



Isle of Man
Government

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Report for Un-occupied Urban Sites Register: East

November 2020

Cabinet Office

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1 Introduction

1.1 Overview

On the 17th April 2018 Tynwald resolved that a Select Committee be appointed to investigate the options available to encourage and prioritise the development of unoccupied or previously developed urban sites ahead of building on green fields in the Manx countryside and to report its findings and recommendations by July 2018.

The Select Committee published its report in June 2018. The report concludes that there is a lack of a register of brownfield sites. Following concluding comments, a number of recommendations were set out, including recommendations 1 and 2 below.

Recommendation 1 of the Select Committee Report was approved by Tynwald. It states:-

'that the Cabinet Office should publish at regular intervals data on planning approvals given and taken up in brownfield and greenfield sites respectively.'

In his address to Tynwald¹, Mr. Shimmins MHK indicated that this recommendation is about collecting data to *'better understand the trends that we are seeing on the Island in more detail. There is a general acceptance that if we are to reverse the trend we need to measure and understand what is going on.'*

An amended version of Recommendation 2 of the Select Committee Report was approved by Tynwald, and an extract of the recommendation is set out below:-

'That Tynwald calls upon the Council of Ministers and all Departments to use all reasonable means at their disposal to encourage, where possible, the development of unoccupied or previously developed urban sites ahead of building on greenfield sites in the Manx countryside; and in particular that Tynwald is of the opinion that urgent action should be taken:

- (i) to set up flexible development zones in Douglas;*
- (ii) to transfer control of all Government land and buildings to a single strategic body;*
- (iii) to set up a development agency in partnership with local government and the private sector;*
- (iv) (omitted);*
- (v) to use the planning system, taxation and other potential incentives to encourage brownfield development*

A Progress Report in relation to the November 2018 Tynwald Resolution of the Development of Unoccupied Urban Sites was published in June 2019. The Cabinet Office committed to establish a new data set or register of unoccupied urban sites, commencing with the

¹ Hansard Extract for Item 7 of the Tynwald Court Sitting of 20th November 2018

preparation of a scoping report of how this will be implemented including: how sites will be defined, the level of detail required and how the data can be updated and shared.

A further update to the June 2019 Report was published in December 2019, in order to move forward with the implementation of the relevant recommendations identified in the Select Committee Report. The Report confirms that a scoping report has been prepared by Cabinet Office for the proposed new data set/ register of unoccupied urban sites which will complement the existing Residential Land Availability Study and Employment Land Review and datasets.

In respect of the approved Recommendations set out above, Cabinet Office (CO) has now prepared a Unoccupied Urban Sites Register (UUS Register), as attached in Appendix 1 of this report. The UUS Register will complement the existing Residential Land Availability Study and Employment Land Review and datasets. Cabinet Office shall remain the lead Department in updating the Register.

1.2 Status of the Register

The Register will be an information source and may form 'evidence' in the formation of policy documents such as development plans and it may be used as a material consideration in the determination of planning applications.

1.3 Purpose of the Register

The register is intended to facilitate the re-development of previously developed sites within existing settlement boundaries of key service centres that are currently vacant and under-used, by providing an easily accessible data source that clearly identifies and maps unoccupied urban sites on the Island.

Stakeholder engagement is a critical early step in the process of land assembly within the urban environment and it is hoped that the UUS Register will provide information in respect of unoccupied urban sites within Douglas and Onchan that helps to facilitate these early discussions between government, local authorities and private developers.

The Purpose of this register is not to identify every empty home or car park, but to encourage the development industry to assemble land, if required, and re-develop larger unoccupied urban sites that are currently blighting our townscapes.

Reference has been made to data sources that include potential development sites for which an appetite for development has been indicated, either through submission to the Call for Sites Exercise associated with the Area Plan process, or submission to DEFA through the planning application process. The Department of Enterprise frequently engage with developers who may wish to assemble land for development and at their request, we have referred to their Schedule of Disused/Potential Development Sites in Douglas. More information in respect of data sources is given in Section 7 of this report.

1.4 Geographical Scope of the Register

The initial focus will be on the Main Centre and Service Centres in the East but the UUS Register may be extended to cover Service Centres, Service Villages and Villages on an island wide basis after a review of the process.

1.5 Intended Users of the Register

The Register is intended for use by a range of interested stakeholders. This could include:-

- Government Departments tasked with promoting the re-development of government owned sites;
- A potential development agency that is tasked with the delivery of urban regeneration
- Local Authorities who would like to promote the re-development of vacant sites within their authority boundary;
- The Planning Authority (DEFA) who are tasked with assessing planning applications;
- Estate agents/surveyors who have been approached by potential investors who are interested in investing in the Island;
- Land owners who may wish to consolidate land assets; and

Developers that are looking for viable development opportunities within the main service centres.

1.6 Broad Focus of the Register

The broad focus for the register is intended to be as follows:-

- a 'UUS Register', in table form which will list and detail sites that are both unoccupied and in urban areas;
- It will be publically available and be designed so that it is simple to understand, update and to get access to;
- It will be as up to date as possible on each publication date but will not represent in itself any sort of marketing document;
- Both Government owned sites and privately owned sites will be included;
- Where particulars on sites are unknown, not available, or for any other reason are unable to be released publically, this will be specified, and
- The Register in terms of detail/data shall be kept manageable and all definitions and criteria used and data collection methods will be clear and agreed.

1.7 Composition of the Register

The UUS Register for the East is composed of the following documents:-

- An Unoccupied Urban Sites Report (East), with supporting appendices;
- The Unoccupied Urban Sites Register (East), and
- An Unoccupied Urban Sites Map (East) to show the locations of the unoccupied urban sites.

The UUS Register for the East will be updated at regular intervals, coinciding with updates to the Residential Land Availability Study.

This information will be used to support digital mapping methods that reference site specific information in an accessible format.

UUS Registers for other areas of the Island will follow, when the information becomes available.

1.8 Where Can I View the Unoccupied Urban Sites Register?

The Unoccupied Urban Sites Register can be found on the Cabinet Office web site as per the link below. A paper copy of the register is available to view at the Reception Area, 3rd Floor, Government Offices, Bucks Road, Douglas.

<https://www.gov.im/about-the-government/departments/cabinet-office/planning-policy/>

2 Defining 'Unoccupied Urban Site'

2.1 Definition of Unoccupied Urban Site

For the purposes of this register, an unoccupied urban site is defined as:-

An area of land, whether occupied by a building(s) or not which is within an identified settlement that has the potential for development. Generally, all sites which appear on the register will be previously developed land and fit with the definition set out in the Isle of Man Strategic Plan 2016 (or replacement thereof).

The definition of previously developed land located within Appendix 1 of the Strategic Plan 2016 is as follows:-

'Previously developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure'.

The definition includes defence buildings but excludes:-

- *Land that is or has been occupied by agricultural or forestry buildings*
- *Land that has been developed for minerals extraction or waste disposal by land fill purposes where provision for restoration has been made through development control procedures*
- *Land in built-up areas such as parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed*
- *Land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended in to the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).*

There is no presumption that land that is previously developed is necessary suitable for housing development nor that the whole of the curtilage should be developed.

3 Assessment Criteria

3.1 Determining the assessment criteria

In order to ensure that the selection process for inclusion on the list is objective and justifiable, assessment criteria have been identified and tested on a sample of sites and then further refined to arrive at a final set of assessment criteria as set out below in Table 1. All sites have been assessed using these assessment sheets.

Primary Assessment Criteria - a site must be able to show a positive response to the mandatory assessment criteria. Where this is achieved, further consideration can be given to the indicative assessment criteria.

Secondary Assessment Criteria – most sites included in the UUS Register show a positive response to all of the indicative assessment criteria. However, there are a small number of sites that don't achieve an affirmative response to one or two of the indicative assessment criteria, but have still been included in the register. Additional notes give further detail in these instances, to demonstrate the thought process for inclusion.

Table 1 illustrating an Example Assessment Sheet

Site Reference	
Primary Assessment Criteria	
Does the site form an area of previously developed land within an identified settlement?	
Secondary Assessment Criteria	
Is there evidence of an existing vehicular access into the site?	
Are former uses on the site redundant?	
Does the site serve as a visual detractor within the existing urban context?	
Does the site have the potential for re-development, allowing it to be brought back into active use?	
Recommendation and additional notes	

3.2 Basic Assumptions

Sites that fall outside of the settlement boundary will be excluded from the UUS Register. This will include sites that are located within Green Gaps.

Other exclusions include vacant office premises or vacant upper floors, as conversion may be an acceptable alternative in these instances.

Sites that fall within open space and/or sports pitches will also be excluded from the register.

4 Understanding the Economic Context

4.1 Economic Overview

The Island needs to be aware of how the global economic context has impacted, and continues to impact, the economy of the Island, and commercial decision making generally, in order to be able to respond effectively.

Out of town opportunities have been attractive to some businesses looking to expand their floor plate in new, larger premises, whilst retaining staff perks, such as car parking, although Business Policy 7 of the Strategic Plan restricts the re-location of offices, as set out below:

New office floor space should be located within town and village centres on land which is zoned for the purpose on the appropriate area plan; exceptionally, permission may be given for new office space:

(a) on approved Business Parks for Corporate Headquarters which do not involve day to day callers; or

(b) in buildings of acknowledged architectural or historic interest for which office use represents the only or most appropriate practicable and economic way of securing future use, renovation and maintenance.

In respect of Brexit, the Isle of Man could be affected by changes to our relationship with the EU regarding customs, and potentially VAT; we could face the imposition of tariffs on goods which are exported to the EU and other countries, affecting manufacturing, agricultural and fisheries products. There may also be implications for the free movement of people between the UK and the Crown Dependencies and the EU.

CoVID 19 has released many office workers from a fixed employment location and it would appear that home working is now a strong emerging trend, utilising digital technologies.

The Isle of Man Government Action Plan for Achieving Net Zero Emissions by 2050: Phase 1 (2020) contains a number of climate change targets that will impact on future decision making. Transport is a key target, and active travel measures will be promoted. This may also influence where people choose to live and work in the future.

5 Summary of Findings

5.1 Identified Sites

Thirty three sites have been identified for inclusion on the unoccupied urban sites register for the East (Appendix 1) and are broken down by land use allocations in the Area Plan for the East ², as follows:-

- 16 'Predominantly Residential' sites
- 17 'Mixed Use' sites

The allocations will be made final when the adopted plan is approved by Tynwald, with the Area Plan intended to become operative from 1st December 2020.

The total gross area of unoccupied urban sites on the Register equates to 19 hectares. However, each site presents with a variety of constraints that may limit the amount of developable land for each site. Development schemes for each site will initially identify the net developable area which will be assessed as part of the planning application process.

Applying site assumption criteria used for sites in the Area Plan for the East gives a ball park net figure of circa 13.3ha. This can be further broken down into 5.5 ha 'Predominantly Residential' and 8 ha 'Mixed Use', as identified within the adopted Area Plan for the East. Brownfield sites that fall within mixed use areas will allow for greater flexibility to meet market demand.

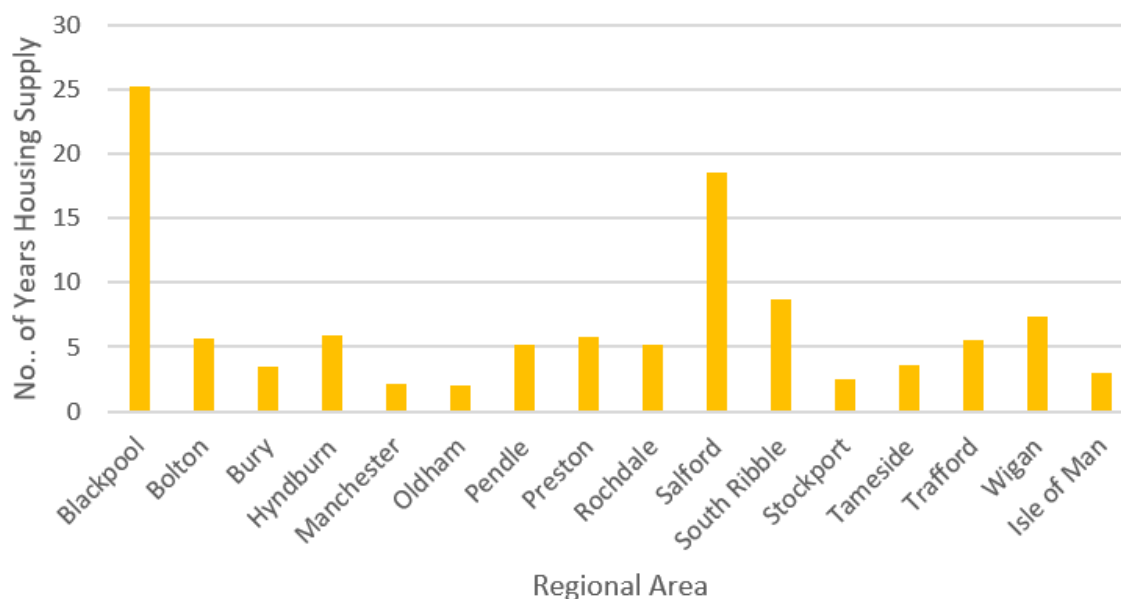
5.5 net hectares are owned by Government, with the future capacity to deliver 136 dwellings, and not requiring compulsory purchase.

484 dwellings are estimated to be deliverable on UU Sites, with the potential to meet up to 50% of housing demand in the East, equating to circa 3 years of housing supply, within the plan period up to 2026. However, enabling works may be required to bring these sites forward, so they might not be immediately available for re-development. The chart below shows a comparison of housing supply per to adjacent areas within the North West of the United Kingdom³. This gives a comparison of estimated housing demand in defined areas. Estimated housing demand for the Isle of Man relates to the East only.

² As identified in the Area Plan for the East

³ Figures have been extracted from Appendix 2 of The Gracechurch Group paper entitled 'Brownfield: The Housing Crisis Solved?', dated December 2017.

Graph to show the estimated housing supply on brownfield land within regional areas in the North West



14 planning applications have been submitted since 2016. Seven flats were approved before the Public Inquiry for the Area Plan for the East. Thirty eight flats and four houses have been approved since the Public Inquiry. One hot food takeaway has also been approved. Future care home provision on site UUs 15 (Glenside) has not been taken into account in the housing yield figures, as this will comprise institutional provision.

Consultation with stakeholders would suggest that there is an estimated 250,000 sq. ft. of vacant office space within Douglas town centre, attracting middle and lower bracket commercial rents, in addition to the combined area of unoccupied urban sites. This equates to circa 2.5 ha. The scope of this report doesn't cover vacant commercial premises, but the consultation summary table includes references to it, as it formed part of discussions in respect of UU sites. Section 6.3 includes a recommendation that a separate study be commissioned to gain a better understanding of the issues in respect of vacant office space in the lower to middle commercial rent brackets.

5.2 Emerging trends

The UUS Map (Appendix 2) shows emerging trends in respect of the location and size of unoccupied urban sites as follows:-

1. Coastal Zone - large vacant sites near to the harbour and promenade that are exposed to the risk of flooding;
2. Historic Core - small spot sites within the older building fabric of the historic core, including the Douglas Town Centre Boundary, but outside of the boundary of conservation areas;
3. Outer-lying Zone - large institutional sites situated within the wider Douglas area. Many of these sites are in government ownership.

Generally, planning approvals on identified unoccupied urban sites show a high lapse rate, and many recent applications are for interim uses only.

5.3 Key Issues

The following key issues have been identified:

- Re-location of Corporate Headquarters to edge of town is resulting in an over-supply of office provision in the lower to middle bracket of commercial rents in the town centre;
- Financial incentives aren't sufficiently competitive with developer incentives offered in other jurisdictions;
- Building Regulation requirements for conversion from office to residential add significant costs that influences investment decisions for new building instead of conversion;
- Other incentives that influence investment decisions, such as a strong leisure offer to support staff wellbeing, is limited in Douglas;
- Wider government policy in respect of car parking in Douglas town centre is currently not robust enough to deter rolling planning approvals for interim car parking;
- Wider government policy in respect of the management of government assets and associated public sector investment strategy needs to be in place, to catalyse private sector investment;
- Our current Property Marketing Strategy is reliant on traditional models of engagement and doesn't embrace digital tools that extend to a global audience;
- Land assembly is difficult and there is a reluctance to use compulsory purchase powers on the part of Government to assist with land assembly;
- Developer contribution negotiations involve consideration of viability. Negotiations are currently undertaken by planning professionals, who don't have the requisite chartered surveying skills to accurately assess viability;
- Environmental issues, such as flooding, unstable ground and falling rocks can deter investment.

5.4 Supporting Planning Legislation and Policies

Through the consultation process, the following planning legislation, planning policies and supporting documents have been identified that are helping to address some of the key issues identified above:-

- TCP (Change of Use) (Development) (No. 2) Order 2019 – this order provides planning approval for conversion within Douglas Town Centre, as set out in the schedules. Planning permission is no longer required for conversion in respect of specified use classes. This will help to support private investment within the town centre by speeding up the process for adaptation and re-use of existing buildings. This in turn will help to maintain the vitality of the town centre.
- Business Policy 10 of the Strategic Plan 2016 – this policy restricts retail development to within the town centre and prevents re-location of retail premises out of town, unless they are bulky goods. This will help to preserve the majority of retail footfall within the town centre, maintain the vitality of the town centre and provide viable options for private sector investment.

- Business Policy 7 of the Strategic Plan 2016 – this policy restricts office development to within the town centre and prevents re-location of office premises out of town, unless they fall within the definition of Corporate Headquarters, as defined in Appendix 1 of the Strategic Plan. Again, this will help to preserve retail footfall within the centre of town and maintain the vitality of the town centre.
- Conservation Area designation allows for the management of demolition through the planning process. The UUS Map clearly shows that management of demolition within our conservation areas has resulted in very few gaps sites within allocated conservation areas. The geographical extent of UU sites tends to be limited to areas outside of the conservation areas.
- The adopted Area Plan for the East restricts the supply of greenfield sites for development, and provides policy certainty in respect of unoccupied urban sites. The inclusion of residential and mixed land use allocations within the town centre will help to support the re-development of UU sites and provide easier access to finance. Compulsory Treatment Areas also afford opportunities for land assembly that can unlock difficult sites.
- The CACI Report is proving to be a useful marketing tool for marketing agents and will help to promote investment on the island.

Together, these policies combine to form a strong framework for a continued concentration of development within the town centre.

Adaptation and re-use of existing building stock by private investors is less risky. Subject to full approval of the Area Plan for the East, there is policy certainty for the re-development of unoccupied urban sites for residential and mixed land uses. This policy certainty will reduce planning risk and aid access to finance. This combined offer will support retail footfall within the town centre and help to maintain the vitality of the primary shopping areas and viability of private sector investment.

The inclusion of compulsory treatment areas within the Area Plan, coupled with the publication of the Unoccupied Urban Sites Register can encourage dialogue between interested stakeholders and support land assembly for the re-development of difficult sites.

Management of demolition can continue to be maintained through our existing Conservation Area designations, which should restrict the number of unoccupied urban sites in the future.

Taken together with the marketing tool afforded by the CACI Report, all of these policy measures will continue to encourage private sector investment within the town centre.

6 Recommendations

6.1 A Tailored Approach

The Island's advantages are not solely restricted to the tax system. Our advantages are many, including a single tier of government and small land mass when compared to neighbouring jurisdictions. Within the context of the Island overall, there are a limited number of unoccupied urban sites. With these advantages, we should be able to deliver a bespoke tailored approach to support the redevelopment of each UUS, that will be difficult to replicate in other jurisdictions.

Each UUS site is different and will come with its own set of challenges. Policies should be tailored to address the specific delivery challenges for each site. An independent assessment of viability would be essential to underpin an unbiased and transparent process that accords with good governance, and this may involve the appointment of an independent assessor that reviews a viability assessment, when instructed by a government official, or official representative within any proposed Development Agency.

Suggested tools within a tailored package to target public sector investment could include:

- Identification of a site for public sector investment within a long term government asset management strategy that serves as a catalyst for private sector investment within surrounding sites;
- Exercise compulsory purchase powers to aid land assembly
- Promote joint venture working, such as government undertaking to prepare exploratory surveys⁴, masterplans and design briefs/parameters;
- Consider land tax holidays for mixed use development within the town centre boundary;
- Relax developer contributions (e.g omit requirements for 25% affordable housing provision);
- Provide government assistance with Building Regulation Fees;
- Remove the requirement to pay planning fees.

Other suggested tools within a tailored package to incentivise private sector investment could include:

- Identification of the site for disposal within a long term government asset management strategy
- Government commissioning of design codes would help to increase developer certainty within the planning process
- The Tax Holiday could be reviewed to respond to anticipated demand and site viability.
- Where retention of a building is required, a tailored financial incentives package could include a grant to contribute towards the costs of works arising from compliance with Building Regulations
- Provide priority access to an independent viability assessment, and assess whether the scheme should be exempt from certain developer contributions.

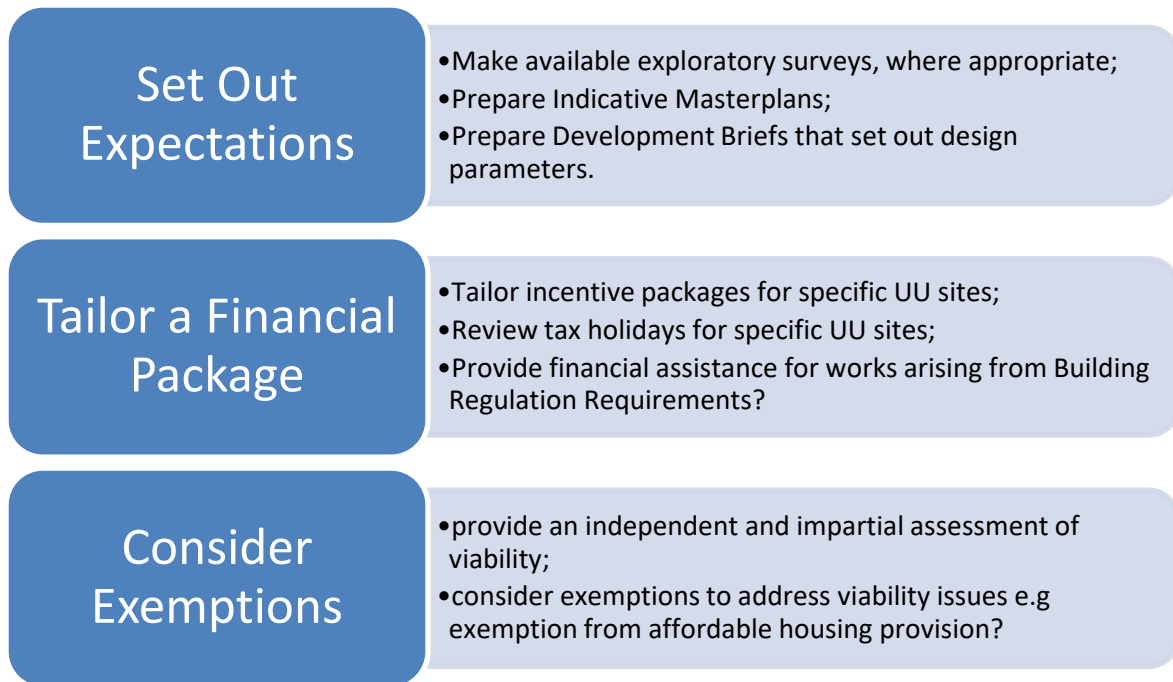
⁴ subject to insurance liability.

6.2 Future Policy Objectives

Future policy objectives should aim to:-

1. increase economic viability of urban sites;
2. make them as attractive to develop as greenfield sites; and
3. support with land assembly and prioritise planning applications.

The diagram below shows a suggested framework to support policy formation for UU sites.



6.3 Further Recommendations

A number of short term wins that could be completed in the next 6-9 months are laid out below:-

1. It is recommended that CIL Regulations be prepared and approved (CO);
2. It is recommended that the Government Integrated Transport Strategy be finalised and published (DOI);
3. It is recommended that the UUS Register be published, to include:-
 - a) identification of government reserved sites, and
 - b) the benefits of engagement to support land assembly within the unoccupied urban sites register (CO);
4. It is recommended that UU sites be fast tracked within the planning application system, including pre-application advice and planning applications (DEFA);
5. It is recommended that the Area Plan for the East be adopted (CO), and
6. It is recommended that the Flooding PPS be finalised (CO).
7. It is recommended that Government commit to providing access to an independent viability assessment for UU sites, in order to provide an unbiased evidence base that enables discussion in respect of financial support/incentives/exemptions.

Moving into the latter part of 2021 and into 2022, a number of actions that could be completed in the medium term include the following:-

8. It is recommended that a regular review and implementation of financial incentives be undertaken to:-
 - a) incentivise town centre residential and mixed use,
 - b) incentivise an emerging leisure offer;
 - c) respond to changing economic climates;
 - d) address financial barriers to development for a range of sites;
 - e) review the land tax holiday to support the development of other land uses, including mixed land uses within Douglas Town Centre.Any future review may also wish to review measures to assist with conversion costs associated with Building Regulation Requirements (various departments);
9. It is recommended that a comparison market study be prepared to assess the Island's competitiveness for attracting developer interest, when compared to other jurisdictions (DfE);
10. It is recommended that Government commit to the preparation of a public sector investment strategy that:
 - a) reviews expenditure of public sector funds raised from developer contributions;
 - b) catalyses private sector investment;
 - c) supports compulsory purchase for land assembly, and
 - d) support delivery of supporting infrastructure that will support key economic sectors (various departments);
11. It is recommended that a review be undertaken in respect of expenditure of funds raised from developer contributions, to
 - a) enable land assembly and the delivery of supporting infrastructure, and
 - b) catalyse private sector investment (Ty/CO);
12. It is recommended that Government commit to preparing a long term management strategy for government land assets, to include for:-
 - a) retention of strategic land assets;
 - b) disposal of land assets, and c) identification of strategic government reserves (Ty);
13. It is recommended that Government commit to developing a UUS Register Phase 2, to focus on:-
 - a) audience engagement and marketing, and
 - b) stakeholder engagement (DfE);
14. It is recommended that the marketing strategy for unoccupied urban sites be reviewed, to target a digital global audience (DfE);
15. It is recommended that Government support further measures to assist with land assembly, to include:-
 - a) compulsory purchase on a localised scale;
 - b) work with Douglas Borough Council to assemble land, and
 - c) prepare an evidence base to identify emerging land use trends within Douglas town centre post CoVID-19 (various departments);
16. It is recommended that Government commission a separate study to:
 - a) better understand the situation in respect of vacant office premises, and

- b) consider whether an internal review of the extent of the Douglas town centre boundary, as set out in the Town and Country Planning (Change of Use) (Development) (No. 2) Order 2019 is required (CO and DfE);
17. It is recommended that Development Briefs be prepared for sites included on the UUS Register that include requirements to address site specific barriers to development. Development briefs for UU Sites should not contradict development briefs within the Area Plan for the East (CO)

7 Data Sources

7.1 Referenced Data Sources

Information used to populate the UUS Register for the East has been obtained from the following Government sources:-

1. The Area Plan for the East process, including the initial site assessment framework stage during preliminary publicity. This information is detailed and provides a snapshot in time in respect of a specific site. It will be subject to change over time;
2. The latest Residential Land Availability Study (RLAS) Update 2020;
3. Schedule of disused / potential development sites in Douglas (DoE).

The first two sources detail potential development sites for which an appetite for development has been indicated, either through submission to the Call for Sites Exercise associated with the Area Plan process, or submission to DEFA through the planning application process.

The DoE frequently engage with developers who may wish to assemble land for development. The Department of Enterprise requested that we consider their Schedule of disused/potential development sites in Douglas.

7.2 Other Possible Data Sources

Over time, new or updated data may influence the Register. This may include the following:-

1. An update to the Employment Land Review;
2. Information arising from Special Planning Vehicle (SPV) Work and Progress;
3. Future iterations of the Vacant Property Review (VPR).⁵

7.3 Stakeholder Engagement

Cabinet Office and the Department for Enterprise has consulted with the following stakeholders:-

- Public Estates, Department of Infrastructure
- Strategy, Policy and Performance, Department of Infrastructure
- Business, Department for Enterprise
- Strategic Asset Management, Treasury
- Programme Management, Crown and External Relations
- Regeneration, Douglas Borough Council
- Chapman Chartered Surveyors
- Cowley Groves Estate Agents

⁵ for the purposes of the UUS Register for the East, the Review did not reveal any suitable sites that had not been identified by other sources.

8 Useful Contacts

Name	Role	Telephone	Email Address
Fiona Huyton	Planning Policy Team, Cabinet Office, 3 rd Floor, Government House, Bucks Road, Douglas, Isle of Man, IM1 3PN	01624 687371	fiona.huyton@gov.im
Stephen Moore	Policy Development Manager - Built Environment, St. George's Court, Upper Church Street, Douglas, Isle of Man, IM1 1EX	01624 685873	stephen.moore@gov.im

9 GDPR Statement

A pre-screening process was undertaken to assess whether a Privacy Impact Assessment is required, in respect of the publication of the UUS Register. A series of questions were asked, as set out in Table 2 below.

Table 2: GDPR Pre-screening Questions.

Questions	Response
1. Will the project involve the collection of new information about individuals?	No
2. Will the project compel individuals to provide information about themselves?	No
3. Will information about individuals be disclosed to organisations or people who have not previously had routine access to information?	No
4. Are you using information about individuals for a purpose it is currently not used for, or in a way it is not currently used for?	No
5. Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	No
6. Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	No
7. Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private?	No
8. Will the project require you to contact individuals in ways that they may find intrusive?	No

No questions were answered with a 'Yes', therefore a privacy impact assessment is not required.



The information in this leaflet can be provided in large print or audio tape on request.

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