking, cash points, churches or chapels and significant areas of maintained public open space. It is the sole provider in the north of the Island of hospital facilities, dentists, secondary school, banks, supermarkets, youth centre, army cadets, Catholic Church, bathing beaches, museum (Gibbs of the Grove), golf club accessed from the Town.

2.2.3 Glen Auldyn is an aspirational neighbourhood and many of the residents of Glen Auldyn have close links to Ramsey through family, friends and businesses or business dealings.

2.2.4 The residents of Glen Auldyn are our friends and closest neighbours. They live in one of the most desirable places on this Island and conceivably one of the most desirable places on the planet. Consequently, some of the residents and proponents of remaining in Lezayre may consider that the premium in purchase price of properties in Glen Auldyn on the very edge of the largest town on the Island justifies the separation from Ramsey.

2.2.5 In the 1980's and prior to the boundary extension in 1993, other areas such as Thornhill, with as strong a sense of community as Glen Auldyn feels today, were outside of the Ramsey Boundary. At that time, the residents made similar claims about land grab and argued they were part of a separate community. However, these areas are now part of Ramsey.

2.2.6 Westhill Village is an aspirational gated community within the town. There is a perception of exclusivity, and the neighbourhood tends to be relatively quiet and peaceful. Although there are distinct characteristics of each neighbourhood, there are many similarities between living in Westhill Village and living in Glen Auldyn. Fundamentally, the residents of both neighbourhoods have access to the same public services and social agencies but until now, whilst Westhill Village is within the Ramsey Town Boundary, Glen Auldyn is not.

2.2.7 The boundary extension process is not a “land grab” but a necessary and overdue re-definition of the boundaries of the town of Ramsey. Things change, historically Glen Auldyn was a separate entity but with the expansion of Ramsey it is no longer geographically separate and simply put, is an extended neighbourhood of Ramsey. Indeed, it feels strange that the primary school catchment areas do not more accurately reflect the distance to the appropriate schools, with the excellent primary schools in Ramsey being circa 152 metres from the Glen Auldyn junction in comparison to the 5.8 kilometres between the same junction at Glen Auldyn and Sulby Primary School.

2.2.8 Glen Auldyn is a collection of approximately 90 houses. Every group of houses or estate can be a community, communities build up where there is a strong sense of belonging or communal interest. As each housing estate (or mini suburb) has been built, there develops a common sense of belonging and common shared interest in the social character of the area. The lineal development of Glen Auldyn along the Auldyn River has been a natural development over time and in many ways mirrors the development of Ramsey along the Sulby River and the Auldyn River.

2.2.9 In a number of the consultation comments, residents of Glen Auldyn have implied that they only ever turn left out of the junction at the end of the road and don't use the services of Ramsey. Outside of Douglas nowhere provides the same depth and breadth of shops, leisure facilities, clubs, sports facilities and entertainment as Ramsey.

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

2.3.1 Area of Ramsey 366 Hectares
Area of Lezayre 5,700 Hectares
Area of Garff in excess of 5,000 Hectares

2.3.2 North

2.3.2.1 The proposed area of the boundary extension to the north of Ramsey is 130 Hectares. There is a small number of residential properties (c 16) within this area with the focus of properties being on the northern side of Jurby Road in a ribbon development clearly extending out from the Town of Ramsey.

2.3.2.2 The proposed area of the boundary extension in this North section (as defined by the associated map) will have little impact on Lezayre Commissioners from a work done basis as the current services delivered to the 16 properties in relation to refuse collection and the weed spraying and sweeping of the Bride, Andreas and Jurby Road. The Civic Amenity site is located in this part of Lezayre, it is operated as a committee of Ramsey Town Commissioners with the 7 northern Local Authorities forming the committee. The site is managed on behalf of the committee by Ramsey Town Commissioners (staffing and operationally).

2.3.2.3 This area of land is significant to Ramsey as it represents the most important area for future development on the outskirts of the town. Flood risk and accurate flood maps have significantly reduced the viability for the development in Ramsey. There is a whole Island plan and strategic need for the Isle of Man to grow its population. The population growth requires at its base housing and particularly affordable housing as the cost of property on the Isle of Man is high and currently is a significant obstacle. Ramsey, as the largest town on the Island, needs to have the ability to meet future population needs.

2.3.2.4 What this boundary extension process does is ensure there is sufficient land for future development. This process sets the scene for the long-term future of Ramsey and for the next generations.

2.3.2.5 What this process does not do is set the development framework; that is currently clearly covered by the 1982 Development Plan and the Ramsey Local Plan 1998. The Area Plan for the North and West is still in development and has a very short-term life to 2026 and the whole Island development plan is in its infancy.

2.3.2.6 The balance of advantage clearly lies in acceptance of the application for the North section of the boundary extension.

2.3.3 West

2.3.3.1 The proposed area of the boundary extension to the west of Ramsey is 56 Hectares . There is a small number of residential properties (c 10) within this area with the focus of properties being on the southern side of Jurby Road in a ribbon development clearly extending out from the Town of Ramsey.

2.3.3.2 The proposed area of the boundary extension in this West section (as defined by the associated map) will have little impact on Lezayre Commissioners from a work done basis as the current services delivered to the 10 properties in relation to refuse collection and the weed spraying and sweeping of the Jurby Road (Lezayre Road being swept and serviced by the Department of Infrastructure).

2.3.3.3 This area of land is significant to Ramsey as it represents an important area for future development on the outskirts of the town. The area around Mountain View Innovation Centre is an area of economic growth and development for companies and represents a significant employment hub. Flood risk and accurate flood maps have significantly reduced the viability for development in Ramsey. Part of this area is relatively low lying and prone to flooding from the Sulby River, it could and would make excellent amenity land significantly enhancing the area.

2.3.3.4 Our Island Plan demonstrates the strategic need for the Isle of Man to grow its population. The population growth requires at its base housing and particularly affordable housing as the cost of property on the Isle of Man is high and currently is a significant obstacle. Ramsey, as the largest town on the Island, needs to have the ability to meet future population needs.

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2.3.3.7 The proposed development of 138 houses on the Lower Milntown Farm fields (planning Application number 20/01080/B) was rejected at appeal on 1st March 2023. Both Lezayre and Ramsey Commissioners objected to the scheme, Ramsey from the perspective that it was outside of Ramsey and Lezayre stating that there were other fields within Ramsey that could address the need. This land still lies zoned for development in the extant 1982 Development Plan.

2.3.3.8 The balance of advantage clearly lies in acceptance of the application for the West section of the boundary extension.

2.3.4 South

2.3.4.1 The proposed area of the boundary extension to the west of Ramsey is 70 Hectares. There is a small number of residential properties (c 3) within this area. This area is not about the development or development potential of this land. The extension of Ramsey into this southern area is simply to formalise and align the actual Ramsey boundary with the perceived boundary. The golf course to the North and West side of this area is assumed by almost everyone to be in Ramsey; the areas of Glen and heath land to the West and South are perceived to be part of Ramsey as the access to these areas is predominantly through Ramsey. The people of Ramsey access the beautiful low hillside on foot from Ramsey and consider the wooded area and glen to be part of Ramsey. DEFA, MHKs and planning have contacted the Town Hall to discuss the area and have been very surprised to find it falls outside of Ramsey.

2.3.4.2 In 1865, when Ramsey was formed, a crest was produced that is proudly displayed at the Town Hall and appears on the official Ramsey embossed stamp, depicting a crown sitting above the Albert Tower. The Albert Tower was vested in Ramsey Town Commissioners by virtue of the Ramsey Town Act 1970, and subsequently transferred to the safekeeping of the Government Property Trustees (now the Department of Infrastructure). Albert Tower is widely associated with Ramsey but currently sits outside of the town boundary, a mistake of history that needs to be corrected.

2.3.5 Glen Auldyn

2.3.5.1 The proposed area of the boundary extension for Glen Auldyn is 145 Hectares. There is a number of residential properties (c 90) within this area with the focus properties being on the southern side of Lezayre Road in a linear development clearly extending out from the Town of Ramsey.

2.3.5.2 The residents of Glen Auldyn already benefit from the communal services provided within the town and there is little physical separation between Ramsey and Glen Auldyn, with development now reaching the current boundary. Glen Auldyn is no longer separated from Ramsey, either in a physical sense or in community spirit.

3. Consultation

3.1 Consultation is vital to ensure the gathered views of all members of the community are incorporated into the process; engagement at an early stage demonstrates that the proposed Ramsey boundary extension application merits review and scrutiny.

3.2 Respondents to the public consultation were self-selecting and it was heartening that 334 responses were received. The fact that 12 individuals also registered to speak at the Inquiry shows people want to engage.

3.3 Ramsey Town Commissioners reviewed the comments made by members of the community who submitted non-confidential comments and, as part of their analysis, general themes were identified, details of which can be found in Appendix 1, along with Ramsey Town Commissioners' further replies.

3.4 As with most consultation processes, there is a silent majority who are not interested, do not want to engage or who see little or no advantage or disadvantage to themselves. In Ramsey, living in the 3875 households are 8,288 people (population from census 2021).

3.5 As shown in the analysis referred to above, it is predominantly the residents of Lezayre that are concerned by this process. There is fear of change and how it would impact the homeowners and residents. In reality, the impact on current households will be only slight. They will benefit from increased frequency of bin collections, access to the Town Library at a reduced subscription and a dedicated team of 20 workers looking after the town, parks, amenities and streets to provide seamless services.

3.6 The Department of Infrastructure is looking at a new Highway Maintenance Charter that devolves more responsibility to local authorities. It is yet to be determined how this will take shape, but Ramsey Town Commissioners recognise the importance of maintaining the town and have the resources, equipment, and staff to do so and as such, are better positioned than Lezayre Commissioners in this regard.

4. Ramsey Facilities and Management

4.1 With a population of 8,288, a 5.6% increase since 2016 (NB across the Island there was a 0.9% increase in this same period) and 3875 households in Ramsey, the town is vibrant and growing. Much of this growth has been filling in the vacant areas earmarked for development in the Ramsey Local Plan 1998.

4.2 Now with very few exceptions the development land has either been used to build and develop or has been rendered difficult if not impossible to develop by the very accurate flood risk models that have been developed by the Flood Risk Team from the Isle of Man Government.

4.3 Ramsey Town Commissioners consist of 12 elected members and has a staff of 52 members of staff. The employees of the Commissioners are responsible for the operation of the town and the duties that they perform are highlighted in Appendix 2.

4.4 The operations of the Commissioners is divided quite concisely into Town Hall, Finance, Housing and Properties, Works and Parks and Leisure, the Town Hall Library and the Northern Civic Amenity Site.

4.5 The Housing and Properties team look after the c 550 public sector commissioners' houses, 125 Ramsey and Northern Districts dwellings and the commercial properties owned by the town such as the Town Hall, Courthouse and the buildings in the Mooragh Park.

4.6 The most commonly visible teams and staff members regularly interacted with are the Works team and the Parks and Leisure team. Both the Works and Parks and Leisure teams have active schedules of work defined for their operations in Ramsey. The Works team is responsible for the refuse rounds, the street cleaning, basic highway maintenance, the maintenance of public open space and the support for events and event preparation. The Parks and Leisure Team are responsible for the town's parks, floral displays, trees and the horticultural elements of public open space.

4.7 The size and scope of the Ramsey Town Commissioners works teams is considerable and there are 2 depots in the town to support the teams. The teams are fully equipped with vans, tractors, lawn mowers and other gardening equipment, together with 3 refuse wagons and a street sweeper.

4.8 Ramsey is not perfect however the teams work hard to keep on top of the town's maintenance; the age of the buildings and infrastructure, specifically the pavements and roads, present challenges and Ramsey Town Commissioners work closely with the Highway Services Division of the Department of Infrastructure to maintain these areas.

4.9 Additional investment is planned in the equipment and infrastructure required by the Ramsey Town Commissioners' works teams to enhance the town environment. The annual budget process is perpetual and the 2024-25 budget setting will be well underway during this Inquiry process, and replacement of road sweepers, machinery and equipment will be considered to reduce the strain on our works teams and to enhance the level of maintenance undertaken throughout the town.

4.10 The built environment and brownfield sites in both public and private ownership needs more focus. With many of the buildings in the centre of town having been constructed in the 18th century, buildings that have not been fully maintained either need a substantial refurbishment or have already been demolished. The team at Ramsey Town Hall are addressing over 20 buildings that are classed as dilapidated and working with other business partners to try and promote the reuse of brownfield sites. However, this is challenging. There are legally enforceable mechanisms that Ramsey Town Commissioners can use in relation to dilapidated or dangerous buildings and they are employed when appropriate. In terms of brownfield sites in private ownership, Ramsey Town Commissioners have no direct control. Grants are available from the Department of Enterprise and there has been active dialogue between relevant parties.

4.11 There is a small number of sites owned by Ramsey Town Commissioners that could be developed; the Policy Committee are reviewing the sites to determine their best use and how they can address the needs of the town. Decisions in relation to this limited land holding are not straightforward. Their size is such that only limited development can take place and will not solve the existing housing shortage let alone make provision for expansion in line with central government policy.

5. Electoral Boundary Review

The Electoral Boundary Review Committee was set up in June 2022. The objective of the committee is to redraw electoral boundaries to ensure that there are consistent numbers of people within each electoral area. The problem with trying to achieve fairness with 2 elected members for each constituency is that there is a significant issue presented by the population density in urban areas vs. rural areas. This is evident in the proposed maps taking out a significant number of properties from Ramsey and putting them in Garff (680 residents) or Ayre and Michael (414). This Boundary Inquiry quite rightly has one of its main focuses on community.

Residents of Ramsey are a community and both 'Garff' and 'Ayre and Michael' constituencies have very different identities to Ramsey, particularly for the purposes of the national general election. It is worthy of note that this consultation was made live in November 2023 but has no influence, nor does it relate directly to the matter in hand, which is the expansion of the Ramsey Town Boundary.

Public Consultation – Response Themes & RTC’s Additional Reply
Summary

Ref No	Response Theme/Issue	Ramsey Town Commissioners’ Additional Reply
	General Comments	
Gen1	Land Grab	<p>Land Grab is defined as ‘the act of taking an area of land by force’. This claim was made by various responders but is strongly refuted by Ramsey Town Commissioners.</p> <p>Ramsey Town Commissioners have followed due process in their application to extend the boundary of the town. This Inquiry will assess the merits of the application through the appropriate consideration of 6 criteria, all of which have been addressed either within the original RTC application or in our statements and presentations.</p>
Gen2	Rural land is being sought	<p>Prior to the last boundary extension, suburban neighbourhoods such as Thornhill, part of Westlands, a section of Jurby Road and Westhill Village sat within Lezayre and, prior to their becoming housing development areas, had been fields within a rural setting. These areas, albeit on the outskirts, are now firmly established neighbourhoods of the town.</p> <p>A boundary extension would bring about no immediate change to the landscape. The Isle of Man does need to focus on food security, but the sought areas are relatively small and there is no lack of agricultural land on the Island.</p>
Gen3	Ramsey – state of the town/decaying from the centre	<p>There is plenty of evidence that supports the regeneration of Parliament Street, Market Square and some work that has already taken place on the quayside opposite the old Stanley public house.</p> <p>Ramsey Town Commissioners have an active schedule of works that covers street cleaning, seasonal weeding, grass-cutting, gullies, etc.</p> <p>Byelaws are in place to deal with littering, dog fouling, etc.</p> <p>Ramsey Town Commissioners are actively addressing dilapidated buildings in the town and have been working with 23 property owners. 8 x Section 24 Improvement Notices have been served in the last 2 years. Additionally, owners of Unoccupied Urban Sites have been contacted to make them aware of grants that may be available to them through the IOM Government Department of Enterprise – no responses have been received.</p>

Gen4	Premature Application/Not the right time/Need to await the adoption of the Draft North & West Area Plan	<p>Previous town boundary extensions have been exercises undertaken so that the boundary ‘catches-up’ with the community neighbourhoods and development areas.</p> <p>RTC is strategically considering the need for progression and expansion and considers the North and West Area Plan (irrespective of its draft status) to be short-sighted in that it has a shelf-life to 2026 only (and remains in draft!). RTC is looking far beyond that date to ensure the diverse needs of the town will be addressed not only in the medium term but also for the next generation and to meet the Island’s economic strategy to grow the population to 100,000.</p> <p>Development outside a settlement is restricted except where there are no other alternatives and even then, only in sustainable extensions to settlements. This is a fundamental strategic aspect of our application, i.e. to ensure development takes place only within accepted urban and suburban areas of the town.</p>
Gen5	Not on mains sewerage system, has own septic tank; no street lighting, no mobile phone reception	<p>This point is considered irrelevant because either a property is serviced via the public sewerage system, which means the cost is included on the annual property rates demand, or it is serviced via a private septic tank, which means the property occupant pays privately for the service. Some properties within a Ramsey boundary proposed extension area are connected to the public sewerage system.</p> <p>There are suburban areas within the town with limited street lighting and poor mobile phone reception and, whilst it is recognised that third parties are continually striving to improve their offerings, remarks of this nature are considered by Ramsey Town Commissioners to be irrelevant to this Inquiry.</p>
Gen6	Not One Community	<p>Ramsey Town Commissioners fully appreciate the distinct characteristics of the various urban and suburban neighbourhoods as well as the public amenities, rest and recreation community facilities, greenspace and the retail and business areas of the town centre.</p> <p>Ramsey Town Commissioners are of the opinion that all sought areas share a strong sense of community and are suburban neighbourhoods within the town.</p> <p>This proposed boundary extension is about taking a longer-term perspective, to enable growth and build a sustainable community that manages its diverse human, natural and physical resources effectively.</p>

		<p>Ramsey Town Commissioners, in considering the community needs, are seeking to pave the way to ensure resources are available to support future generations.</p> <p>See separate points following this table about various sites within some of the proposed extension areas, e.g. Ramsey Golf Course, Milntown Estate, Glen Auldyn, Mountain View Innovation Centre.</p>
Gen7	Ramsey needs to develop its brownfield sites in the town	<p>Development of the majority of brownfield sites is challenging and problematic at best because of their location in a flood-risk zone and that the development costs for isolated small sites render the spaces virtually undevelopable for anything other than owner occupation.</p> <p>See also point Gen3: Owners of Unoccupied Urban Sites have been contacted to make them aware of grants that may be available to them through the IOM Government Department of Enterprise – no responses have been received.</p>
Gen8	Ramsey has greenfield sites that can be developed without the need for expansion of the town boundary	The available greenfield land for development, other than one small site to the West of the Andreas Road, planning applications are pending (e.g. Vollar Fields, Sulby Riverside/Poyll Dooey). There is no other significant development land available within the existing town boundary.
Gen9	<p>Common Services - GP, Dental, Pharmacy Services, School capacity:</p> <ul style="list-style-type: none"> • Lack of available Doctor, Dentist and School Services to support a boundary extension. • Ramsey Group Practice not accessed (Jurby Medical Centre made use of instead). • Dentists outside of Ramsey utilised. • Countryside based Pharmacies used, not any in Ramsey. • Schools can't accommodate an increase in admissions. 	<p>Manx Care is responsible for all primary care services on the Island and medical services are provided to residents if the relevant GP Practice list of patients is 'Open'. Contact was made with Ramsey Group Practice on 4th December 2023 and it was confirmed that the practice is accepting new applications from anyone based in the North of the Island. Appointments for Ramsey and Jurby surgeries are managed via the Ramsey Group Practice.</p> <p>Primary Care Services maintain the NHS dental waiting list and are responsible for making patient allocations to the NHS dental practices as and when practices have availability to take on new patients. When allocated, the dental practice is not necessarily in the locality where the patient is resident.</p> <p>The use of out-of-town pharmacies was largely due to the poor service and product provision (now being addressed).</p> <p>A boundary extension per se will have little effect on the availability and provision of these services. A boundary extension leading to further development and subsequent increase in population will underpin the need for the expansion of GP and dental services in Ramsey, which can be provided as part of structured progression and is aligned with the Policy to grow the economy.</p>

		<p>In terms of school capacity, contact was made with Bunscoill Rhumsaa at the beginning of December 2023 and confirmation received from the Executive Headteacher of Bunscoill Rhumsaa and Sulby Primary School that the maximum capacity of Bunscoill Rhumsaa is 566 pupils. There are 459 pupils in the school, resulting in a balance of 107 available pupil places, equating to 18.90%.</p>
Gen10	Rural vs. Urban – Ramsey Town Commissioners have not addressed the different needs of countryside vs. town living	<p>A review will be required to analyse and agree the way forward for service delivery and governance matters, to address the needs of the various urban and suburban neighbourhoods in the town, and to build community wellbeing and inclusion. Boundary extension, by definition, requires an integration of rural and urban growth – this is controlled by density.</p>
Gen11	Boundary Extension Application is contrary to IOM Gov policies re Climate Change Programme; building on the fields would increase the carbon footprint	<p>The Climate Change Act 2021 sets out the standards and principles that climate action must follow. The actions needed to mitigate climate change are wide-ranging and it is critical that Ramsey Town Commissioners fulfil their duties.</p> <p>Ramsey Town Commissioners are categorised as a Category B public body for the purposes of the Climate Change (Public Bodies' Reporting Requirements) (Amendment) Regulations 2023.</p> <p>In guiding all new policy development and decision making, Ramsey Town Commissioners must undertake a documented Climate Change Assessment to evidence the support of climate justice principles, ensure all interim and net zero emissions targets are met and work towards sustainable development.</p> <p>In fulfilling our duties, we will be contributing to protecting and enhancing biodiversity and ecosystems.</p> <p>A boundary extension as such will have no direct impact on the Climate Change Programme as any subsequent new development application will be subject to climate scrutiny via the Climate Change Assessment process.</p>
Gen12	Proximity to the town centre of some residents living near to the existing Ramsey boundary in some proposed extension areas – they pay a fraction of the rates of Ramsey residents but enjoy the same benefits	<p>Irrespective of the financial aspects (which should be ignored in this process), some of the existing properties near to the edge of the boundary are as close, or closer, to the town centre than other properties within Ramsey.</p> <p>Furthermore, Ramsey Town Commissioners wish to address their concern over a small number of properties located inside the Ramsey Town Boundary Sign that can be found on directly opposite sides of the road, where one property is in Ramsey and others opposite are in Lezayre. Two such examples are:</p>

		<p>i) Creg Malin, <i>Ramsey</i> and 2 properties at Cronk Mayn, <i>Lezayre</i>, are on directly opposite sides of Jurby Road;</p> <p>ii) the Milntown Estate, <i>Lezayre</i> is directly opposite residential/industrial property, <i>Ramsey</i>, on Lezayre Road.</p> <p>The residents of these properties near to the edge of the boundary and within the proposed extension area can avail of the same common services as Ramsey residents and are part of the same community sharing the same community interests.</p> <p>The majority of Ramsey complies with active travel strategies, and this will not change.</p>
Gen13	Some of the proposed extension areas have special ecological value, woodland settings or enjoy dark skies. As such, these areas cannot be part of the Ramsey town	<p>Protected sites best represent our Manx heritage and Ramsey Town Commissioners are proud to partner Biosphere Isle of Man. We are passionate about protecting our natural resources, including established areas of special ecological interest within the town, e.g.:</p> <p>Poyll Dooey, situated in Ramsey next to Sulby River, is a recognised Nature Reserve with ecological significance, comprising salt marsh, wetland, grassland, meadow, woodland, nature trail, etc. Its continuous variation in exposure results in a specialised ecosystem, providing a unique habitat to rare and highly adapted species.</p> <p>The Ramsey Mooragh Shore is an Area of Special Scientific Interest under Section 27 of the Wildlife Act 1990. The Mooragh Park Promenade is registered as a Dark Skies Site; an Interpretation Board ensures that visitors can fully enjoy the stunning stargazing on offer.</p> <p>Ramsey Town Commissioners are of the opinion that, whilst intrinsically important aspects within our diverse community neighbourhoods, environmental/landscape concerns should bear little relevance to this Inquiry and are protected for their own sake via separate legislation.</p>

Ramsey Golf Course is a prime example of a five-star recreation facility and, according to the Ramsey Golf Club website, ‘the clubhouse and course are situated more or less in the centre of the Town of Ramsey’. The Club was founded in 1891, with the Club’s most prestigious trophy being presented to the Club for annual competition by Ramsey Town Commissioners in 1902. The Ramsey Golf Club Challenge Cup, or ‘The Town Cup’ as it is known, has been competed for since then (except for the World War years) and continues today as a prominent annual event in Ramsey’s golfing calendar. The Club was formed to provide facilities to the people of Ramsey to play golf and for public use within the town. In addition to the playing of golf, there are fabulous facilities available for both private and community gatherings to be held in the Clubhouse, which is enjoyed as a community destination by people from the wider Northern Parishes. The fact is that the golf clubhouse and course span across Ramsey, Garff and Lezayre. However, the perception of most people, and by the club’s own assertion, Ramsey Golf Course lies firmly within Ramsey.

The Milntown Estate was bequeathed to the Milntown Trust by the then owner, Sir Clive Edwards, on his death in 1999. A bronze plaque on the wall of the Milntown Mansion House quotes a passage from his will: 'Impressed by the kindness of the Manx people, it is my desire that my estate of Milntown and its grounds should be maintained as a place of historical interest for the benefit of the public.' Prior to Sir Clive's death, the Milntown Estate was not accessible to the public, so his gift to the local residents marked a significant point in time and resulted in the Trustees and Estate staff embarking on extensive improvements and creating new experiences for those visiting the Milntown Estate. 'Milntown', as it is warmly referred to locally, is a fabulous venue for members of the community to meet up for breakfast, lunch, afternoon tea or to visit the gardens and other facilities within the grounds. Additionally, Milntown has an active social media following and organises numerous events for the extended community to attend at various times throughout the year. The entrance is located within Ramsey on Lezayre Road circa 150 metres away from Bunscoill Rhumsaa and, directly opposite the whole northern boundary of the Milntown Estate on Lezayre Road are residential and industrial properties, all within Ramsey. Milntown is very much regarded as an integral part of the Ramsey town community.

Ramsey Town Commissioners consider **Glen Auldyn** to be a neighbourhood within Ramsey. It is positioned abutting the existing Western side boundary. The topography of Sky Hill gives a natural boundary defining Ramsey and Lezayre. The Glen Auldyn residents identify themselves as a separate community which is an important aspect to address. Community and a sense of belonging is crucial to who we are; it gives us identity and purpose. Ramsey is segregated into various small neighbourhood communities, e.g. Glen Auldyn, Lezayre Estate, Thornhill Park, Gibbs Grove, Westhill Village, Balleigh, Claghbane, Barrule Park, etc.; each small community having particular nuances and unique qualities. We are all part of one larger community and that is the community of Ramsey.

The Mountain View Innovation Centre, in addition to employing circa 50 staff, also provides physical space for other businesses within the site, e.g. children's nursery, beauty salon, homecare and occupational health services, financial services, bistro, to name a few. The Centre clearly signifies the principles of innovation and is a key employment area on the outskirts of town. Additionally, the events venue and extensive facilities at MVIC are impressive and widely available to individuals, churches, charities, and community groups from the wider community. It is admirable that the organisation is all about Community – the community of the people who work at the site and the community in which we live.

A strong community spirit is an attribute that Ramsey Town Commissioners attach great importance to, and firmly believe that the Mountain View Innovation Centre and the space around the site can blend in almost seamlessly with the surrounding residential and Ramsey boundary expansion areas to become a fully inclusive extended community.

Ramsey Town Commissioners
FUNCTIONS AND DUTIES

Abandoned Vehicles	Pedlars and Street Traders
Beaches	Play Areas
	Public Clocks and Seating
Car Parking	Public Information/Advice
Civic Amenity Site	Public Pleasure/Recreation Grounds
Community Halls	Public Seats and Shelters
Consumer Advice	Public Toilets
Control of Dogs	Rate Setting
Environmental Health Enforcement	Refuse Collection
Events and Attractions	Registration of Births, Deaths, Marriages and Civil Partnerships
Facility for the Public to view Planning	Sanitation
Houses in Multiple Occupation Regulations/Enforcement	Administration of Sheltered Housing Authority
Food Hygiene Enforcement	Street Cleaning
Highway Hedgerows, Gullies & Verges	Street Lighting
Housing (management of 550 homes)	Street Nameplates
Library	Tourist Information
Litter Act/Designated Litter Officer	Unsightly/Derelict Buildings
Local Byelaws/Enforcement	War Memorial
Maintenance of Open Spaces	Sports Facilities

Ramsey Town Commissioners
EVENTS

Event Name	Description
Chilly Dip	New Year Day Dip
Shennaghys Jiu	A music and performing arts festival organised by a community committee which first took place in 1997
Daffodil Competition	Bulb growing completion with local schools
Sprintfest	Multi night music festival taking place during TT week
Ramsey Sprint	Motorcycle event on Mooragh site as part of TT Festival
Picnic In The Park	Family Fun Day In the Mooragh Park
Ramsey Rocks	Once Day Family Focussed event
Ramsey in Bloom	Completion celebrating domestic, commercial and community gardens
GranFondo	Cycling event hosted in Mooragh Park
Firework Display	Annual firework display in Mooragh Park
Civic Service of Remembrance	Annual Civic Service of Remembrance
Christmas Lights Switch On	Annual event to countdown the start the busy festive season
Ramsey Festival of Christmas Trees	Community festival of Christmas Trees in Town Hall
Ellan Vannin Memorial Service	Service to commemorate the loss of the Ellan Vannin
Ramsey In Bling!	Completion celebrating the best decorated residential and commercial properties during the festive period.
Community Carol Singing	Carol singing at the Courthouse with Ramsey Town Band
Various	Host various sporting events and triathlons, charity events in Mooragh Park

Ramsey Town Commissioners
DISPLAYS AT THE TOWN HALL

TT
World Book Day
Tynwald Day
Manx Grand Prix
Manx Nature Show
Sixties books, and Radio Caroline
A display to mark the start of the new school year
999 Emergency Services Day
Display of materials relating to the boundary extension plans
Access To Cash survey (display and accepted consultation responses)
Wind Farm Consultation
Electoral Boundary Review Information

Statement of Robert Cowell the Deputy Chairman and Lead Member for Finance and General Purposes, Ramsey Town Commissioners, to support the Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023

1. Introduction

1.1 I, Robert Cowell, BSc Hons, am attending the Inquiry for and on behalf of Ramsey Town Commissioners in my capacity as Deputy Chairman and Lead Member for Finance and General Purposes. I also represent Ramsey Town Commissioners at the Northern Chamber of Commerce. The Board voted unanimously for me to represent the Town in helping the Commissioners with achieving our goal of extending the town boundary. Ramsey Town Commissioners' mission statement is very simple – to make Ramsey a better place to be.

1.2 I firmly believe that the Boundary Extension sits perfectly within that vision and that by undertaking this process, we are aiming to make Ramsey better equipped to meet the ever-changing needs of our community.

2. Background to the Inquiry

2.1 I would like to begin my evidence by providing some contextual information about Ramsey Town Commissioners and explaining how our application to extend the town boundary took shape.

2.2 Ramsey Town Commissioners were formed 1865, which was due to the foresight of a number of individuals. The Town had already grown up around the natural harbour and along the Sulby River. Ramsey was a modest port but there was industry in the town as clearly demonstrated by the construction and launching of the Euterpe in 1863 (later named Star of India) a 1,200-ton vessel over 200ft long.

2.3 The Ramsey Town Boundary was first expanded in 1881 to accommodate the Mooragh and adjacent lands. It was then further revised in 1884 as the town grew and expanded.

2.4 The third boundary extension, resolved by Tynwald in 1969, was very much a catch up exercise as the Town Boundary up until this date ran from the Fort on the Mooragh Promenade (by the 2 semi-detached houses at the end of the Mooragh Park) in a straight line to the rear of Ash Grove, across Jurby Road joining in a straight line to the end of Hespera Terrace by the Grammar School and then a straight line to Lheaney Road and ultimately to Ballure tram crossing before meandering down the Ballure glen to the Arches. This Ramsey Town Boundary was desperately out of date, the two world wars and turbulent, difficult times having delayed any expansion of the boundary between 1884 and 1970.

2.5 The Town Boundary change of 1969 was very much a 'catch up with development' approach and sought to bring Ramsey Grammar School, Lezayre Estate, the houses on Jurby Road past Ash Grove, the housing on Andreas Road past Ash Grove and the newly constructed Ormly Estate into Ramsey.

2.6 The 1982 Development Plan was a progressive whole Island plan and by the time of its introduction, there had been significant development in Ramsey with the Cloughbane Estate, Greenlands Avenue Estate, Lezayre Park Estate, Thornhill, Westlands Close and Riverbank Road, Rheast Mooar, and the redevelopment of old Ramsey and the construction of Kings and Queens Court having taken place.

2.7 In 1993 the Town Boundary once again had to catch up with development because the areas identified in the 1982 Development plan as 'Areas of predominantly residential use' sat outside the town boundary and had been developed.

2.8 The Isle of Man has two extant planning policy documents for Ramsey and the surrounding area being the 1982 Development Plan and the Ramsey Local Plan 1998. The West Ramsey Development Framework 2004 was prepared by the then Department for Local Government and the Environment to further develop the proposals for the west Ramsey area within the Ramsey Local Plan 1998. The Framework was a recommendation in the written statement and a natural progression; it was published prior to accurate flood mapping being produced.

2.9 The Isle of Man Strategic Plan 2016 is the overarching planning policy guidance and sets out clearly all development control requirements.

2.10 Ramsey has grown as the population of the Isle of Man has increased. In 1970 the population of the Isle of Man was 50,000 (49,312 in 1966); in 1981, the time of the development it had grown to 64,679; by 1991 the population was 69,788 (figures used at the time of the boundary extension). The population in 2021 was 84,069, which represents a growth of 29% during the period.

2.11 In conjunction with the increase in population, the size of the average household has shrunk from 2.5 to 2.08 people per household. This means more population living in, and requiring more, properties. This is across the Isle of Man, but it is clearly shown in the Census figures where there were 3054 households in Ramsey in 1996 and 3875 households in Ramsey at the time of the 2021 census and represents an increase of 27%. This increase of 821 in this period is very dramatic and shows the popularity of Ramsey, that the town has expanded and filled its available sites and that Ramsey needs space to expand.

2.12 The Isle of Man Economic Strategy 2022-2032 sets out details for an estimated population of 100,000 by 2037. When looking at history, the population increased from 69,788 to 84,069 in the 30 year period between 1991 and 2021. There was an increase in the number of households in Ramsey of 821 in the 25 years between 1996 and 2021. Although there seems to be some plans to skew the population to the South of the Island with the large development in Ballasalla, the likely impact on Ramsey of a population increase of 16,000 is approximately 900 households. Some of this could be yielded by the development of the Vullan Site and by the Riverside Development Scheme but this still leaves a significant shortfall that simply cannot be accommodated within Ramsey's current boundary, and this does not take into account the requirement for employment land!

2.13 Within the same strategic document, it is made clear that the intention is to create and fill 5,000 jobs across new, enabling and existing key sectors by 2032, reaching an overall GDP of £10bn. This further evidences the need for the growth of our service centre town.

2.14 Increasing the population needs to be based on skills and economic benefit. It is hoped that the increase in population will be based upon the economically active, an important group to any economy. Housing costs are high on the Isle of Man; affordable decent homes are required, and they need to be attractive to bring and retain the best people to expand our population. There needs to be a variety of choice for all, not just affordable housing.

2.15 This Ramsey Town Boundary Extension is overdue in that the development land in Ramsey is now practically non-existent and the Strategic Plan limits or prevents building in the countryside. It is not appropriate that the Ramsey Boundary catches up with community and development as has been the case in the past. The Boundary must be extended so as to accurately define the land that is either part of a community of interest, is already considered within Ramsey or is required for future development. The Ramsey community and surrounding neighbourhoods depend greatly on the services, amenities, and facilities within the town. It is only right and proper that Ramsey, in its position as the Capital of the North, looks to the future and does not simply take no action and stifle the town and the North of the Island.

3. Summary

3.1 On behalf of Ramsey Town Commissioners, I can confirm that due process has been followed in our application to extend the boundary of Ramsey. I believe we have been successful in our endeavours to promote the best interests of the town in line with our mission of making Ramsey a better place to be and trust this Inquiry and the Department of Infrastructure recognise our good record of local governance and in the delivery of services and facilities within the town.

3.2 We attach great importance to the need of strategically planning for the future requirements of the town and wider communities and we believe that our evidence for this proposed boundary extension of Ramsey is compelling. I have faith that this Inquiry will make a recommendation to the Department of Infrastructure for our application to be approved in its entirety.



I am Tony Lloyd-Davies, Managing Director of Cornerstone Architects. I have an honours degree in architecture and am a full member of the Association for Project Management and provide my evidence to support the Ramsey Town Commissioners application to the Department of Infrastructure for an Order under Section 6 of the Local Government Act 1985 seeking to extend by Order, the boundary of the town of Ramsey Town.

I have 34 years' experience working in the built environment having my office base in Ramsey and an extensive knowledge of planning matters on the Island. I am a native Manxman and have lived in Ramsey for most of my life.

During my career I have represented both private and public bodies in planning matters and am familiar with the public inquiry process.



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- 1.0 Evidence Basis**
- 2.0 Introduction**
- 3.0 Assessment of existing settlement**
- 4.0 The Ramsey Local Plan 1998**
- 5.0 Area Plan for the North and West**
- 6.0 Unoccupied Urban Sites**
- 7.0 Isle of Man Strategic Plan 2016**
- 8.0 Built Environment Reform Programme**
- 9.0 Area Assessments**
- 10.0 Conclusions**
- 11.0 Appendices**

1.0 **Evidence basis**

I have been requested to review the criteria 3, 4 and 5. I have reviewed the mapping associated with development within the boundaries of Ramsey and the immediate surrounding areas and provide evidence to identify recent settlement patterns having due regard for the:

- 1982 Development Plan.
- Ramsey Local Plan 1998.
- The West Ramsey Development Framework 2004.
- The Isle of Man Strategic Plan 2016.
- The Draft Area Plan for the North and West. (APNW)

In considering the content I have also referred to:

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

[Our Island Plan GD 2022/0095](#)

[Isle of Man Economic Strategy GD 2022/0080](#)

[Island Spatial Strategy Options Evidence Policy Paper P.EP 01 21st July 2023](#)

[Residential Land Availability Study \(Update16\) Planning approvals and Land Monitoring 2001-2023 July 2023 including rlas-north-tables 1309](#)

Statement of the Head of Planning Policy, Cabinet Office 30th October 2023.

Built Environment Reform Programme and the emergence of Biodiversity Net Gain Legislation.

2.0 Introduction

- 2.1 On 12th January 2021 Ramsey Town Commissioners (RTC) applied to the Department of Infrastructure (DOI) under the Local Government Act 1985, Section 6(1) requesting the Department to extend, by Order, the boundary of Ramsey Town.
- 2.2 The DOI in progressing the Draft Order have determined to deal with the application in four elements reflecting the analysis of areas identified within the RTC initial submission made in January 2021. **See Appendix A1, A2, A3 and A4** setting out each area in the context of the extant settlement boundary of the Town of Ramsey. I refer to these as:
1. North Area
 2. West Area
 3. Glen Auldyn
 4. South Area
- 2.3 There have historically been four previous extensions to the Town boundary, the two most recent of which have occurred in 1969 resulting in the Ramsey Town Act 1970, and then in 1992 culminating in the Ramsey (Boundary Extension) Act 1993. **See Appendix B1 and B2** for the settlement boundary agreed at that time - indicated on the current, updated Isle of Man Government mapping data (November 2023) showing where recorded development on available sites has occurred during the plan period to date.
- 2.4 The criteria for consideration of Local Government Boundary Extensions 2004 were established in 2004 during an extensive Tynwald debate into a proposal to extend the Douglas Town Boundary. These 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, doctor's 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 generally be admitted that the area sought may be valuable in various ways to the local authority by whom they are now governed;**
- 2.5 The criteria are further cited by the DOI in its reports on the proposed Port Erin Boundary Extension in 2019 including by the Chairperson of

the Public Inquiry dealing with that matter who confirmed he had considered the application based on these criteria.

- 2.6 Note: Applicant Local Authorities should, in submitting their applications, address each point. Similarly, any affected Local Authority wishing to comment or oppose such application should as far as possible, confine their comments to the above points.

However, applicant Local Authorities should also note that these criteria are not intended to be exhaustive.

The DOI considers that all these points are important and should be addressed but that an Applicant Authority may consider that there are other points or ways of addressing the issues additionally that may support its application and so the criteria are not exclusive to anything further being brought in support of the application.

The following shall not be considered by the Inquiry under S.6 of the Local Government Act 1985:

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

What is being addressed in a boundary extension application is not the relative levels of the rates as between one Authority and another or the financial implications or questions of efficiency between Authorities. These issues are to be ruled Out of Order. The list of criteria has been placed in order of priority, although it is not intended to be exhaustive, or exclusive to any other relevant factors. There is, of course, no requirement that all the above points must be satisfied and one combination or another of them may be used.

- 2.7 I have been requested to address the criteria at **3**, my evidence sets out a background to the existing settlement boundary and concludes that there is no land available for the growth of the Town and that the existing town has outgrown the promoter's area. **4**, my evidence includes mapping data which confirms the logical boundary proposal follows clear physical boundaries where possible **and 5**, my evidence demonstrates that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby.
- 2.8 My evidence addresses each in turn and where appropriate my commentary is added to explain and emphasise points.
- 2.9 I consider that any application to extend a community boundary is driven by a series of factors which must be looked at independently, subjectively and with reasoned methodically before a decision on whether to accept as a collective whole or in part the application is reached.

- 2.10 I have assessed the government mapping for the area and refer to several annotations on base mapping to illustrate the structured reasoning of RTC in their application. These are referred to as appendices and relate to the content of my written statement.
- 2.10 I consider the best format to view these is through electronic visual media with the written statement as a cue as this can be enlarged on screen to closely inspect individual aspects. Hard copies are available on request.
- 2.11 I refer to the emerging Area Plan for the North and West and to an All Island Area Plan both of which are currently being proposed by the Cabinet Office.
- 2.12 I rely on the evidence of Mrs Diane Brown to this process. I quote directly from her report ref:

Statement of the Head of Planning Policy, Cabinet Office to support the Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023 **See Appendix C**

3 The weight attached to Existing and Emerging Plans

3.1 In terms of how the Island Development Plan is taken into account in decision making on planning applications, it is listed as one of a number of considerations to be taken into account. S10(4) states that “In dealing with an application for planning approval...the Department shall have regard to – (a) the provisions of the development plan, so far as material to the application.” *In practice, this means that at the point of a decision being made, the approved development plan is taken into account.*

3.2 All development plans take time to complete. This is because of the need to gather and analyse information, the need to ensure sufficient public consultation, the time and resources necessary for a public inquiry and the approval process which follows relating to modifications, adoption and approval. *Questions are sometimes asked about the weight decision makers should place on emerging plans. For instance, sites may be allocated for development in an existing plan but might not be allocated in an emerging plan (which would include a Draft Plan). Emerging Plans can be seen as “other material considerations” but this doesn’t imply that they should be afforded a specific level of weight in decision making.*

3.3 *Unlike in England, where the National Planning Policy Framework (NPPF section 48) sets out that “Local Planning Authorities may give weight to relevant policies in emerging plans...” there is no equivalent guidance on the Isle of Man. Plans are recognised as being relevant and in operation until they are revoked, which happens when replacement plans are adopted (by Order) and then approved by Tynwald.*

3.4 From personal experience dealing with planning applications on the Island earlier in my career, *emerging plans tend to carry little weight until replaced formally by an approved plan*. The precise 'weight' remains a judgement made by planners and decision makers determining planning applications and considering the particular circumstances of the case. *In practice, there is more certainty about a plan's direction after it has been through Public Inquiry than one which hasn't. While no changes to a plan can be made after an Order has been signed - signalling its adoption - plans still need to be approved by Tynwald*. Tynwald does not have the power to amend an Adopted Plan.

3.4.1 The Area Plan for the North and West once approved will replace the Ramsey Local Plan and the 1982 Development Plan which are both relevant plans in and around Ramsey. They do remain the statutory development plans for the time being and so land which is currently allocated on these Plans could come forward for development at any time. For example, an application has been submitted for development at Vollan Fields, between Bride Road and Andreas Road, North Ramsey. The land is allocated in the Ramsey Local Plan but this was not taken forward in the Draft Area Plan for the North and West. It will be for DEFA to determine the application in the knowledge that there is emerging plan.

3.4.2 How the current status of the Draft Plan impacts on the assessment for any live planning application will be a matter for DEFA, taking into account many of the points mentioned above.

- 2.13 From this statement the factors influencing decision makers should be based on their own merit. In this case I submit that the application under consideration should not be influenced by emerging plans.
- 2.14 RTC are recognised as an UNESCO Biosphere Isle of Man partner and have pledged to help:
- Protect our natural resources
 - Develop our economy in a sustainable way
 - Support and promote our cultural heritage
 - Make our environmental impact positive wherever possible
 - Engage with the local community
 - Promote our outstanding living landscape and seascape through active involvement with UNESCO Biosphere Isle of Man

3.0 Assessment of existing settlement

- 3.1 Development within Ramsey Town and the wider Island is managed through government planning policies. There is a hierarchy to development control and Ramsey has a dedicated Ramsey Local Plan 1998 (Planning Circular 2/99) which sets out zoning for development within the settlement boundary. This is accompanied by two maps and a written statement **See Appendix D** which clearly set out the areas and their respective zoning allocations (I have amalgamated the North and South Plans to create a single map). This is an aged document now 25 years old. This was produced to replace in development terms the 1982 Development Plan **See Appendix E** (Mapping only) which is extant where there is no dedicated further planning policy.
- 3.2 The majority of this is now developed and only in extreme circumstances is the land use identified questioned. Most significantly this mapping is used to identify areas where development generally isn't supported.
- 3.3 It is also important to note that Planning Circular 10/91 - Island Strategic Plan North Eastern Sector Plan (B) Written statement and maps was, in terms of Ramsey superseded by the Ramsey Local Plan 1998 and the now Isle of Man Strategic Plan 2016 to recognise relevant policy.
- 3.4 West Ramsey also benefits from The West Ramsey Development Framework March 2004 which provides supplementary planning guidance and mapping **See Appendix F** which is in accordance with the Ramsey Local Plan. It allocates extensive areas for residential, industrial, and open space use and to which the Department will have regard in the determination of planning applications submitted in relation to the West Ramsey area. The 1998 Local Plan written statement required that the *'development of this land should be undertaken only in accordance with an approved scheme for the whole area'*. I quote:
- 3.4.1 'It is important to understand that this document was prepared to ensure proper regard (to) is had to interests of acknowledged importance and that the nature of the development is tailored to meet the needs of Ramsey.
- 3.4.2 Beyond the Town boundary to the West, in the Parish of Lezayre, there is further land zoned for development on the 1982 Development Plan. This development is not expected to take place before that in Ramsey, but the Development Framework has been prepared so as to be capable of accommodating, if necessary, further development to the west in the long term.

OVERALL CONCEPT

- 3.4.3 The proposals within the Ramsey Local Plan for the West Ramsey area provide a unique opportunity to create a new neighbourhood for Ramsey. The natural characteristics of the area and its proximity to the town centre, the Sulby River and the rural land to the West offer an

opportunity to create a quality environment for those who live and work in the area. The Development Framework seeks to identify the key elements of the existing landscape. By incorporating them and creating new structural landscape features, including open spaces and woodland planting, the intention is to provide a strong landscape structure in which to site the various elements of the neighbourhood.

- 3.4.4 The towns and villages of the Island have developed their own sense of place over many years. It is particularly important in a major development such as West Ramsey to identify those elements that can help create such a sense of place. This Development Framework aims to identify these elements including river corridors, tree belts, areas of salt marsh and notable buildings’.
- 3.5 The Development Framework recognises the frailty of the (then) existing development opportunities whilst providing for expansion for future generations. I submit that the need was established at that time through the robust zoning allocation process and through development control the available areas have now comprehensively been developed.
- 3.6 There are two notable exceptions:

Planning Application: 20/01080/B

Proposal: Residential development of 138 dwellings with associated drainage, highway works and public open space

Address: Land At Lower Milntown (Fields 134278, 134279, 134280, 134281, 134282, 134283, 134284, 134288 & 134289) And Strip Of Land Between Auldyn River & Auldyn Meadows, Off Lezayre Road, Lezayre & Ramsey Isle Of Man.

Which has been through the planning process to appeal and been refused on the following grounds:

- 1. Notwithstanding that the site is allocated for development in the 1982 Development Plan, other material considerations, including the more recent flood risk modelling for the area, would result in the site being developed in isolation, unrelated both to the originally envisaged westward extension of Ramsey and to the existing settlement boundary. There would be material harm, in this regard, to the established character and appearance of this rural area. Although mitigated to a large extent, there would also be harm to biodiversity and ecology interests. Those harms are not outweighed by the benefits of the development proposed.

and

Planning Application: 22/00679/B

Proposal: Combined approval in principle and full approval for a residential development seeking planning permission for the erection of 66 dwellinghouses 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 with all matters reserved save for access

Address: Land At Poylldooey Fields And Part Fields 134271, 134253, 134270, 134272, 131273, 131276, 132274 & 134274 Ramsey Isle Of Man

- 3.7 Which despite being submitted for approval in early June 2022 is still awaiting formal consideration by the planning department. I note that there are several concerns relating to the viability of the development, particularly relating to development in the flood plain and compliance with the requirements of the Climate Change Act.
- 3.8 Both of which indicate that any developments of the residual undeveloped areas identified in the 1982 Development Plan and Ramsey Local Plan 1998 together with the West Ramsey Development Framework are unlikely to be successfully delivered.
- 3.9 Particularly of concern is that collectively these both represent the main areas available for development within the adopted zoning and materially as being at significant risk from flooding **See Appendix G** and as they are at significant risk from flooding are rightly being constrained from delivery for development. The planning department is correctly looking at the constraints on each site and where mitigation cannot be provided is restricting development. This is the planning process working effectively. It follows therefore that alternative areas for development should be explored.
- 3.10 The Central Ramsey area within the Local Plan has been reviewed in terms of National Strategy **See Appendix H** on [Sea Defences flooding](#) and coastal erosion. It has been identified in the predicted flood and coastal erosion risk assessment as hotspot No 1 on the top 100km grid squares overall ranking. I submit that development in this area should not be allowed.
- 3.11 I submit that development within the Town settlement boundary is all but exhausted and residual areas constrained. The total area enclosed within the existing settlement boundary is 905 acres and of that an area of 315 acres is at significant risk from flooding. **See Appendix J** This equates to circa 35% of the available land for development. I suggest that to develop this would be at best foolish and in worst case negligent of the decision makers to allow.
- 3.12 To provide for the future the Ramsey Town Commissioners have applied to the DoI to extend the boundary to allow structured and planned growth for coming generations.
- 3.13 I submit that the reasons for establishing the West Ramsey Development Framework and the associated zoning have not changed and the same fundamental requirements exist. My paragraphs 3.4.1, 3.4.2, 3.4.3 and 3.4.4 all recognise the need for appropriate zoning to be defined and structured. The RTC application is cognisant of the need to plan for the

future and proposes logical extensions abutting the existing settlement boundary.

- 3.14 The [Economic Strategy](#) clearly sets out the Isle of Man Government's aim of growing the Island's population of residents to 100,000 by 2037 to ensure the Island's economy and public services are sustainable. This requires support from landowners and developers to ensure adequate housing options are available to incoming residents. In a similar context [Our Island Plan](#) identifies housing as one of the critical issues that government needs to address. The government commitment is to "tackle the housing crisis by ensuring everyone has a suitable and affordable place to call home" and this is linked to the goal that "our housing stock meets the needs of our population now and into the future." To achieve this land must be made available for development.
- 3.15 The purpose of the Strategic Plan is to set out a spatial strategy to deliver on the Government objectives and ambitions for the future of the Island. The Strategic Plan must also be cognisant of current Local Plans and by intent set policy to provide for managed sustainable development.
- 3.16 In terms of housing, this should mean providing sufficient homes of the right type, size and tenure in sustainable locations to accommodate the intended growth in the Island's population to 100,000 residents by 2037.
- 3.17 The Strategic Plan should identify sufficient land to meet these minimum housing needs. This should be done through the allocation of a blend of allocated sites and Strategic Reserves, like the 'Plan, Monitor and Manage' process endorsed by the Strategic Plan 2016. This was acknowledged by the Inspector presiding over the Area Plan for the East inquiry. A clear review process, including a robust approach to monitoring housing delivery and a mechanism for releasing Strategic Reserve sites, is essential to ensure that the plan and its policies remain effective.
- 3.18 **Strategic Plan period and interim reviews**
3. 18.1 The Strategic Plan should set out housing needs to 2037 to tie in with Government's population growth target. However, an overall plan period to 2041 appears more appropriate as it would cover at least 15 years following the adoption of the Plan and provide longer term certainty on other policy areas.
- 3.18.2 To ensure that the housing target remains robust, I would suggest that housing needs are reviewed after the 2031 Census. This would give the policies of the 'Our Island Plan', and the Strategic Plan, some time to bed in and the 2031 Census will provide an accurate guide to the success of the population growth target.

3.19 **Employment Land Needs**

- 3.19.1 The latest evidence on employment land requirements is the Employment Land Review 2015 (as updated in 2017). This evidence base document is already more than 5 years old and no longer provides a robust basis to inform Strategic Plan policies, particularly as it only provides estimates to 2026. An Employment Land Study looking at the situation now is required.
- 3.19.2 In the absence of more up-to-date evidence, it is difficult to assess what additional employment land allocations will be required to meet employment land needs over the plan period suffice to say there is a requirement for employment land to be available to develop.
- 3.20 [The Isle of Man Population Report 2023](#) is a valuable reference document to understand the internal migration (Section VI) patterns and suggests between July 2021 and July 2023 net migration from outwith Ramsey into the IM8 postcode as being 125 people. It is clear that there is a move away from the IM1 and IM2 areas to primarily Ramsey, this in spite of the large residential development in Ballasalla (the second most desirable location for internal migration) which has provided significant new houses in the period. I would expect this trend to continue.
- 3.21 The [Residential Land Availability Study](#) sets out current residential data and is useful as a guide to take up of planning approvals. It does not consider recent planning decisions in the area and in my opinion cannot be relied on in the current boundary extension process.
- 3.22 It should be noted that the application is for an extension of the Town Boundary only. It is not a request to change the zoning of any land which may or may not be included within the settlement boundary following this process.

4.0 **The Ramsey Local Plan 1998 – See Appendix D identified proposed residential development sites with a square around the letter.**

4.1. The mapping sets out the zoning identified within the written statement published as [Planning Circular 2/99](#).

4.2 **Area A – Thornhill**, housing of mixed densities. Except the area to the south of Thornhill Manor where there shall be no more than six houses. The area has now been developed for 66 houses with a current planning application seeking approval on the remaining plot referred to for 17 residential units.

Once developed this will complete the development of Area A.

4.3 **Area B – Ormly Hall**, Development may take place only in accordance with a scheme for the whole area which:

- a) Preserves as, green open space the land referred to in Policy R/R/P1(a);
- b) Provides for a new primary school if this is required by the Department of Education;
- c) Uses low density housing only; and
- d) Includes landscaping to the western boundary of the area and of the link to the Bride Road.

The area has now been almost fully developed for residential use – construction is on-going and coming to an end.

Once developed this will complete the development of Area B and 128 houses have been provided.

4.4 **Area C – Mooragh Promenade**, Dwellings should be of a high standard, and should be designed to acknowledge the architectural style, scale and massing of adjacent Victorian buildings, particularly on sites which face the Promenade and the harbourside. Heights of dwellings should be stepped down from the Promenade to the harbourside and Old River Road, and design and scale should be appropriate to a harbourside location. On the Peveril plot (Location of the replacement swimming pool) and the Manor house site (Location of The Ramsey Park Hotel), there could be included office use with on-site parking space and open space provision; these particular developments should be undertaken after consultation with the DAFF and should include appropriate measures to identify and transplant rare plants.

This area has been developed to provide a new public swimming pool, 60 bed hotel and 8 residential apartments.

A current planning application ref 22/01340/B has been approved.

Proposal: The development of eight townhouses and associated car parking and landscaping.

The site is within the area identified as being at significant risk from flooding. **See Appendix J**

The site (Commissioners Yard) on Old River Road has been the subject of several private investor/developer schemes to develop however none have come to fruition. I am not aware of the reason for this. The site is within the area identified as being at significant risk from flooding. **See Appendix J**

As part of the Peveril plot there remains a single narrow plot fronting onto Hope Street. During the Plan no development proposals have been brought forward. The site is within the area identified as being at significant risk from flooding. **See Appendix J**

During the lifetime of the Area Plan there has been several applications for development of the various 2 vacant sites on North Shore Road. Neither site has been developed and offer limited development opportunity. Both sites are within the area identified as being at risk from flooding. **See Appendix J**

There are no significant residual areas for significant development.

- 4.5 **Area D – Poyll Dooey/Ballachrink**, Development of this land should be undertaken only in accordance with an approved scheme for the whole area. This should provide, on the Western two-thirds of the land, mixed density housing and a primary school site (if required by the Department of Education). On the Eastern third of the site, there should be light industrial development (Policy R/I/P1(B)). Drainage arrangements must be such as to avoid adverse impact on water quality, fish, and fresh water invertebrate fauna in the Sulby river.

The area has now been largely developed for residential use except for two areas, for one of which there is a current Planning Application ref 22/00679/B. This is also recognised within the APNW as site RR004.

Proposal: Combined approval in principle and full approval for a residential development seeking planning permission for the erection of 66 dwellinghouses 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 with all matters reserved save for access.

The second area forming part of a significantly larger area approved under Planning Application ref 03/00790/B and representing the balance of approved development which has been completed.

The area undeveloped is the 38 self-build plots in the description. This is also recognised within the APNW as site RR005.

Proposal: Residential estate development comprising of roads, plots,

sewers, flood protection measures, drainage, public open space and layout for 26 semi-detached dwellings, 69 terraced dwellings, 42 apartments and 38 self-build plots.

Both sites sit firmly within the areas recognised as having significant flood risk. **See Appendix H**

4.6 **Area E - Lezayre Road/Gardeners Lane**, Development may be undertaken only in accordance with an overall scheme for the area. This scheme should be prepared after examination of the feasibility of providing a second crossing of the Sulby river, and should include:

- a) A minimum of 3 ha of land for light industrial use;
- b) A minimum of 2 ha of land for use as a recreation/play area;
- c) Generous landscaped space alongside the rivers and the former railway line and around Poyll Dooey House.

This area has been developed as Area D referred above where it flanks Gardeners Lane and the Glen Auldyn River. The remaining area has been the subject of a recent planning application.

Planning Application: 20/01080/B

Proposal: Residential development of 138 dwellings with associated drainage, highway works and public open space

Address: Land At Lower Milntown (Fields 134278, 134279, 134280, 134281, 134282, 134283, 134284, 134288 & 134289) And Strip Of Land Between Auldyn River & Auldyn Meadows, Off Lezayre Road, Lezayre & Ramsey Isle Of Man.

Which has been through the planning process to appeal and been refused on the following grounds:

1. Notwithstanding that the site is allocated for development in the 1982 Development Plan, other material considerations, including the more recent flood risk modelling for the area, would result in the site being developed in isolation, unrelated both to the originally envisaged westward extension of Ramsey and to the existing settlement boundary. There would be material harm, in this regard, to the established character and appearance of this rural area. Although mitigated to a large extent, there would also be harm to biodiversity and ecology interests. Those harms are not outweighed by the benefits of the development proposed.

It is also identified in the Draft APNW as Site RR009 and recommended for inclusion. I question whether the referred planning refusal will prevent development in any form as the reason for refusal is clear and there are better development options near the Town of Ramsey and adjoining the settlement boundary.

It should be noted that the application site was in part within the Ramsey Boundary and Part within Lezayre. The site is wholly identified for

development in the West Ramsey Development Framework **See Appendix F.**

- 4.7 **Area F – Ballure**, Most of this area is either developed, or has the benefit of planning permission. It is important that the completion of these developments or any proposals for further development should be such as to safeguard the settings of the Manx Electric Railway and St Mary's Church, and should have regard to the amenity value of existing trees and gardens.

This area has been fully developed.

- 4.8 **Area G – Claghbane and Ballastowell**, Current development proposals should result in the completion of both estates. Any further changes should have careful regard to existing space standards and planting, particularly close to public access routes.

This area has been fully developed.

- 4.9 **Area H – Fairfield**, A maximum of 7 dwellings may be provided, in accordance with the Approval in Principle already granted. All existing streamside and hedgerow trees should be retained. The area of the playing field should be kept as open space.

Plot 6 has an extant approval for a single dwelling. Planning Application ref 23/00465/B. There are no valid planning approvals for the residual plots in this area.

- 4.10 **Area I – Vullan Fields**, An additional area has been zoned for residential development as part of the area of mixed use. This area lies to the East of the A9 and to the North of the Bride Road, limited by the Town boundary to the north and by Volan Farm to the East. Development may proceed only in accordance with an overall scheme for the whole area. This scheme should include an appropriately landscaped soft Northern edge to the Town.

There is a current Planning Application ref 23/00744/B for development of this Area.

Proposal: Full approval for a residential development comprising up to 153 dwellings and community uses with associated highway and pedestrian access and infrastructure, drainage, landscaping and public open space together with approval in principle for a primary school on land at Vullan Fields together with enhancement of existing habitat on land to the east of Royal Park.

When approved this will be developed and no further land is available in this area.

- 4.11 During the lifespan of the Local Plan and to date several smaller areas which comply with [Policy R/R/P3: Infill/Backland](#) see page 10. Sites have been identified for development and have resulted in additional dwellings

being created. I have reviewed the mapping and confirm an additional 41 plots/sites have been built and are now occupied.

- 4.12 The green spaces left are attractive, natural ‘breathing’ spaces between established residential buildings, they are protected as such within planning legislation. **See Appendix K**
- 4.13 I conclude that there is no further land available within the settlement boundary which allows for development of residential properties such as to address the housing crisis or the Government Policy to grow the economy and population.
- 4.14 **The Ramsey Local Plan 1998 Employment, Industry and Public Utilities, See Appendix D, identified proposed Light Industrial Use with a circle around the letter.**

The plan recognises the need to attract employment to the area and refers to four areas for Industry.

Workshops, out of town offices and Public Utilities are all given weight and policy provided to support development:

- 4.15 **Policy R/I/P1 Light Industrial Development – the following areas are allocated for light industrial development subject to the general provisions stipulated.**
- 4.16 **Area A – North Shore Area.** Further industrial or warehousing units beyond those with planning consent will not be permitted unless required for the shipyard. There will be a presumption in favour of the relocation/rationalisation of existing service/utility/construction industries in the gas works area to allow for improved traffic circulation in accordance with an adopted traffic management plan. Only after implementation will any surplus land be approved for housing.

During the plan period limited industrial development has taken place in this area. Housing has also been approved on two parcels of land:

Planning Application: 20/00433/B

Proposal: Demolition of existing buildings within yard and creation of residential development of 10 dwellings with associated roads, landscaping and parking.

Address: Caines Yard Shipyard Road Ramsey IM8 3DR – In construction.

and

Planning Applications: 13/91461/B

Proposal: Demolition of redundant gas works structures and erection of thirty dwellings with associated roads and parking and re-cladding of existing commercial building.

Address: Former Gas Works Site North Shore Road Ramsey Isle Of Man IM8 3DF - Development completed.

There is no further available new development of this area.

- 4.17 **Area B – Riverside/Station Road/Ballachrink.** Development of this area may be undertaken only in accordance with an approved development brief for Poyll Dooley/ Ballachrink. The presumption will be in favour of an extension to Station Road to serve the area (ref Policy R/R/P2D) and the relocation of the bus maintenance facilities in this area. A pumping station shall be located following discussion with the Department of Transport and be subject to an appropriate landscaping scheme.

Except for the creation of a heavy goods car park no development has taken place in this area. This area is the subject of:

Planning Application: 22/00679/B

Proposal: Combined approval in principle and full approval for a residential development seeking planning permission for the erection of 66 dwellinghouses 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 with all matters reserved save for access.

Address: Land At Poylldooey Fields And Part Fields 134271, 134253, 134270, 134272, 131273, 131276, 132274 & 134274 Ramsey Isle Of Man

The application is non-compliant in terms of zoning allocations in accordance with the 1998 Ramsey Local Plan and the West Ramsey Development Framework.

The site sits entirely within the area recognised as being at significant risk to flooding. **See Appendix J**

- 4.18 **Area C – Gardeners' Lane/Lezayre Road.** A maximum of 3 Ha shall be reserved for industry as part of a scheme for the whole area (ref Policy R/R/P2E).

This area has been the subject of several planning applications and linked with the West Ramsey Development Framework zoning allocations.

Planning Application: 20/01367/B

Proposal: Development of 19 dwellings (class 3.3), retail unit (class 1.1), children's nursery (class 4.2), and associated drainage and highway services.

Address: Land North Of 15 Auldryn Walk Ramsey Isle Of Man provides commercial premises as set out and is largely developed.

More recently the balance of the site has been the subject of Planning refusal ref 20/01080/B the details of which are referred to earlier in my evidence at paragraphs 3.7 and 4.6.

This area has been largely developed for residential purposes and not for industrial as originally envisaged through the plan process.

The Area sits almost entirely within the area recognised as being at significant risk to flooding. **See Appendix J**

- 4.19 **Area D – Vullan Fields.** The area to the East of the A9, north of the Bride Road and limited by the town boundary to the North and the Vullan Farm to the East has been re-zoned for mixed use which may include light industrial development in the Easternmost area. Development may proceed only in accordance with an overall scheme for the whole area. (ref Policy R/R/P2I).

The Area is subject to a current planning application which is under consideration ref P/A 23/00744/B and referred to at paragraph 4.10.

When approved this will be developed and no further land is available in this area.

- 4.20 I conclude that there is no further land available within the settlement boundary which allows for development of employment opportunities.
- 4.21 Policies associated with the industrial and commercial development can be seen in the written statement within [Planning Circular 2/99](#).

4.22 **Public Utilities**

- 4.23 The Milntown Power Station has been repurposed as a primary substation by Manx Utilities.
- 4.24 The North Shore Road Gas Works has been decommissioned and removed being replaced by residential dwellings as detailed in P/A 13/91461/B referred to in paragraph 4.16.
- 4.25 Sites which have provided significant development during the lifetime of the Ramsey Local Plan 1998 are:

DS1 Auldryn Walk

DS2 Auldryn Meadow Ph1

DS3 Briarville Gardens

DS4 Queens Valley

DS5 Royal Park Ph1

DS6 Royal Park Ph2

DS7 Palm Winds

DS8 Grand Island

DS9 Grove Park and North Shore

DS10 Gibbs Park and The Crescent

DS11 Pavillions

DS12 Queens Pier Apartments

See Appendix L Developed sites for their location within the settlement boundary.

5.0 Area Plan for the North and West.

- 5.1 Through a separate and distinct process there is an ongoing review of the Area Plan for the North and West **See Appendix M** for the Town Centre mapping associated with the Draft Plan and **Appendix N** for the wider mapping within the settlement boundary.
- 5.2 The Draft Area Plan for the North and West is currently being prepared to align with the Isle of Man Strategic Plan 2016. The Area Plans have to be in general conformity with the Strategic Plan.
- 5.3 As part of the preparation of the Area Plan for the North and West the Cabinet Office has undertaken a call for sites to identify potential sites for development. For Ramsey and the North, the geographical area includes Ramsey, Andreas, Ballaugh, Bride, Jurby, Lezayre and the Maughold Ward of Garff.
- 5.4 The Plan has been issued in Draft format with the status for each site simply identified as Y for inclusion and N for exclusion. This process is yet to be tested through public inquiry.
- 5.5 This information must be read together with the [EPD2 All Sites List](#) – (see pages 20 and 21) I have listed those sites within the *Ramsey settlement boundary* where assessment has been made with a recommendation for inclusion.
- 5.6 There has been assessment of 25 sites within the settlement boundary and 11 of these have been excluded from the Draft Area Plan. The residual sites included in the Draft Plan and recommended for inclusion include sites identified in the [UUS Register](#) **See Appendix N** and are listed;
- 5.6.1 RM 001 – Mixed - Gladstone Park – Y. (Private ownership)
- 5.6.2 RM002- Mixed - Former Albert Road School – Y. (RTC part owner – an active scheme is being pursued to provide 32 2 bedroomed residential units. The balance of the site being a public car park)
- 5.6.3 RM003 – Mixed - Adj to Collins Lane – Y. (Private ownership)
- 5.6.4 RM004 – Mixed - Adj to Christian Street – Y. (Private ownership)
- 5.6.5 RM005 – Mixed - Two sites either side of East street – Y. (Private ownership).
- 5.6.6 RO002 – Open - Leighany Field – Y (Department of Education).
- 5.6.7 RO003 – Open - Mooragh, Vollan Crescent and Bride Road – Y (Private ownership).
- 5.6.8 RO004 – Open - Vollan fields – Y (Planning Application currently under consideration).
- 5.6.9 RR001 – Residential - Orchard, Creg Malin – Y (Private ownership – single plot).

- 5.6.10 RR005 – Residential - Field 134276 and part 134273 – Y (Private ownership Planning approval granted P/A 03/00790/B site well developed except area subject to significant flood risk).
- 5.6.11 RM006 – Mixed - Former Auction Site – Y (Private ownership currently being developed for 20 Apartments)
- 5.6.12 RM009 – Mixed - Former Skip Hire – Y (Private ownership).
- 5.6.13 RO002 – Open - Leighany – Y (Dept of Education) (Duplication)
- 5.6.14 RR009 – Residential - P/A 20/1080/B – Y. (Private ownership recent planning refusal as paragraphs 3.7 and 4.6).
- 5.7 I accept that the current APNW Plan process is the mechanism to identify new development areas.
- 5.8 Commercial/Employment land must be released to allow the Town to expand to meet the published objectives of the government.
- 5.9 Any proposed development whether residential or commercial /employment would be required to be at an acceptable density which respects the adjoining extant properties.
- 5.10 From my assessment the sites referred to allow little or no development beyond that for which there is extant planning permission or where sites are pending a decision being made.
- 5.11 The Cabinet Office is also tasked with providing an All-Island Area Plan and a full review of the Strategic Plan. The foreword to this reads:

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

A full review of the Strategic Plan is an opportunity to support the delivery of www.gov.im/islandplan and the vision to have a Secure, Vibrant, Sustainable Island, specifically in terms of building Great communities.

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

the built environment, *and crucially how we plan for the future and meet our needs.*

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

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

- 5.12 [Preliminary Publicity](#) for the Isle of Man Strategic Plan Review has been concluded and the responses received will directly inform the Draft Strategic Plan which will, in turn, be subject to a further round of consultation ahead of public inquiry.

- 5.13 The Cabinet Office overview reads.

“Cabinet Office is undertaking the ‘Preliminary Publicity’ stage signalling the start of the review process into the Isle of Man Strategic Plan 2016. This is in line with Paragraph 2, Schedule 1, of the Town and Country Planning Act (1999). Preliminary Publicity represents the first statutory step of the Development Plan Procedure and sets out the matters that the draft plan will deal with.

The Strategic Plan provides the high-level planning policy framework for the future sustainable development of the Island and aims to ensure that the land use needs and other spatial planning requirements which may relate to economic, social and environmental matters are adequately met.

This is a comprehensive review process which will, once complete, replace the existing plan in its entirety. Some policies may simply be amended and updated but others will be added or potentially removed. The review provides the opportunity to embed Climate Change policies into statutory planning policy and reflect the core strategic objectives set out in Our Island Plan 2023 (GD No. 2022/0095), to build a secure, vibrant and sustainable future for our Island and specifically deliver one of the ‘Building Great Communities’ programmes”.

- 5.14 **Island Spatial Strategy Options Evidence Policy** [Paper P.EP 01](#) has been issued to inform the preliminary publicity process.

- 5.15 In assessing housing and employment land need it is important to consider the Island Spatial Strategy Options Evidence Policy Paper P.EP 01 produced by the Cabinet Office as part of the Isle of Man Strategic Plan Preliminary Publicity.
- 5.16 I refer to the source document which I replicate in *italics* and where appropriate my comments are added in standard text and any emphasis is shown in ***bold italics*** except where the text is a heading in the reference paper. My focus is on Part two: Housing Need and Distribution and Part Three: Employment Land Need and Distribution 2021-2037.
- 5.16.1 **2.1 Housing Need and Distribution**
- 5.16.2 *Housing policy has a significant impact on our towns, our villages and our countryside. It affects what our communities look like and how we feel about them and a strong sense of public feeling is no more apparent than when new estate development is being considered on the edge of our urban areas. Such transition areas between ‘town and country’ are often the most controversial; encroachment into green fields is not always needed, but ***in some instances it may be the better solution to meet future development demands.****
- 5.16.3 *The Strategic Plan sets the broad planning framework for housing location, design, layout, supporting infrastructure requirements and tackles the issues associated with satisfying the Island’s housing needs. One of its core objectives is to identify the right level of housing opportunities needed over a defined period which in turn provides certainty for developers and communities about likely changes over time. Both the 2007 and 2016 Strategic Plan Update have included a total figure for the Island and a breakdown of need figures across the north, south, east and west (see Table 1.3). In terms of housing approvals and delivery since 2001, net figures are set out in Table 1.4.*
- 5.16.4 ***Housing Policies and Island Spatial Policies guide the general distribution of development around the Island and are closely linked.*** Both rely on population and household figures and estimated changes and these are the starting point in any plan making process that attempts to project what land and new homes are required over a defined period.
- 5.16.5 I accept that the starting point for housing policies and island spatial policies is an assessment of the population and household figures and estimated changes.
- 5.16.6 ***It is important to recognise that the population projection data provided by Statistics Isle of Man is an independent data set, and does not take into account Government’s policy goals.*** It focuses in the main on the presentation of statistics and trends albeit within a meaningful context. Cabinet Office in the delivery of its

statutory duty to deliver the Island Development Plan can carry out further analysis. It has the ability to factor in other assumptions, evidence and policy goals in its translation of these projections into Island-wide housing need and land requirements at the national and local level.

5.16.7 I submit that the Governments Policy goals should be factored into all population projections data. They are relevant as current government policy is the driver for population growth. The Isle of Man Economic strategy 2022-2023 is clear on this – I quote directly with emphasis as written –

5.16.8 **INFRASTRUCTURE AND SERVICES.** Further develop the **infrastructure** and **services** for the community to plan for an estimated population Of 100 000 by 2037, by actively **investing in key services and infrastructure** that **attract and retain economically active people**, supported by a range of **targeted incentives** and **disincentives** to **sustain targeted growth**.

In terms of calculating housing need, an ‘Objective Assessment of Housing Need’ (OAHN), as commissioned by the Housing and Communities Board, will influence the policy approach for housing included in the Draft Plan. In the meantime, housing need for the plan period 2021 to 2041 (note this is based on a 10 year household growth) has been calculated using an updated methodology to that used in previous plans to reflect the approach used in other jurisdictions. Firstly though, a brief description of the current method.

5.16.9 This is an emerging document and one on which the draft plan relies, to refer to existing, updated methodology in the knowledge that the outcome of a full review is awaited is simply wrong and will, given current Policy, likely underestimate the projected population requirements. Until the outcome of the Objective Assessment of Housing Need is known I submit that this projection data can’t relied upon and in the boundary extension process the zoning of land is irrelevant.

5.16.10 **2 How Housing Need has been Calculated in the Strategic Plan**

5.16.11 *The Strategic Plan 2016 uses a set of straightforward calculations to identify national housing need across the Island and the breakdown of that figure into the north, south, east and west.*

5.16.12 *This part of the Island Spatial Strategy Paper outlines how housing calculations have been done in the past and goes on to explain an alternative method more commonly used across the United Kingdom, States of Guernsey and Jersey. **Cabinet Office considers the adoption of this alternative method as a practical and sensible option for the Island.***

5.16.13 I am not an expert in calculating housing requirements. I understand that the UK Standard Method, which is being considered, is designed to calculate the minimum housing requirements to meet the projected population growth (in the UK).

5.16.14 However, the Isle of Man is trying to grow its population to 100,000 people, which is beyond the 'natural' population growth trends, which means that using the UK Standard Method will underestimate the housing the Island will need.

5.16.15 Housing needs should be established to at least 2037, and not to 2031 as currently proposed.

5.16.16 **2.3 A New Approach to the Assessment of Housing Need**

5.16.17 ***Work is underway to develop a standard methodology that the Island can use to calculate its housing need. A Housing Needs Assessment has been commissioned to carry out a comprehensive study of current and future housing requirements on the Island. The assessment is being undertaken to inform future housing policies which will be set out in the Draft Plan and also the work of the Housing and Communities Board.***

5.16.18 ***It is hoped the Assessment will help to identify households identified as currently being in housing need, the future housing requirements of established and newly forming households within the Island, as well as inward migrants from the UK and elsewhere in the world. Achieving such gross housing requirements can be offset against the likely supply of housing from within the existing stock to yield a net requirement for additional housing.***

5.16.19 *The intention is to have defined terminology in the Draft Plan in order to better understand the differences between housing 'requirement' (every Islander has a housing requirement), housing 'demand' (those people who can buy or rent a property in the private housing market), and housing 'need' (people who need assistance through social rent or subsidised access to the private sector such as the Shared Equity Purchase Assistance Schemes).*

5.16.20 *Being clearer about these terms will help identify the housing necessary to accommodate the Isle of Man's population and to examine the issue of appropriate minimum standards. Account will be taken of any progress made to introduce a Housing Association on the Island.*

5.16.21 The approach suggested seems sensible and a logical progressive development to identify need however it must also take into

consideration the desire of the Isle of Man government to grow the population to 100 000 in the next 14 years. It cannot rely on previous policy and statistics if we are to achieve the population stated.

5.16.22 **2.4 The Objective Assessment of Housing Need**

5.16.23 *The study which is being carried out seeks to establish the objective housing need for the period to 2037 and up to 2041. The Study will use Statistics Isle of Man data and further modelling scenarios to achieve a number of outputs:*

5.16.24 It is concerning that the period for the housing need assessment is not aligned to the timescale for the policy to grow the population to 100 000.

5.16.25 ***An overall level of housing need for the Island - this will be driven by future household growth over the plan period, and also to a large extent by assumed levels of net migration.*** However, in addition to the future household growth it is also important to take account of unmet needs at the start of the period from concealed households that should have already been able to form and homeless households who do not have a home of their own.

5.16.26 If the assumptions are wrong there will be no market for any surplus proposed housing which in itself is a form of development control.

5.16.27 ***The mix of housing needed*** - this also depends on the size and make-up of the future population but must also take account of the propensity of existing households to move from their current home. For example, there is likely to be a substantial increase in older person households over the Plan Period, but most will be households already living on the Island – so the need for older person housing will inherently depend on the extent to which these households choose to (or have to) move to a more suitable home. The balance between market housing and affordable housing also depends on household mix, combined with information on income and homeownership. The work will help in the understanding of the likely need for private rented and affordable rented homes and first homes, older person housing, supported housing and the impact this will have on the general housing stock.

5.16.28 There should also be consideration for skilled workers and their immediate and extended families moving to the island to provide for targeted growth to align with the policy to encourage skilled workers to come to the island.

5.16.29 ***A view on key drivers underpinning the housing market*** - this will look at the characteristics of the existing stock and key trends.

Indicators such as land prices, house prices, affordability, new housing development and turnover of the existing stock, short-term and long-term vacancies, overcrowding and under-occupation will be looked at. The Study will review the available population and household projections to better understand the key demographic drivers and consider the overall changes projected and also the changes within individual cohorts. The Study will look at projection scenarios and test alternative assumptions to understand the sensitivity of the household growth to a range of differing factors. This will potentially include a review of the different migration rates already assumed but would also consider factors such as household formation rates and the impact on average household sizes. Adopting different household formation rates allows the balance between housing need and housing demand to be properly tested.

5.16.30 **Impact of Government's policy goals** - consideration will be given to the likely number of future workers, taking account of the projected population and sensitivity testing related to economic activity rates, including growing the Island's population up to 100,000 by 2037. These projections can then be aligned against future employment projections based on different economic scenarios.

5.16.31 Without this single factor accurately projected and realistically accounted for the current projections cannot be relied upon.

5.16.32 **2.5 Current Position on Gross Housing Need ahead of the Draft Plan**

5.16.33 Ahead of the OAHN and taking into account existing Census based population data, Cabinet Office has identified a baseline housing need figure using household growth projections and affordability data. The method follows that encouraged in England under the National Planning Policy Framework – i.e. 'the standard method'.

5.16.34 Data Sources include:

- i. The Census (2021) and derivatives of the Survey provided by Statistics Isle of Man
- ii. The Isle of Man Housing Market Review 2022

5.16.35 It should be noted that whilst the National Planning Policy Framework expects authorities to use the 'standard method' to assess local housing need, it is currently being reviewed and elements of the method may change in the future. Cabinet Office has used the methodology to calculate what provisional figures would look like in terms of the minimum number of homes needed.

5.16.36 The Standard method does not consider a net population growth target of 15% population increase.

5.16.37 Sections 2.6 – 2.8 are available in the link at paragraph 5.14

5.16.38 **2.9 The Need to Monitor Data and Evidence up to the Draft Plan**

5.16.39 ***Further evidence will become available ahead of the draft plan***

5.17.40 I submit that the boundary expansion of Ramsey is further evidence and will be considered ahead of the draft plan.

5.17.41 *and Cabinet Office is keen to receive views on the preliminary calculations/conclusions set out in the above tables. We are interested to know if:*

- *you agree with using the Standard Method?*
- *you agree with the gross calculation on new dwellings needed for an estimated population of 100,000 by 2037?*

5.17.42 ***Cabinet Office recognises that projections become increasingly unreliable as time goes on which makes it imperative to make sensible decisions taking into account the most up to date statistical data available alongside this Administration's population goals.***

5.17.43 Fundamentally paragraph 5.17.42 accepts that processes such as the boundary extension under review provide valuable, pertinent data to allow correct policy strategies to be aligned and I submit that the RTC proposal one such approach and will set a benchmark for delivery Island wide.

5.17.44 **2.10 Spatial Distribution and Options for Change**

5.17.45 *The Town and Country Planning Act 1999 states that the Island Development Plan shall consist of a strategic plan and one or more area plans. The intention during this Administration was to have 3 Area Plans in place – The Area Plans for the East and South (both of which are in operation) and The Area Plan for the North and West (published in draft).*

5.17.46 *Cabinet Office is advancing the end goal of having an Island Development Plan made up of: A Strategic Plan and One Area Plan. The latter - a single 'All-Island Area Plan' - will look at land allocations and local planning matters across the whole Island at the same time. It will reflect the Spatial Strategy and Policy guidance set out in the Strategic Plan. Section 2(4) of the Town and Country Planning Act 1999 states that **an area plan shall be in general conformity with the strategic plan.***

5.17.47 *The Spatial Strategy to be followed in the future (as detailed in this paper) is still being considered. This means that the spread of and concentration of development is not yet certain. For the*

purposes of understanding in principle how revised housing need figures would affect the the Island, calculations have been done on the basis of the existing settlement hierarchy. This allows an understanding of how new housing might be spread across the Island in the future, but on the basis of the current spatial strategy.

5.17.48 I submit that the RTC application is cognisant of the emerging plans and is working towards a comprehensive development plan for the future with the boundary extension being the first stage of that process.

5.17.49 *Table 1.7 updates the spread of development across the Island according to planning approval data and settlement hierarchy position - i.e. approvals in the Main Centre (Douglas) and in the Service Centres, Service Villages and Villages. The table also looks at how the new data updates the broad 'distribution' across the the north, south, east and west.*

Table 1.7: Analysis of changing housing distribution across the settlements using the existing settlement hierarchy.

5.18 I conclude that the process will be full and address the development land shortage and submit that the application by RTC to extend their boundaries at this time is appropriate to inform further policy.

6.0 Unoccupied Urban Sites (UUS)

6.1 In assessing the UUS I have reviewed each site, tracked the relevant planning history (any applications predating the Local Plan are ignored) and list the relevant details. These are identified and further comment is made in my assessment of the [Unoccupied Urban Sites Written Statement](#) and [Register](#). See **Appendix P** for the associated mapping.

6.2 Unoccupied Urban Sites North and West – Ramsey

6.3 **UUS 34:** **Two sites either side of East Street and Stanley Hotel – Private Ownership 2 parties.**

PA07/01679/B - Demolition of nos. 36 & 36A Parliament Street and construction of a 32-bedroom hotel with bar / restaurant at ground floor level - 36 - 40 Parliament Street Ramsey Isle of Man – Permitted. Demolition has been carried out and approval exists in perpetuity.

PA08/00173/B - Demolition of existing building and erection of a four storey building consisting of a bar and restaurant at ground floor level and six apartments above - 5 East Street Ramsey Isle of Man IM8 1DN – Permitted. Demolition has been carried out and approval exists in perpetuity.

PA11/01587/B - Erection of a four storey building to provide ground shop unit and bar / restaurant and nine apartments - 5 East Street & 42 Parliament Street Ramsey Isle of Man IM8 1DN - Permitted. Permission has expired.

6.4 **UUS 35:** **10-12 West Quay** - Private Ownership 2 parties. Applications have been submitted separately for each part of the site.

PA14/00342/B - Alterations and erection of extension to rear of existing shop - Looney's 30 & 32A Parliament Street Ramsey Isle of Man IM8 1AW – Permitted. Permission has expired.

PA15/00311/B - Alterations and extensions to property and change of use from retail and residential to retail and office accommodation - 11-12 West Quay Ramsey Isle of Man IM8 1DW – Permitted. Permission has expired. Development costs prevented this scheme from progressing due to the tight nature of the site and construction constraints.

PA17/00930/B - Conversion of existing building to a distillery, to include lifting and replacement of existing roof and alterations to the front elevation and installation of double doors - 10 West Quay Ramsey Isle of Man IM8 1DW – Permitted. Permission has expired.

6.5 **UUS 36:** **24 Parliament Street** – Private ownership not known to me.

PA18/00284/B - Alterations and roof extension to provide one retail unit (Class 1), four offices (Class 4) and one residential apartment - Auldyn House 24 Parliament Street / West Quay Ramsey Isle of Man IM8 1AP – Permitted. Permission has expired.

PA21/00993/CON - Registered Building consent for demolition of building (retrospective) - Auldyn House 24 Parliament Street Ramsey Isle of Man IM8 1AP – Permitted. Works completed.

PA22/00639/B - Erection of new four storey apartment building (class 3.4) with ground floor retail space (class 1.1) - 22 & 24 Parliament Street And 6 West Quay Ramsey Isle of Man IM8 1AP – Permitted. Site includes adjoining neighbour and requires demolition.

PA22/01177/B - Demolition of 24 Parliament Street (in association with 21/00993/CON) (retrospective) - Auldyn House 24 Parliament Street Ramsey Isle of Man IM8 1AP – Permitted. Works completed.

- 6.6 **UUS 37:** **St Olave's and adjacent vacant plot** – Private, ownership not known to me. Historically there has been many applications to develop the site including proposals for multiple dwellings. Development in each case has not proceeded. Access to the site is difficult and is a constraint on development opportunity.

PA98/01966/A - Approval in principle for the erection of a dwelling, kitchen garden at St Olave's, Bowring Road, Ramsey. - St Olave's Bowring Road Ramsey IM8 3ES – Permitted. Permission has expired.

PA01/00131/B - Erection of dwelling with garage - St Olave's Kitchen Garden Bowring Road Ramsey – Permitted. Permission has expired.

PA04/02308/B - Erection of two four storey blocks, each block containing eight flats 06/05/09 - St Olave's Kitchen Garden Bowring Road Ramsey - Permitted on Review. Permission has expired.

PA06/01416/A - Approval in principle for the erection of a dwelling - Part of Garden At St Olave's House Bowring Road Ramsey Isle of Man – Permitted. Permission has expired.

PA09/00455/A - Approval in principle to erect a detached dwelling - Part of Garden At St Olave's House Bowring Road Ramsey Isle of Man – Permitted. Permission has expired.

PA12/00830/A - Approval in principle for a sheltered accommodation development - St Olave's House Bowring Road Ramsey Isle of Man IM8 3ES – Permitted. Permission has expired.

PA22/00444/B - Erection of 2 detached dwellings with integral garages - Land Adjacent To St Olave's Jurby Road Ramsey Isle of Man – Permitted - approval is current and development can commence.

- 6.7 **UUS 38:** **Site adjacent to Collins Lane, West Quay** - Private ownership – it is interesting to note that there is a long history of planning approval on this site. The detailed application ref P/A89/00757/B has been the basis of each application. The owner/s have not commenced development.

PA89/00062/A - Approval in principle to demolition of disused garage and office and construction of 6 flats with covered car park, 21/22 West Quay, Ramsey - 21/22 West Quay, Ramsey - Permitted

PA89/00757/B - 22 West Quay, Ramsey. - Demolition of existing premises and construction of block of 6 No flats and car parking. 21 - 22 West Quay,

Ramsey. - 21 - 22 West Quay Ramsey Isle of Man – Permitted - Permission has expired.

PA94/01849/B - Construction of 6 flats with covered car parking, 21 & 22 West Quay, Ramsey. - 21 & 22 West Quay, Ramsey. - Permitted - Permission has expired. This application is a direct resubmission of P/A 89/00757/B.

PA04/01413/B - Erection of a block of six apartments with associated services and garaging on ground floor - 21/22 West Quay Ramsey IM8 1DL - Permitted - Permission has expired. This application is a direct resubmission of P/A 89/00757/B.

PA16/00576/A - Approval in principle for the erection of a four-storey apartment block - 21 - 22 West Quay Ramsey Isle Of Man - Permitted-Permission has expired. This application is a resubmission of P/A 89/00757/B.

PA18/01234/B - Variation of condition 1 of PA 16/00576/A for the approval in principle for the erection of a four-storey apartment block, to extend the period of approval for a further 2 years - 21 - 22 West Quay Ramsey Isle Of Man - Permitted - Permission has expired.

PA21/00232/B - Variation of condition 1 of PA18/01234/B for the approval in principle for the erection of a four-storey apartment block, to extend the period of approval for a further 2 years - 21 - 22 West Quay Ramsey Isle Of Man IM8 1DL – Permitted - Permission has expired.

21/00622/C - Change of use of vacant site to a temporary car park - 21 - 22 West Quay Ramsey Isle of Man IM8 1DL – Refused – This decision is consistent with the DEFA policy to prevent ad-hoc parking on vacant sites.

23/00446/B- Variation of condition 1 of PA21/00232/B (Original application PA18/01234/B) for the approval in principle for the erection of a four-storey apartment block, to extend the period of approval for a further 2 years - 21-22 West Quay Ramsey Isle of Man IM8 1DL – Permitted – subject to a reserved matters application being approved the site is available for immediate development.

6.8 **UUS 39:** **Site adjacent to Christian Street and West Quay –**
Private ownership

PA08/00737/A - Approval in principle to erect a building to provide seven apartments and associated parking - 33 West Quay Ramsey Isle of Man IM8 1DD - Refused at Appeal

PA08/01012/B - Erection of a building to provide retail and office space and seven residential apartments with associated parking - Former Barry Curran Motor Dealership Site West Quay Ramsey Isle of Man – Permitted - Permission has expired.

PA09/00954/B - Erection of a building to provide retail and office space and six residential apartments with associated parking provision - Former Barry Curran Motor Dealership Site West Quay Ramsey Isle of Man – Permitted - Permission has expired.

PA19/00235/CON - Application for the de-registration of the former Farmers Combine Warehouse (19/00293/REGBLD) in accordance with

7(1)(a) of the (Registered Buildings) Regulations 2013 - Former Farmers Combine Warehouse 33 West Quay Ramsey Isle of Man - Approved at Appeal

PA21/00585/B - Erection of a building to provide retail and office space, with associated access, parking, landscaping and drainage - Former Barry Curran And Farmers Combine Site West Quay Ramsey IM8 1DL – Permitted – Approval valid for 4 years from 6th October 2021. The site is available for immediate development.

- 6.9 **UUS 40:** **Former cattle market, Auction House, Derby Road –**
Private ownership

PA17/01194/B - Construction of twenty apartments within three accommodation blocks with associated refuse storage, car parking and landscaping - Former Mart Site Bowring Road Ramsey Isle of Man – Permitted. DEVELOPMENT OF THIS SITE IS IN PROGRESS.

- 6.10 **UUS 41:** **Former Albert Road School, Albert Road –** RTC ownership in part, DOI ownership in part.

PA12/00994/B - Erection of a multi-purpose building containing community centre, function rooms, cafe/restaurant and offices, together with associated car parking and vehicular access - Site Of Former Albert Road School Albert Road Ramsey Isle of Man IM8 1JB - Deemed Withdrawn.

PA12/01556/B - Erection of a multi-purpose building containing community centre, function rooms, cafe/restaurant and offices, together with associated car parking and vehicular access (Amendments to PA 12/00994/B) - Site Of Former Albert Road School Albert Road Ramsey Isle of Man IM8 1JB – Permitted - Permission has expired.

PA16/01103/B - Erection of multi-purpose building containing three units of commercial use (Classes 1-4), offices, four apartments and three townhouses with associated parking and access. - Albert Road School Albert Road Ramsey Isle of Man IM8 1JB – Permitted - Permission has expired.

PA21/01281/B - Variation of condition 1 to PA 19/01164/B for erection of a two-storey complex comprising of twelve apartments with associated car parking and landscaping to extend the period of approval for a further 1 year is linked to a proposal for the development on part of the former school site for an additional 18 apartments. THIS IS AN RTC SCHEME AND IS CURRENTLY BEING PROGRESSED. The residual area is remaining in current plans as a public car park.

- 6.11 **UUS 42:** **Victoria Mall –** Private ownership – there has been several applications for change of use, associated with the individual units collectively known as the Victoria Mall. The buildings have more recently fallen into an almost dilapidated state and the site would benefit from an extensive scheme to fully refurbish or redevelop the site. From available resource there are no current proposals for this action.

PA91/01748/B - Creation of supermarket extension with car parking, former St. Maugholds School & car park area, off Christian Street, Ramsey.
- Safeway Supermarket Christian Street Ramsey Isle of Man IM8 1DG - Permitted - Permission has expired.

PA04/01679/B - Erection of two storey unit retail area / 178 seat cinema / lecture theatre, 80 seat restaurant with associated services and erection of 2 & 3 storey unit for retail / office area and 3 no. 2 bed apartments with improvements to car park - Old Catholic School Site Albert Road Ramsey Isle of Man IM8 1JB – Permitted - Permission has expired.

- 6.12 **UUS 43:** **Britannia Hotel, Waterloo Road** - Private ownership. Development proposals have been prepared and a planning decision is imminent.

PA20/00229/B - Demolition of building (in association with Registered Building Application 20/00230/CON) - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR – Refused.

PA20/00230/CON - Registered Building Consent Application for the demolition elements to a building in a [conservation area](#) See Appendix Q and associated with planning application 20/00229/B - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR – Refused.

PA23/00066/B - Change of use from public house (use class 1.3) to create ten apartments (use class 3.4) while retaining original element of building, demolition of previous extensions and erection of new replacement extension. - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR – Pending Consideration

PA23/00067/CON - Demolition of previous extensions and erection of new replacement extension in association with application PA 23/00066/B - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR - Pending Consideration

- 6.13 **UUS 44:** **Central Hotel, Bowring Road** – Privately owned.

The site has been re-opened as a licenced premises since the list was created.

- 6.14 **UUS 45:** **Old River Road** – RTC ownership.

There are no relevant planning applications for the development of this site. Historically private developers have assessed the site for development. No formal proposals have been presented for approval.

The RTC Policy Committee are reviewing the sites within their ownership to determine the best use of the sites and how they can address the needs of the town.

- 6.15 **UUS 46:** **Former Ramsey Bakery Site and adjacent plot, Station Road** – Private ownership

There are no relevant planning applications for the development of this site. The use as defined is that of the Ramsey Bakery and the internal layout, fitting out and offices is dedicated to that use.

I accept that this is a vacant site in approved use terms. I do however question whether the bakery site should be on the UUS list. Until the future of bread provision for the Island is fully understood redevelopment of the site may be premature.

The second site identified, on the corner of Gladstone Avenue and Bircham Avenue is a vacant site and would be suitable for small scale development. There has been no proposal brought forward for development.

- 6.16 **UUS 47:** **Water Street Car Park, Ramsey** – RTC ownership in part and private ownership.

Planning applications have been refused for the development of this site due to its being in the Ramsey [conservation area](#). See **Appendix Q** The private owner would welcome the opportunity to develop the site. The combination of the two sites would make a development opportunity. The RTC Policy Committee are reviewing the sites within their ownership to determine the best use of the sites and how they can address the needs of the town.

PA90/01184/A - Approval in principle for construction of 11 apartments with garaging, yard at junction of Tower Street/Water Street, Ramsey. - Garage Tower Street Ramsey Isle of Man - Refused on Review

PA14/00888/B - Demolition of redundant workshop to enable extension of existing car park (in association with 14/00889/CON) - Cannons Court Water Street Ramsey Isle of Man IM8 1JP - Refused

PA14/00889/CON - Registered Building consent for the demolition of redundant workshop to enable extension of existing car park (in association with 14/00888/B) - Cannons Court Water Street Ramsey Isle of Man IM8 1JP - Refused

- 6.17 **UUS 48:** **Raymotors, Brookfield Avenue / Albert Road, Ramsey** – Private ownership.

The site is a recognised commercial site in the town centre. The filling station, car wash and convenience store are well used and supported. The remaining buildings comprise vehicle showroom, workshops and dedicated car parking.

Those areas not utilised in the current use are small and fragmented. Development of these is unlikely to be attractive without the discontinuation of the existing uses.

PA03/01070/B - Showroom and workshop extension to replace existing workshop - Raymotors, Corner Of Queens Pier Road And Brookfield Avenue Ramsey - Approved at Appeal - this is the current usage. I do not consider this site to be vacant or available for development.

- 6.18 I submit that the USS sites represent a very limited opportunity for development and where possible active measures are being taken to

develop these. Development of these sites is important and will provide a small contribution towards the sustained growth of the Town. To ensure Ramsey grows at a rate to support projected population growth there is a need to expand the boundary as requested.

7.0 Isle of Man Strategic Plan 2016

- 7.1 Development adjacent to the settlement boundary is recognised in the [IOMSP](#) where a Local Plan allows:

Housing Policy 4: New housing will be located primarily within our existing towns and villages, or, where appropriate, in sustainable urban extensions..... Sustainable urban extension being defined as ‘Involves the planned expansion of a city or town and can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a wide range of facilities, and when developed at appropriate densities’.

- 7.2 It is recognised that the best opportunities for housing including affordable housing are on greenfield sites or on brownfield sites where delivery can be economically guaranteed.
- 7.3 Nowhere within the APNW Call for Sites documentation is it suggested that greenfield sites are excluded from this exercise, and I submit that, in accordance with current housing policy, **where logical, sustainable extensions can be provided, they should – in this case ahead of those identified in current zoning which are problematic and effectively not available for development as previously set out.** (My emphasis).
- 7.4 Residential development respecting the surrounding area and adjoining the settlement boundary would include: -
- 7.5 Mixed density and varying unit types to address the short fall in available housing recognised by IoM Government to provide choice for all ranging in size from 2 – 4 bedrooms to meet the changing needs of the Islands population.
- 7.6 Mixed format residential units to allow for private sector, public sector, affordable, sheltered accommodation, lifetime, residential care, and nursing homes.
- 7.7 Any houses would be of mixed sizes in sustainable locations, close to existing housing infrastructure and adjacent to the settlement boundary, into desirable, sustainable locations with particular regard for compliance with the Governments own [Housing strategy Principles 1-7](#) (Page 14) in respect of affordable homes.
- 7.8 Commercial/Employment land must be released to allow the Town to expand to meet the published objectives of the government.
- 7.9 Provision of boundary landscaping, woodland areas, and significant areas of open space within sites recognising existing field boundaries is required

and would maintain the countryside feel to reduce the impact of any new development in the boundary extension area.

- 7.10 New development offers an opportunity to approach construction with sustainability in mind:
- maximise carbon sequestration.
 - minimise greenhouse gas emissions.
 - maintain and enhance eco-systems.
 - achieve biodiversity net gain.
 - provide sustainable drainage systems.
 - provide active travel and public transport infrastructure.
- 7.11 New development is constrained by developing legislation and emerging Plans each of which are more cognisant of past lessons learnt. The design guidance as set out in the [Residential Design Guide 2021](#) and the IOMSP (including any amendment) provide much developed guidance on development constraints.
- 7.12 The Climate Change Act and the approach to a Net Zero society each add another layer of sustainable targets to any form of development.
- 7.13 Careful design and an approach to quality choices for materials and specification ensures any development is visually compatible with the neighbouring development areas and adheres to the intent of the Written Statement for the Draft Area Plan for the North and West's density guidance of 18 dwellings per hectare in service centre settlements of which Ramsey is one.
- 7.14 Any proposed development whether residential or commercial/employment would be required to be at an acceptable density which respects the adjoining extant properties.
- 7.15 The boundary extension as proposed recognises the four areas as set out. Each of which has a different character and provides different development opportunities.

8.0 Built Environment Reform Programme

8.1 There is provision within the emerging processes, in particular the Built Environment Reform Programme ([BERP](#)) to improve the planning process and to better support development. It is aligned with the Government's Economic Strategy in particular towards the delivery of a further 1000 homes.

8.2 Objective 1

8.2.1 Create Housing and Economic Needs and Land Assessments; taking into account demographic issues and understanding the deliverability of land to meet identified needs.

8.2.2 Carry out an Infrastructure Needs Assessment to identify infrastructure requirements to deliver the growth aspirations in the Island Plan and Economic Strategy.

8.2.3 Map Environmental Constraints and Opportunities to inform decision making and prioritisation.

8.3 The achievements in this process to date as published are:

8.3.1 Implementing the process for Major Planning Applications.

8.3.2 Launching the Island Infrastructure Scheme.

8.3.3 Carrying out a customer survey and engaging with developers and stakeholders in order to target future changes to the planning process.

8.3.4 Amending public counter and Duty Planner times as informed by the survey.

8.3.5 Engaging with Planning Application consultees.

8.3.6 Developing a Concierge Service.

8.3.7 Publishing refreshed Planning Application validation guides.

8.3.8 Initial Review of the Section 13 process.

8.3.9 Publication of the Planning and Building Control Customer Charter.

8.3.10 Launching Neighbour Notification & Planning Committee referral alerts service.

8.3.11 Developing new processes for condition discharge, pre-application advice, and permitted development queries.

8.3.12 Improvements to the planning website at Gov.im.

8.3.13 Ongoing engagement with stakeholders to develop an approach to delivering Biodiversity Net Gain.

8.3.14 Preparation of updates to the Town and Country Planning Act.

8.4 From the achievements the critical and most relevant points to the boundary extension process are 8.3.2 and 8.3.13. Both of which actively seek additional protection to the countryside and through legislation will ensure funding is available to manage the Biodiversity Net Gain (BNG) and infrastructure requirements.

- 8.5 One of the proposals is to ensure that significant development is conditioned with a requirement to provide a BNG (at a level yet to be agreed) which requires that developers enter into a legal agreement to provide a dedicated area for the management of ecology for a period of 30 years following the implementation of an approval.

9.0 Area Assessments

- 9.1 The application has been set aside to be determined based on each of four agreed areas being considered separately. In my evidence I deal with each of the Criteria (3, 4 and 5) under the headings. I rely on my preceding background evidence and the documents referred to herein and submit that the criteria are all addressed in each case.

The existing topography within the areas is generally flat, with the exception within the Glen Auldyn and South Areas where Glens dominate, undulating with natural contours. It generally has matured established internal sod bank field boundaries, areas of dense woodland and low-lying areas.

Many boundaries with neighbouring residential properties are mature sod banks.

Legislation is being formulated to add a further tier of protection to the environment and developers through BNG requirements must protect and enhance our ecology/countryside.

9.2 North Area –

- 9.2.1 This area of land is significant to this application and Ramsey as it represents the most important area for future residential and community development on the outskirts of the town.
- 9.2.2 Flood risk and accurate flood maps have significantly reduced the availability of land for the development of Ramsey within the settlement boundary – **See Appendix J, Appendix R and Appendix S**
- 9.2.3 These also recognise areas within the North proposal where development will be constrained and which creates an opportunity for development of public open spaces, ones which can link with existing public rights of way, permissive rights of way and public footpaths. **See Appendix T**
- 9.2.4 Generally the topography of the area is above the Douglas 02 datum recognised as being the benchmark to identify areas at significant risk of flooding and the Climate Change Act requires stringent management of surface water to ensure new residential properties are protected. This includes a freeboard allowance of 600mm (residential) and 300mm (Commercial and all other developments) above the 100-year climate change flood level for all new developments.
- 9.2.5 The requirements for commercial/Industrial development are less stringent however no less important.

- 9.2.6 The area is fully accessible from established, serviced highways, the A9 (Andreas Road), A10 (Bride Road) and A13 (Jurby Road) all where connections to utilities are readily available.
- 9.2.7 The ongoing Area Plan Review, All Island Development Plan and BERP processes create a significant opportunity for further structured development to meet the needs of Ramsey for future generations.
- 9.2.8 With the projected Island population growth it is necessary to expand the town boundary to ensure proper facilities and amenities can be provided to support the needs of a Service Centre.
- 9.2.9 I submit that the reasons for establishing the West Ramsey Development Framework and the associated zoning have not changed and the same fundamental requirements exist. My paragraphs 3.4.1, 3.4.2, 3.4.3 and 3.4.4 all recognise the need for appropriate zoning to be defined and structured.
- 9.2.10 The RTC application for the North Area is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are primarily residential.
- 9.2.11 The area sought is an overspill **and** outgrowth of the promotor's area. (My emphasis)
- 9.2.12 The proposed boundary as indicated follows where possible clear, physical boundaries.
- 9.2.13 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.
- 9.2.14 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.
- 9.2.15 The inclusion of the Area with defined zoning and development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment to be secured. It represents an area where development is free from projected river and tidal flooding as set out in the flood maps.
- 9.2.16 The civic amenity centre falls within this area and is currently managed by the RTC and MUA jointly, there are representatives from each Parish on the Board.

9.3 West Area –

- 9.3.1 This area of land is significant to this application and Ramsey as it represents the most important area for future employment land and community development on the outskirts of the town.
- 9.3.2 The area is geographically split to the north and south of the Sulby River.
- 9.3.3 This area of land is directly connected to the current industrial and commercial land as developed – at the north end this is characterised by the Mountain View Innovation Centre which is an area of economic growth and activity. It has seen the development of business and represents a significant employment hub.
- 9.3.4 More recently the Centre has been used as a destination venue hosting amongst others ‘Saturday Night Live’ and TT Launch events.
- 9.3.5 There exists an opportunity to enhance further this well-respected area to support the existing businesses through additional, complementary development.
- 9.3.6 At the southern end the first highway approach to Ramsey at the boundary is commercial development in the form of Banana Computers and the Millichap’s warehouse which has common boundaries with JP Corry who then share boundaries with the Manx Utilities at the site of the former power station. All of which forms the Town boundary to the West, separated only by the Glen Auldyn River.
- 9.3.7 I submit that with the refusal of the recent planning application referred to at my paragraphs 3.7 and 4.6 due in part to the well-documented flooding issues coupled with the content of my paragraph 9.2.4 renders this part of the town more suited to commercial development as the criteria for compliance with flood risk are less stringent. This would then fall more in line with the adopted West Ramsey Development Framework.
- 9.3.8 Part of this area is relatively low lying and prone to flooding. It would make excellent amenity land significantly enhancing the area in BNG terms and allowing the public footpaths to be expanded into the area and include for active travel planning with further dedicated cycle routes linking the town centre.
- 9.3.9 The Area is served by both the main A3 (Lezayre Road) and the A13 (Jurby Road) where connections to utilities are readily available.

- 9.3.10 There are no constraints on highway capacity and this would logically be the location for sensitive additional commercial and industrial development.
- 9.3.11 The RTC application for the West Area is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are primarily commercial/employment.
- 9.3.12 The area sought is an overspill **and** outgrowth of the promotor's area. (My emphasis)
- 9.3.13 The proposed boundary as indicated follows where possible clear, physical boundaries.
- 9.3.14 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.
- 9.3.15 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.
- 9.3.16 The inclusion of the Area with defined zoning and development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment to be secured.

9.4 Glen Auldyn –

- 9.4.1 This area of land is significant to this application and Ramsey as it represents an important area for inclusion as a community.
- 9.4.2 Glen Auldyn is an existing neighbourhood and settlement which benefits geographically from being near the Town of Ramsey, it shares its northern boundary with the existing settlement boundary of Ramsey.
- 9.4.3 The proposal would regularise the Ramsey Golf Club boundary to be within a single Parish.
- 9.4.4 Much of the Glen Auldyn proposal is within an area of [landscape classification](#) which is protected and which currently offers the people of the Isle of Man a variety of outdoor pursuits. Glen Auldyn is categorised as-

B2 – GLEN AULDYN

Key Characteristics

- A medium scale steep sided V-shaped valley surrounded by the Southern Uplands.
- Numerous large coniferous plantations on upper valley slopes.
- Fields of rough grass and pasture in a regular pattern on flatter lower valley bottom.
- Continuous linear settlement of mixed type along bottom of the lower valley around Glen Auldyn and Brookdale gives the valley a settled character.
- River runs alongside the enclosed valley bottom road with numerous concrete bridges over to access houses and slate road bridges.
- Enclosed character due to the steep valley slopes and roadside trees.
- Little sense of remoteness.
- Moderate sense of tranquillity.
- Numerous historic features, in the form of chapels, cairns and mounds.

Overall Character Description

Coniferous plantations cover the majority of the upper valley sides with gorse, heather and rough grasses growing along the upland periphery. Numerous deeply cut tributaries, such as Fern Glen, with lush deciduous vegetation growing in the valley bottom along the river banks join the main valley as it leaves the upland area and deepens. The narrow valley bottom begins to widen with larger flatter fields of pasture and having a more regular pattern with hedgerows containing mature trees around Cronk Aalin. This area of open fields abuts the Ramsey Golf Course to the south and runs alongside the edge of the deciduous woodland of Claghbane Plantation, where the lower slopes of the Northern Uplands meet the urban edge of Ramsey.

The densely wooded valley sides slope steeply up behind the variety of bungalows and detached traditional and modern houses on the valley floor. These buildings with various coloured cement rendered, (predominantly white) and pebble dashed facades, line both their sides of the enclosed valley bottom road which is overhung with hedgerow trees. A mixture of hedge, wall and fence treatments enclosed front gardens, giving a sub-urban character in place. Further up the valley, the Glen Auldyn River runs parallel to and under the road with riparian vegetation and trees growing on the banks. Concrete bridges give access to the larger set back houses with exotic plant species in relatively spacious gardens, enclosed by traditional slate walls and larger hedges creating a less urban character as one progresses upstream to Ballamenagh. An enclosed character due to the steep valley slopes, roadside trees and large dark coniferous plantations. There is little sense of remoteness due to the numerous houses. The moderate sense of tranquillity in the area is broken by the sound of traffic.

Key Views

- Channelled views framed by steep valley slopes

- Glimpsed views up wooded slopes to surrounding uplands.

Historic Features

- Keeills
- Tumulus, cairns and mounds

Ecological Features

- Aquatic and waterside habitats
- Upland heather moorland habitats
- Marginal farmland habitats
- Hedgerows with high biodiversity

Evaluation of landscape sensitivities

- Ecological value of the aquatic ecosystem and riparian habitats.
- Valley bottom and riverside woodland in the lower valley.
- Small-scale nature of buildings, within well wooded, intimate valley landscape.
- Vernacular character of buildings and bridges.
- Sense of history resulting from chapels, cairns, and mounds.

Landscape Strategy

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

- 9.4.5 The wider area within the application comprises the A1 Northern Uplands

Landscape Strategy

The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of the open and exposed character of the moorland, its uninterrupted skyline and panoramic views, its sense of tranquillity and remoteness and its wealth of cultural heritage features.

- 9.4.6 From the adopted planning strategies the countryside and the unzoned areas identified are protected for their own sake. The boundary application does not alter this fact.

- 9.4.7 The RTC application for Glen Auldyn is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are fundamentally countryside, The Milntown Estate or Ramsey Golf Club.

- 9.4.7.1 The Countryside is protected for its own sake.

9.4.7.2 Milntown Estate is managed by the Milntown Trust which was established by Sir Clive Edwards on his death in 1999. The estate was formerly significantly larger and extended over lands which now form the Ramsey Golf Club – in part within the Ramsey Town Boundary, Ramsey Grammar School – Entirely within the Ramsey Town Boundary and Sky Hill – Entirely within Lezayre Parish.

9.4.7.3 Ramsey Golf Club extends to 92 Ac and is in three Parishes Ramsey, Lezayre and Garff. It was originally formed to provide a facility for the people of Ramsey and the North to play golf.

9.4.8 The area sought is an overspill **and** outgrowth of the promotor's area and will allow the supported continued provision of recreation.

This proposed boundary extension is about taking a longer-term perspective, to enable growth and build a sustainable community that manages its diverse human, natural and physical resources effectively. RTC, in considering the community needs, are seeking to pave the way to ensure accessible open spaces and full range of services are available to support future generations.

9.4.9 The proposed boundary as indicated follows where possible clear, physical boundaries.

9.4.10 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.

9.4.11 The Area represents an already accessible mature offering of public rights of way, footpaths, and a sustainable route to the surrounding trails, glens and the wider countryside and nature.

9.4.12 The Area is required to ensure open space commensurate with built development is provided for all to enjoy the open space and countryside from within the Town – there is limited opportunity for built fabric within this area.

9.4.13 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.

9.4.14 The inclusion of the Area with defined zoning and limited development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment in the area to be secured.

9.5 South Area –

- 9.5.1 This area of land is significant to this application and Ramsey as it represents an important area for inclusion as a community. It is widely perceived as being part of Ramsey in any case.
- 9.5.2 The area includes part of the afforested land at Lhergy Frissell, this land is owned by the RTC, although located within Garff, as can be seen within the [title plan in the application](#). (P32) The land is presently located in Garff Parish however is in the ownership of Ramsey Town, the area is leased to DEFA as a national glen access to which is taken directly from the Town at Ballure Road, Cloughbane Walk and the Hairpin.
- 9.5.3 The South Area is proposed for inclusion to allow the Ramsey Boundary to catch up with the perceived boundary.
- 9.5.4 The golf course joining the north and east boundary of this area is, I suggest, historically embraced as a whole as being part of Ramsey. The fact that it sits within three boundaries should be addressed. There are no opportunities for built development on the golf course. The facility is for the people of Ramsey and the North to play golf only.
- 9.5.5 Much of the South Area proposal is within an area of [landscape classification](#) which is protected and which currently offers the people of the Isle of Man a variety of outdoor pursuits. The South Area is categorised as:

F5 SULBY RIVER

Key Characteristics

- Lower reaches of the Sulby River corridor (as it flows across the northern plain towards the sea at Ramsey).
- River corridor lined with mature deciduous vegetation, creating a sense of enclosure.
- Small and medium-scale irregular fields set along both sides of the river channels.
- Fields delineated by a combination of mature, low Manx hedgerows and traditional grey stone walls (which also line the main road corridors).
- Scattered settlement pattern, along the river course (relatively isolated farmsteads and houses).
- Sulby forms main settlement at western edge (marking point at which river emerged from Sulby Glen), and Ramsey to the east (where the river flows out into the sea).
- Dramatic views to the typically wooded slopes of the Northern Uplands to the south.
- Relatively strong sense of tranquillity throughout most of the character area.

Overall Character Description

This landscape character area contains the lower reaches of the Sulby River as it flows across the northern plain, eastwards towards the sea at Ramsey Bay. The course of the river begins within the Uplands, further to the south and flows rapidly, down Sulby Glen. At the foot of the Uplands, the course of the river becomes flatter and wider, with slower moving water. Within the character area, the river is lined along almost its entire length by mature deciduous vegetation, which often channels views along the river corridor and provides a strong sense of enclosure. Several small and medium scale irregular fields are set along both sides of the river channel (comprising a mixture of rough grassland, pasture and arable). These fields are delineated by a combination of mature, low Manx hedgerows and traditional grey stone walls. The main A3 (also forming part of the TT course) runs through the southern half of the area, hugging the base of the uplands to the south and a dismantled railway line also runs to the north of the river (now providing a mature landscape and recreation corridor). Several minor rural roads provide access to the area, and the river is crossed at fairly regular intervals along the west-east corridor. Sulby Bridge provides one of the main crossing points, and is a distinctive landmark feature within the surrounding landscape, alongside the colourful Ginger Hall hotel. Several farmsteads and relatively isolated houses also line the course of the river, set slightly back from the river channel. Traditional white walls and grey roofs dominate built character. The relatively intimate Sulby village nestles at the western end of the character area, marking the point at which the river corridor meets the low northern plain after its journey through Sulby Glen. Settlement character within the village is dominated by traditional Manx architecture, with several rows of colourful terraced houses and cottages.

At the eastern end, the river flows into Ramsey (a medium sized seaside town), where the corridor becomes more open and is influenced by surrounding urban built development. As it meanders amongst the urban fabric, the river eventually forms the basis for Ramsey's working harbour and then flows out to sea.

Although views are generally channelled along the river corridor, a strong recognisable sense of place is apparent at Sulby, Sulby Bridge, Ramsey and set slightly back from the river corridor along its length (views to the dramatic southern upland backdrop). Overall, there is a relatively strong sense of tranquillity throughout the character area.

Key Views

- Views along the river corridor generally channelled by vegetation which lines the banks of the river.
- Dramatic views to the adjacent southern uplands, which provide a wooded backdrop within views southwards.

- At bridging points, open views from the river corridor may be obtained across adjacent fields which are set back from the line of the river.
- Views to and from the urban edges of Ramsey.

Historic Features

- Sulby Church (Registered Building)
- St. Stephen's Church (Registered Building).
- Lezayre Road War Memorial and Cemetery.

Ecological Features

- Mature, diverse deciduous vegetation lining the river corridor.
- Mature hedgerows at field boundaries.
- Diverse habitats within the river corridor.

Evaluation of Inherent Landscape Sensitivities

- Strong sense of tranquillity away from main roads.
- Scattered settlement patterns of farmsteads along river's course.
- Enclosed and wooded river corridor.
- Valuable aquatic riparian and wet meadow habitats alongside river.
- Minor rural roads enclosed by roadside vegetation.
- Vernacular character of buildings and churches.
- Presence of Manx Mile stones.
- Few vertical elements.
- Dramatic views south to Uplands.
- Field pattern delineated by a mixture of stone walls, relatively tall Manx hedge-banks and post and wire fences.

Landscape Strategy

The overall strategy should be to conserve and enhance the character, quality and distinctiveness of this rural area with its scattered settlement pattern, relatively strong field pattern, a network of enclosed minor rural roads and its ecologically valuable aquatic and riparian habitats.

- 9.5.6 From the adopted planning strategies the countryside and the unzoned areas identified are protected for their own sake. The boundary application does not alter this fact.
- 9.5.7 The RTC application for the South Area is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are fundamentally Ramsey Golf Club, South Ramsey residential areas or countryside.

- 9.5.8 The area sought is an overspill **and** outgrowth of the promotor's area and will allow the supported continued provision of recreation and outdoor pursuits. (My emphasis)
- 9.5.9 This proposed boundary extension is about taking a longer-term perspective, to enable growth and build a sustainable community that manages its diverse human, natural and physical resources effectively. RTC, in considering the community needs, are seeking to pave the way to ensure accessible open spaces and full range of services are available to support future generations.
- 9.5.10 The proposed boundary as indicated follows where possible clear, physical boundaries.
- 9.5.11 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.
- 9.5.12 The Area represents an already accessible mature offering of public rights of way, footpaths, and a sustainable route to the surrounding trails, glens and the wider countryside and nature.
- 9.5.13 The Area is required to ensure open space commensurate with future built development is provided for all to enjoy the open space and countryside from within the Town – there is limited opportunity for any built fabric within this area.
- 9.5.14 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.
- 9.5.15 The inclusion of the Area with defined zoning and limited development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment in the area to be secured.
- 9.6 I confirm that each of the Areas identified for consideration meet the criteria to be considered in the boundary extension application which seeks to ensure that there is sufficient land within the town for future development.

10.0 Conclusions

- 10.1 My evidence sets out the related reference papers and explains the on-going processes within Government to align their targets for meeting their published economic strategy goals.
- 10.2 These require a review of existing planning policy through the Strategic Plan review which will pave a way for an All Island (development) Plan.
- 10.3 Both documents are in their infancy however neither change the fact that Ramsey Town has developed as far as is practicable the available space within its current settlement boundary.
- 10.4 I submit that the reasons for establishing the West Ramsey Development Framework in 2004 and the associated zoning have not changed and the same fundamental requirements exist. My paragraphs 3.4.1, 3.4.2, 3.4.3 and 3.4.4 all recognise the need for appropriate zoning to be defined and structured. The boundary extension as defined allows this to be reviewed and meaningful, deliverable development briefs to be established.
- 10.5 Significantly there has been a fundamental recognition that most of central Ramsey including the majority of the lowland area identified for development is located in what has been identified as the Island's number one hotspot for extreme flooding. This renders the area unsuitable for further development.
- 10.6 I confirm that the criteria for consideration are met and my evidence sets out how 'The Ramsey Town Commissioners application to the Department of Infrastructure for an Order under Section 6 of the Local Government Act 1985 seeking to extend by Order, the boundary of the town of Ramsey Town', including the proposed boundary is the logical approach and is a cohesive strategy towards providing security for future generations.
- 10.7 I confirm criteria for consideration:
- 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**
- are fulfilled.
- 10.8 I commend Sir that you recommend to the Department of Infrastructure that the application by the Ramsey Town Commissioners in the format requested is approved without amendment.

11.0 Appendices

Appendix A1 - North Area

Appendix A2 - West Area

Appendix A3 - Glen Auldyn

Appendix A4 - South Area

Appendix B1 - Existing Settlement Boundary

Appendix B2 - 1992 Town Boundary Extension

Appendix C - Statement of the Head of Planning Policy

Appendix D - Ramsey Local Plan 1998

Appendix E - 1982 Development Plan

Appendix F - West Ramsey Development Framework

Appendix G - West Ramsey Development Framework with High FRA's

Appendix H - Ramsey Urban Area and Catchment Management Area

Appendix J - Ramsey Local Plan 1998 with High FRA's

Appendix K - 'Breathing' Spaces

Appendix L - Significant Developed Sites Since 1998 Plan

Appendix M - APNW Ramsey Town Centre

Appendix N - APNW Ramsey

Appendix P - Unoccupied Urban Sites North and West Ramsey

Appendix Q - Conservation Areas and Registered Buildings

Appendix R - Flood Risk Map

Appendix S - Flood Risk Areas Unsuitable for Development

Appendix T - Public Rights of Way

Proposed Ramsey (Boundary Extension) Order 2023
Public Inquiry 22-24 January 2024

Proposed Time Table

Start 10am- 1pm (break 11:15 for 10 minutes)

Afternoon 2:00pm – 4:30pm (break 3:30 for 10minutes)

Day 1

- General opening remarks from the Chair
- Promoters / authorities general opening remarks.

Area to consider

- **South Area-** promoters / authorities. to lead
- South Area- no one has sought Interested party status

(To allow Attendance Glen Auldyn – timetabled to start not earlier than 2pm)

- **Glen Auldyn-** promoters / authorities. to lead
- Interested Party Status- those with submissions specifically on Glen Auldyn and their general points.
 - Philip Dunne
 - Andrew Collins
 - Graham Allott

Day 2

Areas to consider

- **North Area-** promoters / authorities.to lead
- Interested persons- those with submissions specifically on North Area and their general points.
 - Robert Barden
 - Jill Evans
 - John Evans
 -
- **West Area-** Authorities to lead
- Interested persons- those with submissions specifically on the West area and their general points
 - Brian Corlett
 - David Dorricott
 - Charles Jennings
 - Keith Quane

Day 3

- Submissions by Interested persons not in the affected areas.
 - Tim Johnston, (MHK)
 - Keith Dalrymple
- Evidence by Ramsey Town Commissioners
 - Tim Cowin
 - Robert Cowell
 - Tony Lloyd Davies
- Closing remarks / Responses by promoters / authorities.
- Chairman – Any other issues not addressed- Closing Remarks

Proposed Ramsey (Boundary Extension) Order 2023
Public Inquiry 22-24 January 2024

Evidence of Mr Lloyd Davies

1. An application has been made by Lezayre Parish Commissioners to exclude the evidence presented by Mr Lloyd Davies contained in the submissions to the Inquiry made by Ramsey Town Commissioners on the 11 December 2023.

Background

2. Mr Lloyd Davies made submissions to the consultation hub during the consultation period. Those submissions were made as an individual (Cornerstone Architects). His submissions expressed support for the boundary expansion application and more importantly was the only individual supporting the application expressing a willingness to speak at the Inquiry.
3. At the pre-Inquiry hearing, interested party status was granted to the three authorities. I did not make any orders regarding the identity of who would exercise that status on behalf of the authorities except in respect of Garf Commissioners.
4. As Garff Commissioners were not legally represented I asked for them to formally indicate the names / positions of the persons instructed to speak on behalf of the Commissioners.
5. At the pre inquiry I gave liberty for the local authorities to provide further submissions. I did not place any limit on what those further submissions could include.
6. I also granted an extension for any further applications for interested party status from the public to be made.
7. Mr Lloyd Davies did not make an application and did not have interested party status as an individual when his statement was submitted.

Further Submissions

8. The Inquiry received an e-mail from Tim Cowin on the 11 December 2023 which contained Ramsey Town Commission Commissioners' further submissions to the inquiry. This included the evidence of Mr Lloyd Davies.

9. As Chairman I queried what status Mr Lloyd Davies had to make the statement.
10. At this stage had Mr Lloyd Davies applied for interested party status as an individual I would have had to decline it given the lateness of the submissions.
11. I did advise the local authorities on the 2 January 2024 to prepare as though Mr Lloyd Davies evidence was to be considered under the umbrella of Ramsey Town Commissioners' interested party status.
12. In response to my request both Mr Tim Cowin and Mr Jelski confirmed Mr Lloyd Davies was giving evidence on behalf of Ramsey Town Commissioners under their umbrella interested party status.

Tim Cowin email dated 8 January 2024

Ramsey Town Commissioners have employed Tony Lloyd Davis, and he will be working with me and Rob Cowell to represent Ramsey Town Commissioners at the Inquiry.

Michael Jelski email 3 January 2024

The position with regards to Mr Lloyd-Davies is that he originally provided a response to the consultation in his personal capacity. Following there [SIC] Inquiry Meeting where it was made clear that evidence was forthcoming from planning, RTC made the decision to approach and instruct Mr Lloyd-Davies to provide expert advice on the potential issues being raised before the Inquiry. Mr Lloyd-Davies is therefore assisting RTC on a professional basis and it was anticipated he would fall within RTCs IPS.

Owing to the constitution of the public inquiry, it had not been anticipated that there was a need to make an expert witness declaration as would be under the civil court rules. Of course an amendment, containing such declaration, could be made if such was deemed necessary.

13. As I did not place and restrictions on any of the local authorities on what they could and could not include in any further submissions they were at liberty to file the statement of Mr Lloyd Davies to support their position before the Inquiry.

14. There has been no objection to Mr Tim Cowin or Mr Robert Cowell giving evidence on behalf of Ramsey Town Commissioners. Their statements were provided on the same date as the statement of Mr Lloyd Davies.
15. Section 6(2) of the Local Government Act 1985 requires that.
the Department shall consult with every local authority whose district is affected by the proposed order,
If I refused to accept the evidence of Mr Lloyd Davies, then the Department would be seen to be acting outside their statutory duty to consult.
16. Therefore, there is nothing precluding the Inquiry to take Mr Lloyd Davies' evidence into consideration as part and parcel of Ramsey Town Commissioners' submission. Indeed it may well breach the Department's statutory duty to consult the local authority if I were to refuse to admit it. This is exactly in the same way that I will take into account the written submissions of Lezayre Parish Commissioners of the 7 December 2023.
17. Lezayre Commissioners do however raise an important issue that they and others have not had the opportunity to call expert evidence.
18. However, it has been clear from the pre-Inquiry hearing that there were issues with expert evidence. Only Ramsey Town Commissioners have sought to instruct an "expert".
19. Given the lack of expert evidence being advanced at the time of the pre inquiry hearing, I was grateful that the Inquiry would have the benefit of Mrs Diane Brown Head of Planning Policy in the Cabinet Office giving evidence.
20. As she can respond to any queries or questions raised throughout the Inquiry including any "expert" submissions made by Mr Lloyd, no one is prejudiced by not instructing an expert.
21. I therefore do not see the fact that Lezayre Commissioners have not sought to call an expert as a reason to exclude Mr Lloyd Davies evidence.
22. It has been open to all parties to bolster their arguments by instructing an expert and in any event the Inquiry has access to an expert other than Mr Lloyd Davies.

23. In my opinion no party is prejudiced by Mr Lloyd Davies' evidence being taken into consideration. Both Lezayre Commissioners and Garff Commissioners have the opportunity to present their arguments throughout the hearing and challenge any statements made by Ramsey Town Commissioners including those by Mr Lloyd Davies.

24. I do not however consider Mr Lloyd Davies to be totally independent as he is advancing a positive case for Ramsey Town Commission (as he did on his own / Cornerstone Architects behalf), but I do expect Mr Lloyd Davies in his evidence to;

only provide an opinion on matters within his expertise, and not assume the role of an advocate;

to consider all material facts, including those which might detract from his opinion; and

make it clear —

(i) when a question or issue falls outside his expertise; and

(ii) when he is not able to reach a definite opinion (for example because he has insufficient information).

(Extract from The Rules of the High Court 2009 Rule 8.53)

25. I will allow Ramsey Town Commissioners time to implement the above in respect of Mr Lloyd Davies' evidence.

26. The second issue is whether Mr Lloyd Davies should be allowed to speak at the Inquiry.

27. Under Section 3 of the Inquiries (Evidence) Act 2003.

Any person appearing to the person conducting an inquiry to which this Act applies to be interested in the subject matter at the inquiry may appear and be heard at the inquiry —

(a) in person,


(b) by an advocate, or

(c) with the leave of the person conducting the inquiry, by a representative other than an advocate.

28. Mr Lloyd Davies clearly has evidence of interest to the Inquiry. His evidence subject to clarification will be considered.

29. The local authorities and the Chair will be asking question of Ramsey Town Commissioners and it is clear that some questions should be answered directly by Mr Lloyd Davies rather than through an Advocate or other party giving evidence for Ramsey Town Commissioners. In the interest of clarity and understanding Mr Lloyd Davies should answer questions directly and like others giving evidence will be under oath or affirmation when he does so.
30. The balance of whether to allow Mr Lloyd Davies evidence to be admitted falls in favour of Ramsey Town Commissioners as they would be prejudiced if the evidence was excluded and Lezayre Commissioners have not shown what if any prejudice they would suffer by the evidence being admitted.
31. Subject to the information requested at Paragraph 24 above, the evidence of Mr Lloyd Davies is admitted and he will be allowed to speak at the inquiry as part of Ramsey Town Commissioners' submissions.

Signed



Peter J Taylor

Chair of the Inquiry

Date 15 January 2024

Peter Taylor

From: Peter Taylor
Sent: 08 January 2024 17:18
To: Lezayre Parish Commissioners; Michael Jelski; admin
Cc: 'Camilla.Rand@corlettbolton.com'; 'tim.cowin@rtc.gov.im'
Subject: Ramsey Boundary Inquiry - Application amendments

To all Parties,

I have noted that Ramsey Town Commissioners wish to amend their application to include Wildwood House and Glen Auldyn Lodge, at the end of Glen Auldyn.

Similarly, I received a letter from Lezayre Commissioners regarding an application to the inquiry to take back areas inside the boundary of Ramsey Town.

I advised at the preliminary hearing that I could not consider that application as it had not been made to the Department of Infrastructure.

The Department has a statutory duty to consult with every local authority whose district is affected by the proposed order and shall hold an inquiry. So only applications that have been accepted by the Department and been consulted on can be considered.

The only powers I have are those given to me by the Department under the Local Government Act 1985. Those powers are to chair the inquiry that the Department is legally obliged to hold Under Section 6 (2) the Local Government Act 1985 into the application by Ramsey Town Commissioners to extend the boundaries of their district.

The only power I have is to chair the inquiry into the application received by the Department in September 2022 and the application that has been consulted on.

As chair of the inquiry, I can find no other powers in the Local Government Act 1985 to allow me as the chair to consider amendments to the application after it has been accepted by the Department or more importantly after the consultation period has passed.

The powers I have in respect of conducting the inquiry are set out in the Inquiries (Evidence) Act 2003. There is no power contained in this Act that allows the person conducting the Inquiry to amend the application.

The application that is under consideration is the one submitted, which excludes Wildwood House and Glen Auldyn Lodge, at the end of Glen Auldyn .

If there is an error in that application, then it can only be corrected by Ramsey Town Commissioners making a fresh submission to the Department and a fresh consultation process started again.

The inquiry will therefore hear evidence and submissions on the application and no amendments can be considered at this stage.

I hope this answers the parties' questions.

Regards

Peter Taylor
Advocate

In 2001 some 2300 (6.1%) of the employed population worked in Malew. Some 1400 (2.7%) worked in Castletown.

- 5.4 This area framework is supported by a strategic transport network which comprises a radial pattern of roads converging on Douglas with links between the main towns and villages around the coast.
- 5.5 Thus the current spatial framework is characterised by four areas each with a main centre or, in the case of the south, a series of smaller centres, with the strategic transport network providing the links between all parts of the Island. These form a family of settlements which provide a hierarchy of employment and service centres across the Island. The size of some of these settlements presents challenges in terms of maintaining the current level of services in the future. Over the years this area framework has been supported by Government in terms of public service provision of education, healthcare and leisure. Area Plans for each of the four defined areas will be prepared during the next 4 to 5 years.
- 5.6 The Consultation Draft (2000) introduced the concept of a new settlement as a means of accommodating new housing provision but this idea was rejected by the Department in the Draft Strategic Plan (2001) in favour of a policy of containment around existing urban areas (see **Appendix 3**). The Strategic Aim, Objectives and Policies provide the framework to develop the existing spatial framework into a Spatial Strategy.

Spatial Vision

- 5.7 The Strategic Objectives and Strategic Policies direct that the focus of new development should be within existing towns and villages or in sustainable urban extensions, avoiding coalescence of settlements and maintaining their local identity. This translates into a Spatial Vision that by 2016 the Island's communities will have become more sustainable, prosperous, safe, healthy and vibrant. People from all sections of society will have been provided with better access to a range and choice of homes, jobs and services. This will have been achieved in ways that reduce the impact of society on the environment, improve the quality of design and the built environment and enhance the Island's natural environment and heritage assets.
- 5.8 In order to achieve this 'Spatial Vision', a framework is required as part of the Island Spatial Strategy for the future development of the Island based on service **CENTRES**, key transport **LINKS** and the main **GATEWAYS** of ports and Ronaldsway Airport (see Key Diagram).

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

These comprise:

Bride	Glen Maye
Sulby	Dalby
Ballaugh	Ballafesson
Glen Mona	Colby
Baldrine	Ballabeg
Crosby	Newtown
Glen Vine	Strang

The only major employment area outside the CENTRES is that based on the Ronaldsway and Ballasalla Industrial Estates and the Freeport but these are adjacent to Ballasalla and Castletown.

The aim of the **CENTRES**, **LINKS** and **GATEWAY** approach is to give a strategic focus to future development and achieve balanced growth on the Island by developing:

- the key transport links as the skeletal framework for future physical development and the primary links to and between the gateway ports and the airport;
- a compact and dynamic eastern area centred on Douglas, the major gateway and the focus of the strategic transport network;
- area service centres in the north and west based on Ramsey and Peel using regeneration opportunities to strengthen their employment and service base; and
- a network of local centres in the south with new development focused on the regeneration of existing centres but recognising the growth potential around Ballasalla and the Airport Gateway.

5.9 In the Douglas and the East Area the focus of development will continue to be in and around Douglas. The current policy of constraining further greenfield development has aided the process of regeneration within the existing urban area. In terms of the Island Spatial Strategy (ISS) for Douglas and the East, the key elements are:

- continued regeneration within Douglas, particularly around the Promenades and Quayside and Douglas Regeneration Area to create further housing, employment, retail and leisure opportunities;
- maintaining the International Shipping Gateway role of Douglas Harbour and;
- continued policy of urban containment with the new Area Plan for the East examining the issue of maintaining the distinctive character of the various settlements.

5.10 The key elements of the ISS for the North are:

- most housing focused on Ramsey in line with the current allocations in the Ramsey Local Plan;
- regeneration of Jurby in line with the Jurby Study;
- continued regeneration of Ramsey Town Centre; and
- employment opportunities focused on Ramsey Town Centre and Poyldooey/Ballachrink in accordance with the development framework.



Proposed Ramsey Boundary Extension order 2023

Glen Auldyn

Andrew Collins

Point One – One Community/extension of Town

- Community – mutually beneficial, Town is Commercial/Service Centre for the North and requires indeed needs to encourage wider footfall, activity to prosper. Ramsey is identified as a Service Centre for its associated hinterland – Isle of Man Strategic Plan 2016 (IOM SP 2016) ref chapter 5 para 5.8 i.e. basically '*Doing exactly what it says on the tin!*'
- Physical separation Glen Auldyn (GA) has always been a separate community, having it's own documented history and sense of place
- A wealth of GA history and culture (pre-dating 1865 Ramsey Town) documented and in pictures can be found at:
 1. imuseum.im/archives
 2. Mate's IOM illustrated 1902, page 62 on describes GA & Milntown, author Rev John Quine
 3. A Manx scrapbook 1929, chapter IV describes GA & Lezayre, author W.Walter Gill
 4. Furthermore extensive detail is available at Milntown Trust Archives & Manx National Heritage document MS 12560/4 Milntown Gateway to GA author Paul Weatherall, includes a timeline of human occupation from Neolithic to modern era (examples: Bronze Age, Norse 1079 Sky Hill/Mills, Christian family 500 years, Victorian etc...)



Point One cont. One Community/extension of Town

- Colloquially GA is referred to as ‘The Village’ there are:
 1. No shared roads/communications GA has own entrance from Lezayre Road outside of existing Town boundary
 2. No coalescing housing or built up area, clear separation green land, agricultural fields/areas including Golf Course a point Ramsey Town Commissioners (RTC) acknowledge themselves in their submission at Point 3 Overspill (Photo 1. slide 14.)
- In terms of GA residents identifying/associating with the Town, you only have to look at the boundary change published responses received by 17/10/23 - **78 oppose only 1 for**
- GA community and surrounding lands (not identified as a settlement within Spatial Policies 1-4) nonetheless are recognised and shielded by prevailing legislation:
 - The Role of Landscape Character in Development 2009 ref section B2 page 35 - **GA is identified as one of ten Narrow Upland Glens**
 - IOM SP 2016 Chapter 7 Environment Policy 1 - *‘The countryside and its ecology will be protected for its own sake...’*
 - IOM SP 2016 ref chapter 8.8 Groups of houses in the countryside – para 8.8.1 – **GA clearly fits the description**
 - The Isle of Man Planning Scheme (Development Plan) Order 1982 circular 8/89 Low Density Housing in Parkland (LDHP) – **provides development guidance/safeguards local area/environment**



Point One Law/Policy cont. One Community/extension of Town

- The most recent independent review of GA is found within IOM Gov document The Role of Landscape Character in Development 2009 ref section B2 page 35 - **GA is identified as one of ten Narrow Upland Glens:**
 1. With an overall character description: *'The narrow valley bottom begins to widen with flatter fields of pasture and having a more regular pattern with hedgerows containing mature trees around Cronk Aalin. This area of open fields abuts Ramsey Golf Course to the south and runs alongside the edge of deciduous woodland of Cloughbane Plantation, where the lower slopes of the Northern Uplands meet the urban edge of Ramsey'*
 2. At the conclusion it recommends: *'The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of wooded valley bottom with housing sensitively located alongside the ecologically valuable riparian corridor'*
- Hence GA is best described as settlement of a countryside wooded V shaped Glen; so in accordance with SP 2016 Chapter 7 Environment Policy:
 - Environment Policy 1: *'The countryside and its ecology will be protected for its own sake. For the purposes of this policy, the countryside comprises all land which is outside the settlements defined in Appendix 3 at A.3.6 (GA is not so identified) or which is not designated on an Area Plan'*



Point One Law/Policy cont. One Community/extension of Town

- IOM SP 2016 ref chapter 8.8 Groups of houses in the countryside:
 1. *'8.8.1. There are in the countryside many small groups of dwellings which, whilst not having the character of, the full range of services usually provided in a village, nevertheless have a sense of place and community. These groups are found variously at crossroads, in places sheltered by trees or topography or around chapels, abandoned mills or smithys.'* - **A description completely befitting GA**
 2. *'8.8.2. Adding further dwellings to these groups may not accord with our strategic objectives relating to settlements and sustainability but may assist in meeting the need for rural areas... Such additions would need to be sensitively related to the existing settlement pattern and the landscape.'*
- In the absence of the Area Plan (reported to be imminent), all recent GA 'Zoned Land' development has been undertaken in accordance with The Isle of Man Planning Scheme (Development Plan) Order 1982 circular 8/89 Low Density Housing in Parkland (LDHP), a document designed to control building and safeguard the specific needs of the local area/environment
- It is identified within draft Area Plan for North and West - ref page 8 that a discussion of LDHP and Residential land outside of settlements has taken place, with a list of groups/criteria with Cabinet Office for further assessment?



Point Two – Community of interest, public services/social agencies, recreation

- Again these are functions of Ramsey service centre role - IOM SP 2016 ref chapter 5 para 5.8
- I feel its key to differentiate:
 1. Public services/agencies centrally provided i.e. IOM Gov: Health, Education, Emergency Services
 2. RTC locally: Parks, Library, Refuse Collection
- Retail and some government services are provided as part of Ramsey Service Centre role, this said GA population has the choice and does travel to use other outlets Douglas, St Johns - Tynwald Mills, Laxey to name a few
- There are a variety of recreational activities provided by Town & Glen
- Many of the Town clubs and sports activities like the Glen are private enterprises and individuals attending support as they wish, simply a matter of personal interest and choice...



Point Two cont. Community of interest, public services/social agencies, recreation

- GA and countryside provide for unique activities in own right:
 1. Milntown visitor attraction and event base
 2. Hill walking within the Glen, Skyhill and Millennium Path, including regular dog walking
 3. Dark skies i.e. great location for star gazing
 4. Horse riding
 5. Mountain Bike Brookdale Forest & Skyhill
 6. Green Lane driving riding
 7. Glen Auldyn Shoot
- At no time 'to my knowledge' has RTC canvassed GA residents or promoted an outline of benefits/enhancements it could provide in taking over local service or recreational responsibilities from Lezayre



Point Three – Overspill or outgrowth

- GA is CLEARLY NOT an overspill or outgrowth, but has developed within its own valley setting over time as a separate community – As evidenced slide 2
- RTC acknowledge that the Glen is not joined to the Town and is clearly separated by green space the Golf Course, however they have failed to mention Milntown and several agricultural fields which are not zoned for development (Photo 1. slide 14.)
- RTC *'themselves'* opposed the **Planning Application 20/01080/B Lower Milntown** a new development of 138 properties on greenfield to the West along Lezayre Road. This application has failed to gain approval effectively halting any movement of the Town further West i.e. towards the entrance for GA and thus countering this point
- In conclusion of the appeal for 20/01080/B The Minister for Environment, Food & Agriculture Hon C Barber MHK decision included:

'There would be harm, in this regard, to the established character and appearance of this rural area'
- Given the outcome it is surprising they continue to seek to gain GA, which alone does not provide for any scale of development
- By far the majority of GA population do not recognise themselves to be residents of a Town – ref boundary change published responses 17/10/23 **78 against 1 for**



Point Four – Wherever possible clear physical boundaries are followed

- The Glen neighbourhood has grown over time (as evidenced) within its valley solely accessed from Lezayre Road, there are no other roadway links with the Town and none projected
- The boundary to the north of GA is provided by Lezayre Road and beyond this open country to the west of the GA stream. In fact directly opposite GA junction the field 132481 is identified as 'White Land' and protected from being zoned for development - ref 20/01080/B Appeal Inspectors Report
- So following the rejection of 20/01080/B Lower Milntown, there is no likelihood in the near to mid future of development extending further to the west i.e. along the Lezayre Road into this open countryside
- The West and Southern boundaries are defined by the shape of the Glen, the Glen paths extending miles into the hills of Lezayre via Sky Hill interconnecting The Millennium Way. To the South Eastern side Brookdale Forest and lower slopes of North Barrule
- Directly East from the lower land is found agricultural fields and then the Golf Course (Photo 1. slide 14.)
- In terms of physical boundaries by far the majority of GA settlement sits within a valley landscape (Photo 2. slide 15.)



Point Five – Insufficient acreage left for development

- **This appears to be a key rationale behind the RTC bid** i.e. They claim to have exhausted all existing possibilities within the current boundary to grow and develop so are seeking change to support longer term plans
- However, they have jumped the gun here:
 1. The latest IOM Gov projection for population increase has now slipped back to 2037, with the Gov prioritising infrastructure and services first. Population growth target has now been downgraded in the IOM Gov strategy - ref Gov.im revised economic strategy November 2022
 2. Additionally the Northern and Western Area Plan is imminent which will provide the overview in terms of needs for the region as a whole
- As it stands today, in accordance with prevailing legislation SP 2016, RTC should really be considering development of existing brown field sites (this being further explored and identified within the draft Area Plan) before seeking wider expansion
- Specifically for GA, all existing zoned/development land is used up/has approved planning in place, so this location clearly cannot provide for the development growth they seek – simply they are looking in the wrong place



Point Six – That the balance of advantage lies in acceptance of the scheme

- As detailed at point 3. no further development is proposed to the west, the most recent planning application 20/01080/B failed at all stages of the process
- Additionally there is significant flood risk associated with this area as per the latest IOM Gov flood risk mapping - ref IOM Flood Hub, that will have to be considered in any future land use zoning applications
- The latest IOM Gov projection for population increase has now slipped back to 2037, with the Gov prioritising infrastructure and services first. Population growth target has now been downgraded in the IOM Gov strategy - ref Gov.im revised economic strategy November 2022
- RTC in their submission has flagged that the draft Area Plan does not signpost this area for development and are pinning hopes on the new All Island Development Plan 2026, i.e. an unknown quantity at this time, but any new plan will be impacted by all of the above...



Point Six cont. That the balance of advantage lies in acceptance of the scheme

- To conclude:
- GA simply does not provide any significant land area/or prospective currently un-zoned land to provide for urban growth – this begs the question why does RTC seek to extend in this direction?
- GA has been suggested as an area that should form a settlement in its own right. Cabinet Office holds the background to criteria for Group of Houses in the Countryside - ref Draft Area Plan for North and West page 8
- Overall the proposal is poorly timed and ill conceived, coming ahead of the imminent Area Plan and the All Island Plan 2026, where an informed overview of population needs and development for the longer term will be considered both Regionally and Nationally, thus providing the 30 year plan RTC seek
- The balance of advantage must surely be to preserve and protect the existing GA character and settlement within the rural Lezayre countryside



Reference documents:

- Isle of Man Strategic Plan 2016 (SP 2016) ref chapter 5 para 5.8
- imuseum.im/archives
- Mate's IOM illustrated 1902, page 62 on, author Rev John Quine
- A Manx Scrapbook 1929, chapter IV Lezayre, author W.Walter Gill
- Milntown Trust Archives & Manx National Heritage document MS 12560/4 Milntown Gateway to GA author Paul Weatherall
- Boundary change published responses received by 17/10/23
- The Role of Landscape Character in Development 2009 ref section B2 page 35
- SP 2016 Chapter 7 Environment Policy 1
- IOM SP 2016 ref chapter 8.8 Groups of houses in the countryside
- The Isle of Man Planning Scheme (Development Plan) Order 1982 circular 8/89 Low Density Housing in Parkland
- Draft Area Plan for North and West ref page 8
- Planning Application 20/01080/B Lower Milntown including under same ref:
 - Appeal Inspectors report & Decision Hon C Barber MHK
- Gov.im revised economic strategy November 2022
- IOM Gov flood risk mapping - ref IOM Flood Hub

Photo 1. Looking east from Sky Hill, GA in foreground, Ramsey in the distance



Photo A Collins 11th December 2022



Photo 2. GA from Sky Hill properties in Valley bottom



Photo A Collins 11th December 2022



Removed Un-used...

- Chapter 4 SP 2016 - para 4.3.3 & SP3
- Chapter 4 SP 2016 - para 4.3.3 *'Each of our towns and villages has an individual character arising not only from its geographical position and existing fabric, but also from its historical, cultural, and social background. This character should be protected and enhanced. Accordingly: Strategic Policy 3: Proposals for development must ensure that the individual character of our towns and villages is protected or enhanced by: (a) avoiding coalescence and maintaining adequate physical separation between settlements'*
- Furthermore *'Spatial Policy 7: In accordance with Strategic Policy 3 Area Plans will assess the need for Green Gaps between settlements so as to avoid coalescence'*
- *'In the context of Spatial Policy 7, "green gap" means an open area which serves to maintain the distinction between settlements; prevents the coalescence or merging of settlements; and may provide recreational opportunities'* - **This is exactly what exists between Ramsey and GA today**
- I think it is worthy to flag at this point, in the submission RTC have omitted from the plan two properties at the very south end of the Glen roadway, meaning these properties would remain within Lezayre. If approved as proposed this would cause a situation where neighbouring properties are serviced by different authorities, effectively creating an issue boundary change reviews are usually asked to fix
- All existing GA zoned land is now exhausted, both existing SP 2016 policies and the imminent Area Plan would clearly impact any further submissions



Brian Corlett Evidence – 23rd January 2024

My wife and I live in Mona Lodge which is one of the small group of houses in Lezayre on Jurby Road, outside the Ramsey town boundary but within RTC's proposed boundary extension. Historically Mona Lodge has also been known as Mona Cottage and Mona House. I will not repeat what I have said in my Proof of Evidence but there are several points which I would like to emphasise and amplify.

Firstly, I would like to point out that the boundary between the North and West areas drawn by RTC in their submissions is completely arbitrary. They have drawn the boundary down the middle of Jurby Road, dividing the small group of houses in which I live in two. This doesn't make sense, either historically or in terms of any projected development of the town. If I was being charitable, I would say that this simply illustrates the lack of coherent thought which has gone into the RTC submission, exemplified by the careless drawing of proposed boundaries up Glen Auldryn, or, if not being charitable, I would suggest that it is an attempt to break up the opposition to their proposal and minimise the impact of this small group of houses. Whilst we live in the west area, many of my comments apply to the north as well.

The group of houses on Jurby Road goes back a long way. Most of them existed around the time when Ramsey was incorporated and they appear on the first Ordnance Survey map dated 1870, which was based

on a survey in 1868. Several can be found on the earlier tythe maps which are available on the government's land registry website under the link to "Wood's Atlas" and which formed part of the basis for the registry itself. There is a tythe map dated 1839 for Mona Lodge, as Mona Cottage, which shows the house and most of the existing outbuildings, and research at the Manx Museum indicates that the current brick house was built in the late 18th century. It was built on the site of an earlier stone house.

On the 1870 OS map, to the south of Jurby Road one can also see Riversdale and its cottages alongside the road; and Baldromma Farm, redeveloped as the site of MVIC, built as a film studio because it was away from Ramsey. To the north of Jurby Road, Balleigh House; the cottage just to the east of it; the 2 cottages opposite Riversdale and Mona Lodge; and a cottage roughly opposite the new entrance to MVIC are all on the map. Apart from the redevelopment of the Baldromma Farm site as the film studio, there has been very little newbuilding in this area for 150 years. In 1870 Ramsey was a long way away to the east.

Mona Lodge, Riversdale and Balleigh House are set back from Jurby Road and have gardens around them and to their south. They exist in their historic context as "houses in parkland", which I think is the technical term, mostly with fields around them. The small group of houses in which we live cannot be characterised as ribbon development

or overspill from Ramsey. It existed pretty much in its current form in the countryside 150 years ago, and the growth of Ramsey has not changed it significantly.

Ramsey has clearly grown to its west with ribbon development along Jurby Road and then infill behind the houses facing the road. Rejection of planning applications has kept the area along Jurby Road to the west of the existing town boundary as a mixture of rural housing and farmed countryside. Whether one simply drives along Jurby Road or looks at the area on a map, the change in character as you pass out of the town boundary is very clear. The map attached to the RTC submission showing the proposed northern boundary extension illustrates this well with the current housing in Westhill Village, Riverbank Road, and Coburn Road.

I don't know whether Mr Lloyd Davies was involved in the preparation of RTC's submission but, notwithstanding that, I was surprised by his evidence where he referred several times to biodiversity net gain and the need for RTC to have land available to provide this for future development; he had to admit on 2 occasions that there was nothing requiring this to be within the same local authority area as a property development. I assume that any biodiversity net gain regulations will be the responsibility of the planning department to enforce and not RTC, and the developer will have to put together a biodiversity net gain plan to

satisfy the planners. I was also surprised by his references to public open space associated with a development. My limited understanding is that it has to be within or at least close to a new development and should not be distant from it since it is for the benefit of the residents who will live there. Perhaps Mrs Brown could comment on those points.

What RTC haven't properly considered is the impact of issues other than reference to flood risk which could affect the developability of much of the land which they are after. We heard yesterday about the hillsides above the Hairpin up to the Albert Tower, the Crossags and Glen Auldyn which are undevelopable but there are other constraints. In respect of flood risk, RTC haven't taken into account that there is a significant amount of land in the northern area which is at risk of flooding with a long and complicated route for drainage to the Sulby Riverout towards the Garey.

In my Proof of Evidence, I referred to a covenant in respect of the fields to the south of Riversdale preventing their development and I understand that you will hear evidence about that later. In addition, all the land around Mona Lodge, including the field to its south, is a Registered Tree Area which would have a significant impact on the ability to develop land around it. I would expect issues such as this to have been researched properly and included in RTC's submission.

Yesterday, on several occasions we heard evidence on behalf of RTC trying to emphasise the Ramsey-ness of some of the infrastructure and facilities in and around the town. I have commented on this and the provision of other services in my Proof of Evidence. One example struck me. There was a reference to the sewage from Glen Auldyn and Andreas going to the “Ramsey Sewage Treatment Works”, with emphasis on the Ramsey label, along with Ramsey’s waste. This is a facility owned by the Department of Infrastructure and operated by Manx Utilities, not RTC. It, and the adjacent Balladoole amenity site, are outside Ramsey and there is no reason why they need to be inside the town boundary. The latter is administered by Ramsey Town Commissioners on behalf of the northern parishes, i.e. we all pay for it. We at Mona Lodge are not on mains drains and it will be the Department of Infrastructure who decides whether they are extended to us and not RTC.

A point that was referred to, I think, by the Chairman in his opening was the question as to what differentiated the benefit that people and properties like ours take from being within the area serviced by Ramsey as a regional centre compared to people farther from Ramsey. With respect, the answer is none. We enjoy services provided by Lezayre Commissioners and use the retail and other facilities in Ramsey when required. There would be no significant difference if we lived in Churchtown, St Judes, Sandygate or elsewhere.

Mr Dalrymple asked Mrs Brown about the likely timetable for completion of the North and West Area Plan and the Strategic Plan and she has commented further on that today. She indicated that the inquiry in respect of the former should be held by the summer, with the process of formalising the conclusions of the inquiry and their approval by Tynwald starting thereafter. The Strategic Plan is not to be far behind. This again begs the question as to why RTC are in so much haste. They have not provided any proper explanation and justification.

The points raised in my Proof of Evidence, the issues raised by me today, and much of the discussion yesterday clearly indicate to me that the RTC submission is badly researched, ill thought through and poorly justified. It is at best premature and appears to be an attempt to pre-empt proper consideration of the actual development requirements of the town at the expense of Lezayre and Garff and their affected residents.

Ramsey Boundary Extension Inquiry:

West Area:

Submissions specifically in relation to the RTC's intended Westward expansion.

Adopt the written submissions of Lezayre at section 9 of its submission doc. dated December 2022 and expanded upon just now by Mr Teare.

Charles and Sian Jennings – the owners of Riversdale.

Application 17/00721/B – application site, as is the case with its neighbours, is within an area zoned as “Low Density Housing in Parkland” on the 1982 Development Plan.

<https://www.gov.im/media/1349250/pc-8-89-low-density-housing-in-parkland.pdf>

Looking at the applicable policy Circular 8/89 – distinguishes between low density housing in Parkland “(a) ... which are **clearly** within the built areas of the islands towns and villages, and (b) those which are not. In the case of (b) the circular provides that “the erection of further dwellings will only be permitted in exceptional circumstances.”

The concept of Low Density Housing in Parkland had become fairly central to the national economic interests in attracting and retaining HNWI to the Isle of Man and this Inquiry should be very cautious of supporting an application based on local interests as perceived by RTC that may interfere / stifle the wider national interests, particularly in circumstances where we are relatively close to a fully evidenced and worked through development plan covering the North of the IOM.

It is for RTC on the strength of its submissions and evidence to persuade the Inquiry that its application should succeed on its merits, principally by reference to the 6 non-exclusive factors set out in CoMIN's 2004 policy paper: “Criteria for the consideration of Local Government Boundary Extensions”.

Benefit of doubt exercised in favour of expansion? – not so sure - “(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.*” Seems to strongly imply that where the balance of advantage doesn't lie in the acceptance of the scheme, for e.g. in situations where the balance of advantage is evenly matched, that the status quo ought to be

maintained and the scheme ought not to be accepted. This interpretation would certainly be in keeping with the local boundary extension process being secondary to the Island's planning and building control processes.

What has struck me when seeking to apply the 6 criteria to the facts in hand Ramsey hasn't engaged with and focused on what is there rather with what it speculates will be there if the scheme is approved. **SEE ADDITIONAL WRITTEN NOTES ... *****

This I submit it has not done and a great deal of what RTC has submitted is highly speculative and extremely light on evidenced intention; floundering and unable to address basic questions such as: "if you get it, what will you do differently?" - not a sound basis for making changes in the teeth of such strong community opposition which in the context of this Inquiry I would submit is a significant material consideration. Felt that this point was brilliantly covered by Mr Barden this morning whose comments in relation to "community" also struck a chord with me. The idea that my clients as owners of Riversdale are members of the Ramsey community can't be assumed and it is certainly not how they view themselves.

Seems clear from RTC's submissions that in re its Westward expansion it is looking to infill what is clearly predominately countryside and "green gap" between its current boundary up to and including the Innovation Centre on the Jurby Road.

After yesterday's hearing instead of scuttling back to Douglas I took a drive out of Ramsey along the Jurby Road, and I was struck by how little the environment had changed since I first drove out this way in the company of Paul Morris as a trainee advocate with Dickinson Cruickshank some 20 odd years ago. Before getting to Riversale there is a very clear sense of leaving an urban community and coming into one which is separately and distinctly rural. A look at the plans accompanying the 1998 Ramsey Local Plan Order (Map No1 North) confirms this to be the case.

In no sense are the Low-Density houses along the Jurby Road overspill of Ramsey and they cannot reasonably be regarded as such.

The Innovation Centre is the countryside – in fact it makes a great play of this fact in its marketing material which is evident from a cursory look at its website – the photographs depict its rural setting:

<https://www.mvic.im/community/>

"Introduction

Welcome to Mountain View Innovation Centre, the home of innovation in the Isle of Man. Situated just outside Ramsey, in a stunning rural location, with views of the famous Mountain Course of the Isle of Man TT and other motor sport events, Mountain View is one of the most resilient technology parks in the world.

With over 25 acres of space around the site, there's lots of breathing room – and with rooms up to 42 x 24 metres, there's plenty of space inside too – the ideal venue for events and exhibitions.

We're all about nurturing innovation at Mountain View – not only sharing physical space with fellow businesses, but providing a creative environment in which to turn good ideas into successful enterprises in a stimulating, supportive environment.

We're also all about Community – the Community of the people who work here, but also the community in which we live – so our facilities are equally available to churches, charities and community groups.

Whether you're a small start-up business, need more space for growth, need a suite of offices in which to flourish – or just want to hold your meeting or event at Mountain View, why not join us?"

Turning then to the Community in which the Innovator Centre sites itself:

"We are part of the communities of Lezayre, Ramsey & the North and the Isle of Man. We welcome visitors to Babbage's – where free WiFi is available.

Our facilities are available to Churches, Charities and Community groups at discounted rates: please contact us with details of your requirements and we'll try to help."

I fully endorse the prematurity arguments raised in a significant number of the representations and articulated so succinctly by both Marinda Faragher from Garff Commissioners and Mr Barden this morning.

Tension between the perceived local needs of Ramsey Town as identified by and mediated through the RTC and the wider planning considerations and factors of more national import. This seems to have been a point that confused the Hon Mrs Hannan in the 16 March 2004 Tynwald debate around CoMIN's 2004 policy paper:

“So I would like to ask the chief minister, what comes first? The perceived needs of a community; the boundary extension; the developments to the area zoned for development? From my point of view, I think it is rather confusing.”

To which the chief minister responded:

“‘what comes first?’ I think the Hon. Member said - well, I think by the very nature of development, planning, zoning, those thoughts 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.”

What does this mean – the local town boundary extension process and the national town and county planning and building control processes are distinct and separate and the local process plays second fiddle to and has to yield to the planning process.

The local boundary extension process is not part of the national planning and building control processes and it pays to keep clear sight of this. At points in RTC’s submissions, most notably when it comes to downplaying the relevance of emerging plans and policy where such is inconvenient and contrary to its intentions (for e.g. call for sites to the West of Ramsey), the local boundary extension process and the national planning and building control processes are conflated and treated as one presumably to minimise the weight to be accorded emerging plans and policy. The attributing of weight to emerging plans and planning policy however is in the statutory context of a planning decision-maker’s functions under Island planning legislation and it doesn’t have a part to play in these proceedings. Infact RTC’s submissions in support of the scheme have been so highly speculative and light on evidenced intention that emerging plans and planning policy may in this context be amongst the most certain indicators of future intention that we have.

Heard from Ms Brown this morning sustainable urban extensions – avoid sporadic and speculative development in the countryside.

Important for us to consider constraints – flood mapping.

Riversdale has the benefit of a modern covenant restricting development on significant portions of land in the vicinity. I understand that the covenant was negotiated by former owner George Daniels,

the renowned watchmaker, and this covenant supports the protections afforded the land by its status as Low Density Housing in Parkland outside the built environment.

Commend to the Inquiry an order for expenses, pursuant to s5 of the Inquiries (Evidence) Act 2003, along the lines ordered by Mr Karran in relation to the Port Erin Inquiry.

*** Mr Cowin - justification for an extension of the Ramsey town boundary into parts of Lazayre, perceived by Ramsey Town Commissioners to be extensions of the community of Ramsey, is that it would regularise peoples' understanding/expectations of the Parish in which the subject land is situated – i.e. people currently see the subject land as situated in Ramsey rather than Lezayre (based on anecdotal evidence).

In justifying the expansion have to view the 6 criteria in relation to what is there now, not in relation to what will be there if the scheme is granted.

Mrs. Marinda Fargher, Vice Chair of Garff Commissioners .

It was over 30 years ago, in 1992, as a much younger Chair of the then Maughold Parish Commissioners, that I recall it was my duty to represent our Parish at the last enquiry, prompted by the application by Ramsey Commissioners to extend their boundary.

The enquiry was held in Ramsey at St. Paul's Hall and chaired by the late Deemster Luft.

The reason I remember it was that it was a scary prospect, so I remember telephoning our Captain of the Parish, Charles Kerruish, a well experienced politician, to ask for advice about what I should say. His words were "Just ask them to justify it gall! And this is what I did. The reaction of the advocate for the Ramsey Commissioners was something like.." we didn't think you would oppose it". They seemed unprepared. I cannot remember any further discussion.

The 1992 enquiry subsequently found that there was no justification for the proposal.

Here we are today and the now Garff Commissioners have been and are today asking the same question despite any justification which Ramsey Commissioners have sought to make in their submission, tried to match with the criteria laid down by Tynwald. There were no criteria in 1992, so maybe there is more to focus on ..to help guide the enquiry.

I have met with our present Captain of the Parish. Mrs Clare Christian, another experienced politician, who cannot attend today, but who has spent time reading the submissions and responding to the online consultation. In short and to the point, drawing attention to the topography of the area, and as she weighs up and dismisses each of the criteria, concludes with "There does not appear to be any balance of advantage in the acceptance of the proposed South extension area and the Town has made no legitimate argument for it under the criteria listed for consideration for Local Government extensions". She appeals to whoever will make the decision to walk the boundary to get a feel for it.

I will continue with my thoughts, and those of our Commissioners, drawing on matters raised in the submissions , and addressing each of the criteria in turn.

1 and 2..that the promoter's area and the areas sought are really one community, and that there is a community of interest in all or most public services.

The word community links these two criteria and appears to be a simple and fundamental concept. Mr. Taylor, at the pre enquiry meeting also expressed his interest in the word community and " what community is and how communities develop".

Using a personal observation if I may. I live in Glen Mona, have done for 46 years now, some 3 or 4 miles south of Ramsey and am part of that community, and yet would consider myself also part of the community of the north of the Island, where I work, shop, spend time, go to doctor, dentist and hospital. I support, like many others in the room community organizations and events. We have much in common..as friends and work colleagues. I have an interest and link with the work of RTC and other Boards in the North through my chairmanship of the Ramsey and Northern Housing Committee. I am also vice chair of Garff, a community with a spread from Ballure in the north to Groudle in the south.

The word community can have many definitions. So what does community mean for the sake of this enquiry and how can it be defined more closely perhaps? The word refers to a group of people, and if we think about the people in the south area, who live in the few properties at the Crossags, I assume that they, like me, and others in the north of the Island, have the same or similar links with Ramsey Town.

To concentrate our thinking then in 2...a community of interest in all or most public services..this is a closer definition. Mr. Taylor, again at the pre enquiry meeting posed a question to Ramsey ..whether they were offering any specific things to the areas they sought to extend into? The particular public services mentioned in the criteria. We may find out more.

I am bit aware of any significant or specific or different public services offered, to what is their experience now, other than a reduced rate to belong to Ramsey Library. We provide a weekly refuse collection.. The houses are not connected to a public sewer.

To address the 3rd criteria and widen our thinking , to include the huge area sought in the extension, and whether any of it is an overspill or outgrowth of the promoter's area, ..i.e. the town. ..we need to consider what was there first. The town has to exist surely before any overspill or outgrowth can collect. What was there first? How long established are the properties,? History informs us that the Crossags was listed in the 1861 Census as a farm and outbuildings...a late quarterland farm formed out of the ancient holding of Milntown and Cloughbane Farms. The Crossags and its associated fields/land are not an overspill or outgrowth of Ramsey, but existed long before it's establishment.

Indeed none of the area sought is outgrowth of Ramsey, but rural countryside, well established, hill land, including the three national glens of Elfin Glen, Cloughbane Wood and Llergy Frissell, planted in the 19th Century...with more hill land above and beyond, and farm fields below.

To address the 4th criteria...that wherever possible, clear physical boundaries are followed, perhaps this is where , if I may be cynical, we may get a clue as to why such an extensive area of rural land has been included in the south...a much larger area than that previously sought in 1992, when the then derelict buildings at Crossags were included, a small acreage of surrounding farmland and part of the Golf Links. No hill land , no national glens, although an attempt was made then also to join up the southern boundary to connect with , to include Glen Auldyn.

So we may be getting a clue...a reason for this particular boundary, with a Ramsey Commissioner confirming at one of the meetings held between the two authorities, that the proposed boundary stemmed from the Glen Auldyn sure and followed geographical lines.

Was the inclusion of Glen Auldyn the driver, as perhaps in the previous application too, when the disparity in rates was discussed...but this is not for us today?

We questioned how it was drawn up? Here was a line drawn on a map we were told in the boardroom, following we now know unclear mapping, following random field hedges across the hillside, straddling Maughold and Lezayre hilltops.

Another driver, which perhaps prompted RTC to include the 3 national glens this time round might be that some 3 years ago there was talk of the creation of what was to be called the Ramsey Forest promoted by the Wildlife and Woodland Trust...a grand scheme linking the national glens with the slopes above Sulby. But it was just a name. The situation is that the Manx Wildlife Trust have signed a 99 year lease with DEFA to include Claughbane and Crossags Coppice and have named it the Hairpin Woodland Park. It is amazing. I understand that they want to lease further fields in the area. It is an amenity for us all..our grandchildren love it! Car park being created. It is neither Ramsey nor Garff Commissioners who have taken the lead on this...it is DEFA with their partners in the private sector..who are actively seeking to ensure the accessibility of all the national glens .like ones at Ballaglass abs Dhoon. They have the forestry skills. They are Government funded.

It was interesting when we met with the Ramsey Commissioners in order to find out the reasons for the extension that they were unable to offer any plans for future use of any of the land .. whether for development, additional amenity, or any further or future recreation opportunities!

To think further about why the boundary was chosen we noted that this time it also included the hilltop above the Hairpin, above the plantation, where the Albert Tower sits. ...which we know is in the RTC crest.. and in my town band crest too. Was the Tower the main driver for the extension?

The RTC mentioned it in their joint meetings with us. In his submission, the Town Clerk refers to its presence in our Parish as " a mistake of history" . I did wonder if it was of such importance to them why it was not included in the 92 application.

I wouldn't call it a mistake of history ..but a fact that it was placed there in 1849 well before RTC had been formed. It was simply chosen because it was the top of the hill on which Prince Albert stood in 1847 to take in views of the north of the Island, Ramsey and its harbour and bay and the Point of Ayre.

Does it matter where it has its foundation..whether in town or parish ?
Do people really know or care about such a matter? Should this be a concern for this enquiry? It seems petty.

For those interested. Do people really think about Corrins folly, whether it sits in Peel or Patrick Parish ...yes it is in Patrick. And Milner Tower..above Port Erin ..is in Rushen.

Continuing to consider the boundary being suggested to include this huge amount of hillside...forested land, RTC mention their ownership of its lower reaches below the mountain road between it and Claughbane Walk. I would be interested in the history of this. We supply the bin there and empty it. This lower portion of Llergy Frissell was also included in the 92 proposal but was not allowed by Deemster Luft. Was it because this forested area was the natural and clear, distinctive, physical boundary mentioned in criteria 4?

Moving on to criteria 5..that there is insufficient acreage left for the development of the proposers area within its borders and that injury is suffered thereby.

At least we both agree that this is not land which can be used for development. The Town Clerk reiterates that "this is not about development potential but about what he calls "regularisation". He argues that the extension of Ramsey into the southern areas simply to formalise and align the actual Ramsey boundary with the perceived boundary...that the glen and heathland are perceived to be part of Ramsey and that the golf course is assumed by almost everyone to be in Ramsey. People are surprised when it falls outside, he says.

My comment would be that surely to bus applies to any areas of the Island where town and parish meet. Do people really know or care where the boundaries are ..what's in or out, what is where.

More importantly for this enquiry today, presumption and perception ...what people think are not listed in the criteria which need to be met for any boundary extension. These are not justifications.

To think then about the status of the golf course land, included also in 92, but not allowed. History again informs us that it is not overspill or outgrowth from the town, but formed from the original Milntown fields, which were sold off in the 19th century. It is a fact of history that Milntown House itself was considered initially for the clubhouse, but retained as a private residence. It is a fact of history and geography that the land lies between three authorities.

But the question for me again was does it matter?

It isn't being put forward as development land currently but I noted that the previous town clerk's application of 2020 mentioned it as "having development potential". This could be the reason for its inclusion again.

The reason it lies between three authorities is that the stream which flows through it is a physical and ancient boundary ...one which has existed since the Manx Parishes were formed in the 12th century.

Again..elsewhere on the Island take a guess where Peel golf course lies..and the Rowany adjacent to Port Erin. All attract members from wider areas than the town.

The final criteria seeks to ascertain whether there is any balance of advantage which may lie in acceptance of the scheme. Our Captain of the Parish thinks not...there is no legitimate argument in her words. But in weighing up these matters perhaps we should also consider any disadvantages which may be posed by an acceptance of this extension...or for that matter any of the others .

This comment is prompted by the evidence of Diane Brown , Head of Planning Policy, Cabinet Office. A settlement boundary is important to get right because there is a risk that it may lead in future to an incursion of development into sensitive areas of countryside. The present boundary is a clear marker between town and country. When I spoke to residents of the Crossags this is what they were concerned about.

Mrs. Brown specifically mentions "small groups of detached dwellings"...like the three or four properties at Crossags which many people may think is of little significance to be included in a boundary extension. What harm would there be in including this small group of dwellings...people might think. To quote Mrs. Brown..."judgements are necessary to ensure that the inclusion of such properties into settlements in development plan terms wouldn't lead to an incursion of development into the countryside, which would be unacceptable". We need to note that this area has a protected landscape classification....great care is needed. Here then lies the danger. The issue isn't one just for those who live in such places, and not just about rates. We should all be concerned, or at least aware, that indeed any extension may cause harm to our precious Manx countryside in the longer term. Surely something we all want to safeguard.

Finally..our Commissioners have noted how little our Parish features in the overall sum of documents. We wondered how serious the Commissioners really are about the extension to the South for which so little reasoning has been forthcoming. We have been frustrated and disappointed.

The fact that our Commissioners felt it unnecessary to commit ratepayers funds for legal representation is evidence surely both of their awareness of their accountability to their ratepayers, but also that there can be no justification or legitimate argument for this boundary extension.

Mr. Taylor raised the matter of costs. Despite having no legal fees we will have incurred costs in terms of precious staff time, and we will be considering submitting these when we have further details.

Thankyou.

Statement of Robert Barden, Westhill Farm, Lezayre
23 January 2024

Good morning Mr Chairman. I am Robert Barden of Westhill Farm, Jurby Road, Lezayre. Thank you for this opportunity to expand upon my earlier written objection to the Ramsey Town line expansion proposal.

First, I would like to say that I fully support this morning's comments by Mr. Teare of Lezayre.

In my written objection, I used data from and cited various sources, including:

The Ramsey Boundary Extension Report 2022
The Isle of Man Census 2021
The Isle of Man Economic Strategy (Our Island, Our Future 2022)
The Draft Area Plan for the North and West

While I applaud the Town of Ramsey for being proactive in thinking about its future needs, I have raised questions about the methods used and the conclusions reached. My analysis, using simple arithmetic, questioned whether the Town needs the amount of land that has been requested and concludes that it does not, under scenarios ranging from high estimates in which the land is inefficiently used to low estimates under more efficient land use.

My initial submission also objected to the inclusion in the Boundary Extension of large amounts of vulnerable countryside and agricultural land that is currently in use, and pointed out that rural areas should be governed by rural commissioners who are attuned to the needs of the countryside, and not by town commissioners who are (and ought to be) attuned to the needs of higher density towns.

Specifically, in the Summary and Recommendations of my written objection, I note that:

1. All new residential units in the North do not need to be built within the curtilage of the Town of Ramsey.

2. The Town of Ramsey currently includes 905 acres; it has requested more than a doubling in size to 1,883 acres without stating a plan of how the land will be used, the priorities of development by area, or any other details of the proposed land use over the period covered by the Report.
3. The Ramsey Boundary Extension is premature and should be delayed until the Draft Area Plan for the North and West has been finalized and adopted.
4. The Town of Ramsey can use the extra time gained by such a delay to address the concerns about the high vacancy rate in Ramsey cited in the Draft Area Plan for the North and West 2022.
5. The extra time gained by such a delay can also be used to prepare a revised Boundary Extension request based on specific plans and appropriate data. That revised request should be for less total new land to be included and should be specific as to which parcels it wishes to annex, based on specific needs. The current request is general and too large, possibly in the hopes that some part of it will be granted, much in the way that a used car salesman will name a high price at the start of a negotiation, knowing that he will have to settle for something less by the time the sale has been made.
6. My last recommendation was that a formal survey be conducted of all those residents of other jurisdictions who will be affected by boundary extension to find out if they would rather live in their current jurisdictions or within the limits of Ramsey.

Mr. Chairman, The Isle of Man Population Report 2023 was published by Statistics Isle of Man – Cabinet Office in October 2023, after my written submission and my own layman's numeric analysis. I would like to draw your attention to two of the findings of that report.

The Introduction to the Report states that it is focused on the period from the 2021 Isle of Man Census until March 2023. It will be an annual report, eliminating the need to guess at what might be happening to population data in the years between Census polls. While noting that there are inherent difficulties in capturing near-real time data, it draws some broad conclusions of interest.

The Isle of Man Economic Strategy (Our Island, Our Future, July 2022) sets out an aspirational target (not a projection) of 100,000 for the island's population by 2037. The 2023 Population Report tells us how we are doing. It states:

“Were net migration to continue at a pace similar to that in 2022 the population on the Isle of Man would be expected to reach approximately 92,000 by 2035 or 2036.” (page 3.)

This represents a population growth rate of about one half that hoped for in the Economic Strategy of 2022.

The 2023 Population Report also provides rich detail on the movement of people to and from the island and across the island, broken down by Post Code. During the period of the Report, it reports inward migration to Ramsey of 208 people, and outward migration of 203 people, for a total net population increase of 5 people (Isle of Man Population Report 2023, page 21).

Mr. Chairman, I have seen a number of projections for population growth in Ramsey, the main driver of the case for Boundary Expansion, that have used pro-rata projections based on Ramsey's population vs. the whole island population. The layman's numeric analysis that I prepared and submitted in my written submission did just that. This new data from the Cabinet Office of Statistics serves to point out that was the wrong thing to do. If the net growth of population continues at or near the levels reported for 2021 – 1Q 2023, the case for boundary expansion evaporates.

Turning to the Six Criteria that witnesses have been asked to address, you will be relieved to hear that I will not repeat the same points that have been made so eloquently by previous speakers. I would, however, like to talk a little bit about community.

Mr. Chairman, as you may have already noticed from my accent, I was not born on the Isle of Man. Ann and I travelled extensively and lived previously on three continents. We selected the Isle of Man as our new home nearly twenty years ago after exhaustive and detailed research and analysis of places to live, and moved here permanently in 2006. I started a small business that contributed to the Manx economy before my eventual retirement. All of my customers were in Douglas. Ann and I were happy here and I remain very happy here even though she has passed away.

When selecting a home, again we did research and selected the north of the island. We specifically looked for a rural setting and did not want to live in a town. We selected Westhill Farm; it has a small but productive hard fruit orchard of 40 trees, plus soft fruit in cages. The small farm is surrounded by productive agricultural land that is actively farmed by others. The house, like that of our closest neighbour, is set well back from the road down a private driveway and cannot be seen from the road. While it is close to Ramsey, it is in a rural setting in the Parish of Lezayre.

The notion that I am now or would magically become part of the community of Ramsey is incorrect; I have attended church in Glen Mona for years; I have gone to the dentist in Laxey for years; I attend regular lunch meetings of Probus in Andreas; the friends whom I visit most often are in Lezayre and Peel; when I visit my doctor's surgery, I am as likely to visit it in Jurby as in Ramsey. I regard my neighbours and friends in Ramsey with affection and we support each other, but I am not part of their community, as they are not a member of the Lezayre community by being my friend. Like many of my neighbours, I am part of the community of the north of the island without regard to town boundary line distinctions.

In summary Mr. Chairman, I ask that any adoption of the Ramsey Boundary Extension be delayed until after the adoption of the Area Plan for the North and West to make sure they are aligned.

I ask further that the adoption of the Boundary Extension be delayed until the Isle of Man Population Report 2024 or later demonstrates that Ramsey is in need of expansion, and then only in the amount that reasonably aligns with the need. Now that the Government has given us the tool to see, each year, what the actual population data are, it is no longer necessary to guess at what might happen five, ten or fifteen years from now.

I ask that the Town of Ramsey use the time gained by the delay to address the concerns about the Town's high vacancy rate that was cited in the Draft Area Plan.

I ask that the Town of Ramsey also use the time gained by the delay to form a more detailed plan for how any newly annexed land would be used with a view to annexing less land and in particular, less agricultural land. Inflicting pain now to those directly affected in exchange for the Town's flexibility for any future and nebulous planning contingency in the face of such uncertain requirements is not a good trade – it does not meet the test of the balance of advantage in accepting the plan.

I ask that a formal survey of all residents who might be affected by a Boundary Extension be conducted to gain a true sense of the residents about their choice of jurisdiction. This could be as simple as a simple question followed by two boxes to tick.

Thank you for this additional opportunity to express my views on the proposed Ramsey Town Boundary Extension.

Presentation to Proposed Ramsey (Boundary Extension) Order 2023 Public Inquiry 22 January 2024

2:00pm – 4:30pm

Philip Dunne

1. Precedence:

1. “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”, Deemster Luft 1992 Public Enquiry ...
2. makes me wonder why he uses the words “by no stretch of the imagination” when he could just have said “cannot”?
3. Clearly GA not in community with Ramsey in 1992
4. so what has happened since then which exceeded Deemster Lufts power of imagination back in 1992?

2. 6 Criteria (Criteria for the consideration of Local Government Boundary Extensions 2004)

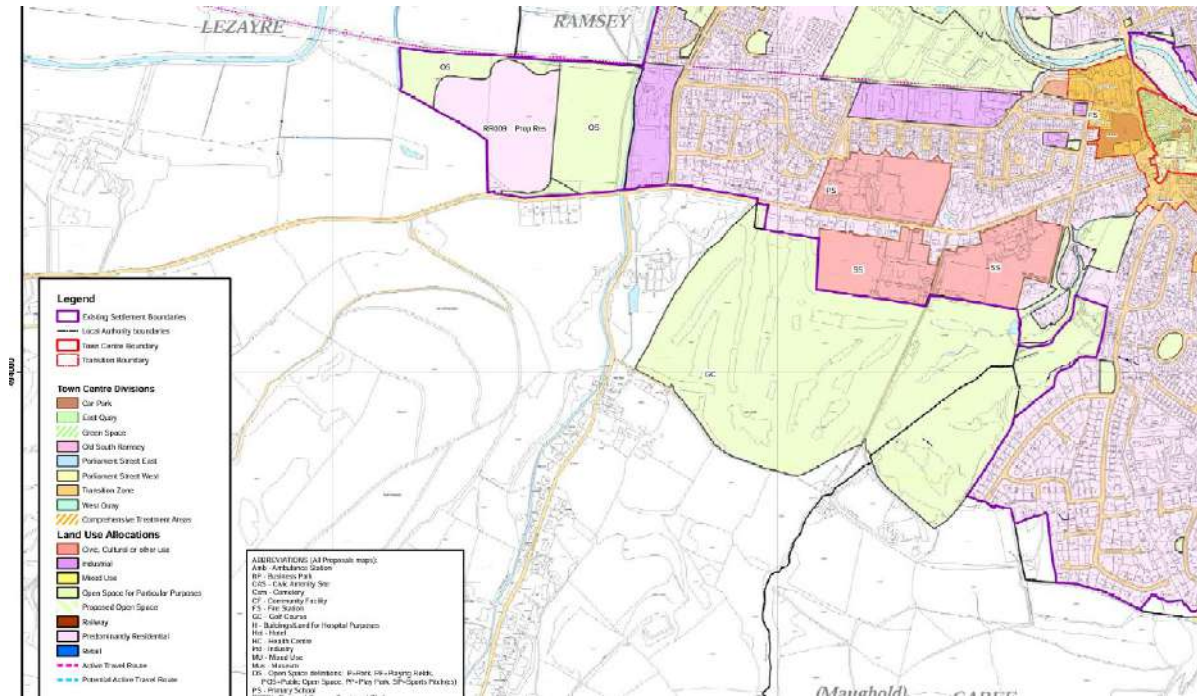
1. One Community
2. Community of Interest
3. Overspill
4. Physical Boundaries
5. Insufficient Acreage
6. Balance of Advantage

1. **One Community** - “that the Ramsey and the GA are really one community”
boundary extensions criteria 2004
2. Clearly not true in 1992 – has something changed since then?
3. IOM 2016 Strategic Plan asks us to look at the whether community have coalesced by
reference to whether there are any green gaps between settlements

a.Green Gaps

Green gaps (see Spatial Policy 7)

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



b. Population Density

- Ramsey 9.2 people / acre - Urban
- Glen Auldyn 2.5 people /acre – Rural

4. Community of Interest

a. Service Centres – Ramsey being one

“There are a number of smaller settlements with little or no service provision which rely on the other centres for various services.” – IOM Strategic Plan 2016

Bride, Andreas, Sulby are all such smaller settlements - Glen Auldyn utilises Ramsey's “amenities” no more than residents of any of those settlements

b. Rural Amenities

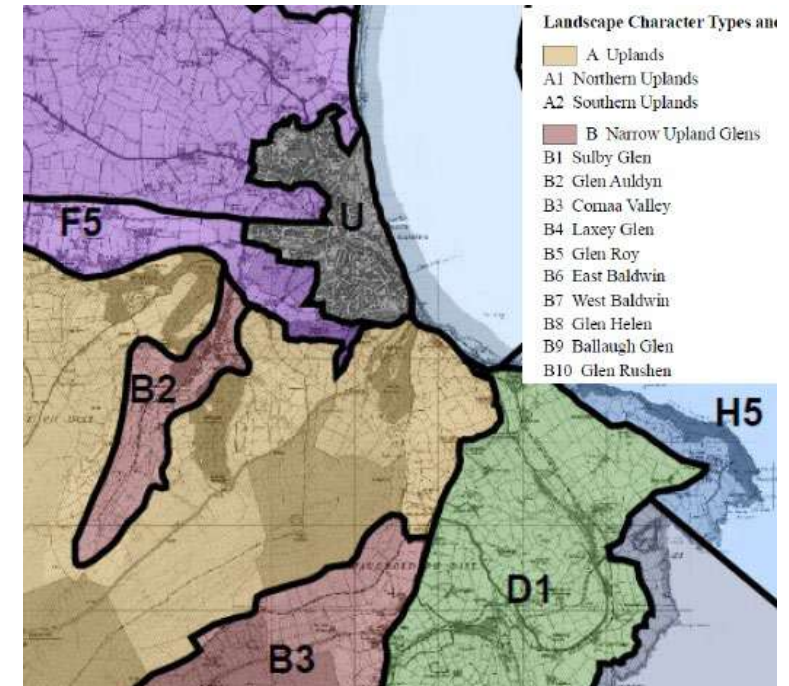
- i. Stables, a farm, a cattery, pheasant shooting, river fishing, hiking and mountain biking.
 - ii. Ramsey's residents use GA for rural pursuits
 - iii. Rural amenities emphasise the difference between GA and Ramsey
- c. What has changed since 1992 -
- d. Since 1992 if anything people are using central resources less and less, internet provides food, entertainment, shopping ...so if anything the community of interest is even more fractured than in 1992

5. Overspill

- Two new homes completed in the 30 years since last considered
- Simply no space to spill into
- Even Ramsey's best efforts to try and suggest it may be overspill are full of qualifiers suggesting that there may be an "argument", that if hypothetically it might be overspill to "some extent" and could be "effectively" overspill.
- There's no case here and certainly nothing has changed here since 1992.

6. Physical Boundaries

- Have the physical boundaries changed since 1992? Well obviously no, GA remains characterised by the “Small-scale nature of its buildings, within a well wooded, intimate valley landscape.”
- How do I know that?
- Landscape Character Assessment 2008
- Narrow Upland Glen
- I understand the Northern Plan will incorporate exactly this assessment so
- Yes things have changed since 1992 .. GA has been recognised by IOM Gov as a separate and distinct and has recommended that *“The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of the wooded valley bottom with housing sensitively located alongside the ecologically valuable riparian corridor.”*



7. Insufficient Acreage – left in Ramsey for development

- This one is a bit like the overspill argument except that RTC have can't even spin this one:
- “it is not considered that the area provides the opportunity for widespread development” - RTC

8. Balance of Advantage

9. Precedence

- a. 1992 – Public Inquiry, Deemster Luft
- b. “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”
- c. What has changed since then?
 - i. Green Gaps Remain
 - ii. Community of Interest remains just as fractured (indeed internet means visits to Ramsey have only decreased)
 - iii. Overspill wasn’t possible then – not possible now
 - iv. Physical Boundaries remain unchanged (and Landscape Character Assessment has since defined them)
 - v. No additional available land for Ramsey to build into there wasn’t then and there isn’t now
- d. So why did Deemster Luft choose to use such an extreme phrase “by no stretch of the imagination can GA be described as being in Community with Ramsey” ..
 - i. I think it was because he recognised that Ramsey’s 1992 proposal was a fishing trip, it was speculative and a waste of everyone’s time
 - ii. I submit if anything GA is even more distinct from Ramsey than in 1992
 - iii. And Deemster Luft’s words remain true - “By No Stretch of the Imagination Can It be Described as Being in Community with Ramsey Town.”

Good morning Chair,

Thank you for allowing me to speak.

I am here to represent my constituents and those constituents who I have spoken to who would be directly affected by this potential boundary change have given me clear views.

I would like to summarise these, following my written submission dated 15th September 2023 into three broad themes – community, infrastructure and necessity.

COMMUNITY

Firstly I want to really stress that it is vital the Island maintains and cherishes the needs, desires and wishes of the whole community.

In this situation, we have two distinct communities, urban and rural, with different needs and contexts.

Rather than uniting community spirits, the overwhelming feedback I have received, on the doorstep of the many families and households I have spoken with is that they do not want to be part of the greater Ramsey area and refute the claim made by Ramsey Town Commissioners in their submission to this Inquiry that, and I quote, 'community feels that development along the Jurby Road to Mountain View Innovation Centre is part of the Ramsey community and identifies as such.' Mr Chairman, I can assure you I did not receive any feedback from Lezayre residents in this area that reflects that sentiment.

Mr Chairman, we must listen to the communities that we are here to serve.

When you do sir, you hear that they feel distinctly different to the town

They see very personalised and cherished community led decisions

Fundamentally, the smaller communities of our Island like Lezayre, have unique identities with their own community spirit.

Members in this community have a high level of voluntary contribution to the broader community, changing boundaries will not improve this – we will erode this community spirit by being swallowed up into a larger authority.

INFRASTRUCTURE

Turning to the second point – that of infrastructure, this is a real example of this inequality.

Under these proposals, people in Lezayre in affected areas would see a fourfold increase in rates, but with no amenity value back for the likes of sewage or streetlights and many aren't wanting them anyway.

The infrastructure that is available and in the town simply is not available or particularly wanted in these zones and, being candid, in the current financial climate, it would be fantasy to think that these zones will in any way benefit from additional infrastructure, or any services for the extra costs they will bear. The rather absurd plan involving properties at The Dhoor clearly indicates that.

Mr Chairman, rural life is different

Rural communities are used to having and maintaining separate infrastructure – reduced streetlights, septic tanks etc..

That is accepted and that is partly what it means to be a member of that rural community.

NECESSITY

The third theme that has come out loud and clear from across our community is these changes are simply unnecessary and are instead a real distraction from the priorities needed to sort out the challenges we have.

The town of Ramsey actually benefits from the patronage of the surrounding rural communities.

Whether to work, to spend, go to school, to socialise. It doesn't need to take charge of the community utilities to benefit from this.

There are challenges in the Town and whatever town and whatever local authority runs that town, they need to work to understand and resolve these challenges, rather than trying to raise revenue from outside the town.

And from the perspective of Lezayre, Mr Chairman, I say this, the case for change has simply not been made.

Glen Auldyn is a prime example of this. IF the issue is Ramsey needs more land, then expanding the boundary into Glen Auldyn is at complete odds with this.

There is no development land within this area of any real substance, so if Section 6 of the Local Government Act 1985 stands, and the financial impact on an Authority either beneficially or negatively is not considered it does, Mr Chairman very much beg the question of WHY? Why on earth would Ramsey Town Commissioners want to absorb Glen Auldyn into the Town?

Even aside from Glen Auldyn, the areas in question comprise of mainly agricultural land and by Manx standards, good land at that.

This land is precious, they stopped making land many thousands of years ago. It is not available to simply be developed on – nor should it be. Very careful consideration weighing many factors needs to be taken.

CONCLUSION

Mr Chairman, Ramsey Town Commissioners really need to focus on improving Ramsey.

Regenerating the Town

Supporting ongoing developments, embracing opportunities for brownfield redevelopment

Working for the wellbeing of the town

The rural communities surrounding the Town compliment it, and the Town benefits from their existence and spending.

These communities do not want to be consumed into a larger authority.

These communities do not want to lose their identity.

These communities do not want to erode their say in matters important to them.

They see real inequality from the proposals, especially when it comes to infrastructure they neither have nor desire.

Mr Chairman, they see these proposals as completely unnecessary and harmful, and so do I.

Thank you Mr Chairman.

Opening Statement Tim Cowin.

I am fortunate to have grown up and lived over half my life here in Ramsey. It is a town that I love and has afforded me love, friendships, education, recreation, and a safe happy community in which to live, work and bring up my children.

Ramsey Commissioners was formed in 1865 by forward thinking members of the community. Ramsey has expanded quite dramatically since then although in reality its boundaries have only been extended on 4 previous occasions. The four previous boundary extensions, in 1881, 1884, 1970 and 1992 have all been as a result of the recognition of Ramsey's expansion. What is clear is that the process of a boundary extension is not entered into lightly by Ramsey Town Commissioners and that at best this is a once in a generation activity which reflects a need to ensure the sustainability and future of Ramsey as the largest Town on the Isle of Man.

Boundary Extensions in Ramsey have previously served to catch up with the expansion of the Town. Most notably the boundary extensions of 1970 and 1993 caught up with the rapid expansion of housing estates that had been built on the edge of the Town. Obviously planning and planning policy have changed and where in the past things such as the Strategic Plan and defined local plans did not exist, there was an organic development around settlements.

Today Ramsey is quite simply built out. There are two substantial sites that have not been built upon but both are already subject to the planning process. Almost every other site in Ramsey which even includes garden plots, have either been built upon or are un-useable or undevelopable due to flood risk. Ramsey due to its very history of developing around a river and a harbour is susceptible to flooding. Technology has afforded us the ability to accurately define flood risk areas and create the accurate flood risk maps that have been produced by the Isle of Man Government Flood Risk Team. This has caused great uncertainty in relation to the areas of Ramsey that are covered by the flood risk maps. Ramsey Town Commissioners have been working to address flood risk with the Department of Infrastructure, however the plans remain in their infancy and are a number of years away from final design and implementation.

Size and scale are important, Ramsey at 366 Hectares is a relatively modest size, Lezayre is over 15 times the size of Ramsey and Garff is somewhere between 15 and 20 times the size of Ramsey. The 4 areas of land (North, West, Glen Auldyn and South) represent a very small proportion of the area of Lezayre and Garff but are significant to the Town of Ramsey and its development.

The Isle of Man is an Island community, and the sense of belonging is very strong, the same can be said of the northern community of the Isle of Man. Ramsey plays a big part in community being the service centre for the north and the largest town on the Isle of Man. I see in this room friends, colleagues, neighbours, employers, employees members of clubs, organisations and groups, I see community and I like and enjoy that sense of community that Ramsey is the focal point of.

In previous times before the advent of motorised transport community was more focused. People did not have the capability to commute 5,10,15 20 miles to their place of work. Ramsey and its community have spread out from the river and harbour side in 1865 to be the town it is today. Places which were clearly outside of the town in past times were integrated into the town as technology and transport enabled it to grow. Glen Auldyn in 1865 may well have been a separate community with some of its own services. Today however it is an important part of Ramsey and is considered by many to be the aspirational suburb of the town.

The rating system on the Isle of Man is flawed due to the reliance on legislation that is approaching 70 years old. Reviewing and changing the rating system consistently falls into the “too hard to do” pile. If rates were based upon a modern and equitable system, then many of the objections put forward during this process would fall away. Ramsey Town Commissioners are focused on making Ramsey a better place to be and the teams of people who work for the Commissioners are working hard to look after maintain and improve Ramsey both for now and for the future.

The Isle of Man Government has set ambitious targets in terms of both population and growth for the Island through its Economic Strategy policy of 2022. That strategy places the future of the Island on a population growth to 100,000 by 2037. That 20% increase in the population will lead to a need to grow many areas of the Isle of Man including jobs, services and housing to meet the needs of those additional people. These proposed increases are likely to lead to a natural increase in the Towns and Cities of the Island which are a natural draw to an increased population with the services that are offered in these areas.

Ramsey Town Commissioners is mindful of the need to ensure that the Town is best placed to cope with the need to both expand and accommodate the needs of the future. The reality is that no sites remain with the current Town Boundary that could accommodate the level of development that will invariably be needed in the future. The only realistic option is to look to expand into areas that border the current boundaries, as has been the case before and Ramsey Town Commissioners make this application now as a proactive, rather than reactive step to help progress both the Town and Island as a whole.

But this application is not just about the future. The expansion of Ramsey has brought other areas such as Glen Auldyn together with Ramsey and the reality now is that what once was a separate community, is now one. This application seeks to unify those areas which share a common community of interest and which are in reality now one community.

There are also some areas in this application that through ownership, geography, or just plain common sense sit outside Ramsey, when they should be part of the Town. This application also seeks to deal with those areas and bring them into, where they should perhaps already be.

This application is not a “land grab”. It is not about Ramsey Town Commissioners seeking to increase the rates income. It is about uniting common areas, uniting communities and providing an opportunity for the Town to expand successfully in the future.

The information that Ramsey Town Commissioners have provided is extensive. The information has been provided in order to cover the 6 criteria that this Enquiry will focus on during the course of the next 3 days. The Deputy Chairman of Ramsey Town Commissioners Robert Cowell, Tony Lloyd-Davies from Cornerstone Architects and I will be taking part in the inquiry on behalf of Ramsey Town Commissioners to add information and clarity to this inquiry as and when required to do so. It is important that everyone that wants to do so, has the opportunity to give their views and opinions on this application. But the reality is that ultimately this application is about the future of Ramsey Town and how the Commissioners feel it is best achieved for Ramsey to maximise its potential for the good of the Isle of Man.

North

The area identified as the North proposes to extend the existing town boundary adjacent to the coastline to just passed the Northern Civic Amenity Site and before Balladoole Farm. The proposed boundary then extends south west, excluding the Dhoor, before continuing down to meet Jurby Road.

This area at present is predominantly un-developed but it has been identified by Ramsey Town Commissioners as the most likely area that any new development to be undertaken with regards to Ramsey in the future.

Any development in the North of the Island depends on Ramsey as a service centre.

Development in this area would clearly be seen to be an extension of Ramsey and would benefit from the services and community that Ramsey provides.

Ramsey Town Commissioners are taking proactive steps with this application to ensure that any future development in this area, would already be included in the Town boundary and would not require a later Boundary Extension application to effectively "catch up" with what has already occurred.

The land which is currently part of Lezayre to the north of Ramsey's northern boundary is a natural extension to the town boundary. The Civic amenity site and sewage treatment works to the north of this area effectively delineate the northern most boundary of this development area. The civic amenity site is a joint venture between the northern parishes although is a sub committee of Ramsey Town Commissioners who oversee both its management by committee and its administration through its staff. Although presently in Lezayre the site is viewed as a part of the Ramsey Community with queries and issues with the site being regularly directed to Ramsey Commissioners as its operator.

Heading west the fields included abut upon the now built out housing estates in Clifton Park and Westhill Village before continuing out Jurby Road and encompassing a number of houses on the way out of Ramsey.

The field boundaries define the intervening boundaries on the west side of the proposed boundary heading away from Jurby Road to the coastline.

The boundary line is purposefully brought around the properties at the Dhoor as Ramsey Commissioners formed the view that this area sits as its own ribbon settlement and currently separate from Ramsey.

The key difference between the Dhoor and Glen Auldyn is the geographical location in terms of the development in Ramsey. The Dhoor currently has a distance of undeveloped land between it and the current Ramsey Boundary and it was not therefore felt that they formed one community. The same is not felt of Glen Auldyn where development has already stretch to its entrance road.

Development along the Jurby Road beyond the properties Cronk Mayn Beg and Creg Malin, both of which are located within the existing boundary, is seen as ribbon

development and an extension of the existing community. This development continues as far as Baldroma Beg and the former film studios, now known as Mountain View Innovation Centre.

It is usual for development on the outskirts of Towns to provide a transition between the countryside and the urban area through lower density development which it is felt is seen in the existing development on Jurby Road.

Development in Ramsey has exhausted available sites provided for within the existing Town Plan. Those lands that remain undeveloped are either sites in identified flood risk areas or have current planning applications awaiting determination.

Any development of this land to the north of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary.

The land is not currently zoned but may well become zoned for development and the expansion of the Island's population and thus Ramsey's population in the Island Economic Strategy that looks to have 100,000 people living on the Isle of Man.

The Draft Area Plan for the North and West does not currently include development land in this area. However as has already been stated this has not yet been confirmed through the enquiry process. And of course as we have heard there is slated to be a new All Island Development plan in due course which may also change this.

As has already been said at this enquiry, this boundary extension application by Ramsey Town Commissioners is forward looking and looking forward a minimum of 30 years. With the Towns areas already built, this area is the next logical step for the development of the Town of Ramsey in the future.

South

The southern section of the proposed boundary extension has a combination of different areas, woodland glens, the upland heath, farmland, and the golf course.

Ramsey Town Commissioners own part of this land but that is not the most important aspect of this land. On the very doorstep of Ramsey access to this area is almost exclusively from Ramsey. Indeed, it is a common held misconception that this area is already part of Ramsey. In terms of development this is not an area for the development of housing or infrastructure more an area for the development of nature and natural habitats. Towns should not just be highly developed urban areas, they need parks, gardens and now more importantly natural habitats for nature and biodiversity.

Manx Wildlife Trust and Douglas Rotary Club are in the process of developing the Hairpin Woodland Park a part of the larger project the Ramsey Forrest. This development on the very doorstep of Ramsey is important to fit in with the development of environmental areas across the north of the Island giving nature pathways through and across the land. Ramsey already has the Pooly Dooley nature reserve and public open space that is an important habitat, there is the Area of Special Scientific Interest at the Mooragh and there are discussions with a developer over a nature reserve area.

Ramsey Town Commissioners have the equipment, staff and financial capability to supplement and enhance the works of the other organisations bringing an area of nature clearly back into the town.

The Albert Tower is an iconic structure for the North, and it forms an important part of the crest of Ramsey, but it sits outside the current town boundary.

Ramsey Golf club currently sits in Ramsey, Garff and Lezayre, and the houses at the top of Crossags Lane can only be accessed from Ramsey are all obviously now all parts of the Town of Ramsey. Services being delivered to these properties by Lezayre and Garff is inefficient and surprising.

This land is on the very border with Ramsey a significant proportion of which is owned by Ramsey. This area is an important area for Ramsey in terms of forest, glen and leisure. Ramsey Town Commissioners are keen to exploit and use this area of land on its doorstep for leisure tourism and the enjoyment of the Manx people. With plans to increase the population to 100,000 areas for leisure and must be enhanced and enjoyed.

There is no doubt that the land owned by Ramsey Town Commissioners is part of the community of Ramsey and an overspill. The same is true of Ramsey Golf Course which is a huge part of the community of Ramsey and an overspill.

The properties at Crossags Farm can only be access by driving through Ramsey. There is a strong community of interest with these properties, and it makes little sense that the services provided to them in terms of refuse collection are made by Garff who travel a large distance through Ramsey just to provide it.

Ramsey is built out so the opportunity to expand areas of nature fall logically in this area which sits abutting Ramsey in the shadows of the hills and North Barrule. It is not an area viewed for development but a logical extension of Ramseys current boundary and land it owns.

Glen Auldyn

There are approximately 100 properties within Glen Auldyn. The area includes the Milntown Estate the entrance to which is taken off Lezayre Road within the existing Town Boundary, although all exiting traffic exits onto the Glen Auldyn Road. The Glen has developed for private housing with the eastern part "Fern Glen" once being operated as a tourist attraction fed by tourists staying in Ramsey during the Victorian heydays of tourism.

At the time of the last boundary extension a proposal to include Glen Auldyn was rejected, the inspector at the time, His Honour Deemster Luft, did not accept that there was a community of interests between these areas, where a large number of residents of Glen Auldyn were opposed to the proposed boundary extension undoubtedly due to the potential impact of rate increase. Since that time substantial development in Ramsey has reached as far as the existing town boundary along Lezayre Road and the Auldyn River so that there is virtually no separation between the town and Glen Auldyn.

Historically Glen Auldyn comprised a special drainage district, in contrast to other rural areas the Glen is served by a mains sewerage system which feeds into the Ramsey Town system where in the past it would have discharged directly to the sea via the Vollan outfall. In recent years all sewerage from the town, Glen Auldyn and Andreas Village are collected for treatment at Balladoole with treated effluent then being discharged to Ramsey Bay at Mooragh Promenade.

In regard to Glen Auldyn it is contended that the properties there already benefit from the services provided within the Town, that there is little physical separation between Glen Auldyn and the Town with town development now reaching the current boundary. The Glen and the properties there are well within walking distance of the schools, shops and local amenities offered by the town. Glen Auldyn is no longer separated and is effectively now an extension of the Ramsey community both in a physical sense and in that the area draws on retail and other services provided within Ramsey.

Residents in the area already identify its association with the town, for example property marketed for sale is often identified as being within Ramsey, in practice any perceived separate identity is influenced purely by the variation in rates charges, and not by any other factors.

The extension of the boundary to incorporate the wider development area to the west of the Auldyn River which is zoned for future development within the Isle of Man Development Plan 1982, and referenced within the West Ramsey Development Framework 2004, would impact considerably on this position with Glen Auldyn Road discharging within the town area and no longer outside any boundary.

Our closest neighbours and especially those in Glen Auldyn and the limited numbers in the North, West and Southern areas identified in this boundary extension application are very much one community.

Money and rates are not a material consideration in this Boundary Extension process. If all the rates for properties in the north of the Island were equal or very comparable then there would be a ready recognition that our next-door neighbours are a part of one community.

Unfortunately, we have a nettle that is too hard to grasp and would appear to spell political suicide for any MHK who cares to grasp it. That is Island wide rate reform. Our antiquated Rating and Valuation Act 1953 is not fit for purpose, but its revision and update has been in the 'too difficult' pile for far too long. The Ramsey Boundary changes of 1970 and 1993 both make it clear that rate reform is required and long overdue. This is still the case, and there is no apparent plan to address the issue.

Spatially, Ramsey is a service centre, and it is the capital of the north of the Island, indeed it is the largest town on the Island. It is the service centre for community, it is the principal community in the north, and it welcomes on a daily basis our friends and neighbours, all island residents, and visitors to this beautiful Island.

Any process such as this is divisive, but the simple fact remains, we are friends, family, business owners, customers, employers, employees, and community members. The utmost priority for Ramsey Town Commissioners is for the town to grow and develop successfully, and for our community to thrive and prosper. To do this we need each other, and we need to come together.

West

The land identified in the proposed Western area of the boundary extension application runs on its northern edge along Jurby Road from the existing boundary, passed Mountain View innovation Centre and meets the proposed Northern area. It then extends south to the Sulby River before veering slightly West and along the river bank before heading South to Lezayre Road and the Glen Auldyn area.

On the Eastern side the area abuts the existing town boundary with some developments in the northern and southern corners. However centrally the existing boundary area abutting this area is predominantly un-developed at present.

As with the North, any new development undertaken in this area would undoubtedly be seen as an extension of the community of Ramsey and again would benefit from the services and community that Ramsey provides.

It is regarded by Ramsey Town Commissioners that the area to the north of the Sulby river represents an overspill of Ramsey, particularly with the presence of Mountain View Innovation Centre. Many people already view this area as a part of Ramsey and its inclusion in the town would confirm a clear boundary to the town and regularise people's perceptions.

And again the existing properties on Jurby Road as with the north area can be seen as ribbon development between the countryside and the urban Town and are an extension of the existing community.

The area to the south of the Sulby River is again seen as a potential area for the future development of Ramsey.

The Draft Area Plan for the North and West has highlighted this and indeed it is the only development opportunity within the Ramsey area but is currently in Lezayre.

The development land sits just a few metres outside the current town boundary and would be clearly linked to Ramsey by roads and paths leading to a sense of community with Ramsey.

Any development of this land to the west of the Ramsey boundary would be as an extension to Ramsey due to its proximity to Ramsey and the Town boundary.

The land is not yet zoned but again may well become zoned for development in the future.

Again, as with the North, this land is about development opportunity for Ramsey, of areas lying directly beyond its existing boundaries. Ramsey Town Commissioners are looking to the future to ensure areas likely to be developed can benefit from the close proximity and community of Ramsey.

[Potential reference - Declined Dandara application – Lezayre wouldn't service]

DOCUMENT OF RAMSEY BOUNDARY EXTENSION - HIS HONOUR A.C. LUFT

DEPARTMENT OF LOCAL GOVERNMENT AND THE ENVIRONMENT

**The application of the Ramsey Town Commissioners for an extension
of the boundaries of their District**

THE REPORT OF THE CHAIRMAN OF THE PUBLIC INQUIRY

To the Honourable Anthony James Brown M.H.K.

Minister of the Department of Local Government and the Environment

I beg to report on the Public Inquiry held at your direction on the application made by the Ramsey Town Commissioners for an order to extend the boundaries of the Town of Ramsey.

The application seeks to have included within the Town boundary the land represented by the area coloured pink lying between the red line and the green line on the Deposited Plan. I shall refer to this area as the extended area. The larger part of the extended area lies in the parish of Lezayre and a small portion is in the parish of Maughold.

1.0 The Inquiry was held in St. Paul's Church Hall Ramsey on the 2nd and 3rd May 1991 after notice had been duly given to the public. The Inquiry commenced at 10.00 a.m. on the 2nd May and continued with a luncheon interval until 5.32 p.m. when it was adjourned to 10.00 a.m. on the 3rd May, and concluded at about 12.20 p.m. on that day. After the proceedings had commenced there were over seventy people in attendance.

Mr. R. A. E. Jelski appeared as Counsel for the Ramsey Town Commissioners.

Mr. Richard Penn appeared as Counsel for the Lezayre Parish Commissioners.

Mrs. A. M. Faragher being the Vice-Chairman represented the Maughold Parish Commissioners.

The case for the Ramsey Town Commissioners

2.0 Mr Jelski referred to Section 6 of the Local Government Act 1985 under which the application is made

2.1 Mr Jelski mentioned the criteria I had used in determining my recommendations on the application of the Commissioners for the village District of Port Erin for an extension of boundaries earlier this year. The criteria used is set out in the Report of the Select Committee of Tynwald on the Petition of the Douglas Corporation for an extension of boundaries in June 1984. as follows:

"Criteria and their Application

3.1 In the past the following guidelines have been used in the consideration of applications for extension of boundaries:-

(a) that the promoters' area and the areas sought are really one community;

(b) that the area sought is an overspill or outgrowth of the promoters' area;

(c) that there is insufficient acreage left for the development of the promoters' area within its borders and injury is suffered thereby;

(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;

(e) that the balance of advantage lies in the acceptance of the scheme, though it may generally be admitted that the areas sought may be valuable in various ways to the Councils by whom they are now governed;

(f) 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;

(g) that there is not ground for complaint that there is inadequate provision for compensation by way of financial adjustment.

3.2 We consider it important to follow clear physical boundaries wherever possible.

3.3 There is of course no requirement that all the above points must be satisfied, and one combination or another of them have been used: alterations must be decided on the merits of each particular case."

Both Mr Jelski and Mr Penn for the Lezayre Parish Commissioners agreed that it was appropriate to use this criteria to determine the present application.

Mr. Jelski explained that the present area of the Town District of Ramsey is 707 acres and the proposed extension area is made up of:

North of Lezayre Road	267 acres	
South of Lezayre Road	206 acres	473 acres
Maughold Parish		54 acres

		527
Existing Parish of Lezayre is		15,734 acres
Existing Parish of Maughold is		8,460 acres

Mr Jelski said that a number of residents of Lezayre had indicated opposition to the application in written submissions and that these residents mostly resided in close proximity to the town. The Report of the Select Committee of Tynwald considering the last application by Ramsey for an extension of its boundary had expressed the view in their Report that persons who settle on the periphery must expect expansion of the boundary to take in these areas.

In his opening Mr. Jelski related that the Town of Ramsey was incorporated in 1865 and the first extension of boundaries took place in August 1883 and a further extension took effect in May 1970.

The extension, Mr. Jelski said if granted, would mean approximately 336 properties presently in the Parish of Lezayre, being included in the Town. One of the plans displayed on behalf of Ramsey Commissioners showed the distribution of properties taken into the extended area, by circles having their radii centred on Parliament Square this being taken to be effectively the centre of the Town.

Mr John Ramsey Kissack the Surveyor of Ramsey Commissioners later gave evidence that this plan indicated the approximate number of properties constructed within the extended area as follows:

within half to three quarters of a mile	100 properties
within three quarters to one mile	186 properties
within one mile to one and quarter miles	30 properties
within more than one and quarter miles	20 properties

Total	336 properties

There were 286 properties within one mile and 50 properties within more than one mile.

2.2 Mr Jelski called Miss Rhonda Beryl Quine the Chairman of the Ramsey Town Commissioners to give evidence. Miss Quine said that the matter had been mentioned in the 1988 rates speech. In 1989 the Commissioners went thoroughly into the question of the present application. Reference to the report of the Select Committee of Tynwald on Rating, showed that Tynwald decided on the 16th October 1985 to establish a Committee to examine the structure of Local Government, and accepted the final report of the Committee that whilst there had been considerable improvements through the rating system lessening the various differentials that existed in the urban and rural areas, differentials still existed and remained inequitable. She said that these differentials between Ramsey and the neighbouring parishes had become much more pronounced in recent years, and that this trend could only accelerate. There were vast differences between the services provided by the Town and the Parish districts. That Tynwald also accepted the conclusion of the Committee that no further improvements could be effected in the rating system before further radical changes were made in whole Local Government structure. Ramsey Commissioners favoured the amalgamation of authorities. However in January 1987 the Parish Commissioners of Andreas, Ballaugh, Bride, Jurby and Lezayre, in January 1987, published a joint statement putting their unanimous opposition for any form of Local Government re-organisation.

She said that the Ramsey Town Commissioners feel that a significant extension of the Town Boundaries is essential for the future development of the Town. That Ramsey has made great strides in the last five years in properties, shops and re-furnished premises and for that air of prosperity to continue that there is surely a need for effective Local Government for its controlled development. It is the Capital of the North and its success spills over into the neighbouring parishes, providing employment opportunities as an example. Without an extension Ramsey will falter and the twenty first century will pass us by. Only by commanding additional resources will the Commissioners be able to plan the extension of amenities and facilities in Ramsey in which the North of the Island depends to a great extent. The Commissioners feel that there is now a need for a stronger Local Government unit, that their desire is to spread the rate burden more equitably, that the picture is of widely differing standards of Local Government services. She produced a comparison of the main account headings between Ramsey and Lezayre. For example the receipts of Ramsey in 1990 amounted to £839,592.00 whereas in Lezayre the figure was £17,281.00; the payments in Ramsey £840,353.00 and in Lezayre £9,878.00 and from the general rate, Ramsey produced £566,303.00 whereas in Lezayre it was £14,955.00. The refuse account in Lezayre was £14,644.00. The Capital account in Ramsey was £1,066,482 and in Lezayre £16,941. The Statement of Assets for Ramsey was at the figure of £19,315,105 and in Lezayre £33,748. These figures are set out in Appendix 1.

2.3 Mr. Jelski asked Miss Quine for her comments on some of the points put forward in the written submission by the Lezayre Parish Commissioners as their answers to the criteria (set out in paragraph 2.4. of this report).

She said with reference to paragraphs 2 and 3 of that submission that the residents of the extended area had a lot in common with the residents of the Town of Ramsey, this area does have a community

of interest with the Town of Ramsey. The residents of the extended area rely to large degree on the services and amenities of the Town, which was a common centre with the opportunities of high class shops, churches, offices and factories. The residents play an active part in the places of worship and entertainments in the Town. Several are members of youth organisations based in the Town. Children and adults enjoy the facilities provided at the Town Library, and the Town Band. As to paragraph 3 she claimed that the extended area was an overspill or outgrowth of the Town.

As to paragraph 10 of the written submission of the Lezayre Commissioners, she said that Ramsey Commissioners contend that they do run a very good Local Authority, but that they did not feel that they were overstaffed, that there was the same number of staff employed in the Town Hall as there were in 1983 although the workload had increased very considerably. They did not see any necessity to increase the number of staff as a direct result of the boundary scheme being successful. Ramsey Town Commissioners is a efficient Local Authority and will continue as such. She produced, when setting out the levels of activity, a Summary of Salary Costs for the years 1990, 1989, 1988, 1987 and 1986. This is given as Appendix 2. The figures show that the administrative costs have remained relatively static in percentage terms of around 5% - 7%. The reports of the auditors on the Ramsey Accounts each year are always very good. Ramsey intends to invest in computers to increase still further their efficiency. The Commissioners have had many enquiries from residents in the extended area and officers of Lezayre with reference to building byelaws etc. Mr Jelski asked Miss Quine the question posed in the last paragraph of Lezayre Commissioners written submission "How can the Ramsey Town Commissioners justify such a large staffing level in the Town Housing Department?" Miss Quine said that the Commissioners do not have a Housing Department, the Commissioners have a Housing Officer who worked full time and his duties are to deal with the needs of the Northern and Ramsey Districts Housing Committee, that it is a joint job which is carried out with the Town Commissioners facilities from the Town Hall. The Commissioners have maintenance men and someone in charge of the maintenance men and a Housing Officer but there is no Department. Ramsey Commissioners own 506 houses and are responsible for their maintenance. Miss Quine could not agree with a statement in paragraph 19 of the Lezayre Commissioners written submission that the Ramsey Town Commissioners offices are too heavily staffed. The track record of the amount of work that goes through the Town Hall would show that they are not too heavily staffed and that the work is always efficiently turned out. Had they been too heavily staffed the Government Auditors would have passed comment to this effect. If this application is unsuccessful it would effect the Commissioners they have to go forward, failure of the scheme would mean that they could not tackle the schemes which they should tackle and thought it was the only way forward to extend the boundaries. In answer to Mr. Penn, Miss Quine said that there was no room for expansion within the Town and the only thing to do was to expand outside of it. Miss Quine was questioned by Mr. Penn, representing Lezayre Parish Commissioners, Mr Edgar Quine M.H.K., Mr. Quirk, Mr Radcliffe and others.

2.5 Mr. David Evans Town Clerk to Ramsey, read the statement of case submitted by the Ramsey Town Commissioners and this statement of case is included in this report as Appendix 3.

2.6 Mr Jelski asked the Town Clerk as to the information in paragraph 4 of the written submission of the Lezayre Parish Commissioners "It is clear that there are considerable areas of land within the existing Town Boundary which are zoned or designated as land set aside for residential or industrial use, which, when developed, would produce rateable income" In answer the Town Clerk produced a Summary of the areas of land zoned and this Summary is included as Appendix 4 to this report. This shows the areas of undeveloped land in the existing town district. The Town Clerk explained that the Vollan Farm fields land (29.5 acres) is in agricultural use and is in part subject to restrictive covenants preventing development. There has been no indications of interest in development from the owner despite approaches from developers. The Ramsey Town Commissioners have constructed sewers across the land, which could therefore, be readily developed when the covenants are released.

2.7 The Town Clerk in referring to restrictive covenants affecting the Vollan land produced copies of an agreement and a deed filed in the General Registry. The agreement amounts to the grant by the owner of the Vollan land in 1969 of an option to purchase the Vollan land. The gist of this option to purchase as I understand it, is that the then owner of the land covenanted with the purchaser of a portion of the land, not to sell or develop or build on the remaining lands forming part of the Vollan in the Parish of Lezayre, delineated on the plan attached to the agreement without first giving notice in writing of his intention so to do, to this purchaser who was granted an option to purchase this remaining land at a price to be agreed or in default of the agreement at a price fixed by an independent valuer. If this agreement is still enforceable it means that the owner of the Vollan land before selling must offer the land to the purchaser named in the agreement who would have the right to exercise the option to purchase the land. That purchaser could then, of course, sell the land in an undeveloped state or retain it if he so chose. There is therefore an uncertainty as to whether in the absence of compulsory purchase the Vollan land is available in fact for development.

The land known as Poyll Dhooley comprising 35.5 acres, of which 25 acres is zoned for residential use and 10.5 for industrial use, is the Town Clerk said, divided into three areas. An open space which cannot be developed a large extended industrial area which included an area the other side of Gardeners Lane outside the Town Boundary, which the Sector B Plan recommended should be changed from industrial to residential use. The residential zone is calculated to contain 25 acres and there has been recent interest in survey and initial development investigations in respect of the residential area, by an interested developer. So far as the Town Commissioners were concerned there was no interest in the 10.5 acres of industrial land. There were problems in the residential area concerning the foundations and the peaty soil and being low lying the foul drainage would require a pump system and this could be an inhibiting factor. Infrastructure cost on roads and drainage would be high. The Clerk said that the only other area of significance was 5 acres at the Fairfield Avenue residential zone. The owner has expressed little interest in developing this land in the near future. The Clerk said that when and if it was developed it would be a low

density development being low lying and a marshy area in places the development would be difficult. The Clerk therefore concluded that there was an area of 70 acres comprising the land he had referred to and none of this land was in the ownership of the Commissioners.

2.8 The Town Clerk said that the Wheelie Bin proposed system would be put in use in this extended area if this application was successful. There would be a weekly service provided for all households through the Town and the extended area with the normal service they now provide for commercial premises which is more than once a week.

2.9 Questioned by Mr Penn, the Town Clerk agreed that there were other small areas that could be used for residential development. A further advantage in being within the Town Boundary would be a reduction in the library fee the residents would have to pay. Full membership of the library at present is £5.50 per year but out of town membership is £8.00 per year, there is a difference of £2.50. Mr and Mrs Highton who had asked what advantage there would be would each save £2.50 a year. Other benefits were that they would be entitled to go on the housing list of Ramsey and would have access to the staff of the Town Hall. The residents would have representation in the Local Government of the town and would have two M.H.Ks instead of one. The Town Clerk produced a list in alphabetical order of the polling districts of the Isle of Man now existing, This is included in this report as Appendix 5. In Ramsey at present there were 4,613 voters which places Ramsey in third place out of 24 local authorities. Lezayre has at present 1,172 voters which places them in 11th place. On page 5 of the appendix 5 an attempt has been made to calculate the effect if the extension were granted as asked. Ramsey would remain in 3rd place with 5,110 voters Lezayre would drop to 19th out of 24 with 675 voters. Three other Northern authorities would remain with fewer voters than Lezayre, namely Maughold, Jurby and Bride. On the last page a comparison is made between constituencies, Ayre would become 14th from 15th, Glenfaba would remain smaller with 609 voters, Ayre would have 1,824, considerably less than Michael, Middle and Santon. The Town Clerk agreed that a considerable number of voters would be transferred from Lezayre to Ramsey. The Town Clerk was also asked as to the financing by the Ramsey Commissioners of sewers, the Town Clerk produced a paper on this matter which is included as Appendix 6. The costs the Commissioners have to meet is he said very significant.

2.10 The representative of the Maughold Parish Commissioners asked the Town Clerk the reason for fixing the boundary to include a portion of the Parish of Maughold. The Town Clerk stated that this boundary line followed naturally from the existing boundary line, it followed the tree line and this land was not developed.

2.11 Mr. John Ramsey Kissack the Town Surveyor of Ramsey gave evidence. He had prepared certain plans which had been produced. He gave the information set out in paragraph 2.2 as to the proximity of properties to the Town Centre or Market Square. Mr Penn questioned Mr. Kissack as to the sewer laid in the Vollan fields, and Mr. Kissack agreed that this sewer was to replace the collapsed sewer and was not put in to service the Vollan fields.

2.12 When Mr. Kissack had finished his evidence, I brought to his attention a letter which had been received by the Department from Mr. Stowell Kenyon who had made a strong case for being excluded from the proposed extended area. Mr. Stowell Kenyon had pointed out his properties could not be connected in an economic way to the sewer due to the slope of the land and the proposed new boundary line divided his property, his house was in Ramsey and his fields were in the Parish of Lezayre. As a result the Clerk and the Town Surveyor said on behalf of the Town Commissioners that they agreed the proposed boundary line should in this case be altered so as to exclude Mr. Stowell Kenyon's property. I consider that the Ramsey Town Commissioners have acted properly in recognising the factors on the ground with reference to this property.

CASE FOR THE MAUGHOLD PARISH COMMISSIONERS

3.0 Mrs A.M. Faragher the Vice Chairman of the Maughold Parish Commissioners submitted the case for the Commissioners, she said that the proposed extension into the Maughold Parish does not comprise any developed land, except for the derelict buildings of Crossag Farm, but included an acreage of farm land, and part of the Ramsey Golf Links. It was an area of high landscape value and scenic significance and through the land runs a public footpath. This land was not originally designated for development in the 1982 Development Plan. It was proposed to be the subject of study for future development in the Strategic North Eastern Sector draft written statement. Indeed Mrs Faragher was of the opinion that the inclusion of this land within the extended area would prejudice the comprehensive process of the study and inquiry embarked upon by the Department of Local Government and the Environment. The Maughold Parish Commissioners sought from the Ramsey Town Commissioners a justification for the proposed extension. There was no case made in their written submission. It had been contended by the advocate to the Commissioners that the proposed extended area and the town of Ramsey comprised one community and had a common interest, but it could not be imagined that the derelict buildings and the farm land could take any advantage of the Ramsey services. The Crossag Farm was not on the Ramsey Sewerage Scheme. The farm area is zoned for proposed tourist development, but an application for such a use had been rejected by the planning authorities last year on the grounds of access. It appears that the only justification for the proposed extension running east from the Crossag Farm buildings was that it was a line of convenience or the tree line as indicated by the Town Clerk. The Maughold Commissioners contended that the present boundary that follows the stream is a significant clear physical boundary. Any accretion to the rateable value of the Ramsey Town would be minimal. Mrs Faragher said that the Maughold Parish Commissioners as far as she was aware had not been approached by the Ramsey Town Commissioners with a view to re-organisation of Local Government districts, and any such re-organisation to be based on the present constituencies could more properly be grouped with the Laxey and Lonan areas and the Garff Sheading. The Commissioners noted that was there a review taking place by the Department of Local Government and the Environment of the structure of Local Government and they considered that the present application was premature, as there was likely to be a report and investigation within a reasonable time.

THE CASE FOR THE LEZAYRE PARISH COMMISSIONERS

4.0 Richard Penn the advocate for the Lezayre Parish Commissioners said he hoped to be able to show that there was a considerable amount of land within the existing Town Boundary available for development, and that it was almost equal to the area which in the extended area had the potential for development. If Ramsey wished to increase its rateable income as a readily at hand measure there were 76 acres or more of land within its existing area. One hundred and twenty five letters had been received by the Department of Local Government and the Environment, from residents in the parish of Lezayre who were totally opposed to the proposed extension. He considered that these views were of significance. He also submitted that no tangible advantage had been shown for residents within the Parish of Lezayre to come within the Town boundary except a weekly emptying of their dust bins, and a reduced subscription to the library.

4.1 Mr Finlo Quane the Chairman of the Lezayre Parish Commissioners gave evidence. He read the written statement submitted by the Lezayre Parish Commissioners which is included as Appendix 7. Mr. Quane made a correction in the last paragraph of the statement in the third line from the end. The expression "Town Housing Departments" should be replaced by "Town Hall Departments".

4.2 Questioned by Mr. Jelski he agreed that Lezayre Parish had the largest land area of any parish in the Isle of Man. He said that activities within the parish of Lezayre were centred on the Sulby area and the Lezayre Parish Church area. Lezayre Commissioners met in the hall in Sulby which they owned. It was considered that the people living in Thornhill Park had a connection with Sulby in that the Commissioners kept them in touch with events. Mr. Jelski questioned Mr. Quane at length and his last question elicited the answer from Mr. Quane that some of the criteria applied to the extended area.

4.3 Mr. Quane was questioned at length by Mr. Alan Bell the Member of the House of Keys for Ramsey and was questioned by others.

OBJECTION BY MR. EDGAR QUINE, M.H.K.

5.0 Mr. Quine Member of the House of Keys for Ayre put forward a number of points on which he objected to the application by the Ramsey Town Commissioners. First he said that it was not motivated by constraints on the development in the Town but on dissatisfaction with the organisation of Local Government and the rating system. The petition that they had presented shows this he claimed. This should not be considered as a valid reason for supporting this Town Boundary extension. The grounds are not applicable to Ramsey but to the whole Island. It is a matter for Central Government to address and one which he understood was being addressed by Central Government. He claimed there was a considerable area of land within the Town available, subject to certain restraints, those same restraints would be applicable to land outside the boundary. It was a scheme he claimed, whereby the Ramsey Town Commissioners thought to ease their rate burden. Ramsey Town Commissioners envisaged that at least half of those resources being employed towards the cost of

additional staff, confirming and retaining the senior qualified staff they had. He pointed out that at least half the rates collected were expended on administration and staff costs. Therefore he concluded that the application was not based on the need for further land to expand but it was to get developed properties so as to benefit from the rates on those properties. The persons living on the periphery of the town need not use the services of Ramsey any more than persons living a considerable distance away. As a matter of fact a considerable number of persons came at the weekend from Douglas to Ramsey to use the facilities. What facilities were available for the extended area were available for others outside of the town. It may well be that there was a substantial deficiency in the operation of the Mooragh Park, but whether to charge users a levy for the use of the Park was a matter for the Commissioners, most of the benefit of the park fell to the traders of the Town and not the residents of the Lezayre. Playgrounds of the Town are used almost exclusively by the children of the Town and were a proper charge on the Town. It is open to the Commissioners to recoup the costs from the users of the car parks or otherwise to defray those costs as they see fit. He refuted the argument that a large part of the rateable income of Lezayre should be used for the upkeep of the car parks in Ramsey. For the cost of services of roads and sewers there was a 100% deficiency payment. There were he said, certain costs for the administration of these services but it was so insignificant that there had not been put before them any figure. Whereas for sharing the cost of shared services they should be working towards combination authorities. He could not agree that they could be supported on the grounds of the overspill of the Town. Also the development plans had influenced the development. He termed it parallel development rather than overspill development, there are more units adjacent to the Town than overspill of the Town. He scouted the idea that Glen Auldyn and the Ramsey Golf Links could be called part of the Town of Ramsey. He argued that the people living in these areas did not consider themselves as part of the Town of Ramsey and had made their position very clear. A meeting in Lezayre had demonstrated this. Mr Quane referred to the referendum which quite clearly showed what the voters thought; over 905 voters were opposed to the extension and 11 in favour. The extension was unreasonable in itself, if acceded to it would virtually almost double the land area of the Town and more importantly would half the rateable income of the Parish, clearly undermining the Local Authority's financial viability. The figures of the reduction from £112000 to £54000 of the rateable value of the Parish of Lezayre showed that this would represent a loss of 60% of the rateable value. The cost of running Northern Refuse Board would obviously be increased the extra cost would be passed on not only to the people of Lezayre but to the residents of the other parishes forming part of the service. It was necessary to consider whether the costs of running the Town were reasonable £244,000 represented an increase 15% over the previous year, he had looked at the accounts of a number of other authorities and whilst he did not contend that the make-up of the accounts was even the same but he was taking them at face value as indications. Taking Peel, the administrative costs as against the rates received we were talking of 38% as against 50% in Ramsey. These 1988 figures would need some adjustment. Taking Onchan a

larger unit administrative costs against the rates received figure was 24%. Laxey 16%. If the application was approved it would constitute a new major re-alignment of constituencies. They were talking of 500 voters being switched from one constituency to another. Was it fair for those constituents to have this change imposed upon them, by force? Ayre has about 2,200 voters and that is in line, with the average as Ramsey has some 4,600 in round figures making 2,003 per seat a reasonable balance. Some 500 transferred voters from Maughold and Lezayre to Ramsey would create an unacceptable imbalance which should give rise to the convening of the boundary extension commission Mr Quine was questioned by Mr. Jelski.

Evidence of Mr. Norman Radcliffe, M.L.C.

6.0 Mr Norman Radcliffe, a Member of the Legislative Council and former Member of the House Keys for sheading of Ayre gave evidence. He was opposed to the application of the Ramsey Town Commissioners history shows that the parish authorities had functioned very capably and very well. Loss to the Parish of Lezayre of something like 60% of their income will dilute the capabilities of the Lezayre Commissioners to do anything, they would be cut down by lack of finance almost to the point of extinction. They do not have a huge income to work with the services they provide, they provide capably and this application if successful could be the starting point of a larger district Northern Authority. A district authority was one to be avoided at all costs. If this application was successful it would open the door to the formation of district authorities. If the Ramsey Commissioners were short of land for development that would be a fair argument but I understand there is more than a fair area of land available in the Town which was a potential for development land and this land should be used before the Commissioners start extending boundaries. The Ramsey Commissioners are not able to provide a good service at present. Mr Radcliffe said that if the Ramsey Commissioners were seeking an extension then perhaps a more natural extension which would have been a far more acceptable approach. Had Ramsey contented themselves with looking at certain areas of the Ramsey and Jurby Roads that would have been a natural extension to Ramsey. To seek such a huge area doubling the area of the Town was viewed by me and others as nothing less than avariciousness on the part of the Commissioners. Would it be fair to say that the Commissioners had asked for a lot in the expectation of receiving part of the land at Jurby Road and the Andreas Road. Glen Auldyn was not a natural extension of Ramsey but it was an entirely separate rural area and could never ever be part of Ramsey. The services which the people of Glen Auldyn would expect as part of the Town could not be provided. He suspected that there, were a number of septic tanks there, there were no footpaths, no shops, there was a minimum of street lighting and a hand light was necessary if one went there at night. He submitted that the request by the Ramsey Town Commissioners should not be granted.

In answer to a question by Mr. Jelski he said he would accept footpaths were not the responsibility of the local authority and there were about four properties in Glen Auldyn on the sewer. In answer to Mr. Bell he agreed that in Ramsey as a functioning authority there was a shortage of houses for such as first time buyers. Mr

Radcliffe stated that he had never seen any reason to shy away from compulsory purchase in acquiring land for council houses. In answer to one of the many questions by Mr. Jelski, he said that what he would consider in his personal opinion was a reasonable area for Ramsey to ask for would encompass the area of Thornhill between the Andreas and Bride Roads and the area of Westhill followed naturally on by the Richmond Road area this would have been an natural extension to his mind.

7.0 Mr Penn called Mr. Martin Thomas Nicholas Cook, B.A., Dip., (Arch), R.I.B.A., Chartered Architect practising St. Judes Road, Sulby. Mr Cook read his statement a copy of which is included in this report as Appendix 8

Mr. Penn questioned Mr. Cook, and in answer Mr. Cook said that there were 76 acres of land available in Ramsey comprising:

1. The Vollan fields
2. Poyll Dhooley
3. Land to the east of Ramsey Grammar School (being the Fairfield Avenue land), these areas together amounted to 76 acres, and these areas of land were those which Ramsey Commissioners had stated comprised 70 acres. Mr Cook said he had calculated the acreage using a superimposed grid and he agreed that this was not as accurate a method as measurement on the ground but he had taken the minimum area from his calculations. There were a further 25 acres which he said was additional comprised of several areas, The two main areas were at Clifton Park and the undeveloped part off the Ramsey Road before Ballure. It was agreed these areas would not at present be available for first-time buyers for example. He said that he had checked these areas two and three weeks ago, the total zoned area was 101 acres.

In answer to Mr Jelski he agreed that these lands at Clybane and Ballure were under development now. Of the lands comprising the 25 acres, at Clybane there were two separate developments one at Ballastowell Gardens a sheltered housing development the remaining part of Clybane was Barrule Park which was being developed in plots. Mr Cook agreed that should the development continue on the site at the present rate then it would be completed by the 1st April 1993 when the extended scheme would come into effect if approved. He further agreed that about 35 plots would be right for a low density development at Ballure. He agreed that subject to market conditions some or most of that development would be completed by April 1993. He agreed that the areas at the Vollan are not available for immediate development, but he also agreed that some of the area of Poyll Dhooley was zoned for industrial development and there were problems as to the infrastructure of this site which might delay development. He did not suggest that every green site in the Ramsey Town should be developed.

7.2 In answer to Mr. Bell, Mr. Cook said he was aware of the problem in the Isle of Man for low cost houses and first time buyers who pointed out that there were 170 on the list for Ramsey, 120 for sheltered houses and a considerable waiting list for first time buyers.

8.0 Mr Hubert Casement, Chairman of Lezayre Parish Commissioners for thirteen years and on occasions had been the Chairman of the Northern Refuse Collection Board and had been on that board for eight years gave evidence. He said that the Northern Refuse Board had been congratulated by the Department of Local Government and the Environment in matters of collection of refuse in the parishes for providing a fortnightly collection in the extended area. The Ramsey Commissioners supply a wagon for an extra collection of refuse and the Northern Board will provide this. Mr Casement said he also provided a van for inaccessible areas, he said they ran the Northern Refuse Board on a shoe-string very economically and the expenses of the Clerk and the office do not exceed £2,000 per year. The taking out of the properties in the area for the proposed extension would mean a £9,000 loss of revenue a year. The Board employed a gang of two men and one relief for holidays, they operate in a satisfactory manner at the moment he could not see the reason for being taking over by Ramsey, but they were given the impression that Ramsey had not the resources to carry out this work. The Commissioners had asked them in a letter dated 11th April 1990 if the Northern Refuse Board would contract with Ramsey Commissioners to carry out this collection, which seemed to be for both on a fortnightly and a weekly basis. He stated that the extended area takes in the residence of the Captain of the Parish Mr. R.E.S. Kerruish who lives just off Westlands, Mr Casement said that it was the law that the Captain of the Parish lived within the parish. He pointed out that the parish had always had a shoreline and he could not see any advantage to Ramsey in taking over half a mile of this shoreline from the existing one and half miles.

8.1 Mr. Jelski referred the witness to a letter he had written on the 19th February 1991 to the Department. The second page in this letter stated "I am more than satisfied with the fortnightly collection and so are 98% of the residents of the Parish of Lezayre as well the other districts, namely, Andreas, Ballaugh, Jurby and Kirk Michael." Mr. Jelski asked him where he had got the figure 98% and Mr. Casement said he had visited 98% of the residents in the area which it was intended to take over. He was asked if he visited the residents in the other parishes, and he said that the Board had a representative from each parish and had not had any complaints for the last six years. Whereupon Mr. Jelski put to him the results of a Gallop Survey carried out in 1990 by the Government, Mr. Casement said he was not aware of this. Mr. Jelski produced to him the results of the poll which showed that in Ramsey of residents surveyed 74% were very satisfied with the refuse collection and 24% fairly satisfied whereas in Ayre 39% were very satisfied 33% fairly satisfied 10% fairly dissatisfied and 15% very dissatisfied. Mr. Jelski asked him about the 25% increase in rates mentioned in his letter. It appeared from the answer from Mr. Casement that the increase of £1 from 1989/90 was to create a reserve for the Board. Mr. Casement said he was prepared to accept Mr. Jelski's figure that the properties served by the Northern Refuse Collection Board numbered 1,754 and accept this figure of the properties that the Ramsey Town Commissioners collected refuse from was 4,610. Mr. Jelski quoted figures to Mr. Casement that the Northern Refuse Collection Board costs for a fortnightly collection for each household per year was £18.52 and the Ramsey Town Commissioners weekly collection from households, plus other collections amounted

to £21.56, Mr. Casement was not prepared to accept these figures since they did not show the weekly collection made by the Northern Refuse Board in respect of hotels and the Wildlife Park. Mr. Jelski put to Mr. Casement that it took the Northern Refuse Collection Board six months to reply to the letter from the Ramsey Town Commissioners inquiring as to the possible cost of the Board undertaking the collection in the extended area. Mr Casement said that they had difficulty in calling meetings, and that the Board could meet oftener but he said that the Board meets about once in three months.

9.0 Six residents had stated that they wished to give oral evidence so I inquired specifically as to whether any of these named people were present and wished to give evidence but I had no response. After Mr. Casement's evidence, I asked Mr. Penn to give his final speech on behalf of the Lezayre Parish Commissioners.

MR. PENN'S FINAL ADDRESS

10.0 When giving his final address, Mr. Penn said that it must surely be that the Lezayre Parish Commissioners did not have to defend the status quo but that the onus of proof was upon the applicants the Ramsey Town Commissioners. That the Ramsey Town Commissioners must show that their case was a cogent and valid one. In this case Ramsey Town Commissioners wished to take over 527 acres from the Parish of Lezayre and a small portion from the Parish of Maughold. The Commissioners had a considerable case to make out when they wished to take over such a large area with all the financial consequences. Ramsey Commissioners had not said what they wished to do with the land they sought to include and he thought that the criteria which had been mentioned in the Port Erin report and first established by a Select Committee of Tynwald, were sensible. He pointed out that Miss Quine had insisted that Ramsey Commissioners were not putting forward an application for a large area in the hope of getting a lesser one, but they had put the application forward for the whole of what they were asking for, Mr. Penn said that Glen Auldyn was as much a part of Ramsey as Regaby! The second criteria that the area was an overspill or outgrowth. The Clifton Park area consisted almost entirely of new properties owned and occupied by people who not only come from all over the Island but other Islands as well. It was not part of Ramsey and it was not overspill or outgrowth. The third criteria as to area remaining in the town which was undeveloped he referred to the evidence given by Mr. Cook that there was 76 acres of land for development in the Town, Mr Cook claimed there were other areas in the Town. He argued that there was sufficient land in Ramsey. In dealing with the fourth criteria Mr Penn said that some of the residents in the extended area would use some of the facilities in Ramsey but for the most part they paid for them. They should not be penalised because they lived quite near to Ramsey. Mr. Penn argued as to the balance of advantage (criterion (e)); that the only two advantages to the residents in the extended area, if taken into Ramsey, were that they would have to pay £2.50 a year less than a person residing in Ramsey for the use of the library services and the dust bins would be emptied once a week instead of once a fortnight. These advantages were not very great when set against the increase in

rates, and the tremendous loss to Lezayre Commissioners. Mr. Penn also stressed that there was no suggestion by the Ramsey Town Commissioners that, if this scheme was approved by Tynwald, that the rates in Ramsey would be reduced. The rates of those living in the extended area would, if the scheme was approved, be brought up to the level of Ramsey rates over a period of five years. Mr. Penn argued that the Ramsey Commissioners had not made out a case for the extension they sought.

MAUGHOLD COMMISSIONERS FINAL ADDRESS

11.0 The Clerk to the Maughold Parish Commissioners in the absence of Mrs Faragher who had made her submission on behalf of the Commissioners, said that they merely wished to reiterate what Mrs Faragher had said and to emphasise that the Maughold Parish does not wish any part of the Parish to be taken over by the Ramsey Town Commissioners. The Clerk to the Maughold Commissioners is Mrs. Cook.

MR. JELSKI'S ADDRESS

12.0 In accordance with the procedure which I proposed and has been accepted by the parties, Mr. Jelski made the final speech on behalf of the Ramsey Town Commissioners. Mr. Jelski pointed out that of the 128 letters which had been received 80 had been received from people living in the extended area, representing of the 336 houses approximately 20%. Of the 80 received from the people in the extended area 36 had been received from residents in Glen Auldyn 19 from residents in Clifton Park 10 from residents in Kings Reach 9 from residents in Westlands 7 from residents in Jurby Road 5 from residents in Thornhill Park 3 from residents in the Andreas, Bride Road area and from Romney Vine an area tagged on to Clifton Park. Another 36 letters of the 128 had come from residents in the remainder of Lezayre, one letter had come from a resident of Ramsey in support, all the other letters were in opposition. Mr Jelski emphasised that therefore that of the 336 affected in the extended area, if the extension took place, 6% of those directly affected chose to write in opposition in person. The only one who had come in his private capacity to voice objection was Mr. Casement, who had also made his representations, as representing the Northern Refuse Collection Board. He said that all but 8 properties of the 336 in the extended area drained into the Ramsey sewerage system. Although there was the deficiency payment from Central Government, the cost was partly funded by the Ramsey Town Commissioners funds.

CONCLUSIONS

13.0 The Ramsey Town Commissioners had gone to considerable lengths to prepare papers on various aspects of factual information for the inquiry and in the provision of plans in putting forward in their case. The Lezayre Parish Commissioners too had supplied useful written information on the case they put forward in opposition.

Everyone had presented their respective views and representations concisely and with propriety. There is no doubt in my view, which is shared by the Ramsey Town Commissioners that the property of Mr. J. Stowell Kenyon at Cronk Mayn should be excluded from any extended area. To effect this the boundary line at the figure 7938 on the Jurby Road on the large scale plan could go East along the Jurby Road and then proceed along the perimeter to the East of the property "Cronk Mayn" before rejoining the proposed line of the boundary extension.

13.1 The criteria set out in the written submission of the Lezayre Parish Commissioners which has been accepted previously, and was in particular used by the Select Committee of Tynwald dealing with the extension of the Douglas Town boundary in 1984, was used and accepted by both the Ramsey Town Commissioners and the Lezayre Parish Commissioners and in my view may be usefully employed in considering the present application.

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 out-growth 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 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 an half of shoreline and half a mile of this shore line 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.

13.5 It was argued by those in opposition to the scheme that there was within the existing boundaries of the Town adequate land zoned for development and before any boundary extension was sanctioned the whole of this land so zoned should be used. But this argument

did not take into account two factors. The first is that the land may well not be available or suitable for development. The Vullan Farm fields comprising some 29.5 acres is in agricultural use, part of the land is subject to what the Ramsey Town Commissioners called a restrictive covenant. This is in fact an option to purchase granted by the owner of the land to the person to whom, the owner had sold a plot of land on to which to build a private house. I have no knowledge as to whether the original parties to the agreement are still alive or how far that the agreement is now enforceable. The Town Commissioners however assert that there has been no indication of interest in development from the owner despite approaches from developers. It does appear, therefore, that apart from powers of compulsory purchase being exercised, this land, in fact is not available. It may be as Mr. Norman Radcliffe M.L.C. said that the Commissioners should be more ready to exercise their powers of compulsory purchase where necessary. In the past however, Tynwald has shown itself reluctant to approve of compulsory purchase, and this has been regarded as a last resort only to be exercised when there is no reasonable alternative. The other factor which in my view is of importance is that where there is only a limited area of land available then when the local authority seeks to acquire land for the purpose of providing public sector housing for the people the price of the land becomes artificially inflated. A local authority should not be put in the position, where it has to purchase land to have only a very limited area of land available for development. I consider that it has to be taken as a fact that although land has been zoned for development the owner may not be prepared to have it developed within the foreseeable future. From the point of view of providing urgently needed public sector houses and first time buyers houses sufficient land is not available to the Ramsey Commissioners to purchase within the existing boundary of the Town. By the first day of April 1993 there may well be less in the absence of their successfully exercising compulsory purchase powers. In my opinion the argument of the opposition that there is a sufficient acreage of land within the Town available is not valid. The 25 acres Mr Cook said were available (in addition to the 70 or 76 acres) are being developed privately and in any event are unlikely to be available in 1993. The other main area zoned for residential development in the town at Poyll Dhooy has problems in the way of development. I do not consider that the small areas of possible infill development in the town suggested by Mr Cook constitute an answer to the pressing need for housing to be provided by the Ramsey Town Commissioners. I consider that the Ramsey Town Commissioners have shown they have a need for development land and that a sufficient area is not likely to be available in the near future in the town.

13.6 Whereas I accept the view of the Lezayre Parish Commissioners that there are parts of the extended area which do not constitute one community with the town of Ramsey and cannot be considered as areas of overspill or outgrowth of the town, nevertheless there are portions of the extended area which do meet those descriptions. Looking at the areas of the Andreas Road and Bride Road, Thornhill Park, Ellan Park, and Grove Mount Estate, it is apparent to me that these areas are in fact and substance one community with the Town of Ramsey and do constitute an overspill or outgrowth of the Town of

Ramsey. For example one side of Richmond Road, is in the Town of Ramsey and the properties on the other side of the road are in the parish of Lezayre. Apart from the extension of boundaries in 1883 the Ramsey Town boundary has been extended as recently as 1970. Those who have taken houses just outside the boundary of Ramsey Town much have appreciated that the boundary would most likely be extended to include their properties and they would not always be able to benefit from the lower rating in the parish. Although Mr. N. Radcliffe M.L.C. spoke in opposition to the extension of the boundary, he did say that a more natural extension of the boundary and one he would consider reasonable would encompass the area of Thornhill and between the Andreas and Bride Roads, and the Westhill and Richmond Road areas. Ideally in my view there should be an open space or green belt between the boundary of a town and the nearest buildings in the adjoining parish. Such an open space reduces the unfairness of any dividing boundary line which exists in a built up area. It is also another reason for moving the boundary of Ramsey Town to include properties built adjacent to the boundary so as to create such a green belt.

13.7 The amenities which Ramsey Town has to offer are undoubtedly of benefit to those living within a short distance of the boundary. The opposition was directed mainly to the financial aspects of such facilities. Although the residents in the town equally with those who visit the town pay for the amenities such as the purchase of goods the services of accountants, lawyers, architects and builders, nevertheless the presence of offices and shops, banks and restaurants offering such facilities are certainly beneficial and of advantage to those who live within walking distance. The hospital, library and the Mooragh park and the enquiry desk at the Town Hall cannot be said to be of no benefit to those living on the periphery of the town. Amenities are amenities notwithstanding that they have to be paid for. The people in the extended area benefit from the work Ramsey Commissioners put into the sewerage scheme and such costs as are borne by the Ramsey Commissioners. This is not affected by the fact that some residents of Lezayre outside of the extended area will benefit from the Ramsey sewerage scheme but only pay Lezayre rates. Of course a dividing or boundary line must be drawn somewhere and inevitably this will mean that some fall on one side and others on the other side.

13.8 Opponents of the scheme alleged that the Ramsey Town Commissioners were not efficient, that their administration costs were excessive. It was stated, for example, that in 1970 the Lezayre rates were 75% of Ramsey rates they are now 32%. Lezayre Commissioners claim that the Ramsey accounts show that this excessive expenditure derives mainly from salaries of officials who serve the Town but not the parish of Lezayre. In my view if inflation, which has been with us now for some years continues, then the expenditure of larger local authorities will necessarily increase more than that of the parish authorities. Whereas the larger authorities employ more specialised staff the parish authorities often employ very little staff at all. There is a considerable difference between a functioning and a non-functioning local authority. But I have no doubt on the evidence produced by the Ramsey Town Commissioners that they do provide a service available for the parishes.

Whereas opinions were expressed, by those in opposition that the Ramsey Commissioners were inefficient and that their administration was costly no real evidence was produced to support the allegations. The opposition had not taken into account the administrative services provided by Ramsey, such as those to the Northern Refuse Collection Board. The Ramsey Town Commissioners satisfied me, for example, that there had been no undue increase in their staff over many years. A comparison of the cost of refuse collection between Ramsey Town Commissioners and the Northern Refuse Collection Board did not suggest any inefficiency on the part of the administration of the Ramsey Town Commissioners. The Northern Refuse Collection Board as Mr. Casement said does exist on a shoestring no doubt they are very cost effective and it is difficult to compare costs in a built up area and in a rural area. If the Board undertook a weekly as opposed to a fortnightly collection then their costs would be considerably increased.

13.9 The residents in the extended area will be subject to higher rates if the boundary is extended. They will not be paying the full Ramsey rate, however until 1998 under the scheme proposed. Their present rates will be significantly increased over the period of 5 years from 1993 to 1998. On the face of it it seems to me the proposed differential rating is reasonable. The increased rate burden was a considerable factor in the motivation of those in opposition to the scheme.

13.10 Ramsey Town Commissioners appeared to base one of their grounds for seeking an extension of their boundary on the fact that there had been no re-organisation of local authorities and on the unfairness of the rate burden throughout the island as between rural and urban districts. I consider that the extension of a town boundary could hardly be justified as a means of correcting any general unfairness in rating between town and country and I would not accept this as a proper ground for justifying a boundary extension. The Town Commissioners must justify their extension on other grounds than any possible necessity for the restructuring of local government which seems to me to be a matter for Central Government in consultation with the local authorities. I consider the Ramsey Town commissioners have on other grounds, justified some extension but not to the extent they have sought.

RECOMMENDATIONS

14.0 Therefore, taking the criteria and all relevant circumstances into account I recommend that the Ramsey Town Commissioners' application for the extension of boundaries should not be granted for the whole of the area for which they have applied. I do recommend that an order should be made for limited extension of their boundary. My recommendation is that at the northern most end of the town the existing boundary should be retained from mean high water mark along the boundary of the Grand Island Hotel property across the Bride Road and should then follow the line between field 8428 and field 6617 (so as to exclude field 8428) then following the proposed new boundary line coloured green on the plan submitted until it reaches the Jurby Road when it will deviate to exclude Cronk Mayn and continue to the figure 4300 on the plan across the Sulby River, then deviating from the green line to

follow the western boundary of field 5500 and 5475 then passing along the dismantled railway line until my proposed boundary line reaches the existing boundary of the Town, and then to follow this existing boundary line to the southern extremity of the town at mean high water mark. In my view this should provide sufficient additional land zoned for development and would take in all the overspill and outgrowth areas of the Town.

Such a limited extension would reduce the feared impact on the finances of the Lezayre Parish Commissioners and the reduction in the area would mean that of the 336 houses originally proposed to be taken into Ramsey Town there would be 76 properties fewer making the new total about 260.

15.0 Under Section 6 (3) of the Local Government Act 1985 the Minister is required to consider what provisions (if any) should be included in any Order he may decide to make with reference to the matters set out in sub-paragraphs (a) to (h) of the sub-section. My recommendations on this are:-

(1) That no order is required as to the matters referred to in sub-paragraphs (a), (b) (c) or (d).

(2) The new boundary line which I recommend will take into the Town the drainage districts of Lezayre (Richmond Road) Special Drainage District (1950 Order), and the Lezayre Drainage Area Extension (1983 Order). In view of this no further provisions appear to be required.

(3) It will be necessary to investigate if any property rights, liabilities and obligations of the Lezayre Parish Commissioners or the Northern Refuse Collection Board require to be vested in the Ramsey Town Commissioners under sub-paragraphs (e) and (f) and to consider the question of any payment of compensation in consequence.

(4) Provision will need to be made in the Order to bring in the powers available in sub-paragraph (g) so that the Department may be able to determine any matter arising in connection with the subject matter of the Order and so as to make such incidental, consequential, transitional or supplemental provision as appears to the Department to be necessary or proper for the purpose of the Order.

(5) There will need to be included too, such matters as require to be dealt with under sub-paragraph (h) such as requiring the Ramsey Town Commissioners to introduce a Bill in the Legislature for the following purposes:-

(a) to separate the extended area from the constituency of Ayre and to add that area to the constituency of Ramsey for the purposes of the Representation of the People Acts 1951-1990;

(b) to cancel any existing contracts that may have been entered into by the Lezayre Parish Commissioners for street lighting and refuse collection in the extended area; and

(c) to provide for the differential rating in the extended area in accordance with the Ramsey Town Commissioners proposals or such other scheme as the Minister thinks fit.

A handwritten signature in black ink, appearing to be 'A. G. Smith', written over a horizontal line.

APPENDIX 1.

BOUNDARY INQUIRY
PROOF OF EVIDENCE

COMPARISON OF MAIN ACCOUNT HEADINGS
Year Ended 31st March, 1990.

	<u>Ramsey</u>	<u>Lezayre</u>
1. General Revenue		
Receipts	£ 839,592	£ 17,281
Payments	£ 840,353	£ 9,878
2. General Rate	£ 566,303	£ 14,955
3. Refuse Account	---	£ 14,644
4. Capital Account	£ 1,066,482	£ 16,941
5. Statement of Assets	£ 19,315,105	£ 33,748
6. Unapplied Capital Receipts	£ 260,910	---
7. Sinking Fund	£ 225,390	---
8. Housing Revenue	£ 667,449	---
9. Sewer Reserve	£ 76,281	---
10 Sulby Hall Management		
Receipts	---	£ 7,518
Payments	---	£ 3,935

24th April, 1991.

A:\CmpMACCH

APPENDIX 2.

TOWN HALL ADMINISTRATION

LEVELS OF ACTIVITY / SALARY COSTS

	<u>1990</u>	<u>1989</u>	<u>1988</u>	<u>1987</u>	<u>1986</u>
General Revenue	840,353	758,730	676,486	617,276	631,204
Housing Revenue	667,449	548,679	533,260	483,029	426,419
Northern... Swimming Pool Board Revenue	268,115	132,236	109,633	112,195	121,188
Ramsey and Northern... Housing Revenue	184,270	166,103	155,782	162,651	165,113
	-----	-----	-----	-----	-----
Sub Total	1,960,187	1,605,748	1,475,161	1,375,151	1,343,924
R.T.C. Capital	1,086,482	1,126,748	927,077	612,031	740,374
Northern... Swimming Pool Board Capital	5,772	389,253	42,991	---	---
Ramsey and Northern... Housing Capital	138,660	185,750	114,604	139,084	89,349
	-----	-----	-----	-----	-----
Sub Total	1,230,914	1,701,751	1,084,672	751,115	829,723
REVENUE	1,960,187	1,605,748	1,475,161	1,375,151	1,343,924
CAPITAL	1,230,914	1,701,751	1,084,672	751,115	829,723
	-----	-----	-----	-----	-----
TOTAL	£ 3,191,101	£ 3,307,499	£ 2,559,833	£ 2,126,266	£ 2,173,647
	=====	=====	=====	=====	=====
Salaries	166,858	148,455	133,899	126,565	122,441
Pensions	14,885	13,026	11,918	11,332	9,301
Library	16,775	16,374	17,621	16,381	15,694
	-----	-----	-----	-----	-----
TOTAL	£ 198,518	£ 177,855	£ 163,438	£ 154,278	£ 137,436
	=====	=====	=====	=====	=====
Salary x 100 ----- %	6.22	5.38	6.38	7.26	6.32
Revenue + Capital					

Note: It is very difficult to obtain an accurate indicator of administrative costs as a percentage of the total cost of work undertaken each year. The staffing levels are largely dictated by the government funded services such as housing and sewers; and include the work generated by the Ramsey and Northern Districts Housing Committee and the Northern Local Authorities Swimming Pool Board.

The "levels of activity" in each year since 1986 have resulted in increased expenditure. The above figures show that administrative costs have remained relatively static in percentage terms at around 5% - 7%.

29th April, 1991.

A:\LOFASALS

Ramsey Town CommissionersBoundary Study Proposals

Statement of Case

In preparing their case for a boundary extension, the Ramsey Town Commissioners have been aware from the outset that opponents of the proposal would encounter little difficulty in mobilising public opinion in the parishes against the town's case.

This awareness was heightened by the decision of Lezayre Parish Commissioners in March 1990 to call a public meeting rather than to accept an invitation to hold discussion before final decisions were made on the details of any application. The outcome of that Public Meeting inevitably set the parish representatives on a course of absolute opposition to the extension with claims being made to the effect that the Ramsey Commissioners "were setting out on a land grabbing exercise" which has little or no substance and would, if successful, literally "demolish the parish". Residents of low rated areas on the outskirts of the town naturally objected vociferously when the subject of a boundary extension was raised in such a one sided manner.

In presenting this statement the Ramsey Town Commissioners are convinced that there is substance in their case for a boundary extension and therefore refute any suggestion that they are setting out to grab land and rate income from surrounding authorities. Rather they are seeking to plan for the future and to spread the rate burden more fairly amongst the town residents and those nearby residents who already make use of the town's facilities. The reality is that rateable services have to be paid for by the ratepayers of the town. Alternatives to a boundary extension include ever increasing and inequitable rate differentials between town and parish or reduced services. A third option is of course to seek to transfer more and more functions to Government with the possible demise of the town authority as an end result.

In 1970 at the time of only the second extension to date of the Ramsey Town Boundary, the Town Rate was 21s 11d compared with the Lezayre Parish Rate of 15s 10d (72% of the Town Rate) and the Maughold Parish Rate of 16s 6d (75% of the Town Rate). The comparative rates for 1990/91 are 113p for the Town, 28p [plus £8 per property] in Lezayre, (say 32% of the Town Rate) and 15p in Maughold (13% of the Town Rate). This inequitable trend is set to continue under the present rating system. The Ramsey Town Commissioners believe that they and the parish representatives should be seen as the unintended victims of the present rating system which is becoming increasingly unjust. The elected representatives of the townspeople are clearly under a duty to seek to reduce this inequity whilst the parish representatives are obligated to seek to protect the present advantages of their electorate and ratepayers.

The application to extend the boundary is in essence the inevitable result of development on the outskirts of the town in the absence of an overall policy to either ensure a more equitable distribution of the rating burden or, perhaps more importantly, to rationalise the number of local authorities on the Island.

During the 20 years that have elapsed since the last boundary was formed, considerable residential development has taken place within the town and just beyond its boundaries. This development is continuing apace, particularly to the north west of Ramsey, and increasing the need for additional resources to provide the facilities and services demanded by such growth.

The Commissioners believe that they should not only be willing to provide and to improve the necessary services but should also be able to perform their functions with efficiency - a most important part of which is the ability to employ and retain the services of experienced and qualified full time staff.

The rapid development taking place on the outskirts of the town relies to a large degree on the services and amenities provided by the town. The residents of such areas have a common interest in a variety of matters such as a common centre for work opportunities, shopping, amusements, leisure, playgrounds, car parks, etc.

Development within the town is also hindered by the attraction of more easily developed sites immediately outside the boundary. The immediacy of services and amenities provided by the town and the added advantage of lower rates must have some bearing on the spread of such developments. This pattern of development must therefore be recognised with foresight if the town authority is to plan ahead. The Commissioners are of the firm opinion that a boundary extension should not depend to any great extent on all land within the current boundary limits being fully developed. They contend that most if not all of the residential development in the extension area is either an overspill or an outgrowth of the town.

At a sitting of Tynwald on 22nd April, 1969, approval was given to the Report of the Select Committee appointed to consider the Ramsey Town Commissioners application for an extension of the Town Boundaries.

The Select Committee was critical of the fact that no extension of the town boundary had been sought during the previous 80 years but nevertheless generally upheld the plea for boundary changes. The new boundary with Lezayre Parish was modified from the Commissioners original proposals because of perceived costs to the public purse in relation to sewerage infrastructure. In the interests of the Ramsey ratepayers and Government, the Committee recommended against accepting responsibility for the total drainage needs of developments in the proposed area.

During the past 20 years considerable development has in fact taken place in areas on the outskirts of the boundary which became effective on 12th May, 1970. Drainage difficulties have been met and overcome by the Ramsey Town Commissioners and Government to facilitate the significant growth experienced in these areas. The mere fact that most of the properties in the proposed extension area are connected to the improved Ramsey sewerage system is considered by the Commissioners to be a strong reason for extending the present boundary.

Work undertaken in these areas by the Ramsey Town Commissioners has gone largely unnoticed and is worthy of examination in some detail. In 1975, the Commissioners appointed consultants to investigate and report on the condition and capacity of the main sewerage system and to make recommendations for remedial measures -including cost estimates. Problems of flooding were being experienced partly because the capacity of the 100 year old sewerage system had not been increased to cope with expansion being experienced in the Town and its hinterland.

The investigations soon revealed a need for major capital investments to renew and replace much of the system; and inadequate capacity to meet the demands of development planned for the town and the surrounding areas. Options for remedial actions were identified and costed in a series of reports which enabled the Commissioners to consider the merits of each proposal. These investigations included a status report commissioned to broadly consider alternative phasing programmes for sewer replacement work, its consequences, cost and timescale. The purpose of the very thorough study was to provide a firm basis upon which decisions could be made to justify and promote a sewer replacement programme to facilitate development.

The most important decision taken during the study was to adopt a long-term development plan for replacement of defective and inadequate sewerage by providing a separate system of drainage. Separation of surface water from the combined system was identified as essential in the long term to reduce the load on the system which serves the town and the Lezayre and Glen Auldyn Drainage Areas.

The study undertaken by the Ramsey Town Commissioners in consultation with the Isle of Man Local Government Board in the late 1970's also served to highlight the large rate increases that would ensue in the Town area under the 60% grant system available for sewerage schemes at that time. In 1980, a Government grant equivalent to 90% of the Phase 1 Scheme to replace the main foul sewer in North Shore Road and Park Road was eventually approved: in April, 1981 Tynwald decided to introduce 100% rate deficiency payments for all approved sewerage schemes.

During the past fifteen years the Ramsey Town Commissioners have promoted and administered eleven separate sewer improvement schemes involving expenditure in excess of £2 million. Whilst those schemes have attracted 100% deficiency payments, the Commissioners have retained responsibility for sewerage and have met the costs of promoting and administering the schemes and of servicing the debts through the District Fund of the Town of Ramsey.

The aforementioned drainage investigations promoted by the Ramsey Town Commissioners included several reports on the area to the north and west of Richmond Road on the outskirts of the town. The area in question was drained by a pumped system and rising main connected to the main sea outfall at the Vollan. This area covers approximately 100 acres of which approximately 60 acres lies to the north-west of Richmond Road and between the Andreas Road and Jurby Road.

The remainder of the area consists of housing developments which lie to the south of Jurby Road. The reports on the area outside of the town revealed that there was insufficient capacity in the sewerage system -built in the late 1940's -to deal with the large increase in effluent that would arise from the Ellan Park and Clifton Park developments which were to form only part of the growth expected in that area.

The Ramsey Town Commissioners found themselves obliged to refuse to permit connection of any further properties to the already overburdened system in May 1979. This policy was adopted by The Planning Committee of the Local Government Board "until such time as the Ramsey Town Commissioners were satisfied that adequate arrangements had been made for the discharge of foul and surface water drainage". A protracted series of meetings took place between officers of the Commission and the Local Government Board, and representatives of several developers. Eventual agreement was reached on the need for a new and larger pumping station, gravity main and rising main for foul drainage. Consultants were appointed by the Ramsey Town Commissioners in June 1980 to proceed with site investigations and scheme design work. Considerable difficulties and delays were experienced during this period in obtaining agreements on funding the scheme which of necessity took account of the development potential indicated by the Isle of Man Development Plan 1982.

In December, 1983 Tynwald approved an order extending the Lezayre Drainage Area in response to an application of the Ramsey Town Commissioners and approved a Petition for borrowing powers not exceeding £217,000 repayable within 30 years to defray the cost of installing the new system.

Statutory Notice of the proposed Order was given to the Lezayre Parish Commissioners who replied by letter dated 21st October, 1983 that they had no objection to the extension of the Drainage Area. The improved system has enabled the Ramsey Town Commissioners to permit extensive development of the area since 1984. Despite the construction of the new main system the older subsidiary sewers remain in need of replacement because of ground water infiltration and root penetration. Proposals to effect this work have been delayed because of other priorities in recent years.

However, Ramsey Town Commissioners have recently engaged consultants to prepare a scheme to eliminate the ingress of ground water to the existing foul sewer. A budget sum of £50,000 has been included in the 1990/91 grant estimates for this proposed scheme. Replacement of pumps has recently been completed at the Westlands Pumping Station.

In view of the foregoing information on sewerage matters, the Ramsey Town Commissioners contend that the present ratepayers of the town should not be expected to continue to meet the increasing costs associated with administering and promoting sewerage improvements. Whilst accepting that Government meets by far the largest share of sewerage costs by means of the deficiency scheme, the Commissioners refute the often repeated argument that all costs associated with sewerage maintenance and improvements are met from other than rateborne expenditure.

Waste disposal, recycling, refuse and litter collection are viewed as services which are likely to demand more stringent working practices and greater financial resources in the future. In order to approach the problems of refuse and litter collection effectively, the Commissioners have decided that they wish to introduce a wheeled bin collection system.

The present domestic and commercial refuse collection service is operated by two 2 man crews working under a job and finish contract. To provide the necessary capacity for additional collections anticipated within the existing town, the Commissioners have identified the wheeled bin type of refuse and litter collection system as the best means of ensuring continuance of an efficient service.

The Commissioners are confident that this type of operation would provide the capacity to offer a weekly service to all properties within an extended town district. Commercial premises would continue to receive additional services as necessary. Expenditure on refuse and litter collection is expected to increase significantly in the near future. The Commissioners must plan to provide a service with sufficient flexibility to respond to anticipated growth and changing circumstances.

The Ramsey Town Commissioners have attempted to follow clear physical boundaries in preparing their proposals for the extended town and have generally relied on the residential development limits agreed by Tynwald under the provisions of the Isle of Man Development Plan 1982. Care has been taken as a general rule to include those areas in which properties are either connected to the Ramsey Sewerage System or for which sufficient capacity has been planned.

The Commissioners were aware from the outset that approximately half of the rateable value of Lezayre Parish abuts the present Town boundary. Developments to date in the proposed extension area to the north of Lezayre Road are regarded as clear overspill of the town and the Commissioners are hopeful that this opinion will be supported.

With regard to the inclusion of a large part of Glen Auldyn in the proposed extension area, the Commissioners contend that the majority of the residents of the glen benefit from their closeness to the town in like manner to the residents of Clifton Park, Thornhill, Riverside, etc. Glen Auldyn is therefore viewed as a natural outgrowth of the town with a community of interest in all or most common facilities and services.

The majority of the present properties are drained via the improved and redesigned Ramsey Sewerage System which makes due allowance for foul drainage from those properties and any future development of low density housing on land zoned for such use.

The Ramsey Town Commissioners support many of the views contained in the Written Statement for the North Eastern Sector [B] of the Island Strategic Plan which refers to the Parishes of Maughold, Lezayre, Andreas and Bride as forming the hinterland of Ramsey and relying on the town for essential services. In accordance with the adopted policy of Tynwald, no significant retail developments will be permitted outside the central area of Ramsey. Residents of the extension area in particular will therefore continue to rely on the provisions of better services within the town to encourage a wide variety of shops. Such services will inevitably include more off-street car parks, trade refuse collections, litter collections, decorative lighting, etc. The Town of Ramsey contains the only harbour in this sector of the Island and the Ramsey Town Commissioners are actively promoting the concept of marina based developments to complement existing facilities and to further support the commercial centre of the town.

Future educational requirements will be generated by the envisaged residential development immediately adjacent to the present boundary. The influx of children needs to be catered for by providing amenities such as playgrounds, and an expanding library. A decision to extend the library opening hours from January 1990 has proved to be encouragingly successful. Membership figures have increased with approximately 36% of readers from the rural areas surrounding the town. There remains a need to further expand the services provided by the library including the tourist information service for the North of the Island. The junior membership has increased by more than half since rate funds were made available to improve and expand the book stock in the children's section. The improved and updated reference section is well used by members of the public from all areas of the Island. More books, continually updated information and larger premises are needed to meet the demands of the public.

The adopted strategy for tourism in Sector B depends largely on the importance of Ramsey and its ability to respond to Government initiatives. No future significant office development will be permitted in the sector other than in Ramsey Town Centre. Areas zoned for residential development within the Parish of Lezayre abut on the town's boundary with the sole exception of land to the north-west and south-west of Sulby Bridge. In fact, 80% of the development potential in relation to residential land availability within Section [B] is contained within the proposed extension area.

The Ramsey Town Commissioners have long recognised the importance of Ramsey to the Northern Community and have sought to foster the creation of an effective District Authority which would be able to respond to the increasing need for public amenities and services. The Commissioners have not been able to persuade the Parish Authorities, including Lezayre, to begin talks on this district concept.

The Commissioners have not been surprised by this lack of interest which in their opinion serves to highlight the need for a significant boundary extension. Only by commanding additional resources, will the Commissioners be able to plan for future expansion of the amenities and facilities of Ramsey on which the north of the Island depends to a great extent.

A public statement issued by Lezayre Parish Commissioners in June, 1990, refers to the possibility of increasing the Parish Rate from 15p to 29p and the Refuse Rate from 10p to 16p on the assumption that a net rateable value of £58,386 would be lost to Ramsey.

As far as the Parish of Lezayre is concerned, a net rateable value of approximately £57,702 excluding farmland and zero rated properties [see Appendix 1] is contained within the extension area as now proposed by the Ramsey Town Commissioners. The estimated increase to 45p (29p + 16p) as published by Lezayre Parish Commissioners presumably assumes a fixed charge of £8.00 per household for refuse collection in addition to the parish and refuse rates.

For the purpose of comparing the possible financial effect of the boundary extension on ratepayers within the extension area and within the remainder of Lezayre, the attached tables [see Appendix 2] assume a Town Rate of 113p (1990/91 actual) and the assumed higher parish charges of 45p plus £8 per household. The Ramsey Town Commissioners propose that the rates within the extension area be increased in stages to equal the Town Rate by the 1997/98 Rate Year.

With effect from the 1993/94 Rating Year, ratepayers in the extension area would be charged 40% of the Town Rate. The charge would be increased annually in 15% stages until equal payments applied throughout the extended Town District. [see Appendices 3 - 7 inclusive].

An average rateable value of £141 has been calculated for properties which attract rates within the whole of Lezayre. The average within the proposed extension area is approximately £172 and within the remainder of Lezayre is approximately £118.

The estimated effect on average rateable values has been calculated as shown in the attached tables which do not take account of inflation or the additional charges for Water Rates (52.5p) and Churchyard Rates (4.5p) which apply equally to town and parish areas.

The extension into Maughold Parish includes the derelict buildings at Crossags Farm, a small acreage of farmland and part of the Ramsey Golf Links. The unoccupied buildings are presently not rated and the total net rateable value of the farmland and recreational land is presently £319. The net rates receivable by the Ramsey Town Commissioners would be in respect of the Golf Links land only, at present, and this amounts to a net rateable value of £70. The total rateable value of the parish is approximately £67,678.

The Ramsey Town Commissioners are not seeking to extend the town boundaries any further into Maughold beyond the present limits at Ballure Road. There is little likelihood of any further development immediately outside the boundary in the Ballure area and the properties are not connected to the Ramsey sewerage system at present.

The approximate additional income to the Town based on the 1990/91 Rate of 113p in the pound and the proposed 5 year formula would be as follows:-

<u>Year</u>	<u>% Charge</u>	<u>Amount</u>	<u>% Increase</u>
1993/94	40	£ 25,962	4.51
1994/95	55	£ 35,698	6.20
1995/96	70	£ 45,433	7.89
1996/97	85	£ 55,169	9.58
1997/98	100	£ 64,905	11.28

The total projected income from rates for an extended town district, again based on the 1990/91 rate, would be approximately as follows in each year:-

<u>Year</u>	<u>% Charge in Extn. Area</u>	<u>Total Income</u>
1993/94	40 %	£ 601,590
1994/95	55 %	£ 611,326
1995/96	70 %	£ 621,061
1996/97	85 %	£ 630,797
1997/98	100 %	£ 640,533

The estimated net rateable income for Ramsey for 1990/91 [113 p rate] is £575,628.00. No account has been taken of the 1991/92 and 1992/93 years, or of inflation, in all approximate calculations and estimates. The published figures are as accurate as possible according to the data available at the time of compilation.

According to the current Voters List which will remain in force until the 31st August, 1991, the total number of registered voters within the proposed new town district has been estimated at 5,110; an increase of slightly less than 11% on the present electorate of 4,613.

Approximately 497 voters would be transferred from Lezayre East and thereby reduce the total number of voters in Lezayre to approximately 675. The Parishes of Maughold (634); Ballaugh ((617); Jurby (432); Santon (338) and Bride (303). would remain smaller in total voting strengths.

[see Summary Page 10]

S U M M A R Y

The Ramsey Town Commissioners contend that there is a community of interest between the present town and the proposed extension areas in all or most public services, social agencies and communal requirements for the future.

The present rating system is considered to be inequitable and should therefore be redressed at least in part by inclusion of the proposed areas within the town and by an equal distribution of the burden by common rating to be introduced during a period of not more than 5 years. The extension areas are considered to be either overspill or outgrowth arising naturally on the present boundary and thereby taking advantage of facilities and amenities provided in part by the ratepayers of the town.

The Commissioners believe that there is limited acreage left for development of the town within its borders and that injury is caused thereby.

The Commissioners believe that opposition expressed against the proposed extension has neither been fairly directed nor rightly expressed and is almost certainly heavily influenced by fear of paying increased rates. The Commissioners are not aware of any service that may be endangered by the proposed transfer of the areas in question. Whilst recognising that the areas sought are of value in various ways to the parish authorities by whom they are now governed, the Ramsey Town Commissioners contend that the areas are potentially of more value to the town and that the balance of advantage should therefore lie in acceptance of their scheme.

Subject to such acceptance the Commissioners would propose to ensure that adequate provision is made to compensate the parish authorities by way of any financial adjustments required because of the transfer of assets and liabilities.

In the past, the aforementioned factors have been used as guidelines in considering the merits or otherwise of boundary applications to Tynwald for extensions of boundaries. There is of course no absolute requirement to satisfy all of the guidelines and each case has to be considered on its own merits.

The Ramsey Town Commissioners are of the opinion that they will be able to satisfy most, if not all, of the guidelines and earnestly believe that in the long-term the whole of the northern community would benefit from the facilities of an enlarged town.

Town Hall,
Ramsey.
28th December, 1990.

D. Evans,
Town Clerk.

L E Z A Y R E P A R I S H

	NET R.V.	PROPERTIES
TOTAL	117,781	875
LESS FARMLAND AND ZERO RATED	5,580	79
	112,201	796
EXTENSION AREA	58,169	352
LESS FARMLAND AND ZERO RATED	467	16
	57,702	336
REMAINDER OF LEZAYRE	59,612	523
LESS FARMLAND AND ZERO RATED	5,113	63
	54,449	460
NET EXTENSION	57,702	336
NET REMAINDER	54,449	460
TOTAL	112,201	796

28th December, 1990.

Figures are as accurate as possible as at 28th December, 1990.

Comparison of Possible Rates Payable for Average Rated Properties
Excluding Inflation, Water Rates and Churchyard Rates

TABLE A

ANNUAL DIRECT COMPARISON	Average R.V.	1993 / 94	1994 / 95	1995 / 96	1996 / 97	1997 / 98
Extension Area (113p)	141	£ 53.73 (40%)	£ 87.63 (55%)	£ 111.53 (70%)	£ 135.43 (85%)	£ 159.33 (100%)
Lezayre Remainder (45p + £8.00)		£ 71.45	£ 71.45	£ 71.45	£ 71.45	£ 71.45

TABLE B

ANNUAL SPLIT COMPARISON	Average R.V.	1993 / 94	1994 / 95	1995 / 96	1996 / 97	1997 / 98
Extension Area (113p)	172	£ 77.74 (40%)	£106.90 (55%)	£ 136.05 (70%)	£ 165.21 (85%)	£ 194.36 (100%)
Lezayre Remainder (45p + £8.00)	118	£ 61.10	£ 61.10	£ 61.10	£ 61.10	£ 61.10

TABLE C

WEEKLY DIRECT COMPARISON	Average R.V.	1993 / 94	1994 / 95	1995 / 96	1996 / 97	1997 / 98
Extension Area (113p)	141	£ 1.23 (40%)	£ 1.59 (55%)	£ 2.14 (70%)	£ 2.60 (85%)	£ 3.06 (100%)
Lezayre Remainder (45p + £8.00)		£ 1.37	£ 1.37	£ 1.37	£ 1.37	£ 1.37

TABLE D

WEEKLY SPLIT COMPARISON	Average R.V.	1993 / 94	1994 / 95	1995 / 96	1996 / 97	1997 / 98
Extension Area (113p)	172	£ 1.50 (40%)	£ 2.06 (55%)	£ 2.62 (70%)	£ 3.18 (85%)	£ 3.74 (100%)
Lezayre Remainder (45p + £8.00)	118	£ 1.18	£ 1.18	£ 1.18	£ 1.18	£ 1.18

RAMSEY TOWN COMMISSIONERS
PROPOSED BOUNDARY EXTENSION - 1990
APPENDICES 3 - 7 INCLUSIVE

KEY TO INFORMATION

Average	=	Average net rateable values of properties in each district
Count Property	=	Number of rated properties
Count Fixed	=	Number of fixed charges
FXD	=	Fixed charge of £8 per property for fortnightly collection of refuse.
LEZ COMM	=	Total cost of Parish [18 p] and Refuse [10 p] Rates plus fixed charge [£8].
RSY PERCENTAGE	=	Percentage as per heading [e.g. 40%] of Town Rate [113 p].
DIFF	=	Additional cost in year for average rated property within the district.

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1993/94

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 40%	DIFF.
ANDREAS ROAD						
	Average:	169		55.29	75.33	21.05
	Total:	1,351	64.00	442.28	510.65	158.37
	Count:	8	8			
BRIDE ROAD						
	Average:	192		58.82	92.04	23.22
	Total:	2,178	96.00	705.84	984.47	278.63
	Count:	12	12			
CLIFTON PARK						
	Average:	205		65.70	93.15	27.45
	Total:	5,770	224.00	1,839.60	2,608.06	768.46
	Count:	28	28			
CROSSAGS						
	Average:	63		21.64	28.48	6.84
	Total:	126	8.00	43.28	56.95	13.67
	Count:	2	1			
ELLAN PARK						
	Average:	115		39.71	52.19	12.47
	Total:	1,501	96.00	516.28	678.44	162.16
	Count:	13	12			
GAINSBOROUGH CRESCENT						
	Average:	205		65.43	92.70	27.27
	Total:	2,256	88.00	719.68	1,019.70	300.02
	Count:	11	11			
GARDENER'S LANE						
	Average:	260		80.80	117.52	36.72
	Total:	260	8.00	80.80	117.52	36.72
	Count:	1	1			
EN AULOYN						
	Average:	149		49.52	57.22	17.69
	Total:	10,261	544.00	3,417.08	4,637.97	1,220.89
	Count:	69	68			
GOLF LINKS						
	Average:	375		105.00	169.50	64.50
	Total:	375		105.00	169.50	64.50
	Count:	1	0			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1993/94

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 40%	DIFF.
JURBY ROAD						
	Average:	164		54.02	74.29	20.27
	Total:	3,287	160.00	1,080.36	1,485.73	405.37
	Count:	20	20			
KING'S REACH						
	Average:	128		43.58	57.77	14.19
	Total:	5,112	312.00	1,743.36	2,310.67	567.31
	Count:	40	39			
LEZAYRE ROAD (G.A.)						
	Average:	175		57.40	79.75	22.35
	Total:	1,235	56.00	401.80	558.22	156.42
	Count:	7	7			
MILNTOWN						
	Average:	55		26.29	29.53	3.24
	Total:	196	24.00	78.88	88.59	9.71
	Count:	3	3			
RICHMOND ROAD						
	Average:	194		62.38	87.79	25.41
	Total:	1,748	72.00	561.44	790.09	228.65
	Count:	9	9			
RIVERBANK ROAD						
	Average:	201		63.71	90.79	27.08
	Total:	6,026	224.00	1,911.28	2,723.75	812.47
	Count:	30	28			
RIVERSDALE						
	Average:	228		71.84	103.06	31.22
	Total:	228	8.00	71.84	103.06	31.22
	Count:	1	1			
ROMNEY WYND						
	Average:	232		73.07	105.04	31.97
	Total:	2,324	80.00	730.72	1,050.44	319.72
	Count:	10	10			
THORNHILL PARK						
	Average:	208		66.23	94.00	27.77
	Total:	5,407	208.00	1,721.96	2,443.97	722.01
	Count:	26	26			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1993/94

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 40%	DIFF.
WESTLANDS AVENUE						
	Average:	189		50.92	85.43	24.51
	Total:	756	32.00	243.68	341.71	98.03
	Count:	4	4			
WESTLANDS CLOSE						
	Average:	157		54.74	75.46	20.71
	Total:	2,671	128.00	875.88	1,207.29	331.41
	Count:	16	16			
WESTLANDS ESTATE						
	Average:	223		70.38	100.71	30.32
	Total:	2,228	80.00	703.84	1,007.07	303.23
	Count:	10	10			
WHITEBRIDGE AVENUE						
	Average:	150		52.91	72.50	19.59
	Total:	2,406	120.00	793.68	1,087.52	293.84
	Count:	15	15			
	Average:	172		55.92	77.62	21.70
	Total:	57,702	2,632.00	18,788.56	26,081.37	7,292.81
	Count:	336	329			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1994/95

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 55%	DIFF.
ANDREAS ROAD						
	Average:	169		55.29	104.96	49.57
	Total:	1,351	64.00	442.28	839.66	397.38
	Count:	8	9			
BRIDE ROAD						
	Average:	182		58.82	112.80	53.98
	Total:	2,178	96.00	705.84	1,353.64	647.80
	Count:	12	12			
CLIFTON PARK						
	Average:	206		55.70	128.07	62.37
	Total:	5,770	224.00	1,839.60	3,586.02	1,746.42
	Count:	28	28			
CROSSAGS						
	Average:	63		21.64	39.16	17.52
	Total:	126	8.00	43.28	78.31	35.03
	Count:	2	1			
ELLAN PARK						
	Average:	115		39.71	71.76	32.05
	Total:	1,501	96.00	516.28	932.88	416.60
	Count:	13	12			
GAINSBOROUGH CRESCENT						
	Average:	205		65.43	127.47	62.04
	Total:	2,256	88.00	719.68	1,402.12	682.44
	Count:	11	11			
GARDENER'S LANE						
	Average:	260		80.80	161.59	80.79
	Total:	260	8.00	80.80	161.59	80.79
	Count:	1	1			
GLEN AULDYN						
	Average:	149		49.52	92.42	42.90
	Total:	10,261	544.00	3,417.08	6,377.18	2,960.10
	Count:	69	58			
GOLF LINKS						
	Average:	375		105.00	233.06	128.06
	Total:	375		105.00	233.06	128.06
	Count:	1	0			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1994/95

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 55%	DIFF
JILROY ROAD						
Average:		154		54.00	102.14	48.13
Total:		3,287	160.00	1,080.36	2,042.88	962.52
Count:	20		20			
KING'S REACH						
Average:		129		43.58	79.43	35.84
Total:		5,112	312.00	1,743.36	3,177.09	1,433.73
Count:	40		39			
LEZAYRE ROAD (G.A.)						
Average:		175		57.40	109.65	52.25
Total:		1,235	56.00	401.80	767.57	365.77
Count:	7		7			
MILNTOWN						
Average:		55		26.29	40.60	14.31
Total:		196	24.00	78.88	121.81	42.93
Count:	3		3			
RICHMOND ROAD						
Average:		194		62.38	120.71	58.33
Total:		1,748	72.00	561.44	1,086.37	524.93
Count:	9		9			
RIVERSBANK ROAD						
Average:		201		63.71	124.84	61.13
Total:		6,026	224.00	1,911.28	3,745.18	1,833.90
Count:	30		28			
RIVERSDALE						
Average:		229		71.84	141.70	69.86
Total:		228	8.00	71.84	141.70	69.86
Count:	1		1			
ROMNEY WYND						
Average:		232		73.07	144.44	71.36
Total:		2,324	80.00	730.72	1,444.36	713.64
Count:	10		10			
THORNHILL PARK						
Average:		208		66.23	129.25	63.02
Total:		5,407	208.00	1,721.96	3,360.46	1,638.50
Count:	25		25			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1994/95

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 55%	DIFF.
WESTLANDS AVENUE						
	Average:	189		50.92	117.47	56.55
	Total:	756	32.00	243.68	469.86	226.18
	Count:	4	4			
WESTLANDS CLOSE						
	Average:	157		54.74	103.75	49.01
	Total:	2,671	128.00	875.88	1,550.03	784.15
	Count:	15	15			
WESTLANDS ESTATE						
	Average:	223		70.38	138.47	58.09
	Total:	2,228	80.00	703.84	1,384.70	680.86
	Count:	10	10			
WHITEBRIDGE AVENUE						
	Average:	160		52.91	99.69	46.78
	Total:	2,406	120.00	793.68	1,495.33	701.65
	Count:	15	15			
	Average:	172		55.92	106.73	50.91
	Total:	57,702	2,632.00	18,788.56	35,861.80	17,073.24
	Count:	336	329			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1995/96

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 70%	DIFF.
ANDREAS ROAD						
	Average:	159		55.29	133.58	78.29
	Total:	1,351	54.00	442.28	1,058.52	526.34
	Count:	8	8			
BRIDE ROAD						
	Average:	182		59.82	143.57	94.75
	Total:	2,178	96.00	705.84	1,722.79	1,016.95
	Count:	12	12			
CLIFTON PARK						
	Average:	206		55.70	153.00	97.30
	Total:	5,770	224.00	1,839.60	4,564.09	2,724.49
	Count:	28	28			
CROSSAGS						
	Average:	63		21.64	49.84	28.20
	Total:	126	8.00	43.28	99.67	56.39
	Count:	2	1			
ELLAN PARK						
	Average:	115		39.71	91.33	51.52*
	Total:	1,501	96.00	516.28	1,187.29	671.01
	Count:	13	12			
GAINSBOROUGH CRESCENT						
	Average:	205		65.43	152.23	96.80
	Total:	2,256	88.00	719.68	1,784.48	1,064.80
	Count:	11	11			
GARDENER'S LANE						
	Average:	260		80.80	205.66	124.86
	Total:	260	8.00	80.80	205.66	124.86
	Count:	1	1			
GLEN AULDYN						
	Average:	149		49.52	117.63	68.11
	Total:	10,261	544.00	3,417.08	8,116.48	4,699.40
	Count:	69	58			
GOLF LINKS						
	Average:	375		105.00	296.63	191.63
	Total:	375		105.00	296.63	191.63
	Count:	1	0			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1995/96

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 70%	DIFF.
JURBY ROAD						
	Average:	154		54.02	130.00	75.98
	Total:	3,287	160.00	1,080.35	2,600.00	1,519.54
	Count:	20	20			
KING'S REACH						
	Average:	128		43.58	101.09	57.51
	Total:	5,112	312.00	1,743.35	4,043.61	2,300.25
	Count:	40	39			
LEZAYRE ROAD (G.A.)						
	Average:	175		57.40	139.55	82.15
	Total:	1,235	56.00	401.80	976.87	575.07
	Count:	7	7			
MILNTOWN						
	Average:	55		26.29	51.68	25.39
	Total:	196	24.00	78.88	155.04	76.16
	Count:	3	3			
RICHMOND ROAD						
	Average:	194		52.38	153.63	91.25
	Total:	1,748	72.00	561.44	1,382.68	821.24
	Count:	9	9			
RIVERBANK ROAD						
	Average:	201		63.71	158.88	95.18
	Total:	6,026	224.00	1,911.28	4,766.54	2,855.26
	Count:	30	28			
RIVERSDALE						
	Average:	228		71.84	180.35	108.51
	Total:	228	8.00	71.84	180.35	108.51
	Count:	1	1			
ROMNEY WYND						
	Average:	232		73.07	183.83	110.76
	Total:	2,324	80.00	730.72	1,838.29	1,107.57
	Count:	10	10			
THORNHILL PARK						
	Average:	208		56.23	164.50	98.27
	Total:	5,407	208.00	1,721.96	4,276.93	2,554.97
	Count:	26	25			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1995/96

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 70%	DIFF.
WESTLANDS AVENUE						
	Average:	199		50.92	149.50	88.59
	Total:	756	32.00	243.68	597.99	354.31
	Count:	4	4			
WESTLANDS CLOSE						
	Average:	167		54.74	132.05	77.31
	Total:	2,671	128.00	875.88	2,112.77	1,236.89
	Count:	16	16			
WESTLANDS ESTATE						
	Average:	223		70.38	176.24	105.85
	Total:	2,228	80.00	703.84	1,762.35	1,058.51
	Count:	10	10			
WHITEBRIDGE AVENUE						
	Average:	160		52.91	126.88	73.96
	Total:	2,406	120.00	793.68	1,903.14	1,109.46
	Count:	15	15			
	Average:	172		55.92	135.84	79.92
	Total:	57,702	2,632.00	18,788.56	45,642.27	26,853.71
	Count:	336	329			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1996/97

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 85%	DIFF
ANDREAS ROAD						
	Average:	159		55.29	152.21	106.92
	Total:	1,351	54.00	442.28	1,297.64	955.36
	Count:	9	3			
BRIDE ROAD						
	Average:	192		58.92	174.33	115.51
	Total:	2,179	96.00	705.94	2,091.96	1,386.12
	Count:	12	12			
CLIFTON PARK						
	Average:	206		65.70	197.93	132.23
	Total:	5,770	224.00	1,839.60	5,542.07	3,702.47
	Count:	28	28			
CROSSAGS						
	Average:	53		21.64	60.52	38.88
	Total:	126	8.00	43.28	121.03	77.75
	Count:	2	1			
ELLAN PARK						
	Average:	115		39.71	110.90	71.19
	Total:	1,501	96.00	516.28	1,441.71	925.43
	Count:	13	12			
GAINSBOROUGH CRESCENT						
	Average:	205		55.43	196.99	131.57
	Total:	2,256	88.00	719.68	2,166.90	1,447.22
	Count:	11	11			
GARDENER'S LANE						
	Average:	260		80.80	249.73	168.93
	Total:	260	8.00	80.80	249.73	168.93
	Count:	1	1			
GLEN AULDYN						
	Average:	149		49.52	142.84	93.31
	Total:	10,261	544.00	3,417.08	9,855.69	6,439.51
	Count:	59	58			
GOLF LINKS						
	Average:	375		105.00	360.19	255.19
	Total:	375		105.00	360.19	255.19
	Count:	1	0			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1995/97

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 85%	DIFF.
JURBY ROAD						
	Average:	164		54.02	157.86	103.84
	Total:	3,287	150.00	1,080.36	3,157.17	2,075.91
	Count:	20	20			
KING'S REACH						
	Average:	128		43.58	122.75	79.17
	Total:	5,112	312.00	1,743.36	4,910.03	3,166.67
	Count:	40	39			
LEZAYRE ROAD (G.A.)						
	Average:	176		57.40	159.46	112.06
	Total:	1,235	55.00	401.80	1,186.22	784.42
	Count:	7	7			
MILNTOWN						
	Average:	65		26.29	62.75	36.46
	Total:	195	24.00	78.88	188.25	109.38
	Count:	3	3			
RICHMOND ROAD						
	Average:	194		62.38	186.55	124.17
	Total:	1,748	72.00	561.44	1,678.95	1,117.51
	Count:	9	9			
RIVERSBANK ROAD						
	Average:	201		63.71	192.93	129.22
	Total:	6,026	224.00	1,911.28	5,787.97	3,876.69
	Count:	30	28			
RIVERSDALE						
	Average:	228		71.84	218.99	147.15
	Total:	228	8.00	71.84	218.99	147.15
	Count:	1	1			
ROMNEY WYND						
	Average:	232		73.07	223.22	150.15
	Total:	2,324	80.00	730.72	2,232.21	1,501.49
	Count:	10	10			
THORNHILL PARK						
	Average:	208		56.23	199.75	133.52
	Total:	5,407	208.00	1,721.96	5,193.43	3,471.47
	Count:	26	26			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1996/97

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 95%	DIFF.
WESTLANDS AVENUE						
	Average:	189		50.92	191.54	120.52
	Total:	756	32.00	243.68	725.14	482.46
	Count:	4	4			
WESTLANDS CLOSE						
	Average:	157		54.74	150.34	105.50
	Total:	2,571	128.00	875.88	2,565.50	1,699.62
	Count:	16	16			
WESTLANDS ESTATE						
	Average:	223		70.38	214.00	143.61
	Total:	2,228	80.00	703.84	2,139.98	1,436.14
	Count:	10	10			
WHITEBRIDGE AVENUE						
	Average:	160		52.91	154.06	101.15
	Total:	2,406	120.00	793.68	2,310.96	1,517.28
	Count:	15	15			
	Average:	172		55.92	164.95	109.03
	Total:	57,702	2,632.00	18,788.56	55,422.73	36,634.17
	Count:	336	329			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1997/98

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 100%	DIFF.
ANDREAS ROAD						
	Average:	169		55.29	190.93	135.54
	Total:	1,351	64.00	442.28	1,526.63	1,084.35
	Count:	8	8			
BRIDE ROAD						
	Average:	182		59.82	205.10	146.28
	Total:	2,178	96.00	705.84	2,461.14	1,755.30
	Count:	12	12			
CLIFTON PARK						
	Average:	206		65.70	232.86	167.16
	Total:	5,770	224.00	1,839.60	6,520.10	4,680.50
	Count:	28	28			
CROSSAGS						
	Average:	53		21.54	71.19	49.55
	Total:	126	8.00	43.29	142.38	99.10
	Count:	2	1			
ELLAN PARK						
	Average:	115		39.71	130.47	90.76
	Total:	1,501	96.00	516.28	1,696.13	1,179.85
	Count:	13	12			
GAINSBOROUGH CRESCENT						
	Average:	205		65.43	231.75	166.33
	Total:	2,256	88.00	719.68	2,549.28	1,829.60
	Count:	11	11			
GARDENER'S LANE						
	Average:	260		80.80	293.80	213.00
	Total:	260	8.00	80.80	293.80	213.00
	Count:	1	1			
GLEN AULDYN						
	Average:	149		49.52	168.04	118.52
	Total:	10,261	544.00	3,417.08	11,594.93	8,177.85
	Count:	59	68			
GOLF LINKS						
	Average:	375		105.00	423.75	318.75
	Total:	375		105.00	423.75	318.75
	Count:	1	0			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1997/98

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 100%	DIFF.
JURBY ROAD						
	Average:	154		54.02	185.72	131.70
	Total:	3,287	160.00	1,080.36	3,714.31	2,633.95
	Count:	20	20			
KING'S REACH						
	Average:	128		43.58	144.41	100.93
	Total:	5,112	312.00	1,743.36	5,776.56	4,033.20
	Count:	40	39			
LEZAYRE ROAD (G.A.)						
	Average:	176		57.40	199.36	141.96
	Total:	1,235	56.00	401.80	1,395.55	993.75
	Count:	7	7			
MILNTOWN						
	Average:	65		26.29	73.83	47.53
	Total:	196	24.00	78.88	221.48	142.50
	Count:	3	3			
RICHMOND ROAD						
	Average:	194		62.38	219.47	157.09
	Total:	1,748	72.00	561.44	1,975.24	1,413.80
	Count:	9	9			
RIVERSBANK ROAD						
	Average:	201		63.71	226.98	163.27
	Total:	6,026	224.00	1,911.28	6,809.38	4,898.10
	Count:	30	28			
RIVERSDALE						
	Average:	228		71.84	257.64	185.80
	Total:	228	8.00	71.84	257.64	185.80
	Count:	1	1			
ROMNEY WYND						
	Average:	232		73.07	262.61	189.54
	Total:	2,324	80.00	730.72	2,626.12	1,895.40
	Count:	10	10			
THORNHILL PARK						
	Average:	209		66.23	235.00	168.77
	Total:	5,407	209.00	1,721.96	6,109.91	4,387.95
	Count:	26	26			

COMPARISON OF COMMISSIONERS RATES PAYABLE - LEZAYRE/RAMSEY 1997/98

DISTRICT	PROPERTY	RV	FXD	LEZ COMM	RSY 100%	DIFF.
WESTLANDS AVENUE						
	Average:	189		50.92	213.57	152.65
	Total:	756	32.00	243.68	854.29	610.60
	Count:	4	4			
WESTLANDS CLOSE						
	Average:	157		54.74	198.64	133.90
	Total:	2,671	128.00	875.88	3,018.23	2,142.35
	Count:	15	15			
WESTLANDS ESTATE						
	Average:	223		70.38	251.76	181.38
	Total:	2,228	80.00	703.84	2,517.64	1,813.80
	Count:	10	10			
WHITEBRIDGE AVENUE						
	Average:	160		52.91	181.25	128.34
	Total:	2,406	120.00	793.68	2,718.78	1,925.10
	Count:	15	15			
	Average:	172		55.92	194.06	138.14
	Total:	57,702	2,632.00	18,788.56	65,203.26	46,414.70
	Count:	335	329			

RAMSEY TOWN COMMISSIONERS
PROPOSED BOUNDARY EXTENSION STUDY
SUMMARY OF APPROXIMATE AREAS

ACRES

Existing Town District707.0
=====Proposed Extension Area

Lezayre:

North of Lezayre Road

267

South of Lezayre Road

206

473

Maughold

54527.0
=====Existing Parish of Lezayre15,734.0
=====Existing Parish of Maughold8,460.0
=====Undeveloped Land Within Existing Town

Vollan Farm Fields

29.5

Poyll Dhooley

Residential Zone

25.0

Industrial Zone

10.5

35.5

Fairfield Avenue Residential Zone

5.0

70.0
=====Golf CourseLezayre
Maughold

67.0

14.581.5
=====

23rd April, 1991.

Boundary - A:\LANDAREA

TOWN OF RAMSEY
COMPARISON OF ELECTORAL DISTRICTS

A) Alphabetical Order of Polling Districts Existing

<u>Existing</u>	<u>Voters</u>		
Andreas	846		846
Arbory - East	537		
West	700	1,237	1,237
Ballaugh	617		617
Bride	303		303
Braddan - North	1,072		
South	245	1,317	1,317
Castletown - District No. 1	1,395		
District No. 2	847	2,242	2,242
Douglas Atholl - Glencrutchery	841		
Willaston	1,608	2,449	
Derby - Tynwald	623		
Windsor	607		
Derby	1,179	2,409	
Hills - Ballaughton	1,108		
Anagh Coar	761		
Pulrose	1,121	2,990	
Murrays Garden City	982		
Somerset	603		
Albany	794	2,379	
St. Georges - St. Georges	548		
Ballabrooie	761		
Eastfield	764	2,073	
Victoria - Crescent	874		
Strand	289		
St. Ninians	982		
Quay	285	2,430	14,730
German	788		788
Jurby	432		432
Laxey	1,077		1,077
Lezayre - West	447		
East	725	1,172	1,172
Lonan - North	490		
South	473	963	963
Maughold - North	422		
South	212	634	634
Malew - North	336		
South	1,272	1,608	1,608
Marown	1,137		1,137
Michael	892		892
Onchan - Parish	230		
Ballachurry	1,072		
Birch Hill	2,124		
Howstrake	1,830		
Hague	820	6,076	6,076
Patrick - North	177		
Northeast	418		
Southwest	226	821	821
Port Erin	2,282		2,282

Peel - District No. 1	1,193		
District No. 2	475		
District No. 3	1,118	2,786	2,786
Port St. Mary	1,286		1,286
Ramsey - North District No. 1	928		
District No. 2	1,293	2,221	
- South District No. 1	1,217		
District No. 2	1,175	2,392	4,613
Rushen - East	507		
West	589	1,096	1,096
Santon	338		338

B) Total Voters - Numerical Order (24)

Douglas	14,730
Onchan	6,076
Ramsey	4,613 ³
Peel	2,786
Port Erin	2,282
Castletown	2,242
Malew	1,608
Braddan	1,317
Port St. Mary	1,286
Arbory	1,237
Lezayre	1,172 ¹¹
Malew	1,137
Rushen	1,096
Laxey	1,077
Lonan	963
Michael	892
Andreas	846
Patrick	821
German	788
Maughold	634
Ballaugh	617
Jurby	432
Santon	338
Bride	303 ²⁴

c) Constituencies - Alphabetical and Numerical (15)

Ayre	2,321	Onchan	6,076
Castletown	2,242	Rushen	5,901
Douglas East	3,572	Ramsey	4,613 ³
Douglas North	3,431	Douglas West	3,904
Douglas South	3,823	Douglas South	3,823
Douglas West	3,904	Douglas East	3,572
Garff	2,674	Douglas North	3,431
Glenfaba	1,609	Peel	2,786
Michael	1,941	Garff	2,674
Onchan	6,076	Middle	2,454
Peel	2,786	Ayre	2,321 ¹¹
Ramsey	4,613	Castletown	2,242
Rushen	5,901	Malew and Santon	1,946
Malew and Santon	1,946	Michael	1,941
Middle	2,454	Glenfaba	1,609 ¹⁵

RAMSEY TOWN COMMISSIONERS
PROPOSED BOUNDARY EXTENSION

PROOF OF EVIDENCE - SEWERS

The 100% sewerage deficiency system is somewhat complicated to explain. A Sewerage Authority is able to claim a 100% deficiency payment from Government to meet

- (a) the net annual cost of loan charges and sinking fund payments arising from capital expenditure on sewers;
- (b) an annual revenue allowance for day to day maintenance and repair of sewers and pumping stations; and
- (c) an administration allowance based on 10% (£4,300 in 1989/90) of the agreed annual maintenance budget.

The administration allowance is purely based on the annual revenue maintenance estimate and no allowance is received for the work involved in preparing and administering capital schemes and supervising the annual maintenance. Sewer connection fees are credited to Sewer Reserve Accounts and kept solely for expenditure on sewerage related schemes. Such expenditure requires the prior approval of government departments.

The Commissioners are generally obliged to borrow money on the open market by means of mortgage bonds to fund capital schemes. Administration of the Capital Account is an ongoing and time consuming commitment as borrowings for sewers continue for 30 years, and interest payments have to be made at 6 monthly intervals and as schemes are introduced, the work load on the Capital Account increases.

Administration costs, other than the small amount mentioned earlier, are a direct charge on the Town Rate. Similar arrangements apply for housing deficiency schemes although 5% (£23,575) of rent income is reclaimable from Government.

It is evident from many submissions against the boundary application that there is a general misunderstanding and a popular misconception concerning the role of the Ramsey Town Commissioners in pursuing their responsibilities as a Sewerage Authority.

The sewerage facilities in Ramsey, and in the Special Drainage Districts which drain via the town system, are vested in the Ramsey Town Commissioners. The Commissioners do not act as agents of the Department of Highways, Ports and Properties in sewerage matters but do liaise very closely with that Department (and the Department of Local Government and the Environment) on such matters.

The role of the Commissioners and their staff is to maintain the sewerage facilities and to effect improvements. Everyone must be aware of how active the Ramsey Town Commissioners have been in this area of their responsibility. A typical scheme, such as the contract to be let soon for replacement of the sewers in the Waterloo Road area of the town, takes many months of planning and promotion in the engagement and direction of consultants and in carrying out consultations with Government Departments. Estimates have to be prepared for inclusion in Government Estimates and borrowing powers have to be sought by means of Petitions.

Many problems arise in ensuring maintenance of any sewerage system and daily supervision is required at the 10 separate pumping stations in the care of the Commissioners, three of which stations are situated within the proposed extension area. Alarm facilities are connected directly to the homes of senior staff, who respond to alarm calls on a 24 hour basis, with work force call out when necessary.

The sewerage system serving Ramsey and surrounding drainage areas is mainly a combined foul and storm water gravity system which drains to the storage tunnel at the Vollar where the effluent is pumped into the sea outfall. Expert advice obtained by the Ramsey Town Commissioners during the latter part of the 1970's including a closed circuit television survey, revealed that much of the existing main sewerage system was then in a poor structural condition and that certain sections were liable to collapse.

A major sewer replacement programme was initiated by the Commissioners and is continuing to be promoted at every possible opportunity. There is no doubt, whatsoever, that much of the development in the Extension Area would not have been possible without the foresight and initiative of the Ramsey Town Commissioners in employing staff capable of pursuing their policies in this respect.

24th April, 1991.

A:\EVSEWERS

IN THE DEPARTMENT OF LOCAL GOVERNMENT AND THE ENVIRONMENT
To The Honourable the Minister and members of the
Department.

IN THE MATTER of the Application of the Ramsey Town
Commissioners for a boundary extension as set out in their
Application dated the 28th December 1990 with documents
annexed thereto.

The Lezayre Parish Commissioners wish to state as follows:-

1 In previous years the following guidelines have been
used in the consideration of applications for the extension
of boundaries (see the Report of the Select Committee of
Tynwald on the Petition of the Mayor Aldermen and Burgesses
of the Borough of Douglas for an extension of the
boundaries of the Borough of Douglas 1984):-

(a) that the promoter's area and the areas sought are
really one community;

(b) that the area sought is an overspill or outgrowth of
the promoter's area;

(c) that there is insufficient acreage left for the
development of the promoter's area within its borders and
injury is suffered thereby;

(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;

(e) that the balance of advantage lies in the acceptance
of the scheme, though it may be generally admitted that the
areas sought may be valuable in various ways to the
Councils by whom they are now governed;

(f) that public opinion, where rightly expressed and
fairly directed, is in favour of the proposals or that it
is not at all unanimously against, or if heavily against is
influenced mostly by fear of paying the same rates as the
promoter's area;

(g) that there is not ground for complaint that there is
inadequate provision for compensation by way of financial
adjustment.

2. As to (a) above it is contended that the area sought
is not really one community with the Town of Ramsey. The
Parish of Lezayre is predominantly a rural community having
little in common with the Town of Ramsey.

3. As to (b) above it is denied that the area sought is
an overspill or outgrowth of the Town of Ramsey. The
Clifton Park and Ellan Park Estates to the North and West

of Richmond Road consist of new properties and dwellings largely inhabited by persons not born in the Town of Ramsey. All other areas in the area sought are largely agricultural with scattered housing.

4. As to (c) above from reference to the Ramsey Town Plan (Written Statement) Planning Circular 1/89 (adopted by Tynwald 13th December 1988) and the plans annexed thereto, it is clear that there are considerable areas of land within the existing Town Boundary which are zoned or designated as land set aside for residential or industrial use, which lands are presently undeveloped and which, when developed, would produce rateable income.

5. As to (d) there is no real community of interest in all or most public services, social agencies and communal requirements of the future save those which are directly funded by the Government of the Isle of Man.

6. As to (e) there is no advantage whatsoever that would accrue to the inhabitants of the area sought by their becoming inhabitants of Ramsey rather than Lezayre. There is an advantage for the Town of Ramsey in that, by extending its boundaries, the Town would significantly add to its rateable income. However, the Town would have to provide services for its new residents insofar as these are not provided by the Government of the Isle of Man.

7. As to (f) it is submitted that public opinion in the Parish of Lezayre, which is against the extension of the boundaries of the Town of Ramsey, is not solely or largely motivated by fear of paying Ramsey Rates.

8. As will be seen later, the proposed extension of the boundaries of the Town of Ramsey will result in a serious loss to the Parish of Lezayre in loss of income raised by Rates.

9. The Ramsey document makes it obvious that Ramsey see the proposed boundary extension as an alternative to the Local Authority rating reform which, by implication, (see page one of R.T.C para. 4), they would prefer, the underlying objective being to reduce the rate burden on the rate payers of the Town.

This is not an acceptable premise on which to found a case for a boundary extension.

10. Part of the Ramsey case hinges on the contention that there is a need for additional resources to provide the facilities, services and staff demanded by the anticipated growth. The Lezayre Parish Commissioners question the proposed facilities and services that are likely to be provided (refer to page 2, para. 2 of R.T.C. 1) for it is doubtful whether the residents of Ramsey will be any better off with regard to rates if the extension is granted, for the extra amount of rates gained by Ramsey will be dissipated, if the increase in services is realised, and

the administration costs are taken into account. For instance, in 1970 Lezayre rates were 75% of Ramsey rates; they are now 32%. This could argue good government by Lezayre Parish Commissioners over the past 20 years, and/or excessive expenditure by the Ramsey Town Commissioners, for the Ramsey accounts show that this excessive expenditure derives mainly from salaries of officials, who serve the Town but not the Parishioners of Lezayre.

11. The main facility of Ramsey used by persons living within the proposed extension area is its shops. The proprietors of these shops pay rates and the cost is passed on to their customers whether they live within the Town or come from outside. In the absence of support from outside the Town, many such facilities and services could not exist. For example, Lezayre residents and residents of the other rural parishes comprise 36% of the library users. If they are taken into Ramsey, the fees collected will reduce, but not the overheads, so a larger shortfall may ensue.

12. No case of substance for increased rate income can be sustained on the basis that Ramsey provides amusement or leisure facilities. Those few that exist, apart from the Mooragh Park, are not maintained by Ramsey alone. The Swimming Pool is subsidised by the Northern Parish Authorities and any benefits that arise from the Mooragh Park fall to local traders and not to the residents of Lezayre Parish. This lack of amenities is illustrated by the fact that 30 Ramsey residents have joined Sulby Seniors Group, in order to enjoy entertainment, and the company of others of the same age group, also the Ramsey Fur and Feather Society founded in 1901 have had to move out of the Town, and hold their Annual Show in Andreas Hall due to the lack of a suitable community hall in Ramsey, facilities obviously needed, but lacking in the system adopted in Ramsey. The playgrounds are almost exclusively used by Town children and are very properly a charge on the Town, in the same way that the charges for Andreas playground fall on the ratepayers of Andreas.

13. If Ramsey Commissioners wish to provide car parks within the Town, largely for the benefit of local traders, it is for them to determine whether the cost is recouped from the users or traders, or by some other means. Any loss would be a legitimate charge on Ramsey rates. It is not reasonable to use the provision of such facilities as part of a case to obtain rate income from Lezayre.

14. If the Ramsey Commissioners feel that a weekly collection of refuse is necessary within the Town, the cost of such collections is quite rightly borne by the Ramsey rates. It is wrong that Ramsey should seek to reduce the cost of their refuse collection services by the take over of half the ratepayers of Lezayre.

15. The core services of drainage and sewage may have been relevant to a boundary extension in 1969, but such services are now subject to 100% deficiency support from Central

Government (ie the cost is borne by Central Government, not Ramsey). See page 13 of R.T.C.1, Town accounts dated the 31st March 1990.

16. The Commissioners do not consider the proposed extension areas to be "overspill" of Ramsey. They are clearly identifiable communities, built in these areas as a result of the constraints of the Planning and Development regulations, and populated by residents of the Northern Parishes, and new residents, who have had to purchase houses in these areas because they were unable to build or buy houses in the other areas of the Parish in which they would have preferred to live. Glen Auldyn itself has no community of interest with Ramsey, being self contained within its own Church and community activities.

17. The proposed extension would almost double the land area of Ramsey, and more than halve the rateable income of the Parish of Lezayre, seriously undermining its financial base. It must also be pointed out that in the Section B Development Plan, 80% of the land allocated by Government for development in Lezayre is within the proposed boundary extension. It follows that Lezayre will be impoverished for ever, with no way to replace its lost rate income, once again through the constraints of the Planning and Development regulations. The Commissioners also feel that further encroachment onto the coastal area of Lezayre Parish is unreasonable, making access to the shore line more difficult than it is at present.

18. The proposed extension would have serious implications for the Representation of the Peoples Act 1951 (as amended). To transfer in the region of 550 voters from Ayre Sheading to Ramsey would leave Ayre with some 1700 voters, the lowest for any Sheading, and would necessitate the convening of a Boundary Commission, with implications for a considerable number of Sheadings and Parishes. The results of the Commissioners' postal vote on the proposed extension was as follows:-

Total number of letters sent out	1180
Total number of letters returned	946
Total number not in favour of extension	905
Total number in favour of extension	11
Spoilt papers and unoccupied properties	30

A very definite vote of "no thanks" from the ratepayers.

19. The financial consequences of the proposed extension should be highlighted. The rateable value of the Parish would fall from £112,201.00 to £54,449.00 and would represent a loss of rates in the order of 56%. This loss would have to be shared amongst the remaining ratepayers of the Parish. Coupled with this, the cost of running the Northern Refuse Board would not be diminished, so the remaining Parishioners in Lezayre would have to absorb the collection charge, and it should be noted that Lezayre's contribution to the Swimming Pool Board would also decrease

due to the loss of rate income. The Town Commissioners are seeking to retain additional experienced and professional staff. In the financial year ended 31st March 1990, the cost to the Ramsey ratepayers for administration and office expenses amounted to £244,449.00, up 15% on the previous year. It is considered that the Ramsey Town Commissioners' offices are too heavily staffed. It has been remarked to the Lezayre Commissioners that the norm for Local Authority staffing in England is 1 employee to 1200 voters, with computer back up, and possible access to Central Government computer data base. How can the Ramsey Town Commissioners justify such a large staffing level in the Town ~~Housing~~ *Hall* Departments? It is felt that there is a need for scrutiny of the Town's accounts over recent years, with comparison with Onchan or Peel weighted according to population.

PROOF OF EVIDENCE

RAMSEY TOWN BOUNDARY EXTENSION

On behalf of the Lezayre Commissioners

Prepared by M.T.M. Cook, B.A. Dip. (Arch), R.I.B.A.

- 1) I have been requested to submit evidence on the Ramsey Town Commissioners' Proposed Town Boundary Extension by the Lezayre Parish Commissioners.
- 2) Part of the proposed Ramsey Town Boundary Extension incorporates land which has been designated on the 1982 Isle of Man Development Plan and on the Ramsey Local Plan dated 13th December 1988, as land zoned for residential and industrial development.
- 3) Apart from low density housing in parkland zoned for Glen Auldyn to the south west of the golf course, and a coastal area based on Port Lewaigue, this area comprises principally of two residential zones, being Clifton Park totalling approximately 37 acres, and an area bounded by the Sulby River to the north, The Glen Auldyn River to the east and the Lezayre Road to the south, totalling approximately 66 acres. Additionally, an industrial area to the north of the disused railway and to the east of Glen Auldyn River comprises approximately 5 acres.
- 4) To date, of the combined 108 acres of these three zones, only 9 acres have been developed, yet this land has been available for residential development since 1982 when the Isle of Man Development Plan was published.
- 5) The boundaries of the areas zoned for residential development on the 1982 Isle of Man Development Plan and the 1989 Ramsey Local Plan are almost identical, yet, to date, it has taken 9 years to develop 8.7% of the land allocated outside the Ramsey Town Boundary for residential development, at a time of considerable increased economic activity and population growth in the Isle of Man.

- 6) Published in the Isle of Man Government Policy Report 1990, the population of the Island by the year 2000 was projected to be 75,000, but current indicators suggest that this figure will be exceeded. If the rapid rate of population growth over the next 9 years is similar to the last 9 years, then still only 17.4% of the land zoned for residential development in Clifton Park and the Sulby River/Glen Auldyn River/Lezayre Road areas will be taken up.
- 7) If Tynwald intervenes to assist with the management of population growth, then this land may never be developed and there would be no reason for it to be included on an extended Ramsey Town Boundary.
- 8) If the Ramsey Commissioners' require an increase in revenue from rateable income, it would be incorrect to assume that this could only be raised by an extension of its Town Boundary.
- 9) Within the existing Town Boundary, land has also been zoned for Residential and Industrial development, and of this approximately 76 acres is available for development.
- 10) In addition to this are a number of other vacant sites which are either infill or parts of existing developments which remain incomplete. The acreage of these areas is difficult to calculate due to their irregular proportions and dispersed locations, but, at minimum amounts to a further 25 acres, making / the total acreage available for development within the existing Ramsey Town Boundary approximately 101 acres.
- 11) Before making a final comparison between land available for development within and outside the Ramsey Town Boundary, two areas of land (referred to in paragraph 2) have not been included. These are areas of Low Density Housing at Glen Auldyn to the south west of the golf course, and a coastal area based on Port Lewaigue. The reasons for their non inclusion are as follows:-
 - (a) The land at Port Lewaigue is not proposed to be incorporated within the extended Town Boundary.
 - (b) The land at Glen Auldyn is relatively difficult to develop; is of low density, and although relatively small in size, its area has not been defined in the Ramsey Written Statement, therefore it cannot be calculated.

- 12) The land available for development with the proposed extension to the Ramsey Town Boundary at 108 acres is only 7 acres more than the land undeveloped within the existing Town Boundary, therefore, there exists as much potential for increasing the rateable revenue from within the existing boundary as from the extended area. If Policy 5.7 of the Ramsey Written Statement is pursued, which encourages the upper levels of properties within the commercial area to be used for office or residential use, then the revenue potential within the existing Town Centre is possibly greater.
- 13) Finally, the Ramsey Written Statement and Planning Circular 1/89 clearly states in Policy 5.8 that, "Emphasis should be placed on identifying areas within Ramsey which have potential for regeneration for residential uses. The intention will be to make the optimum use of the present infrastructure in conjunction with locating population increases within the town and so reinforcing the Town facilities."
- 14) It is therefore within the town of Ramsey where the need and potential for residential regeneration exists, and it is within the existing Town Boundary where the Ramsey Town Commissioners should be directing their efforts, rather than development land which is located within the neighbouring Parish of Lezayre.

If the proposed boundary extension proceeds the following changes will take place within the Town's Wards and within the Parish of Lezayre.

North Ward No. 1:

Existing Voters			928
From North Ward No. 2:	Ash Grove	28	
	Grove Mount West	34	
	Jurby Road	11	
	Richmond Grove	27	
	Richmond Road	<u>15</u>	115

			1,043
From Lezayre East:	Andreas Road	11	
	Bride Road (say)	20	
	Clifton Park	16	
	Ellan Park	23	
	Gainsborough Crescent	30	
	Jurby Road	27	
	Kings Reach	17	
	Marlborough Way/ Crescent	20	
	Richmond Road	18	
	Romney Wynd	3	
	Thornhill Park	<u>36</u>	211

	TOTAL		1,264
			=====

North Ward No. 2:

Existing Voters			1,293
Less* Voters to North 1			115

			1,178
From Lezayre East:	Coburn Drive	20	
	Gardeners' Lane	2	
	Glen Auldyn	98	
	Jurby Road	17	
	Lezayre/ Lezayre Road (say)	17	
	Milntown	5	
	Riverbank Road	48	
	Westlands Avenue	7	
	Westlands Close	29	
	Whitebridge Avenue	29	
	Sundry	<u>4</u>	276

	TOTAL		1,454
			=====

The net difference between the polling districts of North ward is now 190 votes whereas it was 365 voters.

The polling districts of South Ward remain unaltered at 1,217 and 1,175 a difference of 42.

Because of the inaccuracies inherent in the Voters' Lists and without up to date mapping it is difficult to define the actual locations of some properties.

Lezayre East has currently 725 voters of which it is estimated that 497 would transfer to Ramsey.

The effect of movement on the Parish/Town/Constituencies would be as follows:-

D) Alphabetical Order of Polling Districts Proposed:

Andreas	846		846
Arbory - East	537		
West	700	1,237	1,237
Ballaugh	617		617
Bride	303		303
Braddan - North	1,072		
South	245	1,317	1,317
Castletown - District No. 1	1,395		
District No. 2	847	2,242	2,242
Douglas Atholl - Glencrutchery	841		
Willaston	1,608	2,449	
Derby - Tynwald	623		
Windsor	607		
Derby	1,179	2,409	
Hills - Ballaughton	1,108		
Anagh Coar	761		
Pulrose	1,121	2,990	
Murrays Garden City	982		
Somerset	603		
Albany	794	2,379	
St. Georges - St. Georges	548		
Ballabrooie	761		
Eastfield	764	2,073	
Victoria - Crescent	874		
Strand	289		
St. Ninians	982		
Quay	285	2,430	14,730
German	788		788
Jurby	432		432
Laxey	1,077		1,077
Lezayre East	228		
West	447	675	675
Lonan - North	490		
South	473	963	963

Maughold - North	422		
South	212	634	634
Malew - North	336		
South	1,272	1,608	1,608
Marown	1,137		1,137
Michael	892		892
Onchan - Parish	230		
Ballachurry	1,072		
Birch Hill	2,124		
Howstrake	1,830		
Hague	820	6,076	6,076
Patrick - North	177		
Northeast	418		
Southwest	226	821	821
Port Erin	2,282		2,282
Peel - District No. 1	1,193		
District No. 2	475		
District No. 3	1,118	2,786	2,786
Port St. Mary	1,286		1,286
Ramsey - North District No. 1	1,264		
District No. 2	1,454	2,718	
- South District No. 1	1,217		
District No. 2	1,175	2,392	5,110
Rushen - East	507		
West	589	1,096	1,096
Santon	338		338

E) Total Voters - Numerical Order

Douglas	14,730
Onchan	6,076
Ramsey	5,110
Peel	2,786
Port Erin	2,282
Castletown	2,242
Malew	1,608
Braddan	1,317
Port St. Mary	1,286
Arbory	1,237
Malew	1,137
Rushen	1,096
Laxey	1,077
Lonan	963
Michael	892
Andreas	846
Patrick	821
German	788
Lozayre	675
Maughold	634
Ballaugh	617
Jurby	432
Santon	338
Bride	303

F) Constituencies - Alphabetical and Numerical

Ayre	1,824	Onchan	6,076
Castletown	2,242	Rushen	5,901
Douglas East	3,572	Ramsey	5,110 ³
Douglas North	3,431	Douglas West	3,904
Douglas South	3,823	Douglas South	3,823
Douglas West	3,904	Douglas East	3,572
Garff	2,674	Douglas North	3,431
Glenfaba	1,609	Peel	2,786
Michael	1,941	Garff	2,674
Onchan	6,076	Middle	2,454
Peel	2,786	Castletown	2,242
Ramsey	5,110	Malew and Santon	1,946
Rushen	5,901	Michael	1,941
Malew and Santon	1,946	Ayre	1,824 ¹⁴
Middle	2,454	Glenfaba	1,609 ¹⁵

The basis for the foregoing is the Registers of Voters in force 1st September, 1990, to 31st August, 1991, together with numbers in polling districts/constituencies supplied by the General Registry. Details are as accurate as possible on the information available.

19th November, 1990.

Table 19. **Summary of Residential Land Provision**

Supply Source		Dwellings
A. Dwellings completed between 2011-2022		811
B. Expected yield from outstanding approvals		200
C. Projected conversions 2022-2026		39
Total of A+B+C		1050
D. Available sites in the following settlements (without planning approval)		
Ramsey	<i>Sites could deliver</i>	63
Peel		68
St Johns		3
Jurby		6
Ballaugh		3
Sulby		2
Dalby		1
D. Total delivery potential on available sites		147
E. Allocated Sites		
RR009	Fields 134284, 134282 and part 134281, Lezayre Road	138
PR002	Fields 311843, 311884, 314538, 314542 & 314543 Ballaterson, Glenfaba Road	90
AR018	Field 121432 & 125001, Andreas	26
BR010	Field 2244256, Main Road, Ballaugh	33
LR007	Land off Sulby Glen Road and Claddagh Road (Field 134370), Sulby	18
GMR001	Plot of land located between Mac's and Allanson's Nurseries Peel Road St. Johns	13
E. Total - Allocated Sites		318
Strategic Reserves		0
Grand Total		1515