

COOIL ROAD DEVELOPMENT ORDER INQUIRY

Comments on Alternative site suggested by Mr H Kennaugh

1. Background

- 1.1 Mr Kennaugh's suggested alternative site (see **Appendix 1**) was produced at the inquiry late in the afternoon of Friday 8th October. This statement is an initial response by the Department in an effort to be of assistance to the Inquiry.
- 1.2 The Department reserves the right to respond to any further comments from any of the parties at the Inquiry to the information or assessments included in this statement.

2. Braddan Plan

- 2.1 The area on the plan submitted by Mr Kennaugh corresponds to Area 25 Port-e-Chee in the Braddan Parish Plan MDWS 2003 (CD 7). An extract of the proposals map showing Area 25 and the Cooil Road Development Order land is attached as **Appendix 2**.

- 2.2 The site was proposed for residential development with background information set out in paragraphs 4.115 to 4.123 on pages 59-61 of the MDWS 2003 (CD7).

- 2.3 Development constraints are listed in those paragraphs and include:

- Landscape Impact – Paragraphs 4.116 and 4.119
- Access – Paragraph 4.117
- Drainage – Paragraph 4.117
- Ecological interest – Paragraph 4.118
- Archaeological interest – Paragraph 4.118
- Water Supply – Paragraph 4.120
- Phasing – Paragraph 4.120, 4.121

- 2.4 Development of the site was proposed subject to specific requirements in proposal

B/RES/PR/28 PORT-E-CHEE – Area 25 in the Issues and Options Document –

Paragraph 4.185 Page 78 of the MDWS 2003

- 2.5 The Development Brief in that proposal referred to 7 requirements which can be summarised as:

1. Comprehensive plan including phasing
2. Comprehensive landscaping plan
3. Built development to be in clusters separated by significant planting/public open space
4. Variety of house type and densities
5. Evaluation of areas of archaeological and nature conservation interest
6. Phased development only after other specified housing sites
7. Highway access

3. Braddan Plan Inquiry

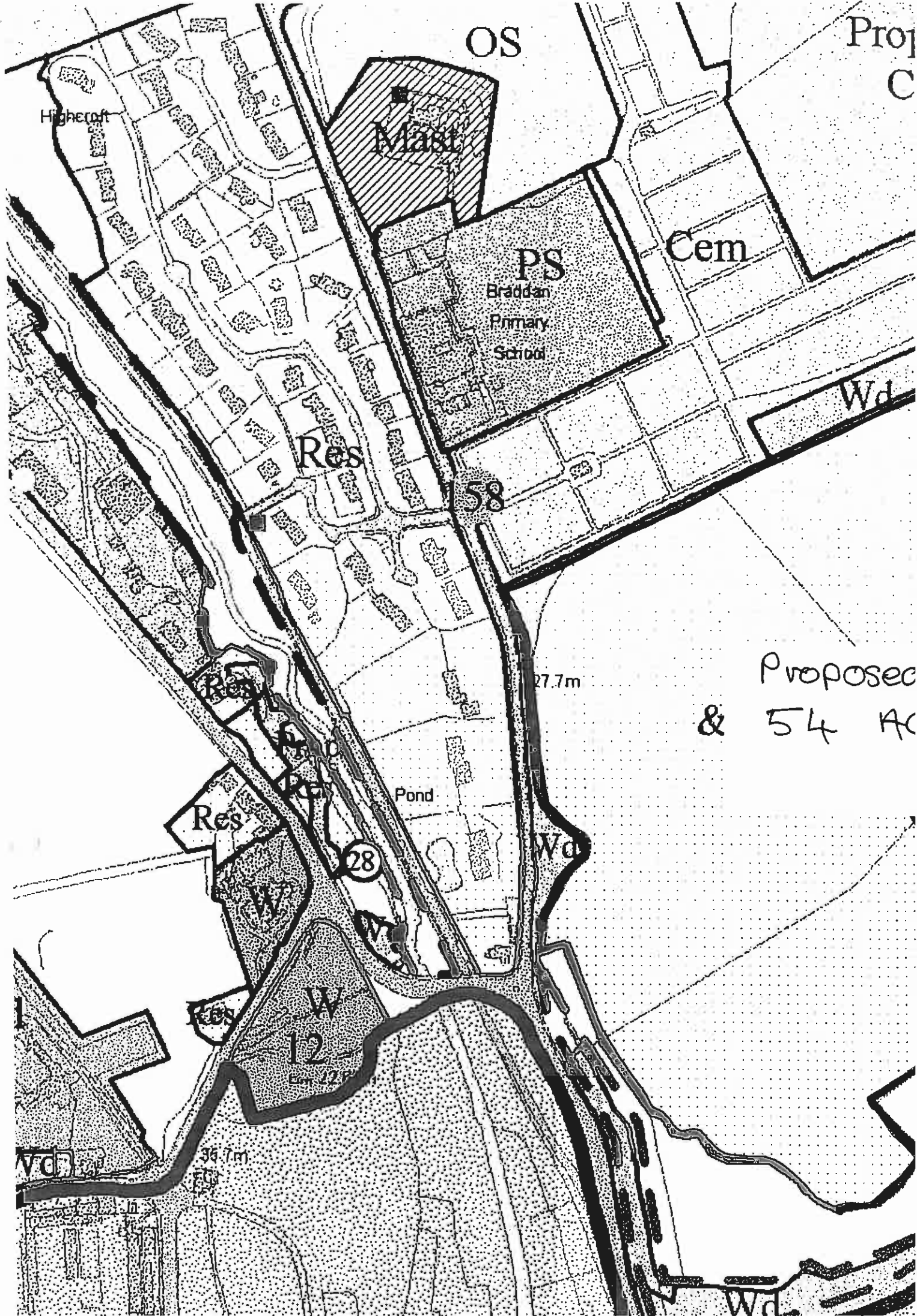
- 3.1 Representations were received from
 - Heritage Homes
 - Baccarat Limited

- 3.2 Heritage Homes representations are summarised in the Inspector's Report (CD 8) in Paragraphs 134 to 136 on Pages 26 and 27.
- 3.3 Baccarat Limited representations were in respect of the development of land on Camlork with an assessment of the suitability of other sites in the MDWS 2003. This is covered in the Inspector's Report on Pages 33 – 44. Reference is made to Area 25 in Paragraphs 190, 191, 204, 208, 219 and 227.
- 3.4 The Inspector's Conclusions and Recommendations in respect of Areas 25 and 26 are set out in Paragraphs 316 to 318 – Pages 64 and 65 of CD 8.
- 3.5 Of particular relevance to the Cooil Road Development Order Inquiry is the evidence submitted by Baccarat to the Braddan Plan MDWS Inquiry and in particular that of Mr Appleton. A copy of his evidence to the Inquiry in respect of Area 25 is attached as **Appendix 3**.

4. Assessment as Alternative Site

- 4.1 While the Department proposed Area 25 for residential development it was subject to a development brief as summarised in Paragraph 2.5 above. The Department would not consider the site a suitable alternative for the Cooil Road Development Order land for various reasons, a number of which are set out in Paragraph 2.3 above. They also include:
1. In respect of the Strategic Plan Spatial Strategy the site is poorly located in terms of the Strategic Highway network in that traffic travelling to and from the Strategic Gateways of the Port of Douglas and the Airport would need to pass through the Quarterbridge junction, the most congested junction in the Island.
 2. As set out in the MDWS 2003, access to the site would be difficult and would require substantial ground modelling for an industrial access, which would be likely to result in the loss of mature trees.
 3. The site would need two points of access to the highway network. Access to Ballafletcher Road would need to cross Area 26.
 4. Being well screened from adjacent roads by the existing topography and tree belt the site lacks the visual prominence required for a Strategic development site with poor visibility of the site from the local highway network.
 5. Development of the site with industrial scale buildings would have a greater visual and landscape impact.
 6. There are existing residential properties on, or in close proximity to, the North Eastern, part of the South Eastern and part of the Western boundary.

Appendix 1



Highcroft

OS

Proj
C

Mast

PS

Braddan
Primary
School

Cem

Res

58

Wd

Proposed
& 54 AC

27.7m

Res

Res

Pond

Res

28

Wd

Res

W

12

Cor 22.5m

36.7m

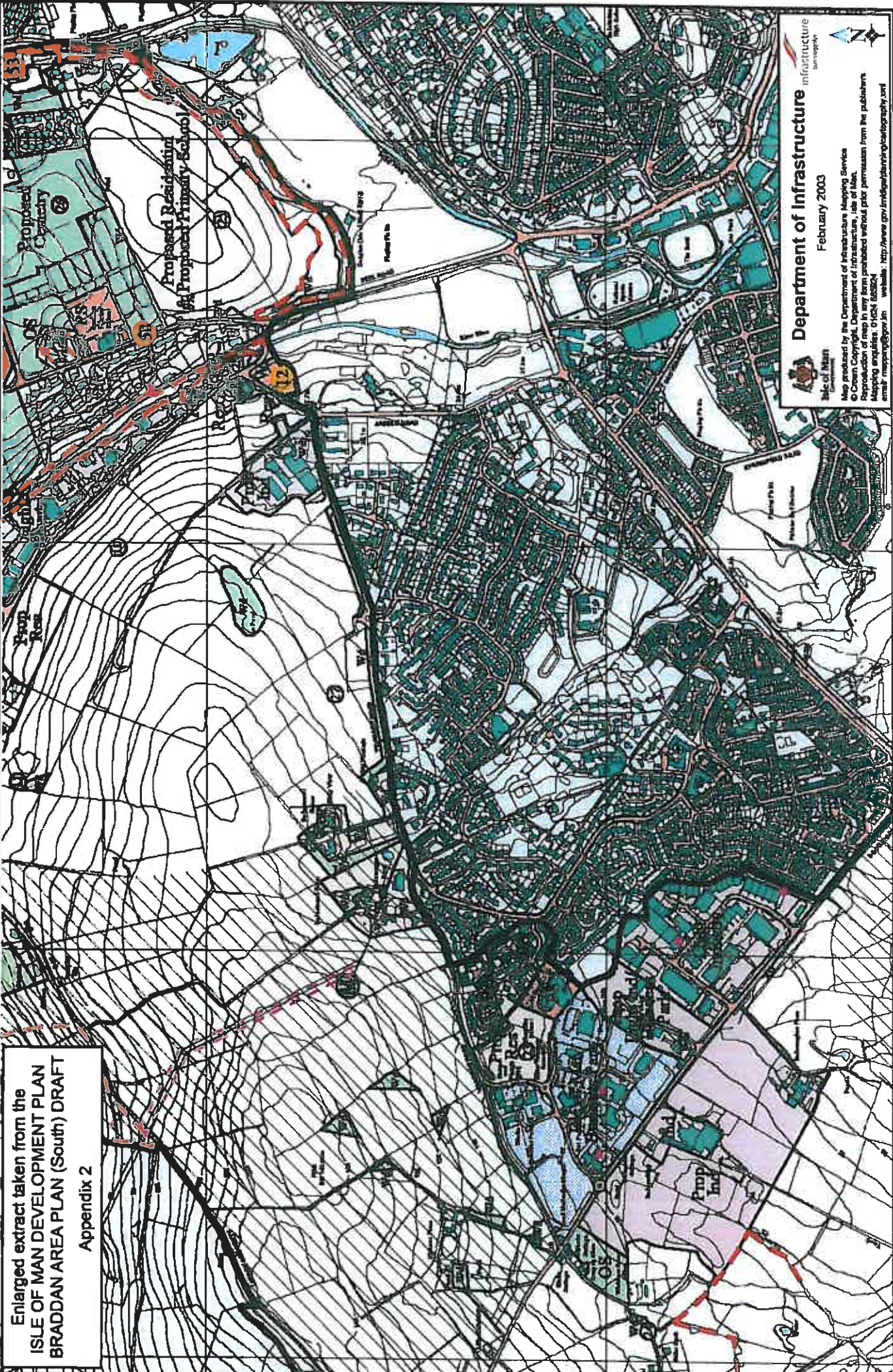
ED

VDF

Wd

Appendix 2

Enlarged extract taken from the
ISLE OF MAN DEVELOPMENT PLAN
BRADDAN AREA PLAN (South) DRAFT
Appendix 2



Department of Infrastructure
infrastructure
is.gov.im

February 2003

Isle of Man
Government

Map produced by the Department of Infrastructure Mapping Service
© Crown Copyright, Department of Infrastructure, Isle of Man.
Reproduction of map in any form prohibited without prior permission from the publishers
Mapping enquiries: 01624 620204
email: mapinfo@is.gov.im website: <http://www.gov.im/infrastructure/infrastructure.html>



Appendix 3

**THE BRADDAN PARISH PLAN
Objections by
BACCARAT LTD
Regarding
LAND AT CAMLORK, UNION MILLS**

**PROOF OF EVIDENCE
Of
DAVID APPLETON NDH MA MLI
Chartered Landscape Architect**

**POLICIES B/RES/PR/1 & B/RES/PR/6
HOUSING ALLOCATION**

**THE APPLETON GROUP
17 CHORLEY OLD ROAD
BOLTON
BL1 3AD**

**Tel. 01204 393006
Fax. 01204 388792
Email. bolton@appletongroup.co.uk**

The development of this site would not consist of a 'rounding off' of development as might be assumed by reference to the Map. It would represent an intrusion into open countryside. The Department acknowledge the sensitivity of this site in its recommendations for development (paragraph 4.57).

4.5 **Area 25, Port-E-Chee**

This site is located to the south eastern corner of the Parish, within 500 metres of the outskirts of Douglas, which lie beyond the valley formed by the River Glass. It is currently agricultural land in 4 separate field units. The land is elevated with unusual domed topography. Contours rise from the 30 metre contour in the valley floor to the south east, up to 35 metres at the site boundary and the 55 metre contour at the highest point of the site. The southern/eastern boundary lies adjacent to woodland on the lower slopes. The western boundary consists of steep slopes and retaining walls adjacent to the Peel Road and Braddan Road. That boundary is partly wooded with both mature and recent tree cover. Land to the north of the site is open land, including both an existing cemetery and a proposed extension, currently used as grazing land. To the north east of the site is located a fairly recent housing development.

4.6 Although the site is to some extent visually influenced by adjacent new residential development when seen from the Ballafletcher Road, its overriding landscape character is more of open countryside than of a suburban area, and this is re-enforced by the mature woodland adjacent to its boundaries. Seen from the south the site appears as a natural extension of the river valley (**Photograph 12**) and this is true also from views gained looking north west from the Tromode Road (**Photograph 13**). In my opinion this area of land forms a strategic open space gap function between Douglas and the Braddan settlements.

- 4.7 Views into the site are limited from the south and east by the mature woodland previously described. Nevertheless it can be seen from the photographs that in winter months, development would be still visible through the tree canopy. The site is more prominent in views from the north and particularly so from the residential development to the north-east. (**Photograph 14**). Development sited on the higher parts of the site would be seen above the tree cover on the skyline, however, and this would be particularly obvious in views from the north-east. I note that the Department in their comments with regard to this site (paragraph 4.119), that they consider that the higher land should be used for open space purposes to avoid this potential impact. The implications of this would be concentrate development adjacent to the boundaries of the site and on the steeper contours. There is a risk that the inevitable changes in topography as the result of re-profiling the slopes for development could affect the water table of the site, leading to adverse impact on adjacent mature woodland.
- 4.8 The presence of woodland planting on the Peel Road or Braddan Road frontage also constrains access into the site from that direction. We note that the Department consider that the existing access point on Braddan Road would be unsuitable in its present form. I understand from Mr Webb's evidence that in order to improve visibility to a satisfactory standard the existing earth banking will have to be re-modelled and that retaining walls will have to be constructed. It is likely that the newly planted trees will have to be removed and there may also be a need to remove mature specimens as well. In addition there may also be impacts on the cemetery boundary to the north. I believe that this will lead to unacceptable landscape and visual impact. Creating a suitable access road into the site from that point with reasonable gradients will also lead to unacceptable landscape impacts due to the cuttings required. The Department consider that alternatively an access from Peel Road could be provided though the route would be *'tortuous'*. They also acknowledge that *'care would have to be taken to avoid excessive tree loss'*. Having visited the site I cannot see how a new road access could be provided from the Peel Road without causing severe damage to existing, mature forest trees.

The loss of those trees and the subsequent visual impact of a steeply engineered road with either retaining walls and/or cutting would in my opinion be unacceptable. An alternative route is suggested leading from Ballafletcher Road. I understand that for highway reasons such a road would have to access the site at a mid-point between Ballafletcher Farm and the existing cemetery. Apart from any severance of the proposed cemetery extension, such a location would render the new road itself unduly prominent.

- 4.9 In my opinion this area of land, together with the adjacent Glass River valley to the south and the existing and proposed cemetery to the north provides an important open land separation function as a strategic gap between Douglas and the settlements of Snugborough and Ballamona. Development of the site would result in coalescence of the settlements and the loss of any separate identity of the Braddan Parish from Douglas.

4.10 **General Summary**

I do not believe that the development of any of the above sites proposed for allocation within the Braddan Parish Plan could be undertaken with any less landscape and visual impact than Area's 1, 2, 3 and 4 at Camlork. To the contrary, development of the other sites would lead to greater impact for the reasons discussed above. The size of the Camlork site is such that mitigation measures can be more readily applied, and constraints in terms of development within Areas of High Landscape Value, breaking skyline, and creating coalescence do not apply. I set out overleaf in tabular form a summary of the various attributes of the sites in comparison with Camlork.