

Cooil Road Development Order – Schedule of Comments

Cooil Road Issues Raised	Cooil Road Issues Code
Procedure	CR1
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Landscape/visual Impact	CR10
General/other	CR11

Comments Ordered by Issues Raised

Respondent	Issue	Comment	Support/ Object/ Comment
Mr B Larson Kilkenny Cottage Colooneys Lane	CR1	Is contrary to the Isle of Man Strategic Plan and the Braddan Local Plan. Believe that a Public Inquiry should be arranged into the proposed Development Order.	OBJECT
Dandara Holdings Ltd	CR1	The Draft Cooil Road Order is promoted on the basis that it is necessary to secure land for economic development in advance of the preparation of the Area Plan (Background Statement paragraph 1.2)	OBJECT

Mr Seamus Nugent		<p>and that there are no suitable alternative sites for this type of development (Background Statement 1.6). Furthermore the Draft Order is promoted on the basis that it will not prejudice parties with an interest in the development of the area as their views will be considered by an independent Inspector who will report to the Department (Background Statement 1.2).</p> <p>Given the basis upon which the Draft Order has been promoted it will be necessary for the independent Inspector to be given full and unfettered consideration to alternative sites. Furthermore as Dandara is promoting an alternative site its interests will be substantially prejudiced if it is not allowed to promote its Middle Farm site to the independent Inspector as an alternative proposal to be made the subject of a Development Order.</p> <p>The Company therefore request that the existing Draft Order be amended to allow of the Middle Farm Site to be promoted for development and considered as part of the Order process.</p>	OBJECT
Isle of Man Development Company Mr Baris Liptrout Morbaine Limited Cheshire	CR1	<p>There is no reason whatsoever to proceed with the Cool Road Development Order when enough land is available for at least the next 5 years, when insufficient research and justification has yet been made for the Cool Road Development Order, and when the Strategic Plan review will be completed and the East Area Plan adopted well within this 5 year period.</p>	OBJECT
Mr Andrew Jessop	CR1	<p>For the avoidance of doubt I wish to make it clear I strongly object to the making of this order. The main reasons for my objection - which are not exhaustive and I reserve the right to add or amend to these objections at the public inquiry (that should be held to 'test' the proposal) - are briefly as follows:</p> <p>1) The making of such an Order would be bad planning;</p> <p>2) The making of the Order would be contrary to many Strategic Plan policies <i>inter alia</i>: STP6, STP10, SPP1, 2, 3, 5; GP3 (g) in particular as no alternatives have been properly considered; ENVPI (see previous comment); ENVP2 & 14 the latter having not been properly considered, BP1 & 2; TP1.</p>	OBJECT
Mr John Quinn Kilkenny The Cool	CR1	<p>Having considered carefully the terms of the Proposed Development Order and the case of support has concluded that not only is it inappropriate but also that it is so contrary to acceptable planning policies and procedures that it is being promoted by you contrary to the rules of national justice.</p> <p>Invite you to withdraw the Proposed Development Order and to proceed with the Eastern Area Plan process which is clearly the proper procedure for you to follow.</p> <p>Is noted that the Department is promoting the Order as answering an overriding national need yet the Department has no interest itself in the identification of national need and in particular any national need for employment land uses. The Department's only interest in promoting any particular planning uses, save for its function of the administration and control of planning on the Island, is in the respect</p>	OBJECT

<p>Mr Henry Kennaugh Kiltrellig House Hillberry Green</p>	<p>CR1</p>	<p>of first time buyer schemes. It is not alleged that the land in question or its uses fall within the Department's own remit and accordingly there is an issue to be determined as to its locus and standing in relation to this matter. It is to be argued that the Department, in bringing forward the Development Order, does so to further a private entity's interests as the Department itself has no standing and thus the Department is acting ultra vires.</p> <p>The fact that the Department is promoting the Development Order at this stage in advance of the already scheduled Eastern Area Plan process is bad planning and an abuse of proper planning procedure. To use this procedure to satisfy a perceived demand in the Eastern Area for the next 20 years and to pre-empt the normal Area Plan process is clearly not using this Development Order as an interim measure to answer a perceived national need but rather as a long term solution which will not only rezone an area currently zoned as being of high landscape value and land in current economic agricultural use. Its zoning would also deprive other areas of the Island and in the Eastern Area in particular and the opportunity to share in the perceived economic success of the island by providing employment use land.</p> <p>States that the Inquiry must consider in full potential alternative sites advanced by parties with an interest in the development of the area.</p>
		<p>OBJECT</p> <p>The IDE&A review recommended that the implementation of one Area Plan was more suitable in the time frame than four Area Plans, thus providing a geographical Development Plan which considered development across the whole Island creating a more even development pattern, which would in turn distribute a fairer economic spread, which would be in accordance with the aims of the Strategic Plan.</p> <p>The Cooil Road Order is an illogical timed development proposal, it cuts across the formulation under the 1999 Act of the Department's duty to create a planning framework of Area Plans. The current fragmented framework is out of date and unreliable, and is not capable of producing robust decisions based on reliable data from where proper analysis has taken place.</p> <p>The size of the proposed development is disproportionate to any immediate needs, local or national. The site selection is based on limited information.</p> <p>Such a development proposal needs to be considered in the context of the Area Plan Process, the scale of this proposal for employment land arguably needs to be considered on an overall Island basis, which again begs the question of an All Island Area Plan. Zoning employment land on such a scale without being able to consider the location of residential provisions, amenities and evolving traffic movements from locations yet to be agreed is somewhat nonsensical.</p> <p>It is of concern by what process of identification or policy or why the DLGE has involved itself in the promotion to provide a proposed development by a private company to zone a green field site for the range of uses being identified. The gain from approval of this Order is clearly the company's as the</p>

		<p>Department has no interest in the land or its development. The planning proposal is purely a commercial venture, situated in a single location, it is difficult to recognise or identify any national gain in these circumstances.</p> <p>Best Practice principles advise that a development of a scale which may affect the outcome of the Area Plan should be considered as premature to the consideration of the Plan.</p> <p>It would be prudent for the Department to reflect on the recent refusals the Minister has accepted in the period that this Order has been in existence, where, planning proposals which were clearly including a large percentage of development established as national need (by Tynwald) were fundamentally refused as being premature to the Eastern Area Plan Process.</p> <p>The Greater Douglas Area can only be properly and professionally planned to create a sustainable program of development, redevelopment and much needed refurbishment through full and proper assessment of an Area Plan Process.</p>	OBJECT
<p>Port St Mary Commissioners Mr Barry Kelly</p>	CR1	<p>Pre-empts the Area Plan for the East, a process which is about to get underway. It is felt to be an abuse of the all Island planning framework which the Department, post the Mount Murray inquiry has accepted.</p> <p>Little evidence has been presented to show why this Draft Order is so urgent as to pre-empt the Eastern Area Plan process. The Ecotec report indicates there is significant office development space currently available within Douglas. By releasing land at Cool Road there will be less incentive for these town sites to be utilised.</p> <p>Pre-empts the report of the Tesco Stores Planning Application. Which should give guidance on the issues of (a) the economic effects of large retail operations to the Island wide retailing and (b) the use of 'edge of town' retailing.</p>	OBJECT
<p>Mr K Killian Callin Wild Number Fifty, Athol Street</p>	CR1	<p>It is considered that the Employment Land Availability Study does not do what the Inspector recommended. Has not been referred to the independent Inspector to see if he thought it was adequate. The representations received in respect of the ELA Study were not subject to any further independent consideration by the Inspector even though the ELA study would inevitably form the evidence base for the final policies within the ISP.</p> <p>Does not think that best practice according to Employment Land Review Guidance Note (December 2004) has been adhered to (UK Guidance) which advises that there should be three stages (1) taking stock of the existing situation (2) creating a picture of future land requirements and (3) identifying a new portfolio of sites.</p> <p>The ELA seems to rely on the abandoned Draft Braddan Plan as if it is established policy. Also relied on the flawed Employment Land Availability Study.</p> <p>Chapter 3 is fundamentally flawed in that it relies upon information gathered from the Department</p>	OBJECT

			<p>(DTI) seeking to promote the Development Order through the auspices of the Department (DLGE). However, the EIA (unlike the Ecotec report) refers to itself as having been produced by TEP "in support of a Development Order being promoted by the Department of Local Government and the Environment" as opposed to the DTI.</p> <p>Concerned that the Department's apparent predisposition to this development, namely the fact that the interests of a private developer appear to be one of the main driving forces for the Development order. Note with concern that there is reference in the EIA (para 3.35) to an agreed minimum annual take up of 2.02ha per annum. Query whether it is appropriate for the Department to be promoting this rather than the private land owner through the planning approval process.</p> <p>Requests a Public Inquiry.</p>	
Ramsey Chamber of Commerce Mr Chris Blatcher Chairman	CR2		<p>This land should not be available for future use as a retail park. If the land was to be used solely as light industrial or a business park then members would not express concern.</p>	COMMENT SUPPORT
Mr D B Buchanan Eurocars Ltd Director Peel Rd Douglas	CR2		<p>Would like to record support in favour of the Cooil Road Development Order 2010. There is a lack of suitable land on the Isle of Man for quality car showrooms and a shortage of off street display and parking areas. This causes additional congestion and inconvenience for pedestrians and motorists.</p> <p>Approval of the Order would improve conditions for all Manx residents and be a long term asset to the Isle of Man.</p>	SUPPORT
Mr A Kermode Porsche Centre Chester	CR2		<p>In 2002-2003 I had planning approved to build a state of the art dealership on the land in question. This dealership would combine the businesses I had on the island at the time with Volkswagen cars, Volkswagen commercial vehicles, Audi, Porsche, BMW and Mini. Although planning permission was granted this was overturned on appeal with Dandara objecting to the scheme. The net result was due to available land I was forced to dispose of my business at a loss of 30 plus jobs on the island and there is no longer an Audi or Porsche dealership. I am strongly in favour of the land being released for development.</p>	SUPPORT
Isle of Man Development Company Mr Baris Liptrott Morbaine Limited Cheshire	CR2		<p>The proposed uses within the Development Order site are set out at paragraph 3 of Schedule 2 of the draft Order. No objection is raised to any of the uses stated at (a) – (c). However, greater clarity is needed to the definition of Business Parks since it is unclear which document in annexed to the 2007 Order.</p>	OBJECT
Isle of Man Development	CR2		<p>Without prejudice to our submissions that the Order is premature, that the East Area has enough industrial land until the Strategic Plan is reviewed and the East Area Plan is prepared and that the</p>	OBJECT

<p>Company Mr Baris Liprott Morborne Limited Cheshire</p>		<p>order should be withdrawn altogether, if land was to be granted permission via a Cool Road Development Order then a much smaller hectareage should be approved than the 20 hectares currently proposed. If the 20 hectare proposal was reduced to 10 hectares then on the EIS's own estimates this would give the East Area 26.94 hectares of employment land (from 2007). If the 2.8 hectares at School Road and the 2.6 hectares at the IOM Business Park were subtracted (as suggested by the EIS) then 21.54 hectares would remain available. This would give 10.66 years supply from March 2007 – i.e. sufficient employment land until the beginning of 2018. This does not even allow for the EIS's under-estimate of available floorspace at the Spring Valley Industrial Estate (and who knows where else). Nor does it allow for the likely reduced annual take up of employment land now and post recession. This supply of Employment Land is more than enough for the needs of the East Area until such time as the Strategic Plan is reviewed and the East Area Plan is adopted.</p>	
<p>Mr John Blatcher JAC Distribution Ltd</p>	CR2	<p>Register our objections to this Order. Past planning decisions of this nature have been interpreted to allow retail developments under these descriptions; any further orders must be unambiguous in their interpretation.</p>	OBJECT
<p>Retail Committee of the Isle of Man Chamber of Commerce Mr Stephen Bradley Chairman</p>	CR2	<p>The re-zoning of land needs careful consideration. The Retail Committee are concerned that the very recent planning appeal decision on Unit 6 of the Spring Valley Industrial Estate (Pets at Home/Halfords) will have an impact on the remodeling of existing industrial areas/business parks and any land being brought forward by broadening the retail opportunities to ones beyond those intended by Tynwald for employment land, especially given its location on the outskirts of Douglas. Concerned that the interpretation of uses within classifications has been changed by the appeal decision. Shifting the emphasis from the Tynwald Order definition, to that provided by the Roger Tyn Study believe the nature and scope of all employment land has changed in that potentially the uses of employment land could now include an out of town retail park similar to many in the UK as the range of goods which could be sold as bulky goods has been effectively broadened by the Pets at Home/Halfords decision. Ask that DLGE consider drafting the guidance notes that the Inspector in the Pets at Home/Halfords Appeal considered are lacking in the Strategic Plan to assist with the definition of land permissible for retailing of bulky goods under Business Policy 5(a). Such guidance notes should allow a return to the previously held understanding of Chamber, DLGE and Tynwald on retailing of bulky goods.</p>	SUPPORT as long as stringent controls over the land not being used for retail purposes.
<p>Rose Lea Ltd Mr Barry Murphy Construction Design Ltd</p>	CR2	<p>The suggested use of the land owned by Rose Lea Ltd to be used as Business Park as defined in the Strategic Plan is acceptable. Rose Lea Ltd owns approximately 13% of the total land area and that land is located on the periphery of the site and as such would not wish to become isolated as part of</p>	COMMENT

		<p>the overall development.</p> <p>To ensure that the interests of Rose Lea Ltd are protected throughout future processes suggest that a Master Plan is required which encompasses the entire site. Amendment suggested:</p> <p>5(1) <i>A Master Plan for the development site as a whole, which indicates.....</i></p> <p>The Draft Order does not expressly state the proportion of the area which may be allocated to non-food superstores/retail warehousing. The Ecotec report does estimate it as being 13 1/3 % of the estimated total floor space ultimately likely (some 8000m²). If this estimate of the allocation of industrial floor space is correct then it is equivalent of the existing floorspace for convenience and comparison goods retailed for:</p> <ul style="list-style-type: none"> a) The whole of Ramsey or b) Double that provided with in Peel, or Tynwald Mills or Port Erin or Onchan <p>The potential in principle permission of further edge of town retailing (excluding motor vehicle dealerships) is strongly contested by Port St Mary Commissioners.</p>	OBJECT
<p>Port St Mary Commissioners Mr Barry Kelly</p>	CR2	<p>Abandoned Draft Modified Braddan Plan showed provision for an area of open space to be included between the western edge of the proposed industrial development and Colooney's lane to the western edge.</p> <p>Extent of the Business Park should be limited for the following reasons:</p> <ul style="list-style-type: none"> (a) To minimise the visual impact on residents in the Colooney's Lane/Cool area; (b) To maximise efficient and sustainable use of land (c) To provide a designated 'open space' between Colooney's Lane and the furthest westerly extent of the business park (d) To protect the water course located across the road from the Isle of Man business park (e) To ensure the bats in the area have as much of their environment protected as possible. <p>Consider an Open Space buffer would be entirely appropriate given the site layout, sustainability issues and the potential building height issue. Does not consider a 'landscaping' solution will assist. Includes site plan showing proposed extent of landscape buffer (<i>removes a considerable section of the site</i>)</p>	OBJECT
<p>Mr K Killian Callin Wild Number Fifty, Athol Street</p>	CR3	<p>The black line around the site should be amended in the North East corner alongside the Cool Road to include additional land (plan submitted). This extra land is needed in order to provide an appropriate roundabout junction at the proposed access road into the site.</p> <p>Concerns are primarily in respect to access. The EIA indicates access and internal roads located with the main body of the land area which are accepted as being indicative and would be subject to the production of a Master Plan as required in condition 5(1a). Transport issues would also have to be addressed as part of condition 5(2).</p>	COMMENT
<p>Tesdale Limited Mr Kaz Ryzner</p>	CR3		COMMENT
<p>Rose Lea Ltd Mr Barry Murphy Construction Design Ltd</p>	CR3		COMMENT

<p>Department of Transport Highways Division <i>(now part of the Department of Infrastructure)</i></p>	<p>CR3</p>	<p>There is an existing roundabout on Cool Road which provides access to the Isle of Man Business Park. Roundabout was designed with a spur leading onto the area of land which is subject to the Development Order. It would make sense to utilise this roundabout to access part of the proposed development with or without a link to the main body of the remainder of the land. This would ensure that the clients land does not become an isolated part of the development and could also be beneficial in allowing traffic to access the area designated as Business Park to do so without passing through area proposed as industrial. To allay client's immediate concerns of isolation and access we would ask that Condition 5 of Schedule 2 of the Order to be amended so as to include means of access and internal road infrastructure. Suggest following <i>5 (1) A Master plan which indicates – "Details of vehicular access and internal road infrastructure so as to provide convenient and safe access to all parts of the development land"</i></p> <p>The classification of Cool Road as the A6 Outer Link Primary Distributor route precludes the creation of minor frontage access onto Cool Road in accordance with the Highways Division's policy regarding access to the highway 2005.</p> <p>The creation of major accesses to the site can be taken from Cool Road subject to the design being prepared in accordance with Design Manual for Road and Bridge Works and being supported by a Transport Assessment. The geometry of Cool Road will probably result in major accesses being located opposite to the existing accesses. This would be acceptable to the Highways Division subject to the design of a suitable junction layout.</p> <p>A minimum of two points of access for emergency service access shall be provided. The actual number of accesses will be determined within the Transport Assessment which will be dependent upon the type and intensity of development proposed for the site.</p> <p>Vehicle access to the site must not be permitted from Colooneys Road.</p> <p>The location of the access roads within the development should not prevent the opportunity to create a road link between the A5 and the existing Cool Road Roundabout in the future.</p>	<p>COMMENT</p>
<p>Mr Peter Morrison Creg de Shee Collooneys Lane</p>	<p>CR4</p>	<p>As a resident of Colooney's Lane whose boundary borders on the land earmarked for development by this Order, I would like to take this opportunity to express my views at the above revised Development Order. I have lived at Creg de Shee since January 2000 and greatly value the privacy, quietude and open views that the property affords me.</p> <p>The southern boundary of my property - which looks down (south) to Garey Ashen, approximately 150 metres away - is protected by a fence of approximately 1.5 metres in height. This fence is approximately 2.5 metres away from the southern most wall of my house. I am greatly saddened to</p>	<p>OBJECT</p>

think that within the next few years as I sit in my conservatory, I will be looking out on to commercial buildings thronging with shoppers in extremely close proximity to my breakfast table. A downstairs bedroom window will be on similar public display. To use a cliché, it would be like living in a goldfish bowl.

The January 2010 draft still does not contain any specific restrictions on the maximum height of any new buildings. Nor does it stipulate how far away from my boundary they must be. It also fails to stipulate how rigorous must be the "proposals for screening the development from the buildings fronting on to Colooney's Lane south of the Cooil Crossroads". This rather vague clause is taken from the document entitled: THE TOWN AND COUNTRY PLANNING (COOIL ROAD) ORDER 2010, point 5, subsection 1b(iii).

Furthermore, it would appear that the once designated open space (pre- COOIL ROAD DEVELOPMENT ORDER 2006) separating Clybane Cottage, Creg de Shee and Garey Ashen from the proposed development site is still to be sacrificed for the sake of a maximum building density. As there are no detailed plans for the residents of Colooney's Lane to view, then this development could be literally feet away from our houses. And the phrase "landscaping scheme" is so indistinct that it singularly fails to provide us with any guarantees whatsoever regarding our privacy. Admittedly, you could argue that these matters will be dealt with on receipt of each individual planning application should the Development Order be passed. However, I must object to any proposed Development Order that does not initially guarantee my peace and my privacy.

As the Proposed Development Order currently stands, it would be perfectly possible for planning permission to be granted to erect light industrial or commercial buildings between Creg de Shee and Garey Ashen or for the construction of a road between Creg de Shee and Garey Ashen. Of course, I may be raising possibilities which may not even be in the minds of whatever private and public development consortium is driving this piece of legislation, but then I have not seen any plans of what the proposed development might look like. How about presenting for public consultation a scale model, a detailed architectural drawing or a 3D computer simulation? This would allow those most affected, such as myself, to have a clear and honest view of how well protected our properties will be from the new industrial park. Admittedly, any plans presented at this stage may not be able to incorporate the buildings that will eventually be erected ... but they could clearly indicate the maximum height of any such buildings, their proximity to my property and what, if any, screening there will be to protect my privacy.

		<p>To be quite honest, any buildings or road placed between Garey Ashen and Creg de Shee will destroy the peaceful rural quality of the property that I have lived in for the past ten years. Furthermore, I wish to advocate that there should still be an Open Space Designation between any proposed light industrial estate and Creg de Shee, Clybane Cottage and Garey Ashen so as to protect these dwellings from the undue noise and intrusion that this new development will inevitably bring. The extent of this undue noise and intrusion can be gleaned from the ECONOMIC IMPACT STUDY SUMMARY which states:</p> <p>"Our formative assessment suggests that a fully occupied Cooil Road development might potentially generate in the region of 1,100-1,500 additional jobs to the Eastern sector ..."</p> <p>Should the Order be progressed and a scheme is put forward for the development of the site, then a substantial buffer zone should be created between the estate and the houses on Collooney's lane.</p>	
<p>Braddan Commissioners Mr J C Whiteway Clerk to Braddan Commissioners</p>	CR4		COMMENT
<p>Mr K Killian Callin Wild Number Fifty, Athol Street</p>	CR4	<p>Business Park designation allows for the tallest buildings (18m) these will be at edge of the site closet to the existing countryside and potentially very close to the properties in Collooney's lane. These should be located away from residential properties. Entirely appropriate to preserve the rural/semi rural aspect of the Cooil area.</p> <p>The development order would create additional traffic and noise pollution in a largely rural area during and after the development to the detriment of residents in the surrounding area.</p>	OBJECT
<p>Mr B Larson Kilkenny Cottage Collooneys Lane</p>	CR5		OBJECT
<p>Tesdale Limited Mr Kaz Ryzner</p>	CR5	<p>Sub-paragraph 2). It is recommended in the interests of clarity that in the penultimate line the words "arising from" should replace the word "at".</p> <p>In relation to sub-paragraph (b) of condition 6, it is recommended that the words "<i>which includes an assessment of the transport issues relating to the proposed development, and</i>" be deleted on the grounds that the transport issues will already have been addressed as part of the requirement for the master plan under condition sub-paragraph 2) of condition 5. Also replace the word "at" in the penultimate line with the words "<i>arising from</i>". The condition would then read as follows; "<i>a report, prepared in consultation with the Department of Transport, which identifies what measures will be taken to deal with the anticipated traffic impacts arising from that phase of development.</i>"</p> <p>The provision of a footway along Cooil Road is required as part of any development</p>	COMMENT
Department of	CR5		COMMENT

<p>Transport Highways Division (<i>now part of the Department of Infrastructure</i>)</p>		<p>The provision of a bus lay-by on Cooil Road is required as part of any development. The road and footway within the development shall be designed in accordance with the Design Manual for Road and Bridge Works supported by a Transport Assessment. Convenient and safe pedestrian and cycling routes from the site to the existing industrial estate off Cooil Road are required as part of any development. The off street parking provision shall be in accordance with the Strategic Plan and supported by a Transport Assessment.</p>	
<p>Mr K Killian Callin Wild Number Fifty, Athol Street</p>	CR5	<p>Lack of sustainability of business park uses from transport point of view. The indicated road ways in the indicative Master Plan do not seem to lend themselves to any form of public transport being provided.</p>	OBJECT
<p>Dandara Holdings Ltd Mr Seamus Nugent</p>	CR6	<p>Dandara are interested in developing land within their ownership at Middle Farm (approximately 22 hectares immediately to the south east of the Energy from Waste Plant and it adjacent industrial area) for the uses proposed in the Draft Cooil Road Order. The Middle Farm site represents a superior site for this form of development when compared to the Cooil Site. The Middle Farm site is contiguous with an established industrial area and well served by existing infrastructure including highways. The area is not prominent in the landscape, in particular when viewed from public highways and its further development of industrial/commercial uses would not conflict with established neighbouring uses.</p> <p>The development of this site would not require Government to defray any infrastructure costs, in that for example the site can easily be connected to the nearby IRIS system.</p> <p>Further due to the fact large buildings will be developed, then the company would seriously investigate the provision of a district heating scheme from the adjacent EFW Plant using the steam generated from the incineration process as a means of heat source for use in the proposed development. Finally by extending the existing development this will not have any detrimental impact on the public at large during its construction and use phase, nor result in the removal or disturbance to existing features in the landscape. It was Dandara's intention to promote the development of this site through the Eastern Area Plan.</p>	OBJECT
<p>Ramsey Town Commissioners Mr P S Harrison</p>	CR6	<p>Rezoning of land at Cooil Road Braddan should not take place while there are other existing areas around the Island which are suitably zoned for the proposed purposes.</p>	OBJECT
<p>Mr John Quinn Kilkenny The Cooil</p>	CR6	<p>The only exception to General Policy 1 of the Strategic Plan which is relevant to the proposal at the Cooil Road is (g) <i>development recognised to be of overriding national need in land use planning terms and for which there is no reasonable and acceptable alternative.</i> The Department has not brought</p>	OBJECT

		<p>forward any evidence by way of studies or otherwise to seek to establish that there "is no reasonable and acceptable alternative". There has been no site selection process undertaken by the Department save for the Department expressing its own unsubstantiated and non-evidenced based views.</p> <p>The Department has rejected alternative sites on grounds that would apply to the Cooil Road Site. The Department claim that potential alternative sites are not suitable because they are classified as areas of High Landscape Value. The Cooil Road site is designated as an area of High Landscape Value. The Department claim that potential alternative sites are not suitable because they are areas of ecological interest – the Order requires ecological surveys to be undertaken to establish the ecological significance of the site.</p> <p>There are suitable superior alternative sites which require full and fair consideration before an independent inspector.</p>	
<p>Mr Henry Kennaugh Kitrellig House Hillberry Green</p>	CR6	<p>The overdue Eastern Area Plan will identify a range of redevelopment opportunities and brown field sites which could regenerate many underutilised and degenerating areas in the East and in planning terms be more beneficial to the appearance of the Greater Douglas Area, zoning a green field site before this analysis has taken place in an Area Plan Process will seriously damage that process.</p> <p>The scale of development proposed in this Planning Order is clearly going to undermine the Area Plan Process. The selection of this site has not been subjected to the proper rigor of that of an Area Plan Process. There has not been afforded the opportunity to bring forward other contending sites, no consideration has been given to the quality of the farm land, other contending sites would create that analysis process, its visual impact cannot be fairly assessed against other sites suitability.</p>	OBJECT
<p>Mr K Killian Callin Wild Number Fifty, Athol Street</p>	CR6	<p>It is quite clear from 9.1.5 of the Strategic Plan that there is available alternative land located near to the Airport "Gateway" which in only a reasonable and acceptable alternative but is also an available alternative. Furthermore the existing local plan designates the land as AHLV and accordingly there needs to be yet further exceptional grounds for the development proposed.</p> <p>In addition the emphasis of the existing Douglas Local Plan is to encourage development in the town centre. This ought particularly to be the case in relation to offices and corporate headquarters.</p> <p>Para 1.9 of the EIA non-technical summary and para 3.62 of the EIA establish the Dept view with regards to alternative sites. Para 3.62 states that "the issue of potential alternative sites will be set out in the Department's statement setting out the background to the Development Order". However, the background statement simply states "The Department does not consider there are suitable alternative sites for this type of development which meets spatial strategy and other policies in the approved Strategic Plan". Does not consider that this amounts to proper analysis, not least given the further statement that most of the potential areas around Douglas, Onchan and Braddan are classified as</p>	OBJECT

		<p>AHLV and coastal or scenic significance. Department has ignored that this designation applies to the proposed development area. Department's view is unreasonable as it ignores the fact that there are plenty of identified alternative available sites well located on the strategic highway network and close to the airport Gateway in particular.</p>	
<p>Mr B Larson Kilkenny Cottage Colooneys Lane</p> <p>DAFF Dr Richard Selman <i>(now part of the Department of Environment, Food and Agriculture)</i></p>	<p>CR7</p>	<p>The development order would have a negative impact on the wildlife in the area.</p>	<p>OBJECT</p>
<p>Mr Charlie Murray</p>	<p>CR7</p>	<p>Wildlife protection will centre around the protection of wetlands against damage and against pollution during construction, the retention of trees and hedges where possible (can any more be retained?), keeping lighting away from trees and hedges where bats may be present, and undertaking clearance outside of the bird breeding season (ideally September-February).</p> <p>It is good to see the retention of the wildlife area adjacent to the current roundabout (Field 3), though I notice that the internal road is proposed to cut through the hedge behind this. I see that bats, including brown long-eared (that forage in woodlands and along tree lines) were observed using the hedgeline (Hedge F) as a route and navigation line to the wetland area. Is it necessary to link the two sides of the site with a road, cutting off the wetland, or merely access them from different points? If it is necessary to put a road right through then could this hedge be retained with a relatively narrow gap in order that the gap for bat crossing is minimised (woodland bats will commonly avoid crossing open areas) and minimise road lighting at that point? If it were a cul-de-sac then bats could move around the other hedges and along the Cool Road but this will also be cut through. Narrow gaps won't matter, wide ones might.</p> <p>There is a wetland used for water treatment, linked to Robinsons. Although I would think that this is mainly outside of the site, there is great potential to damage this either directly or through damage to the shallow pipe connecting the wetland to Robinsons. I recommend that you discuss this with Dru Leoidson, who has organised the running of the wetland. The other wetland is better protected due to the hedges though clear fencing will be necessary to protect it during works.</p> <p>Concerned that any Department that is prepared to do an environmental impact study from a desk in a couple of months on an area of land which changes throughout the year. That is so important to the wild life of the area and I stress PROTECTED wild life BIRDS OF PREY, BATS, FROGS, which all live and feed on this land, which are protected by law suddenly disappear when a large developer or government body want to develop land.</p> <p>I am sorry but this kind of thing makes both my Family and myself ashamed to be MANX as any were</p>	<p>COMMENT</p>
			<p>OBJECT</p>

Tesdale Limited Mr Kaz Ryzner	CR7	else in the world the Government try to protect the environment . To destroy it for just profit is a sin Sub-paragraphs 3 and 4 These conditions are unnecessary and should be deleted in the light of the extensive ecological survey work already carried out as part of the EIA. No further ecological surveys are necessary. It has been fully established that the site does not, and is not suitable to support a population of either frogs or lizards. There was no evidence of bat roosts on site and Manx Wildlife Trust concluded that the site had low suitability for bat roosting and foraging. See chapter 6 of the EIA and accompanying surveys at Appendices 6-8.	COMMENT (seems at odds with the comments from DAFF/DEFA)
Manx National Heritage Dr Foxon	CR7	Schedule 2: Condition 6 sub-paragraph (a) of condition 6 should be deleted. The areas of wetland an open water on site would fall within the Isle of Man's commitment to the Ramsar Convention, which directs contracting parties to make 'wise use of wetlands'. Measures proposed to preserve and enhance the wildlife value of the pond and wetland area in field 3 are to be welcomed. It is essential that all measures necessary to intercept possible pollution exiting the site are operational as development is realised in order to protect the river and comply with the Islands responsibilities under Ramsar. The use of native trees and shrubs in planting schemes would benefit some of the wildlife which would otherwise be displaced. Used imaginatively, and with aftercare, native species could, over time, provide an effective screen to the industrial development as well as supplying new habitats. Would prefer to work around the sites likely to be inhabited by swallows or bats and to try and accommodate them within the existing buildings than providing bat roosting or bird boxes.	COMMENT
Mr K Killian Callin Wild Number Fifty, Athol Street	CR7	The reporting in the EIA of an absence of areas of recognised significant wildlife value is noted. However, there are clearly still some areas of wildlife interest which will be lost as a result of development and it is appropriate for there to be conditions which limit the damage or provide mitigating habitat enhancement. MNH therefore supports the conditions 5(3), 5(4) and 6(a). Feels that there is a significant risk of pollutions of the watercourse during the construction phase and also on an ongoing basis. Takes issue the para 6.68 of the EIA which states that only very low levels of bat activity were recorded during survey. Includes DVD evidence to back claims that Collooney's Lane/ Vicarage Road is an area of significant bat activity and therefore it would be entirely appropriate for there to be a buffer of open space to best preserve the existing natural landscape and maximise the mitigation of any development required in the national need.	OBJECT

<p>Mr B Larson Kilkenny Cottage Colooneys Lane</p>	<p>CR8</p>	<p>There is no need for a further development of commercial and industrial purposes. The forecasted generation of jobs and other economic benefits set out in the Economic Impact Study are hugely exaggerated and without foundation.</p>	<p>OBJECT</p>
<p>Isle of Man Development Company Mr Baris Liptrott Morbaine Limited Cheshire</p>	<p>CR8</p>	<p>The authors of the Economic Impact Study (EIS) readily accept that it provides a far from thorough analysis of the economic position. Indeed the EIS states that: Further research may be necessary to produce a cogent economic argument in support of the Development Order (para 1.2). Assumptions have had to be made by the EIS and no local surveys have been carried out (paras 5.2.2, 5.2.3, 5.3). It should be stressed that the impact assessment is highly speculative in nature, and is based on limited information and available data. Looking forward, it should be clear that the scope and scale of any future impacts accruing from the Cool Road approval will necessarily be dependent on a range of factors, many of which are currently unknown (para 5.3). It is clear that the EIS does not provide a sound basis for progressing the Cool Road Order. By their own admission, the authors of the EIS consider that more work is required in order to properly assess requirements before any such Development Order is considered. The contents and conclusions of the EIS provide insufficient justification for an inspector to reasonably consider and endorse the Development Order. The proposed Cool Road Order is therefore premature and should be withdrawn until such time as necessary further investigative work has been undertaken, at which time this further work can be analysed thoroughly before an Inspector. The Employment Land Availability Study is out of date and the findings should not be relied on. 2007 study identifies 16.94 hectares of land as being available for employment use in the East of the Island. Based on this figure the ELAS's agreed land take up of 2.02 hectares per annum gives an 8.4 year supply of employment land in the East Area, this supply taking us from March 2007 to late summer 2015. The study does not provide an accurate assessment of available floorspace figures for the Spring Valley Industrial Estate; in this regard the EIS states that only 2250sq m of floorspace is vacant at the Spring Valley Industrial Estate and the Isle of Man Business Park, whereas the Spring Valley Industrial Estate alone has 2557 sq m of vacant floorspace (evidence provided). Who knows where else under-provision has been assumed by the EIS. The Isle of Man Development Company recently applied for retail development on 0.57 hectares of employment land at Spring Valley Trading Estate. In its report to Planning Committee on 30.09.09 the DLGE stated that "it is not considered that this would significantly undermine availability of employment land". The Minister granted consent for this development – land availability cannot, therefore, be at critical levels.</p>	<p>OBJECT</p>

<p>Mr Peter Morrison Creg de Shee Collooneys Lane</p>	<p>CR8</p>	<p>further concern that I have is regarding the projected revenue to be generated by the development. The ECONOMIC IMPACT STUDY SUMMARY states:</p> <p>"In terms of contribution to national income, it might be anticipated that a fully occupied development at Cool Road could generate in the order of £62-83 million to the Eastern sector, and perhaps £73-101 million overall annually to the Isle of Man's GDP."</p> <p>Presumably the above calculations were made before the unforeseen bombshell of the re-calculation of the VAT formula with the UK in October 2010. Therefore, the economic assessments in the ECONOMIC IMPACT STUDY are now surely out of date? Does this study still really provide a sound economic basis for the 2010 Development Order? Furthermore, in the light of the world recession, how likely is it that a site consisting of 19.8 hectares could generate a contribution to Manx national income of between 3% and 5% of overall GDP? In any case, for any income from the site to make a positive contribution to the Manx economy, it would have to result in income from new business to the Isle of Man and not income from relocated existing businesses. Is this site really likely to attract that volume of business to the Island, either to the site itself or to the vacated premises of existing businesses which have relocated to the site? Or is it merely likely to encourage the relocation of existing businesses thus leaving empty premises dotted elsewhere around the Island?</p>	<p>OBJECT</p>
<p>Mr Mike Shaw Cemex Island Aggregates Ltd</p>	<p>CR8</p>	<p>For reasons outlined earlier in this submission, I am not convinced that the economic case as stated in the ECONOMIC IMPACT STUDY SUMMARY is realistic and, therefore, I am not convinced that the development of this site does satisfy an "overriding national need".</p> <p>Cemex Island Aggregates Limited are near neighbours to the proposed Development Area. As has been evident over a number of years, the Isle of Man's economic development has been hindered by a lack of zoned land, suitable for light industrial, commercial and housing. Land ready serviced by transport infrastructure and with good road access to and from Douglas Harbour.</p> <p>As can be seen in the DTI's Economic Impact Study, there is a recognised need for this type of development land and the Cool Road site, shown in the Draft Plan would appear to be ideal for this useage. Provided protection from uncontrolled, unsuitable development is granted by careful application of the island's Planning Procedures, we at Cemex IAL would fully support this proposed Development Order.</p>	<p>SUPPORT</p>
<p>Mr John Swindlehurst Ballacubbon Farm Richmond Hill</p>	<p>CR8</p>	<p>I wish to place my objection to the proposed planning order at Cool Road.</p> <p>In this present economic climate there are many industrial units at already established Industrial Sites around the island lying empty. Surely the drive should be to encourage trade to utilise the existing</p>	<p>OBJECT</p>

	COMMENT
<p>Braddan Commissioners Mr J C Whiteway Clerk to Braddan Commissioners</p>	<p>infrastructure and empty sites rather than creating another building site. Should be confirmed that the Department has actually assessed the all island need before proposing this Order and that the decision to approve the Order is not simply focused on the eastern area of the island.</p>
<p>Retail Committee of the Isle of Man Chamber of Commerce Mr Stephen Bradley Chairman</p>	<p>CR8</p> <p>Can see from the Employment Land Availability Report provided by DLGE in April 2007 that there is a shortage of zoned employment land in the Douglas area.</p>
<p>Mr John Quinn Kilkenny The Cooil</p>	<p>CR8</p> <p>The Department has not brought forward any evidence to establish an overriding need for "mixed commercial and industrial purposes". The reliance on a study prepared for DTI will be challenged. The study does not address a national need for "a mixed use development" but rather seeks to identify a separate need for offices, a separate need for light industrial and a separate need for car showrooms. Study seeks to identify that the development would have considerable benefits in terms of the number of jobs created but there is no consideration as to where the people in these new jobs might live. So it promotes employment land uses with no associated housing supply in the Eastern Area. The Assessment focuses on the Eastern Area and it not therefore an assessment of or evidence of a national overriding economic need. It is not appropriate to use a Development Order justifies on an overriding national need basis when it promotes a range of proposed uses; technology, warehousing, car showrooms and offices. It is a scattergun approach totally contrary to the principles of proper planning process and procedures. The Department has not established that any need must be addressed immediately and cannot await preparation of the Eastern Area Plan. The Department has not adequately taken into consideration English Planning Guidance namely PPS12 and UK Department of the Environment guide for Development Plans – a good practice guide. Claims that if we had followed PPS 12 we would have undertaken a sustainability appraisal, an urban capacity study and a housing needs survey. The Department asserts that there is an undersupply of land available for industrial use in the Eastern Sector at the present time. This assertion is challenged. The undersupply of land if any is a matter to be addressed in Area Plans. Planning applications made to address the undersupply of land for</p>
	<p>SUPPORT</p>
	<p>OBJECT</p>

		residential purposes have consistently been refused by the Department as being premature in advance of Area Plans. Economic Study does not address the issue of the whole Island's needs or the impact on the other areas.	
Mr Henry Kennaugh Kiltellig House Hilberry Green	CR8	The Department should not be promoting Planning Orders focused on National Need relying on a hope basis. A private company's proposal to encourage economic development and employment in one particular area cannot constitute to be of National Importance, if that was the case the Department would be inundated with similar hope full proposals focused on economic and employment predictions. The Department clearly needs to clarify before any more public money is expended a clear definition through Tynwald interpreting national need in relation to private commercial ventures where Government have no ownership and where alternative sites are available and suitable in other areas. There is no sustainable evidence that the Islands economy will suffer if this Order is withdrawn and awaits to be considered as part of a full and comprehensive process and be considered within and evolve as part of the planning framework process.	OBJECT
Port St Mary Commissioners Mr Barry Kelly	CR8	The Strategic Plan and the Draft Area Plan for the South recognise that there is significant existing land availability in and around the Airport/Ballasalla area. There is already the proposal to reclassify Ronaldsway Industrial Estate a Business park. At Baltane Industrial Estate approximately half the designated area has yet to be utilised. Ecotec report is flawed as there is no comparative of the all island benefit between permitting Cool Road development and developing elsewhere. Permittin the Order at this point in time will do little to encourage economic regeneration of the Airport/Ballasalla industrial/business areas which is recent years have seen closure and relocation of several light manufacturing enterprises overseas. Does nothing to achieve the decentralisation of employment opportunities that Tynwald and Government have states to be their aim. Port St Mary Commissioners believe the economic development opportunity should be for the Southern Area of the Island rather than the Douglas conurbation.	OBJECT
Mr K Killian Callin Wild Number Fifty, Athol Street	CR8	The Economic Impact Study should not be limited to look only at the Eastern Area. It is further flawed by its reliance on the abandoned draft Braddan Plan. States that there is an over-supply of land already zoned for business park use within existing business parks and an over-supply of land already zoned for headquarters business park use within Douglas. Of the opinion that only Honda would be in a position to relocate at the Cool Road as all the other car sales showrooms located within Douglas are second hand car sales. The relocation of car show rooms does not constitute over-riding national need and for which there is no reasonable and acceptable alternative.	OBJECT

<p>Tesdale Limited Mr Kaz Ryzner</p>	<p>CR9</p>	<p>Following a recent detailed assessment of the heritage issues by our consultant Paul Chadwick of CgMs, it is considered that the proposed conditions are unnecessarily onerous. There is no reasonable basis for requiring the retention of Ballavagher farmhouse and its garden or the stone constructed farm buildings; nor the in situ preservation, wherever possible, of all archaeological remains. Furthermore, ground conditions on the site mean that it would not be possible to have a geophysical survey of the whole site. Accordingly these sub-paragraphs of condition 5 should be replaced with the following wording;</p> <p>5) <i>A geophysical survey of those parts of the site (as shown on the attached plan) and a fieldwalking survey of any ploughed fields within the site.</i></p> <p>6) <i>Such further archaeological investigations as may be identified as required as a result of the geophysical and field walking surveys.</i></p> <p>7) <i>a) Proposals for mitigating the impact of development on any archaeological sites so identified by the geophysical and fieldwalking surveys.</i></p> <p><i>b) the provision for a suitable record of Ballavagher Farmhouse, associated 19th century farm buildings and its historic gardens prior to demolition and development.</i></p>	<p>COMMENT</p>
<p>Manx National Heritage Dr Foxon</p>	<p>CR9</p>	<p>Wish to record strong support for the retention of Ballavagher farmhouse and potentially also the stone farm buildings. (highlight contradiction between Draft Order Conditions and para 6.46 of the EIA – order seeks to protect the buildings whereas the EIA seems indicate the loss of all buildings).</p> <p>Endorse the precautionary approach taken by the chapter on cultural heritage within the EIA. In particular its emphasis on the prehistoric cultural potential of the area and the historical interest of Ballavagher farmstead.</p> <p>Welcome the proposals for a geophysical survey of the site but it should be recognised that this is only one of several methodologies which could or should be employed to further understanding of the archaeological potential of the site.</p> <p>Note that 5(6) requires a full assessment of the risks to archaeological remains within the site whilst condition 5(7) requires the preparation of a mitigation strategy, with emphasis on preservation in situ and a requirement to retain Ballavagher farmhouse, stone buildings and planned garden.</p>	<p>COMMENT</p>

		<p>Note that only a very preliminary cultural assessment of the Ballavagher garden was undertaken as part of the EIA. We therefore suggest that the Ballavagher farmhouse, stone outbuildings and garden should be the subject of appropriate historical survey, which may of course demonstrate that the outbuildings and garden are of limited historical significance. However we note that the established garden also has potential ecological value and as such its retention and continued association with the farmhouse as required by Condition 5(7) has our full support. It is possible of course that a careful historical survey may elucidate that a certain amount of alteration is both acceptable and desirable as a means of finding a continued use for the farmhouse, guaranteeing its preservation into the future.</p> <p>Note that the assessment strategy, including any proposed geophysical survey, should be discussed with MNH.</p>	
<p>Mr B Larson Kilkenny Cottage Colooneys Lane</p>	CR10	The development order would have a negative effect on the landscape in the area.	OBJECT
<p>Mr John Swindlehurst Ballacubbon Farm Richmond Hill</p>	CR10	<p>This area has already had its fair share of industrial development with the Incinerator, Ballapaddag and Eden Park, there is major road works taking place and there is still development in the Ballafletcher Estate and Cooil Estate. The visual impact will also be huge and I believe so too will the light pollution and noise pollution from the build and any industrial residents in the future.</p>	OBJECT
<p>Tesdale Limited Mr Kaz Ryzner</p>	CR10	<p>Schedule 2 Condition 5 sub-paragraph 1) (b) (ii) Should be reworded to read: <i>"proposals for plantings designed to mitigate any adverse visual impact of the development when viewed from the buildings fronting on to Colooney's Lane south of the Cooil Crossroads".</i> This would be consistent with previous paragraph.</p>	COMMENT
<p>Manx National Heritage Dr Foxon</p>	CR10	<p>Potential visual impact experienced by public visitors to the Home of Rest for Old Horses does not seem to have been taken into account in the consideration of potential Visual Receptor Points. Has been assessed purely as a 'private' receptor, whereas it is a popular visitor destination. It will be necessary to ensure that screening of the Cooil Road development is sufficient to preserve this view which is part of the visitor experience.</p>	COMMENT
<p>Isle of Man Water Authority Mr Leece Head of Service Delivery</p>	CR11	<p>Provision of water supplies for domestic purposes</p> <p>The area proposed for the development is outside the Authority's compulsory area of supply, the Authority has no obligation to provide water for domestic purposes, the developer would be responsible for the cost of any mains and services within the development and also getting the water</p>	COMMENT

		from the nearest trunk main to that development.	
		<p>Provision of water supplies for non domestic use</p> <p>Under the provisions Water Act 1991 the Authority may contract for the supply of water-</p> <p>(a) to persons within the compulsory area of supply to be used for trade purposes or for purposes other than domestic use; and</p> <p>(b) to persons outside the compulsory area for the supply of water for any purpose; at such rates or charges and upon such terms and conditions as may be fixed by the Authority.</p> <p>Although we are not under a duty to provide a supply for non domestic use we endeavour to meet our customers' needs wherever possible. Where reinforcement of our system is required to provide a supply, we will expect the developer to contribute fully to the costs of any necessary works.</p> <p>Like to express support for the Development Order on the South of Cooil Road. Our company along with several other Manx companies have been involved with earlier developments on this site and have been eagerly awaiting the allocation of this land. The development will provide some much needed work for many Manx companies and will be spread widely within the Manx construction industry. In addition my company is interested in taking up several units on this key site once developed.</p>	SUPPORT
Mr J Cubbon JCK Ltd Balthane Industrial Estate	CR11		
Port Erin Commissioners Mr Cowin	CR11	Express concern over the proposed development order and in particular to the possible detrimental effect it could have on the outlying regions of the Island especially the South. The proposals are also seen as being contradictory especially when central Government are currently promoting and funding various regional regeneration schemes as well as attempting to promote decentralisation.	OBJECT
Mr S Green Green-Powers Electrical Ltd Port Erin	CR11	Like to express support for the Development Order on the South of the Cooil Road, Braddan. Our company along with several other Manx companies, have been involved with earlier developments on the site and have been eagerly anticipating the allocation of this land for future developments. Development on this land will not only provide much needed facilities for local Manx companies but will also utilise many of the existing local Manx construction companies in future works. As the land has been partially developed already, this site would be ideal for further development as services and logistics have already been established.	SUPPORT
Mr Peter Morrison Greg de Shee Collooneys Lane	CR11	I would like to raise a concern about agricultural land being sacrificed for commercial development. Now that we live in an age in which Global Warming has become an accepted fact and in which climate change is predicted to devastate many of the world' s major food growing areas by 2050, why	OBJECT

		is prime farm land not being preserved? The situation is further exacerbated by a world population growth trend which is estimated to reach 9 billion by the year 2040. Surely, it should be government policy to preserve as much farm land as possible so as to protect the Island from the inevitable food price hikes (if not food shortages) which lie not so many years hence. Long-term strategic planning, therefore, would suggest that another less fertile site would be better suited to such a development.	
Retail Committee of the Isle of Man Chamber of Commerce Mr Stephen Bradley Chairman	CR11	The Chamber of Commerce and the Retail Committee of the Chamber of Commerce are supportive of plans for economic development, including the Cooil Road Development Order, especially in these uncertain times.	SUPPORT
Chief Secretary's Office Mrs Linda McCauley	CR11	Information noted – no further comments.	
Tesdale Limited Mr Kaz Ryzner	CR11	Fully support the principle of the Draft Development Order. However they have a number of objections to the detailed wording of part of the Order.	SUPPORT
Manx National Heritage Dr Foxon	CR11	Unclear in the draft Order there the responsibilities lie for compliance with the proposed Conditions of Approval. It may be helpful to clarify who is to make the 'first application' and thereby take on the burden of the master plan and other reports, surveys and mitigation. Would the Order as drafted remain workable were the existing owner to divide the property before the first application was made. Feel that to avoid confusion caused by the numbering scheme of the sub-conditions within the table these should be renumbered 5.1-5.7 Note that the draft conditions contained within the draft Order were drawn up by the Planning Office without reference to MNH. Suggest that the order of 5(5) and 5(6) should be reversed.	COMMENT
Rose Lea Ltd Mr Barry Murphy Construction Design Ltd	CR11	Acting as agent for Rose Lea Ltd who own approximately 7 acres of land in the area stretching from the roundabout at IOM business park to the boundary with Collooney's Lane (site plan submitted). In general terms Rose Lea Ltd welcome the Order and accepts the conditions, with some minor reservations.	SUPPORT
Department of Transport Drainage Division (now part of the Water and Sewerage	CR11	The supporting information in relation to this proposed development order does not give any indication of the existing drainage problems that are associated with the land. They previously compiled a report detailing the existing sewerage constraints on the proposed development land together with options for the foul and surface water disposal. The report at the time firmly stated that there should be no discharge from the proposed development land into the existing Douglas drainage system, due to	COMMENT

<i>Authority)</i>			
	<p>flooding occurrences downstream.</p> <p>Recent hydraulic model assessments indicate that in order to alleviate some of the downstream flooding, approximately 600m of combined sewer from the Anagh Coar junction to the NSC entrance would have to be upgraded in order to accommodate flows from the proposed development. Due to the scale of downstream works, this option has been dismissed.</p> <p>Drainage division outline two options</p> <ol style="list-style-type: none"> 1) The installation of a standalone sewage treatment works (STW) to cater for all foul flows generated from the entire development, or 2) The construction of a single foul pump station to transfer the development flows directly to White Hoe therefore bypassing the Douglas catchment. <p>Although Douglas is connected to the IRIS system, the proposed industrial land would not be and would therefore standalone. The long term use of standalone treatment plants has recently been questioned by the Planning Committee for a recent housing development at Peel.</p> <p>Drainage option (1) could be contrary to Infrastructure Policy 1 of the Strategic Plan if a standalone treatment plan was utilised – however this is an issue for the Planning Committee to determine as the SSTW would not be adopted by the Department.</p>	OBJECT	
<p>Port St Mary Commissioners Mr Barry Kelly</p>	CR11		
<p>Ballachrink Limited Dickinson Cruikshank, Ramsey</p>	CR11		OBJECT

