

The Department of Infrastructure's response to the representations received on the Draft Isle of Man Strategic Plan 2015

Consultation Period – 16th January 2015 to 13th March 2015

Response Table DSP1 - Collated by Respondent

Strategy, Policy and Performance Division
Department of Infrastructure
Published 10th July 2015



Respondents to the consultation on the Draft Isle of Man Strategic Plan 2015

A total of 33 responses were received in response to the consultation. The names of the respondents are set out in the table below and each has been allocated a respondent number. The comprehensive table which follows, groups comments by respondent and the Department's response to each comment appears alongside. Full copies of the representations are available on the Isle of Man Government website: <http://www.gov.im/strategicplan>

Respondent No.	Respondent	Respondent No.	Respondent
DSP 1	Department of Economic Development	DSP 19	Tim Norton
DSP 2	Manx National Heritage	DSP 20	Andrew Jessopp
DSP 3	Manx Utilities Authority	DSP 21	Patricia Newton
DSP 4	Braddan Parish Commissioners	DSP 22	Heritage Homes
DSP 5	Onchan Parish Commissioners	DSP 23	W R Tomlinson
DSP 6	Patrick Parish Commissioners	DSP 24	BADRA
	Plus submission on behalf of Patrick Commissioners	DSP 25	Manx Wildlife Trust
DSP 7	Douglas Borough Council	DSP 26	David Comish
DSP 8	Peel Commissioners	DSP 27	Nigel Geoffrey Crowe
DSP 9	Marown Commissioners	DSP 28	Stephen Woodward
DSP 10	Malew Parish Commissioners	DSP 29	Chris Wilson
DSP 11	Castletown Commissioners represented by Keith Hargest	DSP 30	Dennis & Mary Aram
DSP 12	Chamber of Commerce*	DSP 31	Jonathon Kermode
DSP 13	Peel Land (IoM) Ltd represented by How Planning*	DSP 32	Stephen Moore
DSP 14	Shoprite Isle of Man Limited	DSP 33	Juan Watterson MHK
DSP 15	Andrew Berry		
DSP 16	Carse Hannay		Late: DEFA
DSP 17	John Matthews		IoM Antiquarian Society
DSP 18	K Moughtin		C. Corkill

*Submission includes enclosures which are available on the Isle of Man Government website noted above.

Glossary – Key Terms

General Allocation Sites: Development sites identified in an Area Plan which can be released at any time.

Strategic Reserves Sites: Development sites identified in an Area Plan which are for release in the longer term, in line with an approved methodology.

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Government

Department of Economic Development

1	DSP 1	DED	Housing Distribution Chapter 5 and Chapter 8 Housing Policy 3		<p>The distribution of new housing is important to DED for two economic reasons. Firstly, DED needs to ensure there is sufficient housing for employees in locations which offer good and convenient access to current and future major employment areas. Secondly, Douglas needs to be supported as a thriving capital able to sustain leisure/retail and as a centre for business networking.</p> <p>There are three pieces of DED economic evidence which might impact on the distribution of housing.</p> <ol style="list-style-type: none"> Vision 2020 agreed by Tynwald The draft Employment Land Review 2015 on employment land and potential economic developments planned and The Central Douglas Masterplan 2015 agreed by Tynwald on the need to support the emergence of Douglas as a thriving economic capital. <p>The Draft Plan proposes changes to the distribution of future housing with higher percentages allocated</p>	<p>The Department acknowledges the documents referred to:</p> <ul style="list-style-type: none"> Vision 2020 published by Government (October 2012) The Draft Employment Land Review (ELR) - internal draft published March 2015 (Final Report to be issued June 2015) The Central Douglas Master Plan (a non-statutory document) approved by Tynwald February 2015 <p>The proposed housing distribution figures set out in Housing Policy 3 (compared to the Isle of Man Strategic Plan 2007) have indeed changed:</p> <p>The combined distribution for the East and South has increased by 6.6%. Consequently, the combined distribution for the North and the West has decreased by 6.6%.</p> <p>The Department continually monitors planning</p>
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		DED			<p>in the East and South (from 63% to 70%) and lower percentages in the West and North (from 37% to 30%). Taking the proposed distribution at face value, it would seem to favour supporting the major employment areas and the Capital but if the figures are analysed then they reveal some concerns for DED (further information provided – see individual representation).</p> <p>Firstly, the basis to calculate the distribution of new housing is mainly planning approval data from the last 12 years plus settlement pattern, character of the settlements, their proximity to major employment areas and the impact of the spatial distribution on the strategic highway network. In primarily using planning approval data for distribution then any trends in the approval data such as more land coming forward for development in the last 15 years will be continued.</p> <p>Secondly, in overall terms the East's share of total housing numbers between 2001 and 2026 will have dropped by 0.7% (from 54.7% of the total number of houses on the Island to 54%). If the East and South are added together then the East and South's share of total housing numbers will have dropped by 1% (73.2% to 72.2% which equates to a medium sized housing estate). Therefore the distribution trend is away from the major employment areas and the capital.</p>	<p>approvals for new housing (net) and records the 'take-up' of such approvals. There has now been a full historical analysis of housing approval data between January 2001 and June 2014. In terms of how the spatial distribution of future housing need was calculated, housing approval figures up to and including Update 6 (end of June 2013) were examined and divided into groups based on their location i.e. by 'settlement type' as identified in the spatial hierarchy. These figures were used to calculate the percentage distribution going forward.</p> <p>It is important to note that the approval data records both new housing on land allocated for residential as well as new housing created by way of conversions or redevelopment. The Department has been open about the statistics it has used and why it has based future figures for housing distribution on clear and identifiable data.</p> <p>The housing data can be said to be a sound indicator of the demand for housing across the Island. The draft Employment land Review reveals that the demand for employment land is greatest in the East and then the South. The housing distribution is in line with this identified demand.</p> <p>It is important to remember that the Census data deals with 'numbers of households' as opposed to actual numbers of domestic properties. The Department recognises the use of particular terms</p>

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		DED			<p>These findings are further supported by the draft Employment Land Review (ELR) which identifies that 78% of all employment floorspace is in the East. The South accounts for 14% of floorspace with the North having 6% and the West 2.5%. In addition the resident employed population by region of residence 2011 (source 2011 Census) shows that 74% reside in the East and South.</p> <p>The draft ELR also identifies a need for circa 15 hectares of employment land to be zoned in the East. DED has made some assumptions to try and test whether the housing distribution proposed in the East and South will meet the needs of the anticipated extensions of 15h (@ 36 acres) employment land. The assumptions are based on employment densities per sqft and ratio of building to landscaping/parking. The estimated total number of additional employees would be 2335. On these assumptions the East and South housing distribution may be able to just accommodate the employees but perhaps there needs to be more flexibility because there are other potential economic developments in the East/South which will give rise to housing demands such as the proposed University at the Nunnery and leisure developments in Central Douglas.</p> <p>There is also evidence from the Central Douglas Masterplan (CDM) on the need to create and support a thriving Capital, it is clear that the 'Vision' for Douglas is an 'economically strong, dynamic</p>	<p>can lead to misinterpretation and accepts that in Appendix 8 of the Draft Plan 2015, the second column should have been titled 'number of private households' and not 'existing dwelling units' (see Schedule of Proposed Changes – DSP 2 No. PC1).</p> <p>In terms of households, the proportion of households in the East in 2011 was 54.9%. The Census does not provide household projection data broken down by Area. Island wide the projection is that there will be an additional 4885 households on the Island based on what the Department believes to be a reasonable reduction in household size over 15 years in line with recent trends. This reduction was one of three possible scenarios identified by the Economic Affairs Division (Cabinet Office) during the early stages in the Strategic Plan Review process.</p> <p>Based purely on a figure of 4885 and using the % breakdown for distribution, the household numbers in the East in 2026 would equate to 21,895 or 54%. The household numbers in the South would equate to 7329 or 18.1%. Together the number of households would be 29,224 or 72.1%. Between 2001 and 2026 (25 years) the evidence suggests a drop in households in the East and South of 1.1%. The Department judges that this reduction is acceptable given that there is a spatial hierarchy which identifies not only a Main Centre and Service</p>

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		DED			<p>destination..' and with one of the objectives as 'A distinctive and sustainable Capital'. Jurisdictions that have a capital such as London or St Hellier where firms are close to each other and have networks (Vision 2020) benefit from that closeness. There is therefore a need to maintain the dominance of the East and in particular the wider Douglas area not only for employment land but also for new dwellings for the population to access major employment areas and for a good balance of the population to support the infrastructure of retail, leisure etc. and make it viable.</p> <p>It is concluded that the future distribution of housing is not in the best interests of the economy. The balance is considered to be too heavily weighted towards planning approvals trends and not sufficient weight has been given to the need to distribute more new housing in the East and South to support the major and future employment areas and the emergence of Douglas as an economically strong, dynamic destination. It is not clear from DOI Paper 3 (Future housing requirements and recommended policy change) what weight has been given to employment centres and the need to support the capital.</p> <p>Based on the evidence in Vision 2020, the Employment Land Review and the recently agreed Central Douglas Masterplan DED suggest that there should be a change to the housing distribution figures (Policy H3) with an increase of the proposed number of houses in the East and South.</p>	<p>Centres/Services Villages in the East but also other Service Centres, Service Villages and Villages around the Island where new development should be focused.</p> <p>The Strategic Plan identifies 4 Major Employment Areas: Douglas (Main Centre - East), Ballasalla (Service Village - South), Ramsey (Service Centre - North) and Jurby (Service Village - North).</p> <p>The Department accepts there would be (according to the projections) a small reduction in the proportion of households in the East and the South in 2026 compared to 2001 but would not support the assertion that this represents a trend away from the major employment areas and the Capital.</p> <p>The broad figures for new housing between 2011 and 2026 are in line with the findings of the Draft Employment Land Review 2015. The main focus being the East and then the South. In terms of estimating whether or not an additional 2440 houses would be able to support the additional 15 ha of employment land required in the East, the Department judges that there is already enough flexibility in the planned approach for allocating development sites. It is important to note that:</p> <ol style="list-style-type: none"> 1. The draft ELR report estimates employment land requirements up to 2029 (not 2026) 2. The Area Plans intend to use Strategic Reserve Sites where appropriate to 'build

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		DED			<p>DOI has suggested that if DED suggest changes to the distribution figure then it should put forward an alternative distribution figure. This is difficult to do because it is not clear from the DOI evidence the weightings attached to their analysis. DED suggest that the weighting is more transparent with a suggested higher weighting given to major employment areas by the number of employees. In addition a further weighting should be allocated to the East so that the Government policy in the CDM of support for the capital's retail and leisure infrastructure is carried through to housing allocations. At the very least there should be an increase in the housing distributions in the East and South so that by 2026 the East and South will have a distribution of dwellings at least in line with 2001, i.e. with 73.2% of the total dwellings.</p>	<p>in' sufficient 'flexibility'</p> <p>3. A number of potential 'workers' may well choose to reside elsewhere on the Island. Some acknowledgement needs to be made of the likelihood that some employees on new employment sites might well reside in locations which fall outside of the East.</p> <p>It is perhaps too simple an analogy to suggest there has to be an exact location match between potential new workers and new houses but clearly having both housing land and employment land in sustainable locations is critical to sustainable development overall. It is important to bear in mind that the figures in the Draft Isle of Strategic Plan 2015 relate to households and the need for new housing units based on anticipated household size, not merely additional people.</p> <p>The Department agrees that there is a need to create a 'thriving Capital'. The figures identified relating to housing, support the need to maintain the dominance of the East. Whilst the Department maintains that there are sound reasons to include 'numbers' when it comes to housing in the Strategic Plan, there is not such a need to do the same for employment land. Area Plans can fully anticipate land requirements based on up to date evidence (which will include the Employment Land Review Report). All such evidence will feed into the Plan making process.</p>

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		DED				<p>The Department does not agree with the statement that the distribution as proposed would “not be in the best interests of the economy”. DED acknowledge that “it may be able to just accommodate the employees”; the Department intends to avoid any perceived housing shortages by the use of Strategic Reserve Sites to plan for long term needs through the identified ‘plan period’.</p> <p>The Department has not used the existence of a major employment centre (as identified in the Strategic Plan) to ‘weight’ the housing distribution figure. The ‘area profiles’ in Evidence Paper 3 act as supporting information. Any use of weightings would naturally have increased a distribution in the North as it has 2 major employment areas. However, it is apparent that the North already has the highest level of housing land available (60.5 ha or 41%) compared to the East (9.7%) and the South (25.4%). In addition the North has the highest level of lapsed applications; when looking at data for the number of units that could have been developed in the North, 23% lapsed compared to the East 10%, South 9% and West 5%.</p> <p>DED make the suggestion that by 2026 the East and South should have a distribution of dwellings at least in line with 2001 i.e. 73.2% of total dwellings.</p>
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		DED				Reference is made to dwellings but the real description to use here is 'households'. Households in the East and the South according to the 2001 Census accounted for 23,104 out of 31,521 households (73.2%). The best way to accommodate any greater housing need is at the Area Plan level when there can be closer analysis of land supply and assessment of the need for Strategic Reserves Sites.
2	DSP 1	DED			<p>Transport Chapter 11 Transport</p> <p>The proposed change to the Transport Chapter focuses on additional information to predict increased congestion at Quarterbridge and Governors and further work to be undertaken at Ballasalla. These three junctions are priorities for the economy because of the journey to and from work, the length and time of that journey and the transport of raw materials and manufactured goods.</p> <p>The Review does not include an Integrated Transport Strategy despite this being one of the strategic objectives of the 2007 Plan. The lack of such a Strategy means that the future planning of transport to support the economy will continue to be decided primarily on congestion information rather than through a strategic approach which considers all the components of transport viz public, private, freight and servicing.</p> <p>DED suggest that DOI undertake this work so that</p>	<p>Chapter 3 of the Isle of Man Strategic Plan sets out the Strategic Aims for developing policy. These Aims remain unchanged from the 2007 Plan. This has resulted in the development of Strategic Policy 10, and the Transport Policies in Chapter 11 to ensure sustainable patterns of development in the future. Such Policies have been used previously in the consideration of the Area Plan for the South as well as planning applications submitted for consideration since the Plan's approval by Tynwald in 2007. The Strategic Plan does not have a policy for the development of an integrated transport strategy even though this term is often referred to.</p> <p>The current review of the Strategic Plan concentrates on housing numbers. This has resulted in an update to the transport assessment section to take into account the impact of these additional properties on the strategic network. This assessment continues to predict congestion at the</p>

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					<p>when the five-yearly Review is undertaken a Strategy will be ready.</p>	<p>same locations as the 2007 document. The Ballasalla bypass issue was dealt with in-depth by the Area Plan for the South. The other locations (Douglas) will be matters for the Area Plan for the East. The Government has strategic land holdings at Quarterbridge and Governor's Bridge to facilitate improvement works at these locations to increase capacity for a variety of modes of transport.</p> <p>The Department continues to work with other Departments on measures to improve strategic cycling routes and is in the process of drafting a public transport strategy. These documents along with the transport assessments contained within the Strategic Plan will form the background to the development of all future Area Plans and in particular the Area Plan for the East which has congested strategic junctions within its geographical remit. It is these development plan documents which must address the policies and transport constraints which are identified in the Isle of Man Strategic Plan. This was successfully negotiated within the preparation, Public Inquiry Stage and subsequent approval of the Area Plan for the South.</p>

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3	DSP 1	DED			<p>Timescale/Monitoring of the Draft Plan Chapter 13 (paras 13.1, 13.2 and 13.3) The extended timescale of the Plan is 15 years to 2026. The vast majority of existing policies are being taken forward without change. The Plan has proved to be robust but there has been no significant Review undertaken and the proposed change of statement (para 13.1) that- <i>'The Plan has been developed with a view to the current and future drivers for change effecting the social and economic structure of the Island'</i> - is not borne out by any reference to Tynwald agreed policy changes in: 'Agenda for Change', Vision 2020 and the Central Douglas Masterplan. DOI propose to annually monitor the Plan and to undertake a 5 year Review but only in response to any amended population projections. There will therefore be little economic monitoring other than the availability of Employment Land despite there being a requirement under the 1999 Act 1(2)(a) that the Department will keep under review 'the economy of the Island'. Bearing in mind that the Plan should provide fundamental support to Government policies DED suggest there is a change in Chapter 13, 'Implementation, Monitoring and Review' para 13.2 to include a requirement to monitor the economy and take account of prevailing economic policies at five yearly intervals.</p>	<p>The first part of paragraph 13.1 is unchanged from that set out in the Strategic Plan 2007. The second part of the paragraph provides updated information regarding monitoring. The Department is of course aware of the Agenda for Change, Vision 2020 and the Central Douglas Masterplan. The Strategic Plan as reviewed does not conflict with any of these documents. The CDM will be picked up at the time of the Area Plan for the East. The Agenda for Change sets out broad priorities for Government up to 2016. Vision 2020 – sets out "a strategy for economic success" based on an overall vision for the Island and a number of strategies. Whilst it is acknowledged that the Draft Strategic Plan 2015 has not updated what would seem to be a number of obvious changes e.g. changes to Government Departments and references to new government documents, the intention has always been to update only those elements which were considered essential and reflective of 'a focused review' as outlined from the start of the review process.</p> <p>It is acknowledged that since 2007, there have been, what can be described as 'factual changes' for instance some Government Departments have been renamed. For context purposes and to aid the Inquiry, a separate document/addendum will be prepared ahead of the Public Inquiry to identify these key factual changes. In terms of monitoring, The Department of Infrastructure monitors housing development</p>

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						<p>across the Island quite comprehensively. In terms of monitoring the economy, the Department of Economic Development will be able to take on some of the responsibility to do this and feed to the development plan process.</p> <p>Paragraph 13.2 states that the next update of the Plan "will likely be a full review taking into account the most up to date Census information and population projection data." A full review would take into account economic monitoring.</p> <p>The Department however agrees to some rewording at Paragraph 13.2.</p> <p>"Such reviews will consider the implications of any amended population projections and also data on employment land in terms of availability, location, quality and demand. A full Review would acknowledge and take into account as appropriate all up to date strategy/policy documents from across Government." (see Schedule of Proposed Changes – DSP 2 No. PC2).</p>
4	DSP 1	DED			<p>Housing Need Chapter 4 Strategic Policy 11 The Department yesterday (11.03.15) received a copy of the submission to the consultation from the Chamber of Commerce. This raises concerns whether the housing growth figures are sufficient to allow for growth among the economically active</p>	<p>It is widely accepted that the State Retirement Age will rise in the future. From the 'possible' Model shown in Evidence Paper 1 (Table Aiii) it can be seen that 'working age' will increase by 5.7% between 2011 and 2015, and 3.1% between 2020 and 2026.</p>

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		DED			<p>population (which Chamber defined as age 16 to 64) and jobs growth as set out in the Government's Economic Strategy, Vision 2020. The Department has not had sufficient time to validate the assertions made in Chamber's submission, but the Department feels strongly that the assertions raise important questions which must be addressed if we are to ensure sufficient housing provision for all in our community. The Department trusts that such analysis will be undertaken and looks forward to the publication of the final figures and supporting evidence in due course.</p> <p>One important related point: a growing proportion of the population are aged over 65 and this will continue for the foreseeable future. However, one cannot assume all such individuals are economically inactive. At the last census 21% of 65 to 75 year olds and 10% of all over 65's were in employment. These proportions have been rising. If one assumes a conservative constant 10% of over 65s in work, then the economically active population will rise based on the central planning projections. If – as expected – the proportion of over 65s in work continues to rise then the overall rise in economically active persons will be higher."</p>	The Department has made a detailed response to the Chamber in the comments below.
5	DSP 1	DED	Annex A		Employment Distribution and proposed housing distribution	See comments above.

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Manx National Heritage

6	DSP 2	MNH MNH	General		<p>Appreciate that the amendments to the Plan are necessary to make provision for an expanding population and other demographic changes. No reason to dispute the figures derived from the 2011 Census although the vacancy factor is perhaps more derived from UK equivalents than from actual IOM housing market figures. As the current market is so volatile at present – a range of figures might be more accurate than an absolute number.</p> <p>As the Area Plans are rolled out, MNH will be in a better position to comment on proposals for residential housing when consultations on Draft Area Plans are launched. Involvement will then be to identify any potential conflicts of interest between proposed developments and the Island's cultural and national heritage assets.</p> <p>Strongly advocate continued adherence to the existing Strategic Plan provisions for protection of the environment and cultural heritage and would hope that planning approvals for more residential development will not come at the expense of robust defence of such policies. Communications around this review should continue to stress the importance of the existing policies in the Plan.</p>	<p>In terms of the vacancy factor applied, and vacant housing numbers generally, the Department has identified through the 'Rates' database that as at October 2011 that there were 39,465 domestic properties on the Island. Given that the Census shows 35,599 households, this would indicate that there were around 3,866 vacant domestic properties or 10% of the total domestic property stock. Although data on empty properties is currently unavailable from the 2011 Census, the 2001 Census data suggests that the domestic property stock empty on Census night was 8%.</p> <p>The Department's vacancy factor or uplift of 4% is clearly lower than the number of vacant homes on the Island. There are a number of reasons for this:</p> <p>Compared to the existing housing stock, the new housing stock would be expected to achieve higher occupancy levels; It should not be an objective to strive for a very low vacancy rate Island wide; properties which are empty for short periods help keep the housing market buoyant. There are various reasons why properties may be empty and different surveys may record empty properties in different ways.</p>
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		MNH			<p>Attention is drawn to the new Biodiversity Strategy and the application UNESCO Biosphere Reserve Status which strengthen these areas since the Plan was published in 2007. Also the new Food and Drink Strategy and the Destination Management Plan for the Visitor Economy.</p> <p>Worth looking at guidance and advice on potential for conversion and re-use of existing property or brownfield sites. Demolition of existing property or development of greenfield sites is not a sustainable future direction. Over the shop accommodation in retail areas could contribute both to housing needs and urban regeneration.</p> <p>Residents and tourists repeatedly tell us that they appreciate the Island's countryside and heritage attractions and link these to a high quality of life here. The Strategic Plan is the key to maintaining a balance between preservation of such assets (including their setting) and enabling the Island's economic development.</p>	<p>Properties may be 2nd homes, or undergoing refurbishment or just unoccupied. Properties may be in different states of repair.</p> <p>The point is that recording accurately why a property may be empty can be difficult. It is important to recognise that, relying on empty properties to meet a significant amount of housing need carries with it a high level of risk.</p> <p>A number of approaches are required to ensure the right level of housing supply is available to meet demand which may include the use of incentives or financial penalties to bring some of the vacant properties back into occupation. Sound evidence which defines what constitutes an empty property is important from the outset. It is worth noting that a vacancy rate of 8% would increase the housing need figure to 5276 (as opposed to 5080) and an increase of 10% would equate to 5374 (as opposed to 5080). Applying different uplifts has limited impact on the broad housing figure unlike a change in household size assumptions which can have a significant impact. The Department is content to leave the vacancy factor or uplift at 4%.</p> <p>The Department will continue to take on board the comments of MNH when preparing future Area Plans. The Draft Plan 2015 makes no alterations to the current 'Environmental' Policies set out in Chapter 7.</p>

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						<p>Whilst the Department has not strayed from its commitment to undertake a focused review by largely leaving sections of the Plan untouched, a further evidence paper is to be prepared in time for the Pre-Inquiry meeting which provides a list of factual updates.</p> <p>'Over the shop' accommodation is already supported in the Strategic Plan under Paragraph 8.13.4.</p> <p>Before allocating any land for development through the Area Plans, consideration will be given to the capacity of our existing settlements. Capacity Studies will be undertaken for the identified settlements in the East; the methodology for which and the type of study appropriate for each settlement has yet to be confirmed.</p>
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Manx Utilities Authority

7	DSP 3	MUA	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	Yes		Comment noted.
8	DSP 3	MUA	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	Yes		Comment noted.
9	DSP 3	MUA	Paragraph 1.8.1	Yes	The timeframe specified within the draft Strategic Plan 2015 is only projected for a 15 year period, whereas Manx Utilities is currently designing infrastructure for in excess of 50 years. Other Government Departments are currently assessing Island issues for similar or longer periods of time.	The longer timeframe is noted. The Department is currently not intending to plan further than 15 years because of the uncertainties involved. Population projection data is, however, available up to 2036 and has been included as part of Evidence Paper 1.
10	DSP 3	MUA	Paragraph 8.1.3		It is important that an Urban Capacity Study is carried out as part of any Area plan to ensure the availability of existing infrastructure to serve the number of units proposed in each area.	The Department agrees. Urban Capacity Studies (UCS) will be undertaken for settlements in the East; the methodology for which and the type of study appropriate for each settlement has yet to be confirmed. For some of the smaller settlements, it

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						may not be necessary to undertake an UCS.
11	DSP 3	MUA	Table 8.1		Consideration is given to projecting the Isle of Man population table further than 2016 to give a clear indication on future growth in line with other Government Departments.	Table 8.1 projects up to 2026.
12	DSP 3	MUA	Table 8.2		Consideration is given to projecting the Isle of Man population model further than 2016 to give a clear indication on future growth.	Table 8.2 projects up to 2026.
13	DSP 3	MUA	Comments on Housing Policy 3?	Yes	Review of existing infrastructure in these areas to be addressed at Local Plan stage.	The Department supports this recommendation.

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Local Authorities

Braddan Parish Commissioners

14	DSP 4	Braddan	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	No		The Department considers it helpful to retain the 2007 Foreword and Preface to help understanding of the origins of the Strategic Plan which was first approved in 2007.
15	DSP 4	Braddan	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	No		The Department considers it helpful to retain the 2007 Foreword and Preface to help understanding of the origins of the Strategic Plan which was first approved in 2007.
16	DSP 4	Braddan	Any comments on the proposed wording for Strategic Policy 11 and Housing Policy 1?	Yes	After careful consideration, and consultation with the other eastern authorities, it is the opinion of Braddan Parish Commissioners that the predicted population figures from the 2011 census, upon which the requirement for 5100 additional dwellings (net of demolitions) is based, is flawed. The Commissioners feel that, given the volatility of the	The requirement for 5,100 dwellings between 2011 and 2026 is based on population projection data provided by the Economic Affairs Division. The Division maintains that the population projections are sound. Whilst an interim Census is planned for 2016 there would be a time lag between Census night and the reporting of any initial data. There is

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					islands finances since the 2011 census, it would be more prudent to delay the production of a revised Plan until after the responses to the 2016 mini-census have been analysed.	no reason to prevent adequate account being taken of any projection amendments as part of the Area Plan for the East. The Department has been open about the use of Strategic Reserve Sites. Depending on any projections post 2016, the number of general allocations vs Strategic Reserves can be balanced accordingly.
17	DSP 4	Braddan	Comments on Housing Policy 3?	Yes	Please see previous response based on the Island's predicted future population.	See Department's response to comment 39.

Onchan Commissioners

18	DSP 5	Onchan Commissioners	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	Yes		Comment noted.
19	DSP 5	Onchan Commissioners	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	Yes		Comment noted.

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20	DSP 5	Onchan Commissioners	Paragraph 5.20		It is the Commissioners view that this may not be the most appropriate approach to determine the spread of housing especially when you see the results of the proposed spatial distribution. Concentrating the majority of proposed development into an area already densely populated may be to the detriment of the east and the island as a whole.	The views of the Commissioners are noted. The distribution as set out in Housing Policy 3 has been based on statistical evidence. Given that the East contains the Main Centre, 1 Service Centre, 2 Service Villages and 5 Villages, it is not unreasonable to see a concentration of new development around the East. The distribution would also appear to be in line with the draft Employment Land Review which suggests the greatest demand for Employment Land lies in the East. The Commissioners' views are at odds with the Department of Economic Development (DED) and they are therefore directed to read the comments of DED at the beginning of this Table and the Department's response to those comments.
21	DSP 5	Onchan Commissioners	Paragraph 5.21		See comments on 5.20	See Department's response above.
22	DSP 5	Onchan Commissioners	Paragraph 5.22		See comments on 5.20	See Department's response above.
23	DSP 5	Onchan Commissioners	Paragraph 5.23		See comments on 5.20	See Department's response above.
24	DSP 5	Onchan Commissioners	Paragraph 8.1.3		Only to the fact there is reference to the content of Chapter 5 the content of which is questioned.	There are no changes proposed to the Spatial Strategy set out in Chapter 5.

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25	DSP 5	Onchan Commissioners	Paragraph 8.5.3		See 5.20 and Housing Policy 3	See Department's response to comment 54.
26	DSP 5	Onchan Commissioners	Paragraph 8.5.4		See 5.20 and Housing Policy 3	See Department's response to comment 54.
27	DSP 5	Onchan Commissioners	Comments on Housing Policy 3?	Yes	See 5.20. The Commissioners feel that a more equal distribution may be more appropriate, but acknowledge that the potential impact on the highway infrastructure. There is concern that concentrating development in and around the Main Centre will result in undesirably development (too many apartment blocks creating ghettos) and the loss of identity to other areas.	<p>There are a number of settlements in the East which are likely to all be assessed for their development potential. A number of settlements may be proposed as having the potential for additional development in the Area Plan for the East. It must be recognised that Douglas is the Main Centre and therefore further development opportunities will be looked at seriously in the Area Plan for the East. There is very little land still available in Douglas and the Call for Sites exercise (at the very start of the Plan process) will allow the most sustainable sites to be identified.</p> <p>There will still be the requirement to protect the identity of settlements and avoid coalescence. Highway infrastructure and the ability of the network to accommodate further growth will be one of the main considerations taking into account when planning for new housing/employment land in the East.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
28	DSP 5	Onchan Commissioners	Comments on Paragraphs 11.1.11 to 11.1.12		See 5.20 and Housing Policy 3	See Department's response to comment 54.
Patrick Commissioners						
29	DSP 6	Patrick Commissioners	By letter General		Chairman's comments should be regarded as the response from Patrick Commissioners. Disappointed that there were not presentations to individual local authorities or to area groups. When it comes to the West Plan, there should be full involvement of the Local Authorities.	The Department tried to generate interest by holding an exhibition in the foyer of the Sea Terminal and by holding 2 'open' sessions; the first being in Peel and the second at the Sea Terminal after the normal working day. Officers were also available during normal Office hours for the 8 week consultation period. The attendance at the Peel event unfortunately was very poor. Visiting 24 Local Authorities was an option but would have been demanding on the resources of the Department and therefore combined events were thought to be the best approach. These had worked well for the Preliminary Publicity Stage. It is proposed that when it comes to future Area Plans, the Department will formulate a clear methodology for Local Authority consultation and engagement.

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30	DSP 6	<p>Submission on behalf of Patrick Commissioners</p> <p>Submission on behalf of Patrick Commissioners</p>			<p>Plans don't seem to carry much weight when it comes to planning permissions granted.</p> <p>Cases in Foxdale where two new developments below that of James Cubbon's new build, where one of the proposed sites extends beyond that agreed in the Foxdale Plan of 1999. As far as I am aware this was pointed out by our clerk in a previous response to a planning application to no avail.</p> <p>Whilst it is good that opportunity for local examination is given, there is a sense in which this is somewhat a fait accompli and indeed rushed presumably to obtain Tynwald approval for any agreed plan before the next election. As I said at the time I believe the way forward is for the five Local Authorities in the west to come up with their own plan as to what they consider suitable by way of development for the west of the Island rather than being told this is what central government thinks you should have.</p> <p>The poor attendance (<i>at the Local Authority consultation events</i>) would support the notion that even if they did it wouldn't make any difference to what was imposed on them. Evidence the fact that there was a great hurry after the Polson Report for the housing authorities on the Island to form into smaller units taking on board housing responsibilities presently undertaken by the</p>	<p>The consideration of and determination of planning applications is undertaken by the Planning and Building Control Directorate at Department of Environment, Food and Agriculture (DEFA). Any queries of this nature will, following the completion of the analysis of responses, be forwarded to the Division for an appropriate response.</p> <p>The Department has set out its reasoning for proceeding with a partial review of the Strategic Plan, namely to update the Plan period and the general future housing figures for the Island. The steps undertaken so far have been carried out in line with Schedule 1 of the Town and Country Planning Act 1999. An 8 week consultation was undertaken on the Draft Plan published in January 2015. The Department is disappointed that the Commissioners consider the process to be rushed and would like to repeat one of the reasons is that an updated Strategic Plan will allow the Department to focus on the much needed Area Plan for the East.</p> <p>The 1999 Act sets out that the Island Development Plan shall be prepared by the Department. There are a number of opportunities for discussion and consultation with the Local Authorities throughout the plan making process. Even if, in the future, Local Authorities have greater planning powers, it is likely that any such approach would still need to be in line with an Island-wide Plan such as the 'Isle of</p>

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					<p>Department. We prepared our business plan as a new Western Housing Group (consisting of reps from German, Kirk Michael, Marown, Patrick and Peel) for which I acted as its Chairman, and submitted this in April 2014 to the Department.</p> <p>To date we have had no formal response other than to be told the Department is too busy to handle this at the moment. We appreciate the Minister has lots to resolve particularly on the health service front, and from what we have seen of his proposals we agree in principle with them, however a lot of time and effort went into the business plan which to date has come to nothing. None of this helps in our enthusiasm to deal with the Strategic Plan Review.</p> <p>The other point that I made was that not enough thought is going into encouraging the conversion of living accommodation over shop premises. Whilst I was shown an extract referring to this issue much more needs to be done to develop 'brown' field sites in general.</p> <p>Finally, whilst you stated that from this Strategic Plan other departments such as health and education would take a lead, it is clear from the build of the new Health Centre in Peel that not enough strategic thought was given to its capacity as Kirk Michael residents are now directed to Jurby to see a GP. Any plans for the West are not just</p>	<p>Man Strategic Plan'.</p> <p>The Commissioners query in respect of the Western Housing Group submission has been passed to the Housing Division.</p> <p>There is reference to 'Living over the Shop' at paragraph 8.13.4 (Draft Isle of Man Strategic Plan 2015). The Department generally supports the conversion of redundant storage space above shops subject to proper consideration as well as previously developed land as set out in Strategic Policy 1. The Area Plans will also carry out appropriate capacity assessments at individual settlement level (the format for which has yet to be confirmed).</p> <p>The Isle of Man Strategic Plan is a document relevant across all of Government. The Department has informed all other Departments of the Review process, the proposed amendments and the intended next steps. The Commissioners clearly recognise that all Departments/Local Authorities and other stakeholders should have an interest in the content of the Strategic Plan and any changes proposed thereto. The consultation methods adopted by the Department of Infrastructure promote such awareness.</p>

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					for Peel but for the residents of all the five Local Authorities.	
Douglas Borough Council						
31	DSP 7	Douglas Borough Council	General		<p>Meeting on 24th February 2015 - Local Authorities in the East – strong doubts expressed about the validity of the protracted figures for growth. Population growth figures based on 2006 and 2011 data, were inaccurate, and that either the current review exercise should be delayed until after 2016 interim Census or that the growth figures should be halved as an interim measure pending further review after the 2016 census results are available. Concern had also been expressed at the meeting that, as the Eastern Area Plan was scheduled for revision following this review of the Strategic Plan, the figures currently projected might be imposed on the East, while they would be revised in later Area Plans for the North, South and West, following more accurate figures being available from the 2016 Interim Census. One of the principal concerns expressed was that, should Douglas not be able to accommodate its allocation of new</p>	<p>General</p> <p>In terms of the suggestion that the population growth figures (based on the interim Census 2006) are inaccurate, the following comparison aims to set out the nature of this 'inaccuracy'.</p> <p>In the Isle of Man Strategic Plan 2007, the projection for households in 2011 was 35,275 (based on 2006 interim Census). The 2011 Census recorded the actual figure as 35,599. The 2011 true figure was therefore slightly above the projection by 324 (or 0.9%).</p> <p>In the Isle of Man Strategic Plan 2007, the projection for households in 2016 was 37,296 (based on 2006 interim Census). The projection for 2016 based on the 2011 Census is 37,261 which represents a slight fall in the projection of 35 or</p>

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		Douglas Borough Council			<p> dwellings, then the balance might have to be made up by other local authority areas within the East. Resolved, "(i) That particulars of the report be noted on the minutes; (ii) That the Council acknowledge its inclusion in the consultation exercise, and makes the following comments on the proposed changes to the Isle of Man Strategic Plan:</p>	<p>0.09%. The important point to remember about projections is that they are estimates based on the analysis of available past data. As projections are often amended when new data becomes available, it is useful to consider how different the actual figures turn out to be, compared to the projections.</p> <p>Noting that there was a difference of 0.9% between projected and actual households for 2011, the Department is content to rely on projection data but accepts that the 2016 interim Census results will be of interest and when new headline figures become available.</p> <p>The Department does not support 'halving' the housing numbers required on the basis of the differences in the projections from the 2006 Census and the 2011 Census. In addition, to delay the examination of the Draft Plan now by waiting until mid-2016 (or later) for the 2016 interim Census results/projections would, in the Department's view, cause undue delay to the Strategic Plan/Area Plan timetable.</p> <p>It is expected that all remaining Area Plans will consider the use of Strategic Reserve Sites in order to avoid releasing too much land than is actually really needed.</p> <p>Given that the 'Island Spatial Strategy' states that priority will be given to the development of sites within and on the edge of existing settlements, the</p>

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		Douglas Borough Council			<p>Change 1</p> <p>Inclusion of additional foreword by the current Minister for the Department of Infrastructure reiterating the aims and purpose of the Plan; explaining the need for this partial review in relation to housing figures; and reiterating the intention to use the Strategic Plan to develop four Area Plans (although no timescale had been indicated, unlike the original foreword which stated 'within four years') :</p> <p>That the Council supports the change, but seeks reassurance that the Eastern Area Plan will be expedited, taking into account both the revised Strategic Plan and the recently-approved Douglas Town Centre Masterplan; and that both the Strategic Plan and the Eastern Area Plan would be reviewed in the light of the 2016 Interim Census data;</p> <p>Change 2</p> <p>Insertion of an additional preface to the document, expanding on the reasons for the partial review : That the Council supports the change with the</p>	<p>Department would expect to see a number of sites suggested through the Call for Sites around the edge of existing settlements (including Douglas) as well as within their boundaries.</p> <p>Change 1</p> <p>Agreement to the use of an additional Foreword is noted.</p> <p>It is a current priority to have a Draft Area Plan for the East published by the end of 2016. It would take into account the Isle of Man Strategic Plan as updated, the Central Douglas Masterplan and would take account of the 2016 Census data if, and when known as an important 'check' in the system. All such information sources will be helpful when decisions are being taken in respect of whether to allocate sites for 'general allocation' (immediate release) or by way of 'strategic reserve' (release in the medium/long term in line with a clear methodology).</p> <p>Change 2</p> <p>Support for an additional Preface is noted.</p> <p>The Final Employment Land Review Report (ELR)</p>

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		Douglas Borough Council			<p>reservation that other factors, particularly employment opportunities, should have some bearing on the need for housing and its allocation to different areas;</p> <p>Change 3</p> <p>Relating to the timeframe of the Plan, this being a period of fifteen years from 2011 to 2026 (although this would be subject to periodic review as data from the 2016 and 2021 Censuses became available) : That the Council reiterates the view that the whole Plan should be subject to review on a periodic basis;</p> <p>Change 4</p> <p>Strategic Policy 11 currently provided for development opportunities for 6,000 additional dwellings to be provided between 2001 and 2016, and the proposal was to change that to 5,100 dwellings between 2011 and 2026 :</p>	<p>(commissioned by DED) is due to be published ahead of formal discussion of the Report at July Tynwald on 21st/22nd/23rd July 2015. The Department has noted the contents of previous drafts and the Summary findings made public on 16th June 2015, and acknowledges that the broad distribution of housing as set out in the Draft Isle of Man Strategic Plan 2015 (showing greatest distribution in the East and then the South) is where the ELR recommends new employment land should be concentrated.</p> <p>Change 3</p> <p>The Department agrees that the next review of the Strategic Plan should be a full Review.</p> <p>It is the intention that the next review of the Strategic Plan will examine all of the approved Policies. A start date for such a comprehensive review has not yet been confirmed.</p> <p>Change 4</p> <p>The housing needs for the Island have been anticipated up to 2026. Whilst there will be a full review in the coming years it is unlikely to be immediately after the 2016 interim Census. There is likely to be an opportunity for the headline</p>

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		Douglas Borough Council			<p>That the Council asks the Department of Infrastructure for reassurance that the 2016 Interim Census data would be taken into account, and the figures revised accordingly at the earliest possible opportunity;</p> <p>Change 5</p> <p>Referring to spatial distribution of the new housing provision requirements, and explaining how the figures for distribution of the provision across the North, South, East and West of the Island were calculated :</p> <p>That the Council expresses concern that such a high figure of new development is required within the confines of existing boundaries, while recognising the need for such development (although not convinced of the accuracy of the projected figures); and asks the Department to discuss ways in which the numbers could be accommodated without encroachment into the green areas separating the Borough from neighbouring districts;</p>	<p>figures from the 2016 Census to be acknowledged during the preparation of the Area Plan for the East and other Area Plans. The Department is aware that the monitoring of new Census data (especially when it comes to new forecasts) is important; there may be policy implications to consider or there may not be any. It should be noted that the Department has the power to consider site allocations by way of 'general allocation' or by 'strategic reserve'; the balance between the two across the East will carefully considered right up to the Adoption of the Plan by the Department.</p> <p>Change 5</p> <p>For some settlements in the East, it may be necessary to consider sites on the edge of settlement boundaries which may cross Local Authority boundaries. Given that there are 7 different Local Authorities in the East, it is a possibility that some sites may straddle Local Authority boundaries. Sites will not be discounted purely on the basis of Local Authority boundary issues.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Douglas Borough Council			<p>Change 6(i)</p> <p>Revising and expanding upon the work carried out by the Department in analysing the data and leading to the conclusions in relation to housing needs; reiterating the need for 5,100 dwellings to be provided between 2011 and 2026; and also introducing the concept of 'Strategic Reserves', whereby certain areas would be allocated for development, but not released until the Department was satisfied that the need had been established :</p> <p>That, subject to the same reservations as to the accuracy of the figures as set out in relation to Change 4 above, the Council supports the change, including the provision of 'Strategic Reserves', in order to prioritise development where it was most appropriate in the first instance; and once again urging that the Area Plan for the East be expedited in order to identify such areas;</p> <p>Change 6(ii)</p> <p>Updating the demographic data in the Plan which underpinned the calculations and projections, including revised tables of population growth from 2011 to 2016; and also recognising within the proposed wording that the projections were subject to a wide-range of influences, and that the Plan would need to be regularly reviewed :</p>	<p>Change 6 (i)</p> <p>Support noted for the use of Strategic Reserves.</p> <p>Change 6 (ii)</p> <p>The need for regular reviews is noted by the Department.</p>

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		Douglas Borough Council		<p>That, subject to the same reservations as to the accuracy of the figures as set out in relation to Change 4 above, the Council supports the change;</p> <p>Change 6(iii)</p> <p>Relating to the analysis of development trends across the North, South, East and West of the Island; and how the proposed 5,100 additional dwellings should be spatially distributed across these areas (North = 770; South = 1,120; East = 2,440; West = 770); and amending Housing Policy 3 to reflect Change 5 (above) :</p> <p>That the Council questions the accuracy of the figures calculated for the distribution of new dwellings and, as for Change 5 (above), expresses concern over how the numbers in the East, and specifically Douglas, could be accommodated;</p>	<p>Change 6(iii)</p> <p>The Draft Isle of Man Strategic Plan 2015 and the supporting Evidence Papers set out a simple yet clear methodology about how the spatial distribution of housing has been allocated across the Island.</p> <p>In terms of how the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>2007 Plan</th> <th>2015 Draft Plan</th> <th>% change</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>20%</td> <td>15%</td> <td>-5</td> </tr> <tr> <td>South</td> <td>21.67%</td> <td>22%</td> <td>0.3</td> </tr> <tr> <td>East</td> <td>41.67%</td> <td>48%</td> <td>6.3</td> </tr> <tr> <td>West</td> <td>16.67%</td> <td>15%</td> <td>-1.6</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>It is clear that proportionally, figures for the North and West have gone down and figures for the East and South have gone up. The methodology which uses past planning approval data has been a helpful aid in establishing development interest</p>	Area	2007 Plan	2015 Draft Plan	% change	North	20%	15%	-5	South	21.67%	22%	0.3	East	41.67%	48%	6.3	West	16.67%	15%	-1.6	Total	100%	100%	
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		Douglas Borough Council				<p>across the settlement hierarchy. Given the importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals for the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>Given an understanding of the broad housing need across the Island, and the need to focus development in and around the Island's existing settlements, the revised distribution has ensured that the largest settlements with the most services will have the highest proportion of new housing development.</p> <p>Whilst the Department acknowledges that the distribution is based on a simple mathematical calculation of what has happened in the past it does appear that the broad distribution reflects:</p> <ol style="list-style-type: none"> a. The order of settlements in the spatial hierarchy b. The Draft Isle of Man Employment Land Review Report. This identifies that of the

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		Douglas Borough Council				<p>manufacturing businesses seeking to expand, most will be seeking premises in the East or the South.¹ It would therefore follow that the new housing should reflect this conclusion but not forgetting that there are other high order settlements in other Areas.</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ol style="list-style-type: none"> 1. Housing demand in the North appears to be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence that there would be no basis for adjusting the baseline distribution figure for the North. 2. Despite there being limited housing land in the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing

¹ Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government - Summary Report (dated May 2015)

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		Douglas Borough Council			<p>Change 7</p> <p>Referring to a Transport Study carried out by consultants in 2006 and a further study carried out on the Strategic Transport Links in 2014; taking into account the proposed level and location of housing development (as set out in the 2007 Strategic Plan); and identifying a small number of concerns to be addressed during the life of the revised Plan :</p> <p>That the Council supports the change and looks forward to specific proposals within the Eastern</p>	<p>approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p> <p>Change 7</p> <p>The comment in relation to addressing car parking in the Area Plan for the East is noted as well as the need to examine the strategic and local road network.</p>

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		Douglas Borough Council			<p>Area Plan; with the observation that, in addition to traffic congestion on the Strategic Transport Links, parking provision needs to be a major element of that Area plan;</p> <p>Change 8</p> <p>The implementation, monitoring and review of the Plan had been revised and clarified, allowing for the annual review of key elements (including a more comprehensive review at five years); with the monitoring and review provisions being intended to be particularly helpful in securing a focus on development of brownfield sites, previously-developed land, and sites within existing settlements, before releasing any 'Strategic Reserve' areas of greenfield sites : That the Council supports the revision;</p> <p>Change 9</p> <p>Replacing the outdated figures for development approvals granted, with a table showing the number of dwellings approved and started or completed between 2001 and 2011 : That the Council accepts the change as a factual update; and (iii) That the following additional comments, made specifically by Members of the Committee, also be included in the response:</p>	<p>Change 8</p> <p>Comments are noted in respect of the methodology to release sites for development.</p> <p>Change 9</p> <p>Acknowledgement of a factual update to Appendix 8 is noted. The Department is keen not to be too prescriptive about housing types in the Isle of Man Strategic Plan. Much will depend on the particular circumstances of the sites identified at a more local level.</p> <p>Development briefs are generally accepted as being one of the best ways to set out guidance for the development of individual sites but even so, there</p>

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		Douglas Borough Council			<ul style="list-style-type: none"> • That, alongside the number of units proposed, there should be a focus on the actual type of dwelling required; • That, in order to cope with the projected population figures for the Island, a review should be undertaken in respect of infrastructure; utilities; and transport; • That, in order to accommodate the proposed number of dwellings in Douglas, a review of the boundaries should be undertaken.” 	<p>would have to be sound reasoning in order to be prescriptive about house types even at that level.</p> <p>The evidence gathering stage of any Area Plan is the ideal time to be made aware of and to consider the types of housing that are needed, whether these be specialist forms of housing, residential homes, affordable housing etc. Getting the right mix of housing is, the Department agrees, very important and the Area Plan preparation is the right arena to have these discussions.</p> <p>In terms of highways, an assessment has been undertaken to establish if the network and junctions can accommodate the projected housing figures. The conclusion was that the proposed allocation of 5,100 new housing units between 2011 and 2026 can be built on the Island in line with the existing Island Spatial Strategy and without significant strain on the Strategic Highway Links (Page 29, Evidence Paper 3). Please also see the Department’s response to Comment 2 (DED).</p> <p>Other Government Departments and Agencies are fully aware of the changes expected in population in the coming years as anticipated after the 2011 Census. No sites will be allocated at Area Plan level until a full and proper assessment of such sites has been undertaken and the cumulative impact of the release of such sites anticipated.</p>

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						It would not be appropriate for the Department, through this Strategic Plan Review process, to make any recommendations in respect of the review of local authority boundaries.
Peel Commissioners						
32	DSP 8	Peel Commissioners	General		<p>An additional 770 dwellings in the West between 2011 and 2026 is excessive.</p> <p>The Review should take more of a holistic approach and include policy statements in respect of commercial/industrial development as well. This should not be left the Area Plan proposed for Peel and the West. It is wrong to consider only housing.</p> <p>Concern over the ability of the Town's infrastructure (medical, education and sewerage) being able to adequately cope with yet further development.</p> <p>Further housing development (if approved) should centre on elderly and sheltered housing together with increased social housing and first time buyers provision/shared equity homes.</p> <p>Additional and improved pedestrian access from the</p>	<p>The need for 770 new dwellings in the West represents 15% of the overall Island figure and, together with the North, has proportionally one of the lowest distributions Island-wide.</p> <p>The Draft Isle of Man Strategic Plan 2015 and the supporting Evidence Papers set out a simple yet clear methodology about how the spatial distribution of housing has been allocated across the Island.</p> <p>In terms of how the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.</p>

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					<p>outer parts of Peel into the town is also deemed necessary.</p>	<table border="1"> <thead> <tr> <th>Area</th> <th>2007 Plan</th> <th>2015 Draft Plan</th> <th>% change</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>20%</td> <td>15%</td> <td>-5</td> </tr> <tr> <td>South</td> <td>21.67%</td> <td>22%</td> <td>0.3</td> </tr> <tr> <td>East</td> <td>41.67%</td> <td>48%</td> <td>6.3</td> </tr> <tr> <td>West</td> <td>16.67%</td> <td>15%</td> <td>-1.6</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>It is clear that proportionally, figures for the North and West have gone down and figures for the East and South have gone up. The methodology which uses past planning approval data has been a helpful aid in establishing development interest across the settlement hierarchy. Given the importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals for the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>Given an understanding of the broad housing need across the Island, and the need to focus development in and around the Island's existing</p>	Area	2007 Plan	2015 Draft Plan	% change	North	20%	15%	-5	South	21.67%	22%	0.3	East	41.67%	48%	6.3	West	16.67%	15%	-1.6	Total	100%	100%	
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						<p>settlements, the revised distribution has ensured that the largest settlements with the most services will have the highest proportion of new housing development.</p> <p>Whilst the Department acknowledges that the distribution is based on a simple mathematical calculation of what has happened in the past it does appear that the broad distribution reflects:</p> <ul style="list-style-type: none"> c. The order of settlements in the spatial hierarchy d. The Draft Isle of Man Employment Land Review Report. This identifies that of the manufacturing businesses seeking to expand, most will be seeking premises in the East or the South.² It would therefore follow that the new housing should reflect this conclusion but not forgetting that there are other high order settlements in other Areas. <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ul style="list-style-type: none"> 3. Housing demand in the North appears to be low compared to other Areas. Out of all

² Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government - Summary Report (dated May 2015)

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%).</p> <p>4. Despite there being limited housing land in the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p> <p>It should be remembered that the housing need set It should be noted that the housing need identified is over a period of 15 years and the Plan period has in effect already started.</p> <p>Since 2011 and taking into account Update 7 of the</p>

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						<p>Residential Land Availability Study (2001 – 2014) as well as data up to 31st December 2014, the number of approvals which will be counted in the new Plan period is 218 (28%). The Department is aware also that as at 31st December 2014, land availability in the West stood at 34.3 ha.</p> <p>The Draft Isle of Man Strategic Plan 2015 still contains a number of Policies relating to “Business” (Chapter 9). Other than the changes highlighted in the Draft Plan, all other parts of the Plan remain unaffected. Whilst a full review would inevitably have re-examined all of the Strategic Plan Policies, there is no ability to allocate land for employment purposes by way of the Strategic Plan or any review of it.</p> <p>Infrastructure issues for Peel specifically would be considered at Area Plan level. Clearly there is land already allocated for housing in Peel. When it comes to increased pressure on current medical, education and sewerage systems any planning application made ahead of any new Area Plan would be considered on its merits in line with the Peel Local Plan, in order to ensure that current systems can accommodate the new development.</p>
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Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
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Marown Parish Commissioners

33	DSP 9	Marown Parish Commissioners By letter	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	No	Unnecessary to have two Forewords.	Comment noted but the Department judges that for context purposes, both Forewords serve a purpose.
34	DSP 9	Marown Parish Commissioners	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	No	Unnecessary to have two Prefaces.	Comment noted but the Department judges that for context purposes, both Prefaces serve a purpose.
35	DSP 9	Marown Parish Commissioners	Comments on the revised Foreword or Preface?		It could incorporate some key points from the Preface 2007.	The Department judges that whilst it is slightly unusual to retain the 'old' Foreword and Preface, keeping them separate from the 'new' versions is clearer.
36	DSP 9	Marown Parish Commissioners	Paragraph 1.8.1		The census does not allow any certainty about future population growth as migration flows into and out of the Island are responsive to changed economic conditions. The Strategic Plan should be amended immediately after each census and the Plan should not attempt to plan more than 10 years	The Department believes the Isle of Man Census is the most accurate population evidence available to assist in forward planning. The time lag between the actual Census and the availability of headline figures is always likely to be

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Marown Parish Commissioners			ahead. Strategic Planning must not be based on out of date evidence.	<p>a number of months. It is sensible to look ahead further than 10 years when it comes to Strategic Planning. One of the key challenges is of course anticipating future changes but it is a necessity and is done using the best information available.</p> <p>Fluctuations in migration for instance occur naturally year on year depending on a whole range of factors. It is important to look at the long range picture to prevent knee jerk reactions that might lead to a shortage of land when it is really needed or indeed an oversupply. New data on population projections will always be able to be fed into Area Plans and the Department has been open about its intention to be particularly conscientious when it comes to the timings of site release.</p>
37	DSP 9	Marown Parish Commissioners	Paragraph 1.8.2		The migration gain of 500 people per year is not a figure that derives directly from the 2011 Census. The Census shows inward migration of 1660 in 2010 whilst the UK Census suggests emigration to the UK of 1697 between March 2010 and March 2011. Data and projections which genuinely flow from the 2016 Census must feed into an immediate review of the Strategic Plan. Without that, the Plan is not evidence based.	<p>The net migration figure of 500 per annum is not set by the Department of Infrastructure. It is an assumption made by the Economic Affairs Division as part of its work to produce the Isle of Man Population Projections.</p> <p>The Department would argue that the Plan is evidence based. There will always be the temptation to wait until the next Census but again, after any Census there will be the need to rely on population projections when planning into the future.</p>

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		Marown Parish Commissioners				<p>In the Isle of Man Strategic Plan 2007, the projection for households in 2011 was 35,275 (based on 2006 interim Census). The 2011 Census recorded the actual figure as 35,599. The 2011 true figure was therefore slightly above the projection by 324 (or 0.9%).</p> <p>In the Isle of Man Strategic Plan 2007, the projection for households in 2016 was 37,296 (based on 2006 interim Census). The projection for 2016 based on the 2011 Census is 37,261 which represents a slight fall in the projection of 35 or 0.09%. The important point to remember about projections is that they are estimates based on the analysis of available past data. As projections are often amended when new data becomes available, it is useful to consider how different the actual figures turn out to be, compared to the projections.</p> <p>Noting that there was a difference of 0.9% between projected and actual households for 2011, the Department is content to rely on projection data but accepts that the 2016 interim Census results will be of interest and when new headline figures become available (around November 2016). They will as a matter of course be recognised as part of the Area Plan process for the East.</p>

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38	DSP 9	Marown Parish Commissioners	Any comments on the proposed wording for Strategic Policy 11 and Housing Policy 1?	Yes	There is significant evidence that the Island's population has not grown at the predicted levels since 2011. It may have already been in decline by 2010. Projected requirement for 5,100 is totally unsound.	It has already been acknowledged that there may be fluctuations in the net migration figure; some years it may be higher than 500 and some years it may be lower. A primary purpose of the Plan is to ensure that there is sufficient land available for the needs of the Island. Reacting to short term changes may be counterproductive and harm the Department's ability to comply with the Strategic Aim "to plan for the efficient and effective provision of services and infrastructure and to direct and control development and the use of land to meet the community's needs...." (Paragraph 2.6 Draft Isle of Man Strategic Plan 2015).
39	DSP 9	Marown Parish Commissioners			Migration gain of 500 does not take account of the evidence suggesting that emigration has risen and emigration has fallen. Provision of 5,100 new homes not needed. 2011 Census shows a slowing of growth between 2006 and 2011. Over 1600 people emigrated from IOM to UK in 12 months prior to UK Census 2011.	The Department is content with the data supplied to it by Economic Affairs.
40	DSP 9	Marown Parish Commissioners			5100 does not represent the broad housing requirement for the Isle of Man.	The Department is content that 5,100 new dwellings is a reasonable baseline figure taking into account the projection data for households and expected changes to household size. Allowing for some, but not all of the vacant properties on the Island increases the demand for housing by 195.

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41	DSP 9	Marown Parish Commissioners			It is an abrogation of planning responsibility to determine that future house building will simply follow past house building.	It is vital to have baseline figures and a methodology for setting out such figures. They are not 'maximums' but are important to establish a direction for growth. Given that the data on planning approvals has shown that development has taken place in accordance with the settlement hierarchy, there is good reason to base future growth on the Island Spatial Strategy which sets out how the Island should develop.
42	DSP 9	Marown Parish Commissioners			Between 2001 and 2011 the population of Douglas grew by 10.2%. The arbitrary allocation of 33% of development to Douglas in addition to any brownfield redevelopment of housing does not recognise the reality that there is limited space for housing within the current Douglas boundaries.	<p>The breakdowns for the Areas do not go as far as allocating need to settlement level. There is no need to do this as the Area Plans will undertake a proper Call for Sites exercise and look at the Eastern Area as a whole. It is clear that Douglas is unique in that it is <i>the</i> Main Centre and given the methodology used it would be easy to conclude that 33% would be allocated to Douglas. Decisions have yet to be made on the number or location of sites in the East although the Spatial hierarchy of settlements will of course be a factor to be taken into account.</p> <p>The Department acknowledges that there are 7 Local Authorities in the East. When assessing individual sites, the Department will not exclude sites by reason that a particular settlement that a site would be associated with falls within a different Local Authority area.</p>

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43	DSP 9	Marown Parish Commissioners			Given the unreliable projections there is no justification for distributing 5,100 houses. The determination that the East has taken the brunt of development because it had taken the brunt of development in the past is not a strategic argument. Danger that the overstated housing needs will be unreasonably allocated to the East before the 2016 Census shows that the projections in use are invalid.	The Department does not agree that the projections are unreliable. Development in the East and particularly Douglas has indeed been higher than other Areas. It is important to note that even though residential land availability has been relatively low in recent years in Douglas, the number of approvals and low number of lapsed applications is indicative that i. development sites are being identified (often by way of previously developed land or conversions) and ii. there is a healthy demand for properties in Douglas.
44	DSP 9	Marown Parish Commissioners			There is no evidence of the potential of the East to absorb house construction on this scale. There is no strategy involved.	When it comes to the Area Plan for the East, all of the potential sites and the impact of their release on infrastructure, the road network and environment will all have to be taken into account. As part of the preparation of the Draft Isle of Man Strategic Plan 2015, a broad assessment has been undertaken based on the addition of 5100 dwellings to the strategic highway network and key junctions. Chapter 3 of the Isle of Man Strategic Plan sets out the Strategic Aims for developing policy. These Aims remain unchanged from the 2007 Plan. has resulted in the development of Strategic Policy 10, and the Transport Policies in Chapter 11 to ensure sustainable patterns of development in the future. Such Policies have been used previously in the consideration of the Area Plan for the South as well as planning applications submitted for consideration since the original Plan's approval by Tynwald in

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>2007. The Strategic Plan does not have a policy for the development of an integrated transport strategy even though this term is often referred to.</p> <p>The current review of the Strategic Plan concentrates on housing numbers. This has resulted in an update to the transport assessment section to take into account the impact of these additional properties on the strategic network. This assessment continues to predict congestion at the same locations as the 2007 document. The Ballasalla 'By-pass' issue was dealt with in-depth by the Area Plan for the South. The other locations (Douglas) will be matters for the Area Plan for the East. The Government has strategic land holdings at Quarterbridge and Governor's Bridge to facilitate improvement works at these locations to increase capacity for a variety of modes of transport.</p> <p>The Department continues to work with other Departments on measures to improve strategic cycling routes and is in the process of drafting a public transport strategy. These documents along with the transport assessments contained within the Strategic Plan will form the background to the development of all future Area Plans and in particular the Area Plan for the East which has congested strategic junctions within its geographical remit. It is these development plans documents which must address the policies and transport constraints which are identified in the Isle</p>

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						<p>of Man Strategic Plan. This was successfully negotiated within the preparation, Public Inquiry Stage and subsequent approval of the Area Plan for the South.</p> <p>See also Department's response to Comment 2.</p>
45	DSP 9	Marown Parish Commissioners			<p>Paragraph and table are unclear. Suggests only 3677 dwellings will be needed. Why does the Plan proceed towards the identification of land on which to develop 5,100 dwellings? Just over 150 planning applications per year between 2011 and 2013 – further evidence that 5,100 houses over 15 years is a massive over-estimate.</p>	<p>When considering the provision of new housing to meet the needs of population growth, the Department has to consider all of the ways in which this housing may come forward. Some will be through conversions, some will be through the development of existing sites often within existing settlements and there may be some 'windfalls' which will provide new units but were unexpected additions. It may not therefore be necessary to release new greenfield sites for all 5,100 units. The table was simply to show what approvals have already taken place during the early years of the Plan period and what can be expected to be produced via conversions and windfalls. The Department is not therefore looking for land for 5,100 dwellings but rather in the region of just over 3,500.</p> <p>The Department suggests an update to the table at paragraph 5.25 given the availability of new conversion data from 2011 to 2014. (see Schedule of Proposed Changes – DSP 2 No. PC3).</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
46	DSP 9	Marown Parish Commissioners			Where is the evidence that existing settlements have the potential for this concentration of new residential development? If Douglas is to take 33% of a projected population increase of over 9000 of this would produce an additional 10.7% growth inside Douglas. Douglas has little space within its boundaries. The rural areas that took the brunt of population growth between 2001 and 2011 (Braddan 34.6%. Marown 23% and Braddan 19.1% are at risk of suffering additional pressures if Douglas cannot accommodate the planned concentration of growth.	<p>The breakdowns for the Areas do not go as far as allocating need to settlement level. There is no need to do this as the Area Plans will undertake a proper Call for Sites exercise and look at the Eastern Area as a whole. It is clear that Douglas is unique in that it is <i>the</i> Main Centre and given the methodology used it would be easy to conclude that 33% would be allocated to Douglas. Decisions have yet to be made on the number or location of sites in the East although the Spatial hierarchy of settlements will of course be a factor to be taken into account.</p> <p>The Department acknowledges that there are 7 Local Authorities in the East. When assessing individual sites, the Department will not exclude sites by reason that a particular settlement that a site would be associated with falls within a different Local Authority area.</p>
47	DSP 9	Marown Parish Commissioners			The Plan, Monitor and Manage approach does not remove the need to plan based on recent and accurate information. Zoned land will trigger land options and speculative purchases.	The Plan, Monitor and Manage approach is an effective way in which to change or update general policy direction. Trends can often take a number of years to become evident, for instance migration may have been lower in the past few years, and it may pick up in the next 5 years. It would add a significant amount of uncertainty to the development process if population figures were changed on an annual basis and documents referring to housing numbers and land requirements were expected to react. Consistent,

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		Marown Parish Commissioners				<p>regular and officially recognised all-Island surveys such as the Census are what is required. These 10 yearly surveys, updated after 5 years, are sufficient to feed into Strategic Plan Reviews and Area Plan preparation. The former, it should be noted, also has in built 'flexibility' to react to situations where there is an immediate 'need' of national importance for which there is no alternative site available (GP3(a)).</p> <p>The Department does not control the practice of taking options out on land. It is a practice which goes on but there are no guarantees for those taking out an option. Land normally has to be zoned, development schemes approved via a planning application and development started on site before there can be certainty that new dwellings will be available.</p> <p>The Strategic Plan sets out its Spatial Strategy quite clearly. Those interested in land are able to anticipate which areas may come forward in the future. A speculative option/purchase at any stage does not necessarily mean housing supply and demand and the normal market processes would be hindered.</p>

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48	DSP 9	Marown Parish Commissioners			Absence of an urban capacity study for Douglas is a serious omission. How can 2440 be allocated to the East, mostly in Douglas without establishing that Douglas has the capacity to accommodate this extra housing?	<p>Some work has been undertaken to identify if the broad levels of housing identified would be capable of being provided. This has involved an initial desktop examination of hypothetical sites on the edge of settlements which includes the East.</p> <p>It is worth noting that according to the approval data available up to June 2014, 178 new homes (net) have been approved in Douglas since 2011.</p>
49	DSP 9	Marown Parish Commissioners			The migration figure of 500 is not derived from the Census. The Census provides evidence to suggest that immigration is already slowing.	The Department is content with the data supplied to it by Economic Affairs.
50	DSP 9	Marown Parish Commissioners			Strategic Reserves may be appropriate but they must be based on realistic estimates of land required for housing and must not be unnecessarily large.	The Department will, through the Area Plan process, and once Area figures are confirmed through the Strategic Plan, give careful consideration to the matter of site allocation and the potential of those sites.
51	DSP 9	Marown Parish Commissioners			<p>Estimated population of 93,526 is based on the simplistic assumption that net migration will be 500 per year for 15 years up to 2026. It is not clear what the age profile of the immigrant population is. It is one of a possible range.</p> <p>Working age for women ignores the reality that there will be no state pensions for women until age 65 by 2020.</p>	<p>The Department is content with the data supplied to it by Economic Affairs. The age profile of the '500' is reflective of the known data.</p> <p>Evidence has been provided in Evidence Paper 1 as to the possible future changes in the state retirement age. These changes may yet be amended and in any will need to be subject to legislative changes being made to the pension age.</p>

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52	DSP 9	Marown Parish Commissioners			The 3 scenarios for household size were a failed previous assumption of 0.1 per decade, an assumption that household size will not alter and the preferred assumption - 0.04. This could have been based on evidence related to the age of the population. An ageing population leads to more 1 person households.	The Department acknowledges that there is an ageing population on the Island. The assumptions in household size reflect the situation between 2001 and 2011. Clearly household size figures have a significant impact on the number of houses required. The Department has assessed a number of options and concluded that it is necessary to adjust the expected rate of change in household size. A reduction of 0.04 every 10 years (0.004 per annum) is the most likely scenario.
53	DSP 9	Marown Parish Commissioners			Predictions relying on the migration figure of 500 are unsound.	The Department is content with the data supplied to it by Economic Affairs.
54	DSP 9	Marown Parish Commissioners			Population estimate is unsound therefore the number of dwellings needed is unsound.	The Department is content with the data supplied to it by Economic Affairs as well as its broad assessment of housing need on the Island.
55	DSP 9	Marown Parish Commissioners			Acknowledgement that 'some land in and around Douglas is limited. This is unclear. An urban capacity study would show that land for new development is very limited.	The latest residential land availability work shows that allocated residential land in Douglas stands at 2.3 ha. This represents a limited supply. Further capacity studies at the Area Plan stage may reveal sites that have the potential for housing development and they will be taken into account for the assessment and release of any other sites within or on the edge of Douglas.

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56	DSP 9	Marown Parish Commissioners			<p>What was the nature of the assessment of settlements in the Areas? Given that there were no urban capacity studies? The 10.2% growth in Douglas compared with the 34.6% growth in Braddan 2001 to 2011 is already evidence that Douglas is spreading beyond its boundaries.</p> <p>If Douglas cannot take its share of the 2438 houses planned for the East will the surrounding rural parishes be expected to take the hit?</p>	<p>The Eastern Area will be looked at as a whole. Previously, Local Plans such as Onchan, Douglas, Laxey and Lonan have, geographically, been very focused. Land release has therefore been to some extent 'piecemeal' in the East. The spread of additional land release in and around each settlement will be thoroughly assessed.</p>																								
57	DSP 9	Marown Parish Commissioners			<p>HP3 based on a very poor set of evidence and assumptions. Migration figure is not substantiated and almost certainly incorrect. The East allocation is based on nothing more than "let them build houses where they built houses before" which does not constitute a Strategic Plan.</p>	<p>The Isle of Man Strategic Plan 2015 and the supporting Evidence Papers set out a simple yet clear methodology about how the spatial distribution of housing has been allocated across the Island.</p> <p>In terms of how the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>2007</th> <th>2015</th> <th>% change</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>20%</td> <td>15%</td> <td>-5</td> </tr> <tr> <td>South</td> <td>21.67%</td> <td>22%</td> <td>0.3</td> </tr> <tr> <td>East</td> <td>41.67%</td> <td>48%</td> <td>6.3</td> </tr> <tr> <td>West</td> <td>16.67%</td> <td>15%</td> <td>-1.6</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>It is clear that proportionally, figures for the North</p>	Area	2007	2015	% change	North	20%	15%	-5	South	21.67%	22%	0.3	East	41.67%	48%	6.3	West	16.67%	15%	-1.6	Total	100%	100%	
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		Marown Parish Commissioners				<p>and West have gone down and figures for the East and South have gone up. The methodology which uses past planning approval data has been a helpful aid in establishing development interest across the settlement hierarchy. Given the importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals in the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>Given the broad housing need across the Island, and the need to focus development in and around the Island's existing settlements, the revised distribution has ensured that the largest settlements with the most services have the highest proportions of new housing development.</p> <p>Whilst the Department acknowledges that the distribution is based on a simple mathematical calculation of what's happened in the past it does appear that the broad distribution reflects</p> <ul style="list-style-type: none"> a. The order of the spatial hierarchy

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		Marown Parish Commissioners				<p>b. The Draft Isle of Man Employment Land Review.* This identifies that where manufacturing businesses are seeking to expand, most will be seeking premises in the East or the South. It would therefore follow that new housing should reflect this conclusion but not forgetting that there are high order settlements in other Areas.</p> <p>*Draft Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government, March 2015, page 42.</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ol style="list-style-type: none"> 1. Housing demand in the North appears to be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence that there would be no basis for adjusting the baseline distribution figure for the

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Marown Parish Commissioners				<p>North.</p> <p>2. Despite there being limited housing land in the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p>
58	DSP 9	Marown Parish Commissioners			<p>Cycle of review and the incorporation of the findings of the Censuses are crucial to the planning cycle. Given the change in the Island's economy from 2008 to the present it makes no sense to use net migration estimates based on pre 2011 migration flows to project 15 years into the future. Other evidence should also be used – school population changes, GP and dentist registrations etc. which would cast doubt on the 500 migration figure. Plan should cover no more than 10 years because of uncertainties.</p>	<p>Relying on other surveys can in some respects aid the understanding of the Island Census. However, it is important to remember that economic cycles change and may well change over the Plan period.</p> <p>It is also important to note that there may be anomalies in other data sources. There is no statutory requirement to be registered with a GP or dentist and so using any or a combination of other survey data instead of the Census may have its disadvantages.</p>

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59	DSP 9	Marown Parish Commissioners			Needs to be recognition of the consequences of gross over provision in the East leading to unrealistically large strategic reserves. For other Area Plans will they have reduced allocation because of the overcapacity in Douglas? Will this skew development further towards the Douglas Area?	The housing distribution in the East is 48%. The Commissioners should also read the comments submitted by DED which argue for a higher proportion of housing in the East. The East contains the Main Centre and 1 Service Centre and a number of Service Villages and Villages. If the Department accepts at the Area Plan Stage that the Strategic Reserves are for whatever reason 'too large' it may be that areas of land or potential sites will remain as countryside. Local needs will be assessed at the Area Plan level.
Malew						
60	DSP 10	Malew Parish Commissioners	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	Yes		Comment noted.
61	DSP 10	Malew Parish Commissioners	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	Yes		Comment noted.

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62	DSP 10	Malew Parish Commissioners	Paragraph 5.23	Yes	Consideration should be given to Ballasalla also being a service centre	There are no changes proposed to the Spatial Hierarchy in this Review. Many of the development sites identified in the Area Plan for the South have yet to come forward, however, full consideration will be given to the Commissioners' request at the time of a full Review.
63	DSP 10	Malew Parish Commissioners	Comments on paragraph 11.1.12	Yes	Should further land be released in Castletown, the A5/A7 junction should be reviewed sooner.	The implications of the release of additional development sites in Castletown will be properly assessed.
Castletown Commissioners						
64	DSP 11	Castletown Commissioners (Keith Hargest)	General		<p>Assessment of Housing requirements needs to be robust.</p> <p>Further evidence should be provided to support the assumptions</p> <p>Recognise that the forecasts could be inaccurate to a considerable degree.</p> <p>Undertake a detailed analysis of supply around the Island.</p>	<p>The Department agrees that the assessment of housing requirements for the Island needs to be robust. Intrinsic to any forecasting is the recognition that with any reliance upon projections, comes a certain level of uncertainty associated with those projections.</p> <p>The Department judges that the best way to approach such risk is to use the best information available, be clear about any methodology, to regularly review the baseline projections and build into the 'system' enough flexibility to account for</p>

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						<p>any unexpected circumstances.</p> <p>The Department maintains its background database on residential land and take-up of that land as well as redevelopment sites and uses the projection data available to it sensibly.</p>
65	DSP 11	Castletown Commissioners	Paragraph 8.4.1 Net migration figure of 500		No justification for this assumption is given. The impact of different levels of migration should be tested.	The Department is content with the figures provided by Economic Affairs.
66	DSP 11	Castletown Commissioners	Paragraphs 8.4.5 - 8.4.6 & Table 8.3 Household Size		Further evidence is required to demonstrate why the preferred option was adopted and why the rate of change in household size is expected to remain constant.	Average household size is expected to continue to fall. The Department realises that the rate of fall is slowing such that if the Department failed to react to this then the Island risks adopting an approach which essentially releases too much housing land or alternatively not enough. Like migration, there will be annual changes; what the statistics do is look at the general situation over a longer time period.
67	DSP 11	Castletown Commissioners	Paragraphs 8.4.7 - 8.4.8 Vacancy Factor		<p>Direct Isle of Man evidence should be provided to identify the appropriate vacancy rate to adopt.</p> <p>Provide information on vacancy rates around the Island. This is an indicator of unmet demand. Low vacancy rates may be an indicator of supply not matching demand. Constraining the supply of housing has resulted in a number of adverse social</p>	<p>The Isle of Man can indeed look to the UK to measure how policy changes there and approaches to housing land release may have influenced the well-being of the local economies and communities.</p> <p>General issues of housing supply and demand may be similar but on a much smaller scale. This doesn't make effective policy approaches any less</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>and economic impacts in the UK.</p>	<p>important to strive for, but it is important to accept that occasionally, the data sources available in the UK, may simply not be available on the Island. In terms of Vacancy Rates, there are a number of data sources: The Census (data from the 2011 Census is currently unavailable) The Rates database Local studies (reports prepared by Government) Local studies (reports prepared by non-Government)</p> <p>The Department accepts that it is unfortunate that the 2011 Census data on empty properties is unavailable but does not see this as being a significant issue in the identification of housing need.</p> <p>The evidence suggests that the Department's applied vacancy factor or 'uplift' of 4% is lower than the number of vacant homes on the Island. There are a number of reasons for this:</p> <p>Compared to the existing housing stock, the new housing stock would be expected to achieve higher occupancy levels; It should not be an objective to strive for a very low vacancy rate Island wide; properties which are empty for short periods help keep the housing market buoyant. There are various reasons why properties may be empty and different surveys may</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>record empty properties in different ways. Properties may be 2nd homes, or undergoing refurbishment or just unoccupied. Properties may be in different states of repair.</p> <p>The point is that recording accurately why a property may be empty can be difficult. It is important to recognise that, relying on empty properties to meet a significant amount of housing need carries with it a high level of risk.</p> <p>A number of approaches are required to ensure the right level of housing supply is meeting demand which may include the use of incentives or financial penalties to bring some of the vacant properties back into occupation. Sound evidence which defines what constitutes an empty property is important from the outset. It is worth noting that a vacancy rate of 8% would increase the housing need figure to 5276 (as opposed to 5080) and an increase of 10% would equate to 5374 (as opposed to 5080). Applying different uplifts has limited impact on the broad housing figure unlike a change in household size assumptions which can have a significant impact.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
68	DSP 11	Castletown Commissioners	Paragraphs 5.18 – 5.24 & 8.5.3 – 8.5.6 Spatial Distribution		<p>Commissioners support the calculated distribution of new housing as a proportion of the total requirement (22%). Actual numbers are dependent on the overall number (other comments set have been made on this).</p> <p>New housing development should be directed to settlements that provide appropriate level of community and social services and facilities.</p> <p>Significantly higher levels should be directed to the Main Centre than to Service Centres and so on.</p>	<p>The Commissioners are silent on the proportions allocated to the East, North and West but would seem to accept the 22% allocated in the South. This appears to suggest to the Department that the methodology (which has resulted in 22% being allocated to the South) is generally supported by the Commissioners.</p> <p>The Department agrees that the settlement hierarchy is important when considering the apportionment of housing land.</p>
69	DSP 11	Castletown Commissioners	Paragraphs 5.25 – 5.27 Windfalls and Conversions		<p>There is no evidence presented to justify the high level of conversions.</p> <p>It is suggested 965 could be provided based on 73 per annum.</p> <p>Appendices 1 & 2 suggest much lower figures: Appendix 1 = Projected conversions and windfalls would be 328 over 10 years (33 pa). Appendix 2 = 167 units (13 pa)</p>	<p>Conversion data is now available between 2001 and 2014. The monitoring process for conversions allows figures to be adjusted to take into account the reduction in the Plan period. All of the RLAS Reports have made this clear.</p> <p>The table at paragraph 5.25 was included in the Draft Plan to assist in identifying the opportunities needed (i.e. by way of new sites) after taking into account likely conversions and windfalls over the Plan period. Some further explanation is set out below.</p> <p>Column f is titled 'projected conversions and windfalls 2011-2026 at 73 per annum'. The figure</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>was given as 965.</p> <p>This is how 965 was reached:</p> <p>Average no. of approvals for conversions and windfalls Jan 2001 to Jun 2011 (10.5 years) = 764</p> <p>$764 \div 10.5 = 73$ per annum</p> <p>$73 \times \text{new plan period (15 years)} = 1095$</p> <p>$1095 - \mathbf{130}$ (recorded conversions/windfall 2011-2013) = 965*</p> <p>It is now clear that an error was made with this table which is explained below.</p> <p>* It is accepted only 70 should have been removed from 1095 not 130. On the basis of this correction, column 'g' should have read 3747. In any case, this table can now be updated to reflect additional 2013/2014 data. A revised table for Paragraph 5.25 is set out in the Department's proposed changes document.</p> <p>(see Schedule of Proposed Changes – DSP 2 No. PC3).</p>

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70	DSP 11	Castletown Commissioners	Appendix 8		<p>Appendices identify existing units in 2001 and 2011. Table 8.3 and Paper 1, Table 3 identifies these as households which is different from 'units'. The Department has not done its analysis correctly. It needs to identify how many units there are in order to support its analysis of the requirement for future provision.</p>	<p>The Department accepts that the title of Column 2 in Appendix 8 should read "number of private households" and not "existing dwelling units". This was an error carried forward from the 2007 Plan. The Department apologises for the confusion this has caused (see Schedule of Proposed Changes – DSP 2 No. PC1).</p>
71	DSP 11	Castletown Commissioners	Demolitions		<p>Housing allocations need to take into account demolitions.</p> <p>Example: 2001 Castletown had 1284 units but in 2011 there were 1353 units (net increase of 69 units) even though 294 had been started or completed. There have therefore been a substantial number of demolitions (mostly Janet's corner). Only small increase in housing therefore, despite significant development.</p> <p>Essential that allocations take into account demolitions. This has not been done in the Review so far. Because demolitions/windfalls/conversions will vary across the Island, opportunities should be on an area by area basis.</p>	<p>All of the Residential data set out in the RLAS Reports take into account demolitions. They are set out in the main data tables and also collated as part of the summary tables. All of the figures used are 'net'. Indeed Housing Policy 1 continues to stress that opportunities to be provided shall be 'net of demolitions'.</p> <p>The Department does not agree to a further breakdown of demolition rates across the Island. This data is available but on the whole the benefits of using this data would not influence the final land allocations to a significant degree. Given the small numbers of 'units lost' Island wide averages are considered acceptable.</p>

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Others

Chamber of Commerce

72	DSP 12	Chamber of Commerce			<p>The Context</p> <p>We have contextualised our submission within the framework of the three stated objectives of Government (which has our fullest support):</p> <ol style="list-style-type: none"> 1. Protecting the Vulnerable 2. Grow the Economy 3. Balance the Budget <p>All three objectives to be inter-linked, but we strongly believe the objective with the highest priority is "Grow the Economy". Only with good growth in the economy can we "Protect the Vulnerable" and "Balance the Budget" (in the fullest sense including pensions).</p> <p>The draft Strategic Plan, as amended, sets out the housing requirement for the 11 years forward to year 2026. Sufficient and appropriate housing in the right location is a key requirement for the</p>	<p>The Department is fully aware of the Agenda for Change and the 3 stated objectives of Government. There is a duty for all Departments to understand the clear direction set by the Council of Ministers in this document and to proactively take steps to help build a positive approach to creating a sustainable future.</p> <p>The "further development of the diversified economy of the Island" is set out as being key to the future of the Island. In terms of housing the Agenda for Change section on the 'Economy' states that Government will "work with the construction industry to meet the Island's housing needs." The Agenda for Change section on 'Environment and infrastructure' states Government will "make sure town and country planning supports economic development".</p> <p>The DoI is charged with the development and delivery of an up to date planning framework for</p>
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Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Commerce			<p>by 0.5% per annum in the period 2015 to 2026 we would require 7,396 more new houses. *assumes dependency ratios remains the same as forecast for 2026 which may not be the case</p> <p>4. If current working age population increased by 1.0% per annum in the period 2015 to 2026 we would require 9,808 more new houses. *assumes dependency ratios remains the same as forecast for 2026 which may not be the case</p> <p>5. Historic census figures for 5-year periods record increases in working age population as 8.8% to 2001, 5.1% to 2006 and 4.3% to 2011. Increases in the retirement age will increase the Island's economically active population. However from an economic productivity perspective we caution against over-reliance on such individuals to "Grow the Economy". Some will choose to take early retirement whilst others will choose part-time employment or perhaps easier jobs (with less impact on the overall economy). This is an area worthy of additional study. However a very rough estimate could be made assuming individuals work for two years longer by 2026 before retirement. Assuming a 40-year working life and 50% productivity compared to "younger workers" would indicate an additional 0.23%% growth per annum in economically active working population.</p> <p>(2 years additional working life divided by 40 years working life divided by 11 years to 2016 multiplied by 50% productivity factor).</p>	<p>The Department has set out in the Draft Plan 2015 - Table 8.2 - which shows projected figures based on the existing state retirement age. Evidence Paper 1 also sets out figures for a revised model for state retirement age. For both models the projected number for the total population remains the same.</p> <p>The Department appreciates the efforts the Chamber has gone to in analysing the Census, the Agenda for Change and Vision 2020. It is clear that the Chamber would like to see the housing figures set out in the Draft Isle of Man Strategic Plan 2015, as explained in the Evidence Papers, to be adjusted to take account of possible scenarios in terms of the working population. The calculations set out by the Chamber attempt to show the intricacies of achieving growth in the economy and how those of working age can contribute.</p> <p>The Chamber suggests increasing the overall housing requirement from 5,100 to 7,396 units between 2011 and 2026.</p> <p>It is important to note that despite 141.09 hectares of land being available for residential development as at June 2014 (RLAS Update 7 2001-2014) and the identified need for 6000 new dwellings between 2001 and 2016, the anticipated planning approvals based on past rates would only have provided planning approvals for 5930 dwellings within the</p>

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		Commerce			<p>0.5% workers into the current age working population implies the additional housing requirement set out in the Strategic Plan should be increased from 5,100 units to 7,396 units - a significant increase.</p> <p>We appreciate Government Departments will need to collaborate and co-ordinate on our suggested revision to the Central Planning Assumptions. For example if our illustrative numbers are followed DED could be assigned the Key Performance Indicator of increasing the number of jobs within the economy in line with the revised Assumptions.</p> <p>Spatial Policy and Impact on the Economy</p> <p>The draft Strategic Plan proposes the following spatial distribution of new houses compared to the current location of worker houses (census 2011):</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">Proposed Distribution of New Houses</th> <th colspan="2">Current Resident Employed Population</th> </tr> </thead> <tbody> <tr> <td>East Region</td> <td>2,440</td> <td>48%</td> <td>25,036</td> <td>58%</td> </tr> <tr> <td>South Region</td> <td>1,120</td> <td>22%</td> <td>6,827</td> <td>16%</td> </tr> <tr> <td>North Region</td> <td>770</td> <td>15%</td> <td>6,314</td> <td>15%</td> </tr> </tbody> </table>		Proposed Distribution of New Houses		Current Resident Employed Population		East Region	2,440	48%	25,036	58%	South Region	1,120	22%	6,827	16%	North Region	770	15%	6,314	15%	<p>Vision 2020 builds upon the plans set out in Government's document 'Discover the Agenda for Change in Our Economy' (March 2013).</p> <p>The Executive Summary states that the Vision 2020 analysis indicates that the Isle of Man's growth prospects are good:</p> <table border="1"> <thead> <tr> <th>Projected annual growth rates to 2020</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>National Income (GDP)</td> <td>3 - 4</td> </tr> <tr> <td>Government Income</td> <td>1 - 2</td> </tr> <tr> <td>Jobs</td> <td>0.7 - 1</td> </tr> </tbody> </table> <p>The Department has been able to identify average household changes up to 2026 thanks to the Isle of Man Population projections. This is a sound precursor to the identification of the number of new housing units needed. From the 2011 Census data it is clear that average household size changes from Area to Area. Household size is highest in the West</p>	Projected annual growth rates to 2020	%	National Income (GDP)	3 - 4	Government Income	1 - 2	Jobs	0.7 - 1
	Proposed Distribution of New Houses		Current Resident Employed Population																															
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		Commerce			<table border="0"> <tr> <td>West</td> <td>770</td> <td>15%</td> <td>4,957</td> <td>11%</td> </tr> <tr> <td>Region</td> <td>5,100</td> <td>100%</td> <td>43,134</td> <td>100%</td> </tr> </table> <p>The draft Strategic Plan therefore proposes to reduce the percentage of the employed population living in the East Region.</p> <p>Unfortunately there is no available Government information on the spatial distribution of jobs by region. However it is clear that the most "value-added" jobs to the economy (from a high productivity perspective) are those involving export of goods or provision of off-Island services (together with import substitution of goods and such services). A reasonable assumption might be that 85% of such value-added jobs are located within the East region, 10% within the South region and 5% within the West and North regions.</p>	West	770	15%	4,957	11%	Region	5,100	100%	43,134	100%	<p>(2.39), then the East (2.36), the West and the North both with 2.27. It can be deduced that household size across the Island will continue to differ in the future.</p> <p>It is important not to draw conclusions when comparing data sources for individuals and houses. Put simply, the 2440 additional houses are likely if past trends are considered, to be occupied by more people in the West and the East, than in the North or the South.</p> <p>Whilst the Department accepts that there are perhaps more complex mathematical exercises that could be done to marry up the additional employed population with houses in the East, the Department is conscious of making adjustments to the broad Area distributions unnecessarily. The Department is content to rely on the projections as provided by Economic Affairs and other evidence sources such as the Employment Land Review and the Island Spatial Strategy generally, to focus new housing where required. Almost half the additional houses required are to be distributed across the East. Reducing the need to travel is important, close proximity to the workplace is important, realising that the East is where the majority of the employed population live is critical, hence the distribution that has been made. But choice is also important and recognition that there are other employment centres outside of the East should not be</p>
West	770	15%	4,957	11%												
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Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Chamber of Commerce			<p>There is current dislocation between the location of jobs and location of housing - the draft Strategic Plan proposes to increase the proportion of dislocation of jobs from regions of residence for the purpose of constructing new housing. We disagree with such spatial dislocation.</p> <p>There is strong evidence that productivity of economies are improved by concentrating economic activity and people within a physical area (agglomeration economies). The Island has experienced agglomeration economics with the concentration of the Finance and other Sectors in the East Region. We enclose as Appendix 2 a paper setting out our views on the relevance of agglomeration to the Island - economic benefits through sharing of common pool of resources, better matching of workers to firms and increased learning/upskilling.</p> <p>The Isle of Man is relatively small so there is an argument the Island could be treated as one conurbation for the analysis of agglomeration economics. However, on an Island tolerance to time spent travelling to work or leisure is much less than larger countries and, whilst distances are smaller than considered by the academic studies, the findings are still relevant. A study by Manchester into agglomeration concluded its study with the comment: "All else being equal, reducing the cost of living and producing in high productivity locations is the best spatial policy for creating</p>	<p>overlooked.</p> <p>There will remain a concentration of economic activity and people in the East as a result of the changes proposed to the Isle of Man Strategic Plan.</p>

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		Chamber of Commerce			<p>agglomeration and realising its benefits". We fully agree with this conclusion.</p> <p>Not all agglomeration outcomes are productive. High productivity in a particular place can be mitigated by higher costs of living and producing. A "frictional" cost for the East Region (and perhaps the Island generally) is house prices. House prices are higher on the Island than the North of England which is traditionally a key source of our net inward migration of workers.</p> <p>We enclose a table, kindly provided by Chrystals from their current database of houses for sale, setting out house prices by Region and type of house (Appendix 3). The housing market is driven by simple supply and demand and the higher prices in the East and South indicate higher demand for these Regions. This "frictional" impediment to business productivity of high house prices for the East and South Regions appears to hinder workers being able to locate close to their place of work for an affordable price for their chosen type of house and hinders potential workers migrating to the Isle of Man from the UK.</p> <p>Conclusion The Island faces an unprecedented economic challenge with deteriorating demographic trends and increasing pension deficits which will need to be financed. Within the amendments to the</p>	<p>"The Isle of Man economy has performed exceptionally well over the last 30 years" (Vision 2020). There is no doubt that there are challenges to this and there is no room for Government to be</p>

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		Chamber of Commerce			<p>Strategic Plan, Chamber considers higher priority should be given to the objective of "Growing the Economy". Chamber also considers Government's Central Planning Assumptions should be recalibrated for the same reason.</p>	<p>complacent. The Department is keen to move on to the Area Plan for the East in an expeditious manner, assessing both housing and employment sites as part of a plan which looks at a wider geographical area than previous local plans have done. Such Plans are able to address a number of issues, covering a number of settlements and local authority districts. By making the right decisions about the development plan framework in terms of the timetabling and content of plans, the Department can assist considerably in one of Government's key aims to 'grow the economy'.</p> <p>The Spatial Strategy identifies Douglas and the East as the dominant Area in terms of the settlement hierarchy. In terms of the Employment Land Review this has identified that the main land requirements should be provided in the East and the South. It remains important to provide a range and choice of homes (paragraph 5.7 – Spatial Vision and Paragraph 8.3.2 which identifies a need to provide a choice of sites in terms of location, type and size).</p> <p>The Department does not agree that by aiming to provide nearly 50% of new homes between 2011 and 2026 in the East would result in or exacerbate a 'dislocation between the location of jobs and location of housing'.</p>

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HOW Planning LLP representing Peel Land (IoM) Ltd.

73	DSP 13	Peel Holdings represented by HOW Planning	Content		<p>The Plan does not include any assessment of employment land requirements.</p> <p>Future population and economic growth are inextricably linked. Requirement for analysis of the impact of anticipated economic growth in the baseline housing requirement should take place before the Strategic Plan Inquiry.</p> <p>A strategic assessment of employment land supply and future requirement is necessary at this stage in order to ensure the housing and economic aims of the Plan can be delivered.</p>	<p>In 2013, Government appointed Peter Brett Associates and Black Grace Cowley to undertake an Employment Land Review to:</p> <ul style="list-style-type: none"> • Gather information and evidence about the quality and quantity of and demand for employment land and premises • Identify any constraints on the current zoned land for employment and • Match the constrained employment land to the employment demand. <p>The findings of the draft ELR were available when the Draft Isle of Man Strategic Plan 2015 was published and the Department was content that the broad distribution for housing was in line with the broad findings of the Report i.e. that the need for additional employment land in the future should be focused in the main in the East and then the South.</p> <p>UK Planning Policy Guidance documents do not apply to the Isle of Man. However there are systems in place to ensure that development plans are prepared on up to date evidence, and that there are procedures to ensure full scrutiny of the development plan process.</p>
			Guidance		<p>The Department should have regard to National Planning Policy Guidance.</p> <p>Additional work being undertaken to demonstrate the consideration of economic growth requirements and market signals to inform the housing requirement plus employment land requirements.</p>	
			Summary			

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74	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 1.8.1	Yes	See Comment	Comment noted
75	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 1.8.2	Yes	See Comment	Comment noted
76	DSP 13	Peel Holdings represented by HOW Planning	Any comments on the proposed wording for Strategic Policy 11 and Housing Policy 1? Issues with	Yes	<p>Objects to this approach. Approach assessed by Regeneris and considers whether the Policy fits with the Island's economic aspirations, and has also considered approach to future household formation rates.</p> <p>Assessment approach set out in the NPPG is strongly advocated. This would comply with the Island's objective for economic progress, the aim of which is stated at paragraph 2.3 of the Plan as pursuing manageable and sustainable growth based on a diversified economy and to progress the social wellbeing of the people of the Island.</p> <p>Review of the Plan and changes to the housing policies are sufficiently aspirational and rooted in robust evidence so as to ensure there is reduced scope for delays caused by objections to the Department's approach.</p>	<p>The update to the Strategic Plan and the identified programme for the Area Plans form part of Government's spectrum of policy approaches to aid in 'growing the Island's economy'.</p> <p>The National Planning Practice Guidance (NPPG) sets out broad guidance to local authorities in England in respect of objectively assessing and evidencing development needs for housing (both market and affordable).</p> <p>Contents of the NPPG: Guidance provided to local government:</p> <p>In England, there is a requirement to undertake a Strategic Housing Market Assessment to identify need.</p> <p>- Identify the future quality of housing needed,</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
			<p>approach (paragraph 2.15 - How)</p> <p>Summary</p>		<p>Object to the methodology used to predict the dwelling requirement. It is too simplistic and considerably less sophisticated than the accepted methodology used in UK advocated by NPPG. Approach used is flawed and should be amended.</p> <p>Proposed level of growth only 74% of that recorded between 2001 and 2011.</p> <p>Net migration of 500 is now evidence based.</p> <p>Assumed population growth allows for only 0.1% p.a. growth in the working age population. Government predicts job growth will be 0.75% - 1% p.a. This has negative consequences; it would significantly increase the dependency ratio (proportion of children and retired as a % of the working population) from 65 to 78%.</p> <p>Vision 2020 – identifies potential for significant growth in the emerging sectors and the Island needs to have appropriately skilled and balanced workforce to help facilitate this growth. The proposed housing requirement will lead to a stagnant working age population and increasing dependency ratio leading to labour market shortages, skills mismatch and unfilled economic potential.</p> <p>The proposed housing requirement is not</p>	<p>including a breakdown by type, tenure and size</p> <ul style="list-style-type: none"> - Identify the future quantity of land or floorspace required for economic development uses - Provide a breakdown of that analysis in terms of quality and location and to provide an indication of gaps in current land supply. <p>Does the Isle of Man situation reflect the Guidance?</p> <p>Guidance generally serves to ensure that:</p> <p>Enough homes are provided within the plan period of the right scale, mix and tenure Assessment of development needs are proportionate and take account of growth scenarios that could be reasonably expected to occur Care is taken not to apply unnecessary constraints Standard methodology suggested can be modified if there are particular circumstances which warrant doing so. Approaches should be thorough but proportionate</p> <p>The Department of Infrastructure:</p> <p>Considers a number of different information sources. It is important to note that affordable housing requirements are identified by the Housing Division; employment land requirements have recently been the subject of a separate study which</p>

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						The Department does monitor the flow of new approvals and take up. Strategic reserves can be utilised if actual supply falls below planned supply.
77	DSP 13	Peel Holdings represented by HOW Planning	Comments on Paragraphs 5.18, 5.19, 5.20, 5.21, 5.22, 5.25, 5.26, 5.27	No	Objections to Government's approach.	See Department's response to comments 123 - 144.
78	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 5.23	Yes	Agree with Department in recognising the East has the greatest potential for additional residential opportunities.	Comment noted.
79	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 5.24	Yes	More up to date residential data should be made available (RLAS)	RLAS Update 7 (2001-2014) has now been released analysing data up to June 2014. A supplementary update paper is now also available which examines data up to 31 st December 2014.
80	DSP 13	Peel Holdings represented by HOW Planning	Comments on Paragraphs 8.1.3	Yes	There are limited opportunities within the existing urban area (area covered by the Braddan Local Plan) to meet future population growth and no land remaining which was previously zoned for residential use is still available.	The Department has been clear about the land availability across all of the Parishes on the Island (Evidence Paper 2) and more recently through Update 7). In terms of the East, there are less than 15 ha available compared to the North which has over 60 ha. The Area Plans will address the issue of any identified shortages in development land.

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81	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 8.1.4	Yes		See Department response to other comments by HOW Planning.
82	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 8.1.5	Yes		See Department response to other comments by HOW Planning.
83	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 8.1.6	Yes	<p>Supports statement that there will need to be enough flexibility to react to pressures relating to both supply and demand by use of 'strategic reserves'.</p> <p>Additional policy content needed on location of strategic reserves as well as policy direction.</p>	<p>Support of the use of Strategic Reserves is noted.</p> <p>The most appropriate choice and location of Strategic Reserves can be identified at the Area Plan stage.</p> <p>In terms of setting out an additional policy in the Strategic Plan, the Department does not believe this is necessary. One of the Strategic Objectives of the Strategic Plan (3.6 (a)) is "to provide for sufficient housing of an acceptable standard and of an appropriate nature and in appropriate locations to meet the needs of the community (including special needs)."</p> <p>Whilst the Isle of Man Strategic Plan 2007 made no mention of the term 'strategic reserves', Housing</p>

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						<p>Policy 1 identifies the need to “provide sufficient development opportunities...” The use of Strategic Reserves forms part of these development opportunities.</p> <p>Chapter 13 in the Strategic Plan 2007 and as updated refers to the ‘plan, monitor and manage approach’ which the Department continues to support. The use of strategic reserves is part of the broad approach to managing the amount of land needed to be allocated for housing in the Area Plans.</p> <p>The use of ‘strategic reserves’ forms part of the methodology to achieve sustainable growth where needed.</p> <p>The Department would be reluctant to include a separate Policy referring the use of Strategic Reserves as part of its overall approach to provide sufficient opportunities for housing.</p>
84	DSP 13	Peel Holdings represented by HOW Planning	Comments on Paragraph 8.4.1 to 8.4.10, 8.5.3, 8.5.4, 8.5.6, Tables 8.1, 8.2, 8.3	Yes		See Department response to other comments by HOW Planning.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response															
85	DSP 13	Peel Holdings represented by HOW Planning	Comments on Housing Policy 3?	Yes	<p>Proportion of growth allotted to the East Area is supported. Objects to actual figures.</p> <table> <tr> <td>North</td> <td>770</td> <td>1,020</td> </tr> <tr> <td>South</td> <td>1120</td> <td>1,496</td> </tr> <tr> <td>East</td> <td>2440</td> <td>3,264</td> </tr> <tr> <td>West</td> <td>1020</td> <td>1,020</td> </tr> <tr> <td>Total</td> <td>5,100</td> <td>6,800</td> </tr> </table>	North	770	1,020	South	1120	1,496	East	2440	3,264	West	1020	1,020	Total	5,100	6,800	The Department does not agree to the revised numbers as set out and the overall total. See response to comment 144.
North	770	1,020																			
South	1120	1,496																			
East	2440	3,264																			
West	1020	1,020																			
Total	5,100	6,800																			
86	DSP 13	Peel Holdings represented by HOW Planning	Comments on Paragraph 13.3	No	<p>Support intention to 'plan, monitor and review.'</p> <p>Additional policy is required which formalises this approach. Safeguarded land in UK is usually accompanied by an appropriate policy mechanism.</p>	Comment noted. See Department response to comment 136.															
87	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 13.1	Yes		See Department response to comments 123 - 144. (Also comment 3).															
88	DSP 13	Peel Holdings represented by HOW Planning	Paragraph 13.2	Yes		See Department response to comment 123 – 144. (Also comment 3).															
79	DSP 13	Peel Holdings represented by HOW Planning	Regeneris Consulting (for HOW Planning)		<p>2007 Plan = 6000 or 400 p.a. 2015 Plan = 5100 or 340 p.a.</p> <p>Rejected Scenarios A: 455 p.a.</p>	The Department acknowledges that the projected number of dwellings needed during the 15 year Plan period (2011 to 2026) is lower than that projected for the plan period 2001 to 2016. This is largely due to the changes anticipated in household															

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>C: 266 p.a.</p> <p>Population projection: 9,029 or 602 p.a. Growth from 2011 declines from 620 p.a. in 1st 5 years to 575 in last 5 years.</p> <p>Growth rate between 2001 and 2011 was 818 p.a.</p> <p>2007 Plan: 9,289 (620 p.a.) 2001 and 2016 2,839 (568 p.a) 2011 and 2016.</p> <p>Growth rate in population in Draft Plan is slightly higher than in 2007 for the crossover period 2011 to 2016 but lower than observed trends 2001 to 2011.</p> <p>Little methodological information accompanying the population projections. Usually, all official projections have a technical note explaining how projections were produced. This is currently not available from the Government.</p> <p>Migration assumptions warrant much further investigation than future fertility and mortality rates.</p> <p>Totally unclear where the 500 p.a. assumption came from and the extent to which it is a realistic assumption.</p> <p>The population projections are not sound.</p>	<p>size which has a significant effect on the number of households when calculations are prepared.</p> <p>The Department is content to rely on the basic household data provided by Economic Affairs and judges that 'Scenario C' as selected for household change adequately reflects what is most likely to happen with household size. The Department has, through its Evidence Papers, made it clear that household size can be affected by a number of variables and that it is important to take into account any changes in the projection data, particularly after each full Census.</p> <p>By using the populations projections, the Department accepts that the net migration figure of 500 is acceptable and does not, by reason of its impact on population growth, make the projections 'unsound' and a poor basis upon which to set housing need.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
			Detailed breakdown		<p>1. Scale of future growth equates to only 74% of past growth. No evidence as to why this is lower than 2001 to 2011.</p> <p>2. Migration is locked at 500 p.a. Migration rates in the past must have been higher on average in the past decade overall.</p> <p>More realistic figures:</p> <p>2011 to 2026 = 820 additional residents p.a. = population growth of 12,300 2011 to 2026 – around 3000 more than proposed in the Plan.</p> <p>Fertility and mortality ratios are likely to vary little across projections; the additional growth would be due to more realistic migration assumptions.</p> <p>Declining working age on Isle of Man – rate fell below the total growth rate between 2006 and 2011. Retired population increased growth rate. Providing a workforce in the future is a serious issue.</p> <p>25-44 working age bracket is expected to decline Overall working age population predicted to grow by 1.7% over 15 years or 0.1% p.a. Retirement age population is expected to grow at a rapid rate.</p> <p>Dramatic increase in the dependency ratio. From 0.64 in 2011 to 0.78 by 2026. (it is accepted that rising retirement ages will offset the increase to</p>	<p>In terms of household growth, it is important to note that whether one uses the existing model for retirement age or an adjusted model, the total number of residents in 2026 is the same number i.e. 93,526.</p> <p>The Department is well aware of the intention to</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>some extent).</p> <p>Expansion of the labour force can only occur via:</p> <ol style="list-style-type: none"> 1. Increased rates of economic activity in the existing population (over 55s) 2. Increased net migration to boost working ages people. <p>Only solution is through planning for more migrants in order to get the right skills.</p> <p>Vision 2020 - Projects jobs growth of 0.7 to 1% p.a. this is in excess of the 0.1% p.a. growth predicted in the working age population.</p> <p>Chamber of Commerce business surveys show businesses expect their workforce to grow.</p> <p>Vision 2020 identifies that jobs growth will be the most significant amongst emerging sectors. It is essential that an appropriately skilled workforce is in place to help facilitate this growth.</p> <p>A largely stagnant working population and increasing dependency ratio is not economically sustainable. It will lead to:</p> <p>Tight labour market Recruitment difficulties Unfulfilled economic potential against the goals of Vision 2020</p>	<p>alter the state retirement age and possible new assumptions have been set out in Evidence Paper 1. The Draft Plan sets out in Table 8.2 breakdowns of age based on the existing retirement ages but it is acknowledged that these may change in the future.</p> <p>Based on a possible new model which would see gradual increases for both men and women to reach 67 by 2026. This would see overall growth in the working age population by 12.2% over the plan period.</p> <p>Based on the new retirement age model there would be working age population growth of 0.8% per annum.</p> <p>The Department agrees that it is important to have the right people in the right numbers to facilitate the needs of economic growth. The planning framework provided by development plans plays a significant part in setting the scene for and supporting future development land release. But it is part of a much wider array of Government policy drives and initiatives to secure the sustainable growth of the Island in the future.</p> <p>There will not be a stagnant working population in the future and adjustments in the retirement age will ensure the dependency ratio remains low (changes to the model as set out above would produce a dependency ratio of 0.61 in 2026 which</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
			Household size		<p>Reduced economic input Increasing imbalance in welfare expenditure vs GDP. There should be a firmer grasp of the interconnected issues of population, housing and economic growth. It should plan for an uplift in assumed migration rates to align with the likely economic trajectory.</p> <p>The use of 'average' household size is too simple. Rates for each age cohort should be used. This would allow the household projections to pick up the compositional changes in the population base.</p> <p>Household size reduction in the Draft Plan is only 60% of that assumed in the 2007 Plan. It is wrong to place too much weight on the period post 2005 when the UK was entering into and then recovering from recession.</p> <p>Guidance produced by the Cambridge Centre for Housing and Planning Research: Choice of assumptions in Forecasting Housing Requirements 2013 suggests that housing formation patterns will most likely return to something closer to previous trends when economic conditions improve.</p>	<p>would be below 2001 levels.</p> <p>The Department judges that a recommendation to Economic Affairs that the migration rates should be increased is unwarranted. However, there may be some merit in comparing data sets where different net migration figures are used in the model. The Department is however content for now to rely on the most realistic scenario, which as the evidence currently available suggests, is a net migration of 500 per annum.</p> <p>Given the population of the Island and the number of households both now and projected, the Department judges that it is acceptable to use average household size. It is acknowledged that the 2011 Census data shows that average household size changes from Area to Area being highest in the West (2.39), then the East (2.36), the West and the North both with 2.27. It can be deduced that household size across the Island will continue to differ in the future.</p> <p>There are uncertainties in predicting household size because there are a number of factors which influence when and how new households are formed. The Department acknowledges that whilst there may be research papers being produced elsewhere which estimate what will happen to</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>RTPI 2014: Understanding recent changes in household formation rates: Average household rates had not fallen as expected between the Censuses – influenced by the economic downturn and a long period of poor housing affordability. Planning on the basis of these projections could lead to an under-provision of housing.</p> <p>Common practice when assessing housing requirements to examine housing market signals.</p> <p>Measures available suggest Government should be seeking to deliver more rather than fewer houses relative to the last Strategic Plan period.</p> <p>Evidence suggest:</p> <p>426 dwellings built on average 2001 to 2011.</p> <p>66 dwellings demolished.</p> <p>Net new dwellings = 360 dwellings per annum – 90% of target.</p> <p>Policy response should be to increase the target to correct for past failures.</p> <p>Ratio of house prices to earnings has worsened</p>	<p>housing formation patterns in the future; the Island will, through its own Survey data (the Census), monitor changing circumstances. The economic downturn did not affect the Island as dramatically as other nearby jurisdictions and so there needs to be an element of caution when using UK projections.</p> <p>The new Plan period (2011 – 2026) sets out that 900 fewer dwellings will be required when compared to the previous Plan period (2001 -2016) or 60 per annum. The figures rely on evidence and that evidence suggests that the housing needs are lower. There has to be the right balance between housing need and land release and in any case the approval and take-up statistics and land availability data provide a good indication of demand for housing in certain areas.</p> <p>In terms of dwellings built the 426 average build rate is 'net', i.e. all demolitions have already been taken into account. Out of all the approvals granted according to Update 4 (2001 to 2011), 83% were taken up.</p> <p>Using the calculation method suggested by Regeneris, to realise 6000 new dwellings over 15 years, there would need to be 400 dwellings built per annum. As at 2011, in terms of dwellings completed/taken up, the target of 400 per annum was exceeded.</p>

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			Median Affordability Ratios Conclusions		<p>over the years: 2006 = 8.8 2013 = 9.2</p> <p>It would be more robust to revert back to reduction in household size to 0.01 per annum which was the trend before the housing crisis and in a period of recovery and unconstrained household formation.</p> <p>This would increase housing requirement to 7,900. As a minimum, figure should follow Scenario A of 6,800.</p>	<p>On the Isle of Man, average house prices have been increasing. There have been challenges in achieving housing delivery but the Department would not agree with the description that the Isle of Man has had a housing crisis. To agree to a 0.01 drop in household size per annum contrary to the evidence, would potentially result in an oversupply in housing land, and difficulties in managing the release of that land.</p>
Shoprite (Isle of Man) Limited						
80	DSP 14	Shoprite	General		<p>1. The review should have focussed on all aspects of the Strategic Plan not just housing. The approach used in this consultation predicts housing requirements N/S/E/W. For our population and geographic size one overarching Strategic plan should be used to set ALL development policy for the next 20 years, and not seek to distil the high level data in a piecemeal fashion via area plans.</p> <p>2. Housing provision should be considered alongside provision of related public sector</p>	<p>The Department has from the very start of the Review process considered the merits or otherwise of carrying out a full review of the Strategic Plan compared to a partial review or focused review examining 1 or 2 Policies only. The Department has, for reasons relating to:</p> <ul style="list-style-type: none"> • The need to progress with the Area Plan for the East, • The availability of new projection data following the 2011 Census,

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>facilities: schools, health centres, sports, arts and community. For example decisions currently being considered about future 6th form provision by DEC should be influential in establishing the best place to site future housing provision.</p> <p>3. Future Population size is something of an "elephant in the room" in policy development within Isle of Man Government. A Housing revision to the Strategic Plan should not be based on a vague target of net migration of 500 per annum. Too many future indicators now seem to rely on substantially increasing population size to continue to drive economic growth, prosperity for our people and protection for the vulnerable on an unproven plucked out of the air figure. This subject needs greater consideration by all Government Departments before such vague figures can be used to plan future housing demand and supply or provision of public services.</p> <p>4. A lot is made of the needs of the working population in this revised document, however the total population's needs should be the driver for housing demand. The ageing demographic, and the decline in children, will fuel even greater demand for 1 and 2 bedroomed properties over the next 10 years (currently rental demand on the Island for 2 bed properties is at its highest level for</p>	<ul style="list-style-type: none"> Recognition that the Strategic Plan 2007 is still largely fit for purpose, <p>maintained an approach of a very focused review. The Town and Country Planning Act 1999 sets out that the Island Development Plan shall consist of a strategic plan; and one or more Area Plans³.</p> <p>The need for schools, health centres, community facilities etc. can all still be considered as part of the Area Plan process. Most of the broad Policies from the 2007 Plan have been reiterated in the Draft Plan 2015.</p> <p>The Department is committed to working with the Isle of Man Population Projections provided by Economic Affairs.</p> <p>The Isle of Man Strategic Plan sets out the general policies in respect of the development and other use of land on the Island. It is not necessary to attempt to predict the exact type of new dwellings required. The Area Plans are a much better mechanism to deal with housing 'types' and size and where appropriate specific requirements can be</p>

³ Town and Country Planning Act - Part 1 (2) (1, 2a and 2b)

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Shoprite			<p>20 years according to BGC in Feb 2015), and quality 2 bed (non apartment) properties are in very short supply. This will be a key driver of future demand and yet this figure has not been forecast within the revised plan.</p> <p>In the UK on March 1st 2015, 51% of properties had one resident only. This is an accelerating trend due to divorce rates, declining number of marriages and ageing population. In the last IOM census 67% of housing had less than 2 people in. The revised document fails to address the needs of smaller household sizes – for example it is likely that we already have enough 3 bed properties on the Island, and the only area we need to develop are in 1 and 2 bed, to encourage those with the larger properties to downsize. This revision fails to address that issue, and it is likely to be critical, especially to an ageing population who will not all want to live on the 4th floor in seafront flats. The failure to identify the type of housing covered by the 5100 target is a flaw in the revised document and should be addressed. Based on our own on island market research into future demand for rental properties, the 5100 houses required in the plan calculations should be more like:</p> <ol style="list-style-type: none"> a. 1000 single bed properties (this could include retirement villages) b. 5000 double bed properties c. 600 three bed properties d. A selection of large houses for HNW as requires. 	<p>set out in development briefs.</p> <p>Paragraph 8.1.1 (Housing) in the Draft Plan 2015 states that 'The principal objective of the Government's housing policy is to ensure that sufficient housing, to appropriate standards, is made available to meet demands created by the growth in population and changing household sizes.'</p> <p>Paragraph 8.1.2 goes on 'This provision should be made having regard not only to the other objectives of this Plan, but also to the aspirations of the population to live in particular parts of the Island.'</p> <p>The Department is aware of the projected changes in household size and the changing age cohorts and understands these factors will affect the number, location and type of properties required in the future. Households are getting smaller and there is an ageing population but the Department does not agree that the Plan is flawed because it does not attempt to identify 'types'. The fact that the Strategic Plan is not too prescriptive in this regard, will help ensure that needs can be addressed at local (Area Plan) level with the help of advice from the Housing Division when it comes to affordable housing, the Department of Health and Social Care when it comes to the need for special needs housing and other Government Departments</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Shoprite			<p>Thus a total of almost 7000 properties is required – however to ensure that 2 bed market is deliverable, Isle of Man Government will need to back this with incentives such as shared equity, bridging finance and loans to free up the larger properties that are under occupied in the current market. A piece of market research should be commissioned to identify the current stock of larger properties under occupied before this revision is completed as it will inform greatly the future supply market.</p> <p>5. Average household size is shown, in this document, to have declined slightly in the IOM over the last 10 years however the current trend for this, already mentioned, is escalating, and more work on this should be carried out to identify a realistic future figure for this, rather than just project forward the past trend. The review should have focussed on all aspects of the Strategic Plan not just housing. The approach used in this consultation predicts housing requirements N/S/E/W. For our population and geographic size one overarching Strategic plan should be used to set ALL development policy for the next 20 years, and not seek to distil the high level data in a piecemeal fashion via area plans.</p> <p>2. Housing provision should be considered alongside provision of related public sector facilities: schools, health centres, sports, arts and community. For example decisions currently being</p>	<p>as appropriate.</p> <p>The Department does not agree to increase the number set out in Strategic Policy 11 and Housing Policy 1 from 5,100 to 7,000 which has been based on research which has not been made available.</p> <p>For information, the Housing Division has introduced 2 new House Purchase Assistance Schemes.</p> <p>The Department does not agree that it is necessary to allocate resources to a research project to establish which properties on the Island are “under occupied”. It is content to rely on the data from Rates, and its own assessment of empty properties on the Island rather than those ‘under occupied’. The Census data may in the future be able to supply more supportive data on empty properties.</p> <p>In terms of household size and the reliability of data, the Department is content to rely on the data provided by Economic Affairs and judge a reduction of 0.04 over 10 years is realistic and it would be reluctant to change assumptions based on 12 months’ worth of data. Population projections by their very nature plan for the medium to long term.</p> <p>The Department acknowledges Shoprite’s support for the spatial distribution (in terms of % ages) as set out in Housing Policy 3.</p>

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		Shoprite			<p>considered about future 6th form provision by DEC should be influential in establishing the best place to site future housing provision.</p> <p>3. Future Population size is something of an "elephant in the room" in policy development within Isle of Man Government. A Housing revision to the Strategic Plan should not be based on a vague target of net migration of 500 per annum. Too many future indicators now seem to rely on substantially increasing population size to continue to drive economic growth, prosperity for our people and protection for the vulnerable on an unproven plucked out of the air figure. This subject needs greater consideration by all Government Departments before such vague figures can be used to plan future housing demand and supply or provision of public services.</p> <p>4. A lot is made of the needs of the working population in this revised document, however the total population's needs should be the driver for housing demand. The ageing demographic, and the decline in children, will fuel even greater demand for 1 and 2 bedroomed properties over the next 10 years (currently rental demand on the Island for 2 bed properties is at its highest level for 20 years according to BGC in Feb 2015), and quality 2 bed (non apartment) properties are in very short supply. This will be a key driver of future demand and yet this figure has not been forecast</p>	<p>Continued regeneration of redundant or underused sites is supported by the Strategic Plan across all of the settlements.</p> <p>Paragraph 8.4.4 refers to the ageing population on the Island. A number of implications are recognised not just for planning policy but for Government as a whole. For instance, 'means testing' for sheltered housing is currently being considered. Any changes to social care policies will affect the need for residential care homes – the approach to date is to support people in their own homes. The Department does not agree to being too prescriptive in the Strategic Plan by suggesting the need for 'retirement communities' should be made more formal by Strategic Plan Policy. Healthy societies are about ensuring a mix of communities and this includes a mix of 'ages'. Retirement housing at different scales can be provided successfully as part of existing settlements and under existing and proposed Strategic Plan Policies.</p> <p>The Department would like to point out that whilst many of the Strategic Plan Policies remain unchanged; the Draft Plan has not been prepared in isolation of other issues. During the preparation of the Draft Plan, the Draft Employment Land Review was made available, which is shortly to be published. All Government Departments have been</p>

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		Shoprite			<p>within the revised plan. In the UK on March 1st 2015, 51% of properties had one resident only. This is an accelerating trend due to divorce rates, declining number of marriages and ageing population. In the last IOM census 67% of housing had less than 2 people in. The revised document fails to address the needs of smaller household sizes – for example it is likely that we already have enough 3 bed properties on the Island, and the only area we need to develop are in 1 and 2 bed, to encourage those with the larger properties to downsize. This revision fails to address that issue, and it is likely to be critical, especially to an ageing population who will not all want to live on the 4th floor in seafront flats. The failure to identify the type of housing covered by the 5100 target is a flaw in the revised document and should be addressed. Based on our own on island market research into future demand for rental properties, the 5100 houses required in the plan calculations should be more like:</p> <ol style="list-style-type: none"> a. 1000 single bed properties (this could include retirement villages) b. 5000 double bed properties c. 600 three bed properties d. A selection of large houses for HNW as requires. <p>Thus a total of almost 7000 properties is required – however to ensure that 2 bed market is deliverable, Isle of Man Government will need to back this with incentives such as shared equity, bridging finance</p>	<p>invited to submit comments and opportunities will still exist during the preparation of the Area Plan to address specific land use requirements.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Shoprite			<p>and loans to free up the larger properties that are under occupied in the current market. A piece of market research should be commissioned to identify the current stock of larger properties under occupied before this revision is completed as it will inform greatly the future supply market.</p> <p>5. Average household size is shown, in this document, to have declined slightly in the IOM over the last 10 years however the current trend for this, already mentioned, is escalating, and more work on this should be carried out to identify a realistic future figure for this, rather than just project forward the past trend. This figure is changing rapidly and the decline of 0.04 over 10 years is too inaccurate to use for such a valuable piece of work. The current housing market on the Island (sale and rental) is a great indicator of what property sizes work for the current market, and a piece of market research based on the last 12 months would confirm a very different pattern in household size demand.</p> <p>6. In terms of the location of any new housing, as a business that operates all over the Island, we would suggest a mix of new housing N/S/E/W is correct. With any properties targeting the ageing population being in town and village centres, where possible. This may involve redevelopment of existing sites. For true sustainable development, more housing should be</p>	

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Shoprite			<p>sited within walking and cycling distance of work, town, and community facilities. Ramsey is currently a great example of a location where a regeneration scheme has revitalised the centre of the town, creating a retail, leisure and activity hub that is easily accessible for the majority of residents. This approach should be used when planning additional housing.</p> <p>7. The island has relatively poor specialist retirement housing provision, yet all statistics show that this will be the fastest growing sector of our population over the next 10 years. The location and zoning of land for retirement communities should form an important part of this review- yet is has not been mentioned.</p> <p>In summary, for the reasons above we do not consider that the partial review of the Strategic Plan in relation to housing has been carried out comprehensively, nor does it contain enough base information and research to make meaningful projections of demand and for land and housing.</p> <p>We would suggest that more research is needed, and also wish to point out the risks of carrying out this work in isolation from so many other key influencers such as population size, educational provision for the future, demand for economic land, social provision for the vulnerable and elderly etc.</p>	

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>We wish the above comments to be taken on board but equally would re-iterate that a full revision of the Strategic Plan based on CoMIN policy on population size and analysis of up to date trends and information from the IOM and other jurisdictions is necessary, because at this point in our history, the lessons of the immediate past are not a good indicator of what will happen in the future – you only have to look at the carnage on UK food retailing for proof of that- and no commentators saw that coming.</p>	
Andrew Berry						
81	DSP 15	A Berry	General		<p>As a professional in the residential housing sector I strongly believe that there is likely to be a net migration from the Island in the foreseeable future. Over development will lead to a continued decrease in property values causing existing and future properties to become vacant/neglected.</p> <p>This will be exacerbated by the possible loss of employment from the e-gaming sector; what are the 'odds' on such firms still having a major presence in the Island in ten or even five years' time?</p>	<p>The Department appreciates the comments giving a different perspective on migration figures. The IoM Population Projections are devised by Government and look ahead up to 2026 and beyond depending on the intended user. The Department has to accept that there may be short term fluctuations in migration but that in terms of development land provision has to be prepared and ensure when there is need, land can be made available to ensure the right balance between encouraging the reuse of previously developed land and releasing new greenfield sites.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
Carse Hannay						
82	DSP 16	Carse Hannay			<p>SUMMARY STATEMENT</p> <p>Robust forecasts of demographic change and related matters are critical for the accurate estimation of future housing needs.</p> <p>The Isle of Man is a small country, with a small population. Historically population movement onto and off the Island has essentially been dictated by prevailing economic conditions, making predicting demographic change a particularly complex and difficult matter.</p> <p>Government's Strategic Plan is currently being revised with regard to housing and transport and a Draft Strategic Plan ("the Plan") is out for public consultation</p> <p>This Report examines the key data in the Plan and critically assesses key assumptions in Government's</p>	<p>The Department agrees with the need to have robust forecasts.</p> <p>The Department recognises the difficulties presented by forecasting population movements on and off the Island.</p> <p>The Department is content to rely on the IoM Population Projections produced by Economic Affairs. The baseline assumptions are fed into the Model as decided by Government Economists.</p> <p>In response to Carse Hannay's comments on the "procedure adopted by the Department of Infrastructure (DOI)" it should be clarified that:</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Carse Hannay			<p>model of population change. It also reveals the results of using alternative statistical means of forecasting population change which suggests that the Government model tends towards under estimation both of future population levels and consequent future housing need.</p> <p>However, there are significant question marks against three assumptions fed into the government model, namely on average household size, on the scale of reductions in immigration, and on property occupancy rates. Raising the values on any or all of these inputs leads to a recognition that future housing needs can be met without the volume of new house building proposed in the Plan.</p> <p>INTRODUCTION</p> <p>The latest Isle of Man Government Draft Strategic Plan ("the Plan") is out for consultation. Among its conclusions and proposals is a need (net of demolitions and including conversions) for 5,100 residential units to be built over the period 2011-2026, deriving from a projected increase in the resident population from 84,497 to 93,526 (10.7%)</p> <p>As the table below shows, the population increase is forecasted to be overwhelmingly (almost 80%) in the 60y.o. and above age groups.</p>	<ul style="list-style-type: none"> • The Department has relied upon Economic Affairs to calculate population projections based on the 2011 Census; • The Department has used the projected households numbers and best scenario for household size to calculate the increase in households; • The Department has used a "vacancy factor" – expressed as a percentage uplift – to the resultant figure to arrive at a total increase in demand for new dwellings over the Plan period.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
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		Carse Hannay			<p>Table 1 – projected increase in resident population by age group</p> <table border="1"> <thead> <tr> <th>Age group</th> <th>2011</th> <th>2026</th> <th>Change No.</th> <th>Change %</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>15,036</td> <td>16,058</td> <td>1,022</td> <td>6.8</td> </tr> <tr> <td>Working Age</td> <td>51,614</td> <td>52,496</td> <td>882</td> <td>1.7</td> </tr> <tr> <td>Retired Age¹</td> <td>17,847</td> <td>24,971</td> <td>7,124</td> <td>39.9</td> </tr> <tr> <td>TOTAL</td> <td>84,497</td> <td>93,526</td> <td>9,029</td> <td>10.7</td> </tr> </tbody> </table> <p>¹ Based on a retirement age of 60 for women and 65 for men</p> <p>In deriving its conclusions in respect of population and housing need the procedure adopted by the Department of Infrastructure (DOI), using the services of the Government Cabinet Office, has been to:</p> <ul style="list-style-type: none"> • Take the demographic results relating to the population total and age distribution of the Isle of Man Population Census 2011 • Project these data forward to 2026 using assumptions relating to annual net immigration and fertility and mortality rates. • Estimate the future number of private households by assuming a constant 	Age group	2011	2026	Change No.	Change %	0-15	15,036	16,058	1,022	6.8	Working Age	51,614	52,496	882	1.7	Retired Age ¹	17,847	24,971	7,124	39.9	TOTAL	84,497	93,526	9,029	10.7	<p>The Department is not prepared to comment directly on any 'potential errors' by Economic Affairs' forecasting methods.</p> <p>However, it is accepted that the Department had influence over:</p> <ol style="list-style-type: none"> 1. the Scenario chosen for future household size (but to have selected a greater or lesser figure would not have been in line with advice from Economic Affairs). 2. The 'uplift' in respect of the vacancy factor. <p>Base Year Data</p> <p>The Department acknowledges Carse Hannay's</p>
Age group	2011	2026	Change No.	Change %																											
0-15	15,036	16,058	1,022	6.8																											
Working Age	51,614	52,496	882	1.7																											
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		Carse Hannay			<p>percentage of the population will be in private accommodation and then dividing the total population figure of people in private households by an assumed average private household size for each year.</p> <ul style="list-style-type: none"> • Sum the increases in the number of households for each year. • Add a "vacancy factor" – expressed as a percentage uplift – to the resultant figure to arrive at a total increase in demand for private residential accommodation over the 2011-2016 period. • Use this figure as a proxy for the need for additional dwellings. <p>There are then a number of areas where forecasting errors are possible:</p> <ul style="list-style-type: none"> • Under statement of the actual population and inaccuracies in age distribution in the chosen base year of 2011 • Changes in the proportion of the total population living in private accommodation. • Inaccurate fertility and mortality rates • Inaccurate assumptions of future net immigration levels • Unrepresentative assumptions relating to the age profile of the migrant population, with implications via fertility and mortality rates for future population levels. • Inaccurate assumptions of future average 	<p>acceptance of the accuracy of the base year (Census 2011).</p> <p>Fertility and Mortality Rates</p> <p>The Department notes the comments provided but decisions on the model assumptions are decided by Economic Affairs.</p> <p>Immigration and the Economy</p> <p>The Department acknowledges the views of Carse Hannay that the net immigration levels as assumed are significantly below the level in the last 20 years (720 p.a.) and that a number of different models can be used, all of which have some merit.</p> <p>The Department is aware of the economic vision for the Island and the projected growth rates set out in Vision 2020. Excess supply will be avoided by the use of Strategic Reserve Sites in the Area Plans.</p> <p>Average Household Size</p> <p>The Department agrees that it is difficult to place the responsibility for the slowdown in the reduction in household size to one particular factor. Carse Hannay suggests that in the future the stabilisation of the changing household size may reduce the</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Carse Hannay			<ul style="list-style-type: none"> household size • Inaccurate vacancy ratios <p>Only the first of these sources of error unambiguously would produce under estimation. The others can work in either direction. In the first instance this report considers whether there are any grounds to suggest significant inaccuracies in future population or housing needs deriving from any of the above areas, and if so what the scale of this under or over estimation might then be. It then questions, in the light of a survey of property occupancy, whether it is necessarily the case that fulfilling future housing demand will in fact require the volume of additional housing units as projected in the Plan.</p> <p>THE BASE YEAR CENSUS DATA</p> <p>The intensity of the Island's Census operations, the direction of the efforts to obtain household response, and the rigour with which the collected data is interrogated before inclusion would all suggest that population levels and other results come close to completeness. Accordingly there is no attempt here to seek to attempt to adjust any of the base year (2011) results relevant to any estimation of housing need. It is however incontestable that any inaccuracy in the headline population count will be in the form of under numeration, such that every understatement of 100</p>	<p>demand for additional housing. The Department does not feel it necessary to amend the household size as part of this Review but will monitor statistics from the next Census.</p> <p>Vacancy Ratios</p> <p>The Department acknowledges Carse Hannay's support for the inclusion of a vacancy factor suggesting it to be a "a sensible decision since the dynamics and optimal functioning of all housing markets are such that there will always be a need for the flexibility and 'lubrication' provided by unoccupied housing."</p> <p>Clearly the factor applied is the more delicate issue and requires further consideration and explanation.</p> <p>Carse Hannay's own Survey undertaken to try and identify empty properties on the Island looked at a small sample (1000) of properties. Carse Hannay concluded that at least 10% of properties were vacant (January 2015). The Department judges that the results of the Carse Hannay Survey should be treated with caution given the sample size.</p> <p>The Department has identified through the rates database that as at October 2011 that there were 39,465 domestic properties on the Island. Given that the Census shows 35,599 households, this would indicate that there were around 3,866 vacant</p>

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		Carse Hannay			<p>residents in the 2011 base year would produce an under estimation of total population by 2026 of roughly 10.</p> <p>FERTILITY AND MORTALITY RATES</p> <p>A number of issues arise when applying full fertility and mortality rates in demographic projections. It is understood that the IOM population model uses rates referenced to IOM birth and death registrations in its projections. In a relatively small country with a highly geographically mobile population this approach has to be treated with caution, as best reflected in the variations in the number of births on the Island. Over the 10 years to 2004 to 2013 for instance the number of registered births has gone from 862 in 2004 up to a high of 1,023 in 2010, and back down to 859 in 2013.</p> <p>The result of the rates adopted in the model is an average natural population increase (i.e. that would result if there was zero net immigration) of around 100 p.a.</p> <p>INWARD MIGRATION AND THE ECONOMY</p> <p>The Plan has adopted a population projection that assumes a constant annual net immigration figure of 500. It is to be noted that there is an implicit assumption here that the emigrants and immigrants</p>	<p>domestic properties or 10% of the total domestic property stock. Although data on empty properties is currently unavailable from the 2011 Census, the 2001 Census data suggests that the domestic property stock empty on Census night was 8%.</p> <p>The Department's vacancy factor or uplift of 4% is clearly lower than the number of vacant homes on the Island.</p> <ul style="list-style-type: none"> • It reflects the likelihood that compared to the existing housing stock, the new housing stock would be expected to achieve higher occupancy levels; • It should not be an objective to strive for a very low vacancy rate Island wide; properties which are empty for short periods help keep the housing market buoyant. • There are various reasons why properties may be empty and different surveys may record empty properties in different ways. Properties may be 2nd homes, or undergoing refurbishment or just unoccupied. Properties may be in different states of repair. <p>The point is that recording accurately why a property may be empty can be difficult. It is important to recognise that, relying on empty properties to meet a significant amount of housing</p>

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		Carse Hannay			<p>netted out in arriving at this figure have, amongst other things, the same age and gender profiles.</p> <p>What is instantly clear is that the net immigration levels as assumed are significantly below those that seem to have occurred in the last couple of decades. There are no official data on the inward and outward movement of people but one means of gauging the magnitude of net inward movement is to deduct the excess of births over deaths in the resident population from the intercensal increase in the population. The resultant figure can then be interpreted as being a consequence of net inward movement. So, taking the increase in the population between the Census counts in 2006 and 2011 of 4,439 and deducting the natural increase over the period 1st January 2006 to 1st January 2011 of 832 would provide for an estimate of net inward migration of 3,607 or approximately 720 p.a.</p> <p>The effect of the migration assumption in the Plan would seem to be an under estimation of current and future population levels. However, it is the case, as indicated in Table 2 below that migration is essentially driven by prevailing economic conditions via the labour market.</p> <p>Table 2 – Population and Economic Growth Rates</p>	<p>need carries with it a high level of risk.</p> <p>A number of approaches are required to ensure the right level of housing supply is meeting demand which may include the use of incentives or financial penalties to bring some of the vacant properties back into occupation. Sound evidence which defines what constitutes an empty property is important from the outset. It is worth noting that a vacancy rate of 8% would increase the housing need figure to 5276 (as opposed to 5080) and an increase of 10% would equate to 5374 (as opposed to 5080). Applying different uplifts has limited impact on the broad housing figure unlike a change in household size assumptions which can have a significant impact.</p> <p>Forecasting Error</p> <p>The Department accepts that the number of households predicted for 2011 was underestimated when compared to the true data. In the Isle of Man Strategic Plan 2007, the projection for households in 2011 was 35,275 (based on 2006 interim Census). The 2011 Census recorded the actual figure as 35,599. The 2011 true figure was therefore slightly above the projection by 324 (or 0.9%).</p> <p>In the Isle of Man Strategic Plan 2007, the</p>

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		Carse Hannay			<table border="1"> <thead> <tr> <th></th> <th>Period Real GDP Growth (%)</th> <th>Period Population Growth (%)</th> </tr> </thead> <tbody> <tr> <td>1991-1996</td> <td>14.0</td> <td>2.76</td> </tr> <tr> <td>1996-2001</td> <td>58.9</td> <td>6.42</td> </tr> <tr> <td>2001-2006</td> <td>32.2</td> <td>4.90</td> </tr> <tr> <td>2006-2011</td> <td>28.2</td> <td>5.55</td> </tr> </tbody> </table> <p>Source: IOM National Income Accounts, IOM Census Reports</p> <p>The population projection figures contained in the Plan are based on a simple mathematical model which makes assumptions about, inter alia, mortality rates, fertility rates and net immigration in future years. Used with caution, the outputs of such an approach can be useful; used without due consideration however they can be misleading. For example, a simple exponential model applied to census data gives an even higher projected population figure for 2026 (of 95,095 compared with the Government projection of around 93,526) and a regression of population against time gives a higher figure still (of 95,154).</p> <p>Whilst all these models represent valid approaches,</p>		Period Real GDP Growth (%)	Period Population Growth (%)	1991-1996	14.0	2.76	1996-2001	58.9	6.42	2001-2006	32.2	4.90	2006-2011	28.2	5.55	<p>projection for households in 2016 was 37,296 (based on 2006 interim Census). The projection for 2016 based on the 2011 Census is 37,261 which represents a slight fall in the projection of 35 or 0.09%. The important point to remember about projections is that they are estimates based on the analysis of available past data. As projections are often amended when new data becomes available, it is useful to consider how different the actual figures turn out to be, compared to the projections.</p> <p>Noting that there was a difference of 0.9% between projected and actual households for 2011, the Department is content to rely on projection data but accepts that the 2016 interim Census results will be of interest and when new headline figures become available (around November 2016). They will as a matter of course be recognised as part of the Area Plan process for the East.</p>
	Period Real GDP Growth (%)	Period Population Growth (%)																			
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		Carse Hannay			<p>the problem with purely statistical/mathematical approaches here is that they fail explicitly to mode some of the essential determinants of population growth, certainly for the Isle of Man namely, the scale and type of economic growth. Given the global economic landscape in recent years and associated uncertainty regarding likely performance in future years, it could be argued that it would seriously compromise the accuracy of the forecasting model to assume that the Isle of Man will continue to develop much as it has in the recent past – an assumption implicit in the derivation of the model used to produce the projected population figures in the Plan. Below trend economic growth would almost certainly result in lower net immigration and therefore in lower than projected housing need this would also be the case if growth were to occur in less labour intensive industries (e.g. e-gaming) or significant productivity increases were to occur in more labour intensive industries. These potential difficulties are especially potent in the context of the Plan should there already be excess supply in the Island’s housing market.</p> <p>In this regard the Plan sits in isolation from any other government statements on the Island’s economic strategy and economic future. The Department of Economic Development’s ‘Vision 2020’ report apart, the non-availability of any such long term economic perspectives certainly anything</p>	

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		Carse Hannay			<p>quantitative prevents any further comment being made as to the validity of the Plan's net immigration assumptions.</p> <p>AVERAGE HOUSEHOLD SIZE</p> <p>As in the UK (see for instance the Office for National Statistics 2011 Census Release, 21st March 2013) the Island's 2011 Census results revealed a slow down in the rate of decrease in the average household size and a continuation of this is reflected in the Plan in its assumptions regarding average household size in the future. Over one thousand of the additional households seen as being required in the Plan derive from the anticipated fall in average household size over time (from 2.33 in 2011 to 2.27 by 2026 an average fall of 0.004 p.a.).</p> <p>Predicting average household size is difficult in view of the multiple economic, financial, demographic, cultural and social factors that serve to impact upon demand. And of course a further factor will be on the supply side that is the degree to which housing demand under the weight of all these factors is satisfied through increased housing availability. It is open to conjecture as to how big a factor the fall in new build approvals in recent years – from 1,406 from the 2 years from 1st July 2005 to 30th June 2007 to just 1,452 in the 6 years from 1st July 2007 to 30th June 2013 (Source: IOM Strategic Plan</p>	

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		Carse Hannay			<p>Review, Supporting Evidence, Housing Supply, 16th January 2015, Table 1) has been in the slowdown in the decrease in average household size recorded.</p> <p>One perhaps more evident factor that can help explain the current trend in average household size and will determine future average household size is that of the aging population. Data supplied by the Cabinet Office economic Affairs section shows that although the average household size of households 'headed' by persons of retirement age (defined as at the time of the 2011 census) was almost one person lower than for those of below retirement age this figure has actually been increasing in recent years by an average 0.004 p.a. between 2006 and 2011. On the other hand the average size of younger households though falling did so by only 0.002 p.a. over the same time period. Given that the population projections shown in Table 1 show that much of the future increase in population is going to be in the older age groups then the implication is that future falls in average household size could not only continue to become smaller and smaller but could actually turn to become positive in the future, with one implication being that future demand for additional housing would be significantly lower than forecast in the Plan.</p> <p>The future could also see changes in the proportion of the total population living in private accommodation. The household projections in the</p>	

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		Carse Hannay			<p>Plan are made on the basis of no such changes, with the 2011 ratio of 98.2% retained for the 15 year period to 2026. Even though this is marginally higher than enumerated in either the 2006 or 2001 censuses (both 98.0%) this seems a sensible position to have taken given in particular the number of unknowns in respect of future provision and financing of resident care for the elderly and despite the forecasted increase in their numbers. Any revision towards a 98% ratio would mean a lower requirement for additional housing units than forecasted in the Plan.</p> <p>VACANCY RATIOS</p> <p>The Isle of Man strategic Plan 2007 used a vacancy factor of 4%. It includes properties which are undergoing refurbishment or conversion or in the process of being sold. This factor has, after some deliberation as to whether to include any factor at all, been retained in the Plan. Retaining a vacancy factor in its projections of housing need is a sensible decision since the dynamics and optimal functioning of all housing markets are such that there will always be a need for the flexibility and 'lubrication' provided by unoccupied housing. What is more at issue though is the factor that is to be used.</p> <p>The Plan looks at vacancy rates in other areas of Britain and Ireland and discovers a range of</p>	

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		Carse Hannay			<p>findings in different sources. Such differences are likely to arise from how 'vacant' is defined (for example whether a property has to be empty for over 6 months before being so classified) and from the actual area being considered (for example the Plan refers variously to a UK rate of 3.4% and an England rate of 2.8% to which one could add an England and Wales rate of 4.7% (source: Office for National Statistics, Population Statistics Newsletter, Quarter 2, 2014). What is evident from various statistics is major variation between smaller defined areas and regions (the Plan quotes Jersey for instance with a rate of 7%) and also in respect of the tenure of residents.</p> <p>An IOM vacancy rate is the main product of Carse Hannay's own property survey reported on below. It is shown how this factor takes on a critical role in determining future housing need.</p> <p>FORECASTING ERROR</p> <p>In the Plan (paragraph 1.5) it is stated that 'the Department judges that the 2011 projections allow for sufficient certainty up to 2026'. But forecasting population change in a small area such as the Isle of Man is difficult, particularly since there is a long history of sizeable inward and outward population movement.</p> <p>Consider the eventual magnitude of forecasting</p>	

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		Carse Hannay			<p>error relating to the period 2001-2011 in the Strategic Plan 2007 ('Towards a Sustainable Island') as shown in the table below. From the housing need perspective the inaccuracy of the projection of the future number of additional private households (an underestimate of almost 8%) is perhaps of most concern.</p> <p>Table 3 – Forecasting error 2001 – 2011 in 2007 Strategic Plan</p> <table border="1"> <thead> <tr> <th></th> <th>Population 2011</th> <th>Increase in Population 2001-2011</th> <th>Private Households 2011</th> <th>Increase in Private Households 2001-2011</th> </tr> </thead> <tbody> <tr> <td>Projected</td> <td>82,765</td> <td>6,450</td> <td>35,275</td> <td>3,754</td> </tr> <tr> <td>Actual</td> <td>84,497</td> <td>8,182</td> <td>35,599</td> <td>4,078</td> </tr> <tr> <td>Underestimate</td> <td>1,732</td> <td>1,732</td> <td>324</td> <td>374</td> </tr> <tr> <td>Error</td> <td>2.05</td> <td>21.17</td> <td>0.91</td> <td>7.95</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Source: IOM Strategic Plan 2007 and Draft Strategic Plan 2015</p> <p>Consideration of the assumptions within the projection model used by the DOI has already suggested there are grounds for their questioning. The conclusion is that the modelling process and assumptions used currently tend towards underestimation of both population and household</p>		Population 2011	Increase in Population 2001-2011	Private Households 2011	Increase in Private Households 2001-2011	Projected	82,765	6,450	35,275	3,754	Actual	84,497	8,182	35,599	4,078	Underestimate	1,732	1,732	324	374	Error	2.05	21.17	0.91	7.95						
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		Carse Hannay			<p>numbers.</p> <p>In the table below the actual rate of population increase between 1996 and 2011 is compared with the rate of increase going forward as per the Plan.</p> <p>Table 4(a) - Actual Population Growth 1996 to 2011</p> <table border="1"> <thead> <tr> <th></th> <th>Population Growth (%)</th> </tr> </thead> <tbody> <tr> <td>1996 to 2001</td> <td>6.4</td> </tr> <tr> <td>2001 to 2006</td> <td>4.9</td> </tr> <tr> <td>2006 to 2011</td> <td>5.5</td> </tr> <tr> <td>AVERAGE</td> <td>5.6</td> </tr> </tbody> </table> <p>Source: Isle of Man Census Report 2011</p> <p>Table 4(b) – Projected Population Growth 2011 to 2026 in the Plan</p> <table border="1"> <thead> <tr> <th></th> <th>Population Growth (%)</th> </tr> </thead> <tbody> <tr> <td>1996 to 2001</td> <td>3.7</td> </tr> <tr> <td>2001 to 2006</td> <td>3.5</td> </tr> <tr> <td>2006 to 2011</td> <td>3.2</td> </tr> <tr> <td>AVERAGE</td> <td>3.5</td> </tr> </tbody> </table> <p>Source: Isle of Man Draft Strategic Plan 2015</p> <p>CARSE HANNAY IOM OCCUPANCY SURVEY</p>		Population Growth (%)	1996 to 2001	6.4	2001 to 2006	4.9	2006 to 2011	5.5	AVERAGE	5.6		Population Growth (%)	1996 to 2001	3.7	2001 to 2006	3.5	2006 to 2011	3.2	AVERAGE	3.5	
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		Carse Hannay			<p>Any consideration of how to meet housing need should consider the empty property issue within the existing housing stock. As noted above, the Plan uses a 4% uplift to household figures to reflect this, a figure derived by consideration of empirical evidence from elsewhere. This section includes the results of Carse Hannay's own survey of 1,000 randomly selected properties listed in the Government residential property database. It provides an estimate of the Island's vacancy ratio, with critical implications regarding future housing need.</p> <p>The Plan (in table 8.3 of the draft document) estimates that currently (2015) there will be 85,449 residents in 36,927 private households, an average household size of 2.314 persons. Uplifting the number of private households by the assumed vacancy factor of 4% produces an estimated current housing market of 38,404 households. By 2026 the projection is for there to be 40,484 private households, an increase of 4,885 since the start of the planning period (2011) uplifted by application of the vacancy factor to 5,080 and then rounded to 5,100.</p> <p>However, a property database produced by the IOM Government shows a 2015 total of 42,716 residential properties on the Island reducing to around 42,000 after deletion of a small number of</p>	

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		Carse Hannay			<p>rogue entries. Adjusting this downward by the Plan's assumed 4% vacancy factor produces a figure for the number of private households more like 40,300 than the estimated 36,927 and a 2015 population living in private households of 93,300 compared to the figure of 85,449 in the Plan. It must be the case then that either the database is itself highly inaccurate or the current population is as a consequence of one or more of the assumptions used, significantly understated, or the vacancy ratio being applied in respect of housing requirements is too low. An assessment of the number of vacant properties on the database provides for a determination of which is the more likely explanation.</p> <p>The total number of residential properties currently in the Government database of around 42,000 is the available supply of housing. If Government figures are correct the number occupied (36,927) uplifted by the vacancy factor of 4% (38,404) represents demand for housing plus an element to account for the fact that the housing market does not clear instantaneously. If we treat the figure inclusive of the uplifts as the total demand then the figures still suggest that currently there is an excess supply of over 3,500 housing units.</p> <p>Carse Hannay's own survey results indicate that at the very least 10% of residential properties are vacant. Applying this to the number of properties in</p>	

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		Carse Hannay			<p>the Government database (42,000) provides a minimum estimate of 4,200 vacant properties far more than required under the Government assumption and more than required for the smooth functioning of the housing market.</p> <p>At the time of submission the property survey has covered 900 of the 1,000 properties in the sample and achieved a 92% response rate. Though an excellent response rate, and usually enough to rule out significant non-response bias in the results, it is highly likely in a survey such as this where response is likely to be positively related to occupancy that the estimate understates the true vacancy figure. In other words the vacancy rate for those households that have not responded is highly likely to be greater than the rate for those that have. For this reason the 10% vacancy rate estimated for the survey is best treated as a minimum value.</p> <p>EMPTY PROPERTY AND POLICY IMPLICATIONS</p> <p>In the absence of any supporting evidence it might be considered unwise simply to assume the sort of population growth which would be necessary to generate the numbers of additional housing units contained in the Plan. But even if Government's population projections contained in the Plan do turn out to be correct it would appear that there is currently enough excess housing supply to meet</p>	
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		Carse Hannay			<p>almost half of the likely increased demand for housing that the increase in the population would generate. The demand from the increasing population would incentivise the refurbishment and sale of unoccupied properties and thus reduce the vacancy rate from its current level of over 10% towards a more reasonable level such as the 4% identified in the Plan. If realised such a reduction in the vacancy rate of the current housing stock of 42,000 would provide 2,520 of additional units leaving only a similar number (2,580) as the additional build needed up to 2026.</p> <p>CONCLUDING STATEMENT</p> <p>There are a number of areas in which Government's modelling of future demographic change could be improved. At present certain of the assumptions being used to make projections of the future resident population on the Island require greater investigation and adjustment if found wanting.</p> <p>Notwithstanding the projections in the Plan of future housebuilding requirements to meet the demands of a growing population suggest a need for 5,100 more units over the period.</p> <p>However, the results from a survey of property occupancy on the Island undertaken by Carse Hannay provide for an alternative interpretation of</p>	

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		Carse Hannay			<p>how much new build might be required to satisfy future requirements and at the same time by avoiding over supply avoid any of the negative economic effects of stagnant house purchasing market. Focussing on the survey finding that the proportion of the Island's housing stock currently unoccupied is more like a minimum of 10% than the 4% assume in the Plan and built into the government housing need projections, it is calculated that 2,520 units not far short of half the additional housing requirement projected in the Plan, could be met out of current excess supply without hindering the smooth and efficient operation of the housing market provided for by there being a certain volume of vacant property.</p> <p>Changing assumptions relating to household size, immigration and vacancy rates based on the outcomes of Carse Hannay's assessments will likely reduce projections of population and housing need from the Government model. But irrespective the principal policy implication of this report is that meeting the housing needs of an expanded population can be served by a combination of planning for more housing and seeking means through which the current high number of empty properties on the Island might be reduced. Government should seek to determine the factors behind what seems to be a relatively high vacancy rate in the current stock to inform how this might be achieved.</p>	

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					The results of the next Population Census will be vital to reassessing the assumptions in the Government population forecasting model so it is important that Government continues to fully resource future Census exercises.	
Mr John Matthews						
83	DSP 17	Mr. John Matthews	General		<p>I am an Isle of Man resident now living for 24 years on the erosion ravaged west coastline near Kirk Michael village and a lot closer to the sea than last year. Five thousand, one hundred houses including seven hundred and seventy for the west is too many.</p> <p>A planning application for 100 houses. Now I am informed it will be 300 has already been refused for Kirk Michael Village expansion. I object mainly because of the inadequate sewerage system here and Island-wide and its obvious impact on marine life and seawater quality.</p> <p>Seawater quality is poor! Will it ever meet EU directive standards? Increased population and modern living means excess human waste. The "flushing" of medicines, chemicals for washing,</p>	<p>The Department understands and acknowledges the comments expressed about the pressure on the Island's infrastructure of allowing for additional housing including the additional pressures on the sewerage system.</p> <p>As far as this issue is concerned, the Manx Utilities Authority is currently implementing the Regional Sewage Treatment Strategy (RSTS). This aims to replace the current outdated and ineffective infrastructure and in doing so bring modern day sewage treatment to the existing sewage treatment works at a number of sites including Kirk Michael. Works are complete at some sites and the work at Kirk Michael is ongoing.</p> <p>Coastal erosion is a particular issue for Kirk Michael and the Department is aware of the annual loss of</p>

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		Mr. John Matthews			<p>detergents, and concentration of houses will cause build-up of surface water and will pollute the "system" and accelerate the land drainage which is the major cause of coastal erosion here on the West coast.</p> <p>More houses will mean more cars. I read a very high percentage of workers live in Peel, travel to Douglas. There isn't any employment in the West.</p> <p>100/300 houses in Kirk Michael for who?</p> <p>I read and hear on Radio there are no immigration laws yet for the Isle of Man. I read and hear there are concerns about human longevity and pensions. Will consideration be given to the environment in respect of architecture, estate design and layout. Visual impact and light pollution.</p> <p>Also, medical centres and staff and an increase in Emergency Services and Police.</p> <p>The need for a road network in good condition.</p> <p>Please do not forget the Motorcycle Races which are a unique feature and important. In the IOM 2015 Visitor Guide the Island is described as "Beautiful – a Paradise Island". This is incorrect. There are some outstanding natural, beautiful places around the Island. There are some handsome examples of architecture. But there are</p>	<p>coastline depending on the severity of winter storms. Consideration of any additional land for development in the Kirk Michael area will be subject to thorough appraisal through the Area Plan process. Early work on the Area Plan for the West is likely to be started in 2017.</p> <p>Only 3 Policies in the Isle of Man Strategic Plan 2007 are subject to review meaning that the Draft Plan 2015 repeats the majority of the Policies and supporting text. There are a number of Environmental Policies relating the natural and built environment, design, retention and provision of community services and the protection of residential amenity.</p> <p>All Government Departments have been invited as part of this Review to consider the implications of population growth on their service delivery plans.</p> <p>The Department has a duty to manage development in the most sustainable way, which, it believed to be through strategic and area planning documents and engaging in open and transparent consultation on such plans throughout the process.</p>

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					some ghastly looking areas around.	
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K Moughtin

84	DSP 18	K Moughtin			<p>Re: Government desire to build more than 5,000 homes in just 10 years appears more of a developers' charter than a strategic plan.</p> <p>With few exceptions, our roads have never been in a worse condition, waiting times at GPs surgery are increasing and Nobles Hospital itself is coming under varied and increasing pressure. Will due consideration be given to Local Authorities' ability to cope with a possible 20,000 increase in population given that recently Peel Commissioners and local residents objected to a new development on the grounds of pressure on GPs, Schools etc, yet were overruled?</p> <p>The Government states "planning has a crucial role to play in supporting Government national priority of growing the economy, while reflecting the needs of local communities and protecting our environment." An increase of 20,000 people over just 10 years may make that hope impossible.</p>	<p>There is a duty on the Department to prepare and from time to time revise the 'Island Development Plan' which is/will be made up of the Isle of Man Strategic Plan and a number of Area Plans. The 2007 Plan set out the broad framework for the Island's development. In light of 2011 Census, the Strategic Plan is now being updated to take account of the revised population projections.</p> <p>The proposed new Plan period is 2011 to 2026. The broad housing need has been identified as 5,100 (approximately 340 new dwellings p.a.). It is important to note that new housing will be supplied via a number of sites which may include conversions and redevelopment of previously used land (which essentially means that housing may well be delivered within existing settlements) as well as possible sites in green field locations.</p> <p>There is no doubt that there are challenges ahead in terms of planning for population growth,</p>
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Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>servicing new properties and protecting the environment and all that is special about the Island.</p> <p>The revised Isle of Man Strategic Plan will allow all Government Departments to plan effectively for additional schooling, health and infrastructure as necessary and will influence individual Service Delivery Plans for each Department.</p>
T. Norton						
85	DSP 19	T Norton			<p>I haven't waded through the consultation document yet, so I might be doing it an injustice, but I can't really see how you can make decisions about future land use and housing needs in isolation, without considering other factors like where the jobs are.</p> <p>I would like to make two suggestions (they may not be original but that doesn't make them irrelevant)</p> <ol style="list-style-type: none"> 1. There is no reason why most of the Government departments and the finance sector businesses have to be located in Douglas. I think some of them could move to other parts of the Island. 2. I think that the centre of Douglas should be primarily residential, retail and leisure, not office accommodation, and the gradual conversion of 	<p>There is a duty on the Department to prepare and from time to time revise the 'Island Development Plan' which is made up of the Strategic Plan and a number of Area Plans. The 2007 Plan set out the broad framework for the Island's development. In light of 2011 Census, the Strategic Plan is now being updated to take account of the revised population projections.</p> <p>The allocation of additional housing sites will not be undertaken in isolation. Indeed, as part of this review process the Department has followed the progress of the Employment Land Review which identifies broadly where additional employment land should be focused.</p> <p>The Spatial Hierarchy remains relevant and this</p>

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					houses into offices over the past thirty years or so has had an adverse effect on it. It has also created a lot of the traffic and parking problems. I think that those businesses which need to be in the Douglas/Onchan/Braddan area but don't need a 'shop-front' should be encouraged to move to business parks on the outskirts of Douglas. The buildings they currently occupy could then be converted to residential accommodation.	sets out the general scale of development for the North, South, East and West. It is fair to say that East is the dominant Area of the Island. Douglas is the Main Centre and it is characterised by a high proportion of the Island's population, housing, retail and leisure facilities and commercial properties.
A. Jessop						
86	DSP 20	A Jessop			I am reasonably content with the proposed Chapter 13. However, I am less so with the continued predict and provide approach to the calculation for the number of new dwellings deemed to be needed in the next 10 years. I am not convinced population numbers will increase as predicted in this document which will potentially result in an over supply of zoned land. I would suggest it would be prudent to await the outcome of the 2016 mini census before basing future housing needs on 'old' census data. Furthermore, I am not convinced all aspects of the impact of the 'ageing population' has been considered as, this group won't live for ever and	The Isle of Man Strategic Plan adopts the approach of 'Plan, Monitor and Manage'. The update in respect of the population projections is seen as being essential to ensure the Area Plans select the appropriate number of sites and phase their release accordingly. The Department will not overlook the Census 2016 and will consider any projection data which flows from it in judgements about site selection. The Department agrees that as people are living longer this brings with it a range of challenges for Government generally. Examples include challenges for housing, social care, health and

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					<p>within the next 15 - 20 years or so a lot will peg out leaving an ever increasing amount of vacant property; which could potentially meet the needs of the population.</p> <p>Finally, the current spatial strategy does not address the imbalance in the housing/employment land allocation; and if the island is to become a truly 'sustainable island' then this needs to be addressed.</p>	<p>pensions.</p> <p>As part of this review process the Department has followed the progress of the Employment Land Review which identifies broadly where additional employment land should be focused i.e. in the East and then the South.</p> <p>During the preparation of the Area Plan for the East there may be uses identified within settlements such as central locations in Douglas that may be better suited in locations elsewhere. There may also be a willingness to do so. Recommendations will have to be considered very carefully to avoid any incompatible uses being relocated to equally unsuitable locations.</p>
P. Newton						
87	DSP 21	P Newton			<p>Please find below my comments on the 2015 Draft Strategic Plan. If time permits I will put these on to the questionnaire response but, as commented previously by others, in many cases I would have to answer no to enable me to comment even though "yes" was really the fundamental reply! I really appreciate the work that the Planning Policy team has put into to gathering the statistics for the residential planning applications and therefore the</p>	<p>The Department appreciates the views made in respect of the merits of other data sources. The Department is content to rely on the 'net migration figure' of 500 as used by Economic Affairs in the calculation of the projections. The Department judges that the Census is the most complete survey data available.</p> <p>In terms of housing types, the Department</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		P Newton			<p>true picture of what has been emerging on the Island scene in the past 15 years. I do regret however that this reality check has not been translated into the household figures presumably due to the enforced use of the Government population predictions encompassing a continual net annual migration / increase of 500. Trying to establish what is happening population wise could be partially "sourced" by looking at figures for demand on school places for instance. As I understand it there is no unusual demand and therefore either the migration is not taking place or else it is only of retired people or those without dependent children. Figures for pensions claims and whether initiated from people from over 5 years residency on Island or less could be utilised to refine data. Simply relying on a figure of 500 does not make sense when take up rates of planning approvals are falling. It implies that there must be a lot of vacant houses for the migrants to go into! For information www.primelocation.isleofman gives a figure of 1830 dwellings on the market for sale and 232 on market for rent at present. It might be useful to monitor this in the future.</p> <p>If retirement is to be such an increasing proportion of demand one should have housing stock figures available to see what proportion is public what private and proportion of each that is sheltered housing and affordable homes. It is important for Area Plans that they get guidance as to type of</p>	<p>considers that the right mix of homes can be achieved via the Area Plans rather than in the Strategic Plan and will enable particular local needs to be taken into account.</p> <p>The monitoring of approvals and take-up and land availability is part of the work undertaken by the Planning Policy Team and will continue. This helps to identify specific land requirements and ensure that there is not an immediate over (or under) supply in any one Area.</p> <p>The Department accepts that it is unfortunate that the 2011 Census data on empty properties is unavailable but does not see this as being a significant issue in the identification of housing need.</p> <p>The evidence suggests that the Department's applied vacancy factor or 'uplift' of 4% is lower than the number of vacant homes on the Island. There are a number of reasons for this:</p> <p>Compared to the existing housing stock, the new housing stock would be expected to achieve higher occupancy levels; It should not be an objective to strive for a very low vacancy rate Island wide; properties which are empty for short periods help keep the housing market buoyant. There are various reasons why properties may be empty and different surveys may</p>

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		P Newton			<p>housing needed not just blank figures so that more accurate proportions of land needed for local authority as well as private housing are obtained and over allocations not made.</p> <p>Housing stock figures could also be utilised to give not only total dwelling as against total household figures to compare with the Census and analyse any differences but also to give indications of the number of second homes and whether these are on-Island owned or off-Island owned, vacant houses or postal addresses only.</p> <p>In any event if sustainability is the key to the Strategic Plan the aim should be to reduce "vacancy" or underutilisation of housing stock; a smaller figure should be used and deducted from household figure required not added to it so as to encourage use of dwellings as such.</p> <p>Comments on individual paragraphs are as below: Para 5.21 seems to contradict Para 5.20 which states "the character of each settlement (including the potential of each to accommodate further growth)". Para 5.21 implies regardless of character or potential to accommodate growth the settlements will take the same proportion of growth. Service villages like Laxey and Union Mills in the East have totally different character and potential to accommodate growth. Strategic Plan Policy 11 additional housing 5100 - this figure, and its use in other paragraphs, is queried as above.</p>	<p>record empty properties in different ways. Properties may be 2nd homes, or undergoing refurbishment or just unoccupied. Properties may be in different states of repair.</p> <p>The point is that recording accurately why a property may be empty can be difficult. It is important to recognise that, relying on empty properties to meet a significant amount of housing need carries with it a high level of risk.</p> <p>A number of approaches are required to ensure the right level of housing supply is meeting demand which may include the use of incentives or financial penalties to bring some of the vacant properties back into occupation. Sound evidence which defines what constitutes an empty property is important from the outset. It is worth noting that a vacancy rate of 8% would increase the housing need figure to 5276 (as opposed to 5080) and an increase of 10% would equate to 5374 (as opposed to 5080). Applying different uplifts has limited impact on the broad housing figure unlike a change in household size assumptions which can have a significant impact.</p>

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		P Newton			<p>Paras 5.18, 5.19 use same figure. It would be better reworded that <i>it "follows on Government projected population figures, a projected household occupancy rate based on Census figures and adding a proportion [4%] for vacancy rates onto the resultant household number obtained"</i>.</p> <p>Development in past 10 years is based on where allocated land is eg Peel; it is not a true indication of locational demand.</p> <p>Para 5.23 "greatest potential" - based on what ? - given Area plans and allocations have not been done Islandwide.</p> <p>Spatial Policy 3 It needs to be made clear whether Laxey is assumed to include that part of Lonan immediately adjacent to village of Laxey as that is where the main growth has taken place since 2001 ie Laxey including Ballabeg, Ballacannell, Church Road, Pinfold Hill and Croit-y- Quill areas of Lonan.</p> <p>Para 8.15 again? use of 5100</p> <p>Para 8.16 It needs to be specified whether use of reserve sites is intended to carry population upto 5100 figure or above it? Essential to know in case 2016 Census figures prove to be different from estimates.</p> <p>Para. 8.4.2 Given state pension age is changing- and female pension age has altered for 3 / 4 years now this is unrealistic; some Government Department ought to be able to give an accurate figure - Pensions Division for instance!</p> <p>Housing Policy 1 should include "conversions and windfalls" or else the figure should be 3677 as</p>	

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		P Newton			<p>identified in column g of para 5.25.</p> <p>Para 8.4.10 The "possible lack of need" in housing demand as illustrated by lack of take-up of planning approvals should be specified; it is more important than land quality on Island-wide basis; the latter will come out in Area Plans.</p> <p>Para 11.1.2 Why "in 2026" Surely the identified need for a Ballasalla bypass in the Area plan for the South means that this work should be done before then.</p>	
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Heritage Homes Ltd.

88	DSP 22	Heritage Homes Ltd.	Comments on Paragraph 8.4.1 to 8.4.10, 8.5.3, 8.5.4, 8.5.6, Table 8.1, 8.2, 8.3	Yes		Comments addressed below.
89	DSP 22	Heritage Homes	Paragraph 8.4.10	Yes		Comments addressed below.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
90	DSP 22	Heritage Homes	Paragraph 8.5.3		In response to IoMSP 2013 review Heritage Homes Limited (HHL) expressed the view that the Plan period should run to 2036. Notwithstanding this it is helpful for the Plan to include an explanation of the Department's decision in this respect as proposed at para 1.8.1.	Comment noted.
91	DSP 22	Heritage Homes	Comments on Housing Policy 3?		The content of para 1.8.2 is helpful and we support its inclusion.	Comment noted.
92	DSP 22	Heritage Homes	Paragraph 5.20		The Department recognises in Paper 3 of its supporting evidence that "It is important that there is a clear methodology to explain the way in which the housing distribution for the Island has been calculated". The current IoMSP 2007 is weak on this point, and whilst the use of past planning approval levels as the main basis for the proposed distribution would appear to be the most appropriate of the methods suggested in Paper 3, it should be employed with some caution; a lack of clear methodology in the past may have caused an uneven distribution that could now be repeated or exacerbated, and whilst it is recognised that this approach is "supported" by a range of other considerations, this includes a preliminary assessment of potential for future growth that may require amendment following a more detailed examination as part of an Area Plan process.	<p>The Department welcomes this comment identifying the possible implications of the 'distribution' approach taken for the 2007 Strategic Plan.</p> <p>However:</p> <p>The distribution as set out in Housing Policy 3 has been based on statistical evidence. Given that the East contains the Main Centre, a Service Centre, 2 Service Villages and 5 Villages, it is not unreasonable to see a concentration of new development around the East. The distribution would also appear to be in line with the draft Employment Land Review (ELR) which suggests the greatest demand for Employment Land lies in the East and then the South.</p>

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		Heritage Homes				<p>It is clear that proportionally, figures for the North and West have gone down and figures for the East and South have gone up (compared to the Isle of Man Strategic Plan 2007). The methodology which uses past planning approval data has been a helpful aid in establishing development interest across the settlement hierarchy. Given the importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals in the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>With the knowledge of the broad housing need across the Island, and the need to focus development in and around the Island's existing settlements, the revised distribution has ensured that the largest settlements with the most services have the highest proportions of new housing development.</p> <p>Whilst the Department acknowledges that the distribution is based on a simple mathematical calculation of what has happened in the past it</p>

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		Heritage Homes				<p>does appear that the broad distribution reflects:</p> <ol style="list-style-type: none"> a. The order of the spatial hierarchy b. The Draft Isle of Man Employment Land Review. This identifies that where manufacturing businesses are seeking to expand, most will be seeking premises in the East or the South*. It would therefore follow that new housing should reflect this conclusion but not forgetting that there are other high order settlements in other Areas. <p>*Draft Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government, March 2015, page 42</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ol style="list-style-type: none"> 1. Housing demand in the North appears to be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence

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						<p>that there would be no basis for adjusting the baseline distribution figure for the North.</p> <p>2. Despite there being limited housing land in the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p>
93	DSP 22	Heritage Homes	Paragraph 5.22		We note and support the proposed amendment of para 5.22 of the Plan to remove the current reference to a "maximum" housing requirement.	Comment noted.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
94	DSP 22	Heritage Homes	Paragraph 5.25		<p>In response to the IoMSP 2013 review HHL made the point that previous Inspector's reports have consistently concluded that windfalls and conversions, which by their nature are unpredictable and cannot be relied upon to help meet housing need, should not be taken into account ahead of dwellings which are proposed on allocated sites. Area Plans should take account of this when allocating land and the IoMSP should make reference to it.</p>	<p>The overall housing figure of 5100 has been identified without reference to future conversions and windfalls.</p> <p>The Department accepts that conversions and windfalls are not guaranteed and cannot be relied upon to deliver housing units. However, the evidence shows that additional dwellings from conversions in particular do contribute to the supply pipeline and have to be monitored to see to what degree.</p> <p>The Table at paragraph 5.25 is helpful in that it gives an indication as to the number of new dwellings that may need to be provided on allocated land. The Department does accept that it would be reasonable to stress that caution needs to be applied when referring to housing supply from conversions and windfalls.</p> <p>The table at paragraph 5.25 was included in the Draft Plan to assist in identifying the opportunities needed (i.e. by way of new sites) after taking into account likely conversions and windfalls over the Plan period. Some further explanation is set out below.</p> <p>Column f is titled 'projected conversions and windfalls 2011-2026 at 73 per annum'. The figure was given as 965.</p>

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						<p>This is how 965 was reached:</p> <p>Average no. of approvals for conversions and windfalls Jan 2001 to Jun 2011 (10.5 years) = 764</p> <p>$764 \div 10.5 = 73$ per annum $73 \times \text{new plan period (15 years)} = 1095$</p> <p>$1095 - \mathbf{130}$ (recorded conversions/windfall 2011-2013) = 965*</p> <p>It is now clear that an error was made with this table which is explained below.</p> <p>* It is accepted only 70 should have been removed from 1095 not 130. On the basis of this correction, column 'g' should have read 3747. In any case, this table can now be updated to reflect additional 2013/2014 data. A revised table for Paragraph 5.25 is set out in the Department's proposed changes document.</p> <p>(see Schedule of Proposed Changes – DSP 2 No. PC3).</p>
95	DSP 22	Heritage Homes	Paragraph 8.1.3	Yes	See response to para 5.20.	Please see Department's response to comment 159.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
96	DSP 22	Heritage Homes	Paragraph 8.1.6	Yes	HHL notes and supports the statement that "The Area Plans will need to ensure that there is enough flexibility to react to pressures relating to both supply and demand".	Comment noted.
97	DSP 22	Heritage Homes	Paragraph 8.4.10		It is appropriate for the Plan to highlight the need for Area Plans to address the issue of allocated land not being brought forward for development, and thus HHL notes and supports the content of para 8.4.10.	Comment noted.
98	DSP 22	Heritage Homes	Paragraph 8.5.3		See response to para 5.20.	Please see Department's response to comment 159.
W R Tomlinson						
99	DSP 23	W R Tomlinson	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	No		The Department considers it helpful to retain the 2007 Foreword and Preface to help understanding of the origins of the Strategic Plan which was first approved in 2007.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
100	DSP 23	W R Tomlinson	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	No		The Department considers it helpful to retain the 2007 Foreword and Preface to help understanding of the origins of the Strategic Plan which was first approved in 2007.
101	DSP 23	W R Tomlinson	Comments on the revised Foreword or Preface?	Yes	<p>Just refer to 2007 forward in 2015 forward BUT Mr Gawne mentions "the principles of sustainability" - he ought to explain what is meant.</p> <p>Complicates the process but reference is made to a 'regular cycle of review' with reference to TCP Act 1999 S.1 (1)(a) – the act just states 'shall keep under review the matters which may be expected to affect the development of the Island'</p>	<p>The Department considers it helpful to retain the 2007 Foreword and Preface to help understanding of the origins of the Strategic Plan which was first approved in 2007.</p> <p>Further guidance about the meaning of 'sustainability' is explained further in paragraphs 2.6 and 2.7 of the Draft Strategic Plan 2015.</p> <p>The correct reference should have been Part 1, S.2 (1) and the Department is grateful for this point being raised.</p> <p>(See Schedule of Proposed Changes – DSP 2 No. PC4).</p>
102	DSP 23	W R Tomlinson	Paragraph 1.8.2	Yes	<p>Conducting an interim census is expensive – may not happen?. Department should undertake to collect data on housing – ought to be sufficient for interim review – conducting the centennial census is in question in the UK – there will be a greater reliance on electronic questionnaires.</p>	<p>Government has made a commitment to the full and interim Census surveys on the Isle of Man. It still represents the most complete data set for the Island.</p> <p>Whilst there are moves to change the way data is recorded in the UK in 2021 which would be the</p>

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						next traditional date for the Census, it should be stressed that there are a considerable number of other data sets which are collected by the UK Government which are comprehensive enough to be relied upon in tandem with the Census.
103	DSP 23	W R Tomlinson	Any comments on the proposed wording for Strategic Policy 11 and Housing Policy 1?	Yes	instead of 'The housing needs of the Island WILL be met....' state: 'The housing needs of the Island MAY be met....' or 'The housing needs of the Island COULD be met....'	The Department considers that the word used should remain as "will" as this best indicates the Department's commitment and provides clarity and certainty for all.
104	DSP 23	W R Tomlinson	Paragraph 5.21		too prescriptive	The Department judges that having broad 'island-wide' and 'Area' figures for housing need is not "too prescriptive". This will assist in the allocation of the appropriate number of sites and is particularly useful whilst Area Plans are being prepared.
105	DSP 23	W R Tomlinson	Paragraph 5.22		too prescriptive	The Department judges that having broad 'island-wide' and 'Area' figures for housing need is not "too prescriptive". This will assist in the allocation of the appropriate number of sites and is particularly useful whilst Area Plans are being prepared.

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106	DSP 23	W R Tomlinson	Paragraph 5.26		begin 5.26 'It is estimated that.....'	The Department does not agree with this suggested change. This sentence reflects the existing spatial strategy to focus development in and around existing settlements.
107	DSP 23	W R Tomlinson	Paragraph 5.27		Link to: 1. 'Plan monitor and manage' states 'Planning for an overall ANNUAL rate'. Don't think this is the aim with the Strategic Plan 2. Sequential approach Fail to see how this can be achieved with a dynamic system	The Department accepts that the Strategic and Area Plans do not plan for an overall annual rate of new housing. Whilst 5100 houses would equate to 340 dwelling per year, it is not necessary to set this out and make it part of a Policy. Planning approvals and take-up/completions and supply of new dwellings differ every year. It is important to monitor what is happening over a number of years to ensure that sufficient opportunities are available.
108	DSP 23	W R Tomlinson	8.1.3		urban capacity study ought to have been conducted for this Strategic Plan - it is the foundation for Area Plans. The paragraph indicates a piecemeal approach The residential land survey of 2007 is 8 years old	<p>The Department is content that there are sufficient land opportunities across the Island for 5,100 additional dwellings. A full Island wide urban capacity study would have been time consuming and would have become in need of update at the time of each Area Plan. The Department judges that it is much more beneficial to focus resources at Area Plan level when considering the potential of existing settlements.</p> <p>The Residential Study (RLAS) is updated annually and the release of RLAS 7 examines data between 2001 and June 2014.</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
109	DSP 23	W R Tomlinson	8.1.6		Strategic Reserves how will the department be 'certain that there is a need for them' ?	The Area Plans (as set out originally in the Area Plan for the South) will set out a methodology for the release of the Strategic Reserve Sites and each will have a development brief associated with it. The Department will monitor rates of development and consider issues as necessary to ensure Strategic Reserves are released at the optimal time.
110	DSP 23	W R Tomlinson	Paragraph 8.4.2	Yes	failure to make connection between the number of people of dependent age and HOUSING NEED	The Department is aware of the changing age cohorts and the increasing dependency rates if current retirement ages remain the same. Pension ages are expected to increase; thus dependency ratios will reduce accordingly. It is the number of households anticipated in the projections that has influenced the final numbers. Particular housing needs will be dealt with at Area Plan level.
111	DSP 23	W R Tomlinson	Paragraph 8.4.4		Delete - Progress And Priorities Statement contributes nothing to this document. This is what was said about an ageing population "...there are growing challenges to the long-term sustainability of the Island's economy. The biggest threat to the economic and social future of the Isle of Man is the demographic reality that our nation is growing older. As in many nations, without greater economic expansion there will be fewer people of working age to pay for the needs of the elderly and the young. In the next twenty years the number of	Paragraph 8.4.4 does not conflict with the points made by the respondent. It simply recognises that the issues of an ageing population have been recognised by Government and will need to be tackled by Government as a whole not just the planning system. The Ageing Population Working Group has produced an internal Report which is currently being updated. It is likely to be published later in the year although no specific date has been released.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
					<p>residents aged 65 and over is expected to grow by 75%, with the overall population growing by only 16%. Even overlooking the effects of inflation or a demand for more services, this could mean that the cost of health care for people over 80 in the Isle of Man would double from roughly £25 million to more than £50 million in the same period. A Working Group examining the issues relevant to the Ageing Population will be reporting soon to Council of Ministers. I have asked for resources to be put in place to take forward its recommendations with some urgency."</p>	
112	DSP 23	W R Tomlinson	8.4.8		<p>To me this does not make sense - what are 'household increases generally'?</p>	<p>This refers to the rising number of households i.e. the number of households in 2026 is expected to increase compared to the number in 2011.</p> <p>The Department would no objection to the re-drafting of the 1st sentence in Paragraph 8.4.8 to read:</p> <p>"Having regard therefore to expected changes in population and average household size between 2011 and 2026, as well as an increase in household numbers overall...,"</p> <p>(see Schedule of Proposed Changes – DSP 2 No. PC 5).</p>

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
113	DSP 23	W R Tomlinson	Comments on Housing Policy 3?	Yes	Suggest: The Island's housing 'perceived' or 'predicted' needs of 'approximately' 5100 dwellings.... Insert 'approximately' alongside figure	The Department has used a methodology to identify a figure for the broad housing needs of the Island. Using this methodology, there is no need to use the word 'approximately' as part of the Policy.
114	DSP 23	W R Tomlinson	11.1.7	Yes	Not aware that 2014 transport assessment was undertaken in 2014 - not published (?)	This forms part of Evidence Paper 3 published alongside the Draft Isle of Man Strategic Plan 2015.
115	DSP 23	W R Tomlinson	13.1		In undertaking annual monitoring add 'and publish results'	The Department agrees to use the words "and publish". (see Schedule of Proposed Changes – DSP 2 No. PC6).
116	DSP 23	W R Tomlinson	13.2		too vague to just say 'a regular cycle of review' State when!	This paragraph goes on to refer to 5 yearly reviews.
117	DSP 23	W R Tomlinson	Comments Appendix 8	Yes	Ascribe a date	The dates are included in the column headings. Please note the title of column 2 is proposed to be changed to "Number of existing households". (see Schedule of Proposed Changes – DSP 2 No. PC1).

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
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BADRA (Ballasalla District Residents Association)

118	DSP 24	BADRA	Retain the existing Foreword?	Yes	<p>The Forewords '07 and '15 should both be featured. We answered 'No' to this question in order to make the following important note: We believe the whole approach to this review has been undemocratic in that the Planning Department has given no right of reply to respondents to the Preliminary Publicity (Jan'14) following its comments published in Jan '15. This is with particular reference to the need for Planning to give a definition of 'local' as in 'local needs' for Service Villages and also to review the current classification of Ballasalla as a Service Village. This is despite promises to address these issues in Spatial Policy 3 as part of the Strategic Plan review. These were given as a result of lengthy meetings and correspondence with the Director of Planning and subsequent correspondence with the Minister and Chief Minister. In addition, it seems contradictory that at a time when IOM Government is trying to devolve some central functions to Local Authorities, that the Planning Department sees no merit in examining the possible introduction of a Localism Act for the Island which could embody the aims, structures and spirit of the Act introduced in England in 2011. Such 'Neighbourhood Planning' could make the IOM planning system more democratic and more</p>	<p>Support for both Forewords is noted.</p> <p>The Department does not agree that the process has been 'undemocratic'. Consultation is a key part of plan preparation and Schedule 1 of the Town and Country Planning Act 1999 has, since the start of the process, been followed.</p> <p>There has been opportunity to comment on the Preliminary Publicity and the Draft Isle of Man Strategic Plan 2015 and there will be the opportunity to submit further comments leading up to and at the Public Inquiry if the contributor wishes to support their case. It should be noted however that the Pre Inquiry Meeting (proposed to take place on 23rd July 2015) will establish the extent to which different issues will be dealt with at the Public Inquiry.</p> <p>It is the intention of the Department to review the spatial hierarchy as part of a full review of the Strategic Plan. Given that the Area Plan for the South was approved by Tynwald in February 2013, and whilst it is important in the medium to long term to review the spatial hierarchy, it is not considered an urgent priority to review whether</p>
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		BADRA			effective.	<p>Ballasalla is classified for 'planning purposes' as a Service Centre rather than a Service Village. Since 2013 none of the sites allocated in Ballasalla have been the subject of planning approval and therefore there has been very little change to its character or appearance.</p> <p>The Department is aware of the Localism Act applicable in the UK and the intentions behind it. It is important to note that even if certain functions or delivery of services were devolved to the local authorities there would most likely still need to be an all-Island Strategic Plan setting out broad housing need figures - continuing perhaps the Policy for a spatial breakdown of housing across the Island to ensure sufficient supply of housing opportunities.</p>
119	DSP 24	BADRA	Retain Preface 2007 with Preface 2015?	Yes		Comment noted.
120	DSP 24	BADRA	Paragraph 5.21	Yes	The Spatial Distribution Figures 'based on past planning approvals data' appear to be a little too neat and arbitrary. Given that the whole island figure has been reduced by 15% it seems odd that the North and West have been reduced by 36% and 23% respectively, while the East has remained at virtually the same level and the South has had	In terms of how the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.

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		BADRA			<p>an on par reduction. On that basis, the figure for the South appears excessive and puts an undue burden on residents and infrastructure in the South. Transport links will deteriorate further, particularly if the A5/A7 junction at Ballasalla is not to be reviewed until 2026. The final sentence regarding settlements is unclear and needs revision.</p>	<table border="1"> <thead> <tr> <th>Area</th> <th>2007</th> <th>2015</th> <th>% change</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>20%</td> <td>15%</td> <td>-5</td> </tr> <tr> <td>South</td> <td>21.67%</td> <td>22%</td> <td>0.3</td> </tr> <tr> <td>East</td> <td>41.67%</td> <td>48%</td> <td>6.3</td> </tr> <tr> <td>West</td> <td>16.67%</td> <td>15%</td> <td>-1.6</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>It is clear that proportionally figures for the North and West have gone down and figures for the East and South have gone up. The methodology which uses past planning approval data has been a helpful aid in establishing development interest across the settlement hierarchy. Given the importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals in the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>Given an understanding of the broad housing needs across the Island, and the need to focus development in and around the Island's existing</p>	Area	2007	2015	% change	North	20%	15%	-5	South	21.67%	22%	0.3	East	41.67%	48%	6.3	West	16.67%	15%	-1.6	Total	100%	100%	
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Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		BADRA				<p>settlements, the revised distribution has ensured that the largest settlements with the most services have the highest proportions of new housing development.</p> <p>Whilst the Department acknowledges that the distribution is based on a simple mathematical calculation of what's happened in the past it does appear that the broad distribution reflects</p> <ul style="list-style-type: none"> a. The order of the spatial hierarchy b. The Draft Isle of Man Employment Land Review. This identifies that where manufacturing businesses are seeking to expand, most will be seeking premises in the East or the South.* It would therefore follow that new housing should reflect this conclusion but not forgetting that there are other high order settlements in other Areas. <p>*Draft Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government, March 2015, page 42</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ol style="list-style-type: none"> 1. Housing demand in the North appears to

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
		BADRA				<p>be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence that there would be no basis for adjusting the baseline distribution figure for the North.</p> <p>2. Despite there being limited housing land in the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p>

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121	DSP 24	BADRA	Paragraph 5.22	Yes	See comments to 5.21 above.	See Department response to comment 213.
122	DSP 24	BADRA	Paragraph 5.23	Yes	This paragraph seems to reinforce our previous 'arbitrary' point.	See Department response to comment 213.
123	DSP 24	BADRA	Paragraph 8.5.4	Yes	See comments to 5.21 above.	See Department response to comment 213.
124	DSP 24	BADRA	Housing Policy 3	Yes	See comments re para 5.21 regarding the excessive and arbitrary figure for the South with the consequent unfair burden on residents, infrastructure and travel links. The North and West appear to carry a significantly lower share of the burden.	The spatial distribution for the South is not considered excessive. The overall figure of 5100 is based on the population projections. These are based on the most up to date Island data available i.e. the Census. It is necessary to have a sound methodology for 'spreading' this need across the Isle of Man. The methodology indeed reflects past statistics on growth but clearly aligns with the Employment Land Review which concludes that the highest demand for employment land is in the East followed by the South.
126	DSP 24	BADRA	Paragraphs 11.1.7	Yes	The '07 JMP report should not be relied upon to plan for the next 10 years. Why isn't the latest 2014 assessment available as part of this consultation? A 'rush hour' traffic survey on main arterial routes should be undertaken and form part of this latest review.	A transport assessment (an update to the findings of the 2007 JMP Report) has been included in Evidence Paper 3 and integrated into the Draft Plan in Chapter 11.

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127	DSP 24	BADRA	Paragraphs 11.1.8	Yes	See above comments.	Comment noted.
128	DSP 24	BADRA	Paragraphs 11.1.11	Yes	Agree that A5/A7 Ballasalla junction will suffer and IS suffering NOW from more congestion - this must be addressed prior to 2026. See comments from Inspector on the Southern Area Plan.	The traffic assessment in 2014 concluded that based on the housing projections, there was no need to improve the A5/A7 link until 2026.
129	DSP 24	BADRA	Paragraphs 11.1.12	Yes	See above comments. We strongly disagree with delaying investigation work on the A5/A7 Ballasalla junction until 2026.	See above comment.
130	DSP 24	BADRA	Paragraphs 11.1.14		Disagree, see previous comments re lack of action following implementation of the Southern Area Plan.	There is no need (according to recent traffic assessment 2014) to undertake further improvements to accommodate an additional 1120 dwellings by 2026.
131	DSP 24	BADRA	Paragraphs 11.1.15		See above comments.	See above comment.
132	DSP 24		Paragraphs 13.2	Yes	Does this mean that a full review of the Strategic plan will take place in 2016?	A Full Review is unlikely to be prepared until the findings of the 2021 Census are reported.

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Manx Wildlife Trust

133	DSP 25	Manx Wildlife Trust	Paragraph 8.5.3	Yes	Based on the figures shown in the table below paragraph 8.5.3 and taking into account that of the 5100 additional dwellings needed 3677 of these will be new builds, please can you advise how much land will need to be allocated for development (in terms of acreage) a) for the total required new builds and b) for the new builds required in each of the four Areas: North, South, East and West?	<p>The Island's overall housing need between 2011 and 2026 has been identified as 5100. The figure 3677 set out in the table at paragraph 5.25 is an estimate of the opportunities needed (in terms of land) after having taken into account planning approvals already granted and estimates for conversions and windfalls i.e. new dwellings created which were not anticipated which still contribute to the overall need of 5100.</p> <p>At the Area Plan stage the most up to date evidence will be used to estimate what land needs to be allocated.</p> <p>It should be noted that in the Table at Paragraph 5.25, only 70 should have been removed from 1095 not 130 (i.e. the figure was doubled unnecessarily). On the basis of this amendment column 'g' should have read 3747. In any case, this table can now be updated to reflect additional 2013/2014 data. A revised table for Paragraph 5.25 is set out in the Department's proposed changes document (see Schedule of Proposed Changes – DSP 2 No. PC3).</p>
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134	DSP 25	Manx Wildlife Trust	Comments on Housing Policy 3?	Yes	Please refer to the comment made re paragraph 8.5.3.	Please see Department's response to above comment.
D. Comish – Partial Response submitted						
135	DSP 26	D Comish	Comments on the revised Foreword or Preface?	No	Retain both No other comments	Comment to retain both current and proposed Foreword and Preface is noted.
N. Crowe – Partial Response submitted						
136	DSP 27	N Crowe	Retain Foreword and Preface	Yes	No other comments	Comment to retain both current and proposed Foreword and Preface is noted.

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S. Woodward - Partial Response submitted

137	DSP 28	S Woodward	Retain Foreword and Preface	Yes	No other comments	Comment to retain both current and proposed Foreword and Preface is noted.
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C Wilson - Partial Response submitted

138	DSP 29	S Woodward	Retain Foreword and Preface	Yes	No other comments	Comment to retain both current and proposed Foreword and Preface is noted.
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M and D Aram

139	DSP 30	M & D Aram	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	Yes		Comment to retain both current and proposed Foreword and Preface is noted.
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140	DSP 30	M & D Aram	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	Yes		Comment to retain both current and proposed Foreword and Preface is noted.																								
141	DSP 30	M & D Aram	Paragraph 5.20		The approach chosen (and indeed the others considered in Supporting Evidence Paper 3 Clause 12) has no sound and robust evidence base compatible with the Department's and the Strategic Plan's overarching statement, "Towards a Sustainable Island", which would require a better balance between the location of housing and jobs so as to reduce commuting and therefore the pressure on the Strategic Highway Network. See also response to Q51/52 - Proposed Housing Policy 3	<p>The Strategic Plan 2015 and the supporting Evidence Papers set out a simple yet clear methodology about how the spatial distribution of housing has been allocated across the Island.</p> <p>In terms of how the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>2007</th> <th>2015</th> <th>% change</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>20%</td> <td>15%</td> <td>-5</td> </tr> <tr> <td>South</td> <td>21.67%</td> <td>22%</td> <td>0.3</td> </tr> <tr> <td>East</td> <td>41.67%</td> <td>48%</td> <td>6.3</td> </tr> <tr> <td>West</td> <td>16.67%</td> <td>15%</td> <td>-1.6</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>It is clear that proportionally, figures for the North and West have gone down and figures for the East and South have gone up. The methodology which uses past planning approval data has been a helpful aid in establishing development interest across the settlement hierarchy. Given the</p>	Area	2007	2015	% change	North	20%	15%	-5	South	21.67%	22%	0.3	East	41.67%	48%	6.3	West	16.67%	15%	-1.6	Total	100%	100%	
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		M & D Aram				<p>importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals in the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>With the knowledge of the broad housing need across the Island, and the need to focus development in and around the Island's existing settlements, the revised distribution has ensured that the largest settlements with the most services have the highest proportions of new housing development.</p> <p>Whilst the Department acknowledges that the distribution bases the distribution on a simple mathematical calculation of what's happened in the past it does appear that the broad distribution reflects</p> <ul style="list-style-type: none"> a. The order of the spatial hierarchy b. The Draft Isle of Man Employment Land Review - which identifies that where

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		M & D Aram				<p>manufacturing businesses are seeking to expand, most will be seeking premises in the East or the South.* It would therefore follow that new the housing should reflect this conclusion but not forgetting that there are other high order settlements in other Areas.</p> <p>*Draft Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government, March 2015, page 42</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ol style="list-style-type: none"> 1. Housing demand in the North appears to be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence that there would be no basis for adjusting the baseline distribution figure for the North. 2. Despite there being limited housing land in

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						<p>the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p>
142	DSP 30	M & D Aram	Paragraph 5.21		See above	See the Department's response to comment 258.
143	DSP 30	M & D Aram	Paragraph 5.22		See above	See the Department's response to comment 258.

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
144	DSP 30	M & D Aram	Paragraph 5.23		See above	See the Department's response to comment 258.
145	DSP 30	M & D Aram	Paragraph 8.5.3	Yes	See below	See the Department's response to comment 266.
146	DSP 30	M & D Aram	Paragraph 8.5.4	Yes	See below	See the Department's response to comment 266.
147	DSP 30	M & D Aram	Comments on Housing Policy 3?	Yes	The housing provision for the South is excessive and has no sound and robust evidence base compatible with the Department's and Strategic Plan's overarching statement, "Towards a Sustainable Island". Already housing in the South is out of balance with employment in the South evidenced by the peak morning and evening traffic surveys on the main A5 arterial route, which show about twice as many cars travelling towards Douglas in the morning peak compared with the opposite direction and the reverse in the evening peak. Sustainability requires policies for this imbalance to be reduced (not increased), which will also reduce (not increase) the pressure on the strategic highway network. The proposed housing allocation percentage for the South is also much higher than the percentage of the Island's population currently living in the South.	<p>The Department is content that the allocation in the South reflects the findings of the Employment Land Review in that the greatest need has been highlighted in the East followed by the South.</p> <p>The highways assessment of the anticipated new housing and its general location suggests that there will be need for traffic congestion investigation work in 2026 and not before.</p> <p>The 2011 Census revealed that there were 6254 households in the South (18%). The population was 14,341 (17%). The additional dwellings required is identified as 1120 (22% of total).</p>

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J. Kermode

148	DSP 31	J Kermode	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	Yes		Comment noted.
149	DSP 31	J Kermode	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	Yes		Comment noted.
150	DSP 31	J Kermode	Comments on Housing Policy 3?	Yes	Why only 770 in the north? Surely the government should be pushing businesses to be opening in the north. This would put less strain on Douglas's roads and services. And help improve the economy of the north. Plus it's better for the environment if people can drive less.	<p>The Strategic Plan 2015 and the supporting Evidence Papers set out a simple yet clear methodology about how the spatial distribution of housing has been allocated across the Island.</p> <p>In terms of how the the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.</p>

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		J Kermode				<p>settlements, the revised distribution has ensured that the largest settlements with the most services have the highest proportions of new housing development.</p> <p>Whilst the Department acknowledges that the distribution bases the distribution on a simple mathematical calculation of what's happened in the past it does appear that the broad distribution reflects</p> <ul style="list-style-type: none"> a. The order of the spatial hierarchy b. The Draft Isle of Man Employment Land Review - which identifies that where manufacturing businesses are seeking to expand, most will be seeking premises in the East or the South.* It would therefore follow that new the housing should reflect this conclusion but not forgetting that there are other high order settlements in other Areas. <p>*Draft Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government, March 2015, page 42</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p>

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		J Kermode				<p>Housing demand in the North appears to be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence that there would be no basis for adjusting the baseline distribution figure for the North.</p> <p>In terms of land availability for housing, the North has 60.5 ha available as at June 2014. This represents 41% of the Island's total.</p> <p>In terms of land availability for employment, the North has 10.42 ha of allocated land available as at May 2014 (12% of total) and 3.78 ha of land available for development (but is not currently zoned).</p> <p>The emerging Employment Land Review has identified that the requirement for employment land up to 2029 is highest in the East followed by the South.</p>

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S Moore

150	DSP 32	S Moore	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	No	It makes no sense; it is now 2015 and questions being filled in in 2015.	The intention is for the revised Isle of Man Strategic Plan to be similar in content to the Isle of Man Strategic Plan 2007. The Department judges that it is helpful to understand the background to the origins of the Plan and sets a context which is easy to understand and follow.
151	DSP 32	S Moore	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	No		The intention is for the revised Isle of Man Strategic Plan to be similar in content to the Isle of Man Strategic Plan 2007. The Department judges that it is helpful to understand the background to the origins of the Plan and sets a context which is easy to understand and follow.

Juan Watterson MHK

152	DSP 33	J Watterson MHK	Do you agree that the existing Foreword (2007) should be retained as well as a revised Foreword (2015)?	Yes		Comment noted.
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153	DSP 33	J Watterson MHK	Do you agree that the existing Preface (2007) should be retained as well as a revised Preface (2015)?	Yes		Comment noted.																								
154	DSP 33	J Watterson MHK	Any comments on the proposed wording for Strategic Policy 11 and Housing Policy 1?	Yes	<p>I have significant concerns over the distribution methodology as proposed Spatial Distribution. Continuously adding large chunks of building is having a detrimental effect on the culture and unity of the place. A good example of this is Peel, where the population has ballooned significantly, and Peel is effectively two towns, "Old Peel" and "New Peel". The same danger awaits Castletown, Ramsey and Port Erin. Of all of these, Castletown & Malew have the most promise for acceptable growth. However, I would propose that due consideration be given to the creation of a new town, or developing one existing settlement to mitigate the damage to other towns and villages who are currently losing their sense of identity. An obvious example would be Jurby, which did have a Jurby Masterplan developed in around 2007 but has never been realised. Supply, so it is argued, creates its own demand, and it should be remembered that much of the development will be for the purposes of immigrants to the Island, rather than for locals to stay close to their roots. For this purpose, current demand should not be the sole determinant of future spatial distribution. Sadly, Douglas has</p>	<p>The Strategic Plan 2015 and the supporting Evidence Papers set out a simple yet clear methodology about how the spatial distribution of housing has been allocated across the Island.</p> <p>In terms of how the 2015 distribution compares to that of the 2007 Plan, figures for both have been set out below.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>2007</th> <th>2015</th> <th>% change</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>20%</td> <td>15%</td> <td>-5</td> </tr> <tr> <td>South</td> <td>21.67%</td> <td>22%</td> <td>0.3</td> </tr> <tr> <td>East</td> <td>41.67%</td> <td>48%</td> <td>6.3</td> </tr> <tr> <td>West</td> <td>16.67%</td> <td>15%</td> <td>-1.6</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>It is clear that proportionally, figures for the North and West have gone down and figures for the East and South have gone up. The methodology which uses past planning approval data has been a helpful aid in establishing development interest across the settlement hierarchy. Given the</p>	Area	2007	2015	% change	North	20%	15%	-5	South	21.67%	22%	0.3	East	41.67%	48%	6.3	West	16.67%	15%	-1.6	Total	100%	100%	
Area	2007	2015	% change																											
North	20%	15%	-5																											
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Total	100%	100%																												

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					<p>largely been divested of any cultural identity almost since its inception, so significant growth of Douglas would probably casue the fewest problems of all.</p>	<p>importance for new development to be located primarily in existing towns and villages, it is not unexpected for the settlement hierarchy to play some role in establishing broad 'area' totals in the future.</p> <p>In terms of identified settlements, the East can be said to be at the top of the hierarchy (9 including the Main Centre), then the South with 7 (2 of which are Service Centres), then the North with 7 (only 1 of which is a Service Centre) and lastly the West with 6 (with 1 Service Centre).</p> <p>With the knowledge of the broad housing need across the Island, and the need to focus development in and around the Island's existing settlements, the revised distribution has ensured that the largest settlements with the most services have the highest proportions of new housing development.</p> <p>Whilst the Department acknowledges that the distribution bases the distribution on a simple mathematical calculation of what's happened in the past it does appear that the broad distribution reflects</p> <ul style="list-style-type: none"> a. The order of the spatial hierarchy b. The Draft Isle of Man Employment Land Review. This identifies that where

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>manufacturing businesses are seeking to expand, most will be seeking premises in the East or the South.* It would therefore follow that new the housing should reflect this conclusion but not forgetting that there are other high order settlements in order Areas.</p> <p>*Draft Isle of Man Employment Land Review, Peter Brett Associates on behalf of Isle of Man Government, March 2015, page 42</p> <p>Whilst the final percentages have not been adjusted or weighted in any way they have been cross referenced with other data to ensure they are generally sound. It is important to note that:</p> <ol style="list-style-type: none"> 1. Housing demand in the North appears to be low compared to other Areas. Out of all the new housing opportunities that could have been taken up between 2001 and 2014, 24% of the total in the North 'lapsed' (nearly a quarter). Figures were significantly lower in the West (5%) and moderately lower in the East (12%) and the South (9%). This alone is evidence that there would be no basis for adjusting the baseline distribution figure for the North.

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						<p>2. Despite there being limited housing land in the East and Douglas (15 ha and 3 ha respectively), demand for housing in the East has been high. 45% of housing approvals between 2001 and 2014 were granted in the East, 70% of which were in Douglas.</p> <p>The Area profile work set out in Evidence Paper 3 also supported the distribution figures in that when examining the potential and available land for housing development the conclusion was when looking at the availability and potential residential land, the order for the Areas would be the East, South, North and West with the potential in the East essentially taking priority over availability in the North.</p> <p>The Consultation Draft of the Isle of Man Strategic Plan published in May 2000 mooted the idea of a new settlement as a means of accommodating future development. Appendix 3 of the Draft Isle of Man Strategic Plan (which remains unchanged from 2007) sets out what the Department took into account when coming to the decision not to plan a new settlement. Whilst not having revised this section of the Plan due to a confidence tha the level of development predicted can be accommodated in and around the existing settlements it is pertinent for the Department to</p>

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						<p>reaffirm the conclusions reached in the 2007 Plan that:</p> <ul style="list-style-type: none"> a. within the Plan period, the existing towns and villages can accommodate additional development sufficient to meet demand. There remain opportunities to develop redundant or under-used land, and concentrating on existing settlements can help support local schools, shops, and other services; b. there is not a "brownfield" site which could accommodate satisfactorily a settlement of the required scale; c. there could potentially be significant implications for the Regional Sewage Treatment and Sludge Disposal Strategy. d. the visual impact of a new settlement would be so massive as to have an inevitably greater adverse impact on our countryside than would alternative options; and e. the pattern of development on the Island is characterized by slow evolution over many years, with the various characteristics and qualities of each individual settlement emerging from years of reaction to the people who have lived and worked there, and from the demands and changing circumstances which the settlements have faced; each settlement on the Island is unique, thanks to those who have

Comment no.	Respondent no.	Name	Question/Comment	Response	Detailed Comments	Department Response
						<p>influenced it; any new settlement would have no history, no family connections and no Manx tradition, and would thus be alien to the slow and deliberate pace at which the Isle of Man has developed.</p> <p>The emerging Employment Land Review suggests that employment land is needed most in the East and then the South. A distribution policy which targets significant development to Jurby would not align with this employment evidence and the Department considers that the spatial hierarchy as set out is adequate up to 2026.</p> <p>Douglas has undergone considerable regeneration in recent years helped in many ways by limited releases of land on the outskirts of the Town in the last 15-20 years and a focus of resources on key schemes/infrastructure projects to regenerate specific areas such as the Quay, parts of the Promenade and the Peel Road Improvement Scheme. There have also been a relatively high number of redevelopment schemes and conversion projects to create new housing within the Centre.</p> <p>Douglas retains a distinctive architectural heritage but has clearly benefitted from a number of high quality developments which have improved the design and management of the public realm and set the scene for future improvement schemes and</p>

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						new development. It is worth noting that one of the aims of the Area Plan will be to ensure any new residential developments will integrate well into the existing settlements.
155	DSP 33	J Watterson MHK	Paragraph 5.18	Yes	See previous	Comment noted.
156	DSP 33	J Watterson MHK	Paragraph 5.20	Yes	See previous comments, past development levels are not an acceptable methodology for future projections. For reasons see previous answer.	See Department's response to comment 301.
157	DSP 33	J Watterson MHK	Paragraph 8.1.6		I am not convinced that the slow release of reserve sites has been kept to. I cannot see where such an assessment has taken place, but to me there is little evidence that reserve sites are being treated much differently from regular opportunities. Consideration should be given as to whether such a distinction is working, or serving any purpose.	The Department stands by its approach of using Strategic Reserves as part of the Area Plan process. The Monitoring Report for the South has been delayed but many of the sites allocated as general allocation sites in the Area Plan for the South have yet to come forward for development. The Department has yet to release the first Monitoring Report for the South but this is expected in due course.
158	DSP 33	J Watterson MHK	Table 8.1		Historic data would have contextualised the projection.	The Department would have no objection to the insertion of a replacement/additional graph to provide a better historical context. (see Schedule of Proposed Changes - DSP 2 No. 7)

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159	DSP 33	J Watterson MHK	Paragraph 8.4.2		<p>Dependency ratio is comprised of two different dependency groups, each with very different needs (educational vs health at a most basic level). The dependency ratio should therefore be analysed in two different ways with housing type, transport and school capacity issues pulled out and explained.</p> <p>Are we saying that ageing is having a greater demographic effect than immigration? Is there a bow wave of baby boomers ageing, or is the long term demographic projection one way only?</p>	<p>For the purposes of this Review, the Department is content to show and acknowledge how the dependency ratio is expected to change over time and how this will be affected by any change in retirement ages.</p>
160	DSP 33	J Watterson MHK	Paragraph 8.4.5		<p>The report makes frequent reference to ageing population and the need to build in age related infrastructure, however there appears to be no Government policy relating to fertility and increasing the birth rate. If the policy is 'do nothing' these points are valid, however it may be that this has not been considered!</p>	<p>The Department is not aware of a Government Policy to increase the birth rate. The needs of an 'ageing population' are important and have been recognised in the Draft Plan. Indeed, all of Government has a responsibility to address the issue. However, the Strategic Plan is intended to set the broad direction for the Island's growth. It is not an instrument to set out firm policies on ageing population as the implications of such in terms of health, housing, social care are not certain.</p> <p>The Ageing Population Working Group has produced an internal Report which is currently being updated. It is likely to be published later in the year although no specific date has been released.</p>

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161	DSP 33	J Watterson MHK	Paragraph 8.5.3		See previous statements on spatial distribution	See Department's response to comment 301.
162	DSP 33	J Watterson MHK	Paragraph 8.5.4		Deep reservations on grounds set out above.	See Department's response to comment 301.
163	DSP 33	J Watterson MHK	Comments on Housing Policy 3?		See previous comments on inappropriate methodology for spatial distribution.	See Department's response to comment 301.
164	DSP 33	J Watterson MHK	Comments on Paragraphs 13.1	Yes	Annual monitoring is too frequent and resource intensive. Consider less frequent monitoring.	Given the amount of data that needs to be collated, it is sensible in the Department's view to monitor regularly particularly when it comes to housing and employment land. The intention is to review evidence for the latter on a 6 monthly basis.
165	DSP 33	J Watterson MHK	Paragraph 13.2	Yes	Five year reviews seem sensible.	Comment noted.
166	DSP 33	J Watterson MHK	Paragraph 13.3	Yes	See previous comments on reserve sites.	See Department Response to comment 306.
167	DSP 33	J Watterson MHK	Comments Appendix 8	Yes	see previous comments	Comment noted.

Late

**Isle of Man Natural History
& Antiquarian Society**

Response received 13th March 2015 (6pm)

**Department of Environment,
Food and Agriculture**

Response received 20th March 2015

C Corkill

Response received 28th April 2015