



Summary of Responses to Consultation

Lower Douglas Master Plan – Draft Interim Planning Guidance for Key Town Centre Sites in Douglas



**Isle of Man
Government**

Reiltys Ellan Vannin

Introduction

1. The Lower Douglas Master Plan – Draft Interim Planning Guidance for Key Town Centre Sites in Douglas was published in May 2012 as a means to provide guidance to developers and the public alike on our vision for the key gateway area to the Island and Douglas.
2. This initial summary of responses provides an overview of the consultation process and analysis of all responses received during the consultation exercise.

The Consultation Exercise

3. This 6 week consultation began on 8th May 2012 and ran until 19th June 2012 in line with the Isle of Man Government Code of Practice on Consultation.
4. The Draft Interim Guidance was developed by the Planning and Building Control Division of the Department of Infrastructure. A number of press releases and coverage in the local media made the public aware that the document was available for consultation, and it was listed on the main Government website within the Current Consultations section.
5. The Department also consulted all parties listed within paragraph 7.1 of the Code. In addition, letters seeking comments on the document were sent to Members of the Planning Committee, Owners/occupiers of properties located within the North Quay/South Quay Area, and other interested bodies.

The Responses

6. A total of 24 responses were received in respect of this consultation exercise, which can be broken down into the following groups:

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| Government Agencies/Departments | 8 |
| Consultants/Developers | 5 |
| Local Authorities | 3 |
| Members of the Public/Amenity Groups | 4 |
| Landowners/occupiers | 2 |
| Chamber of Commerce | 2 |

7. A list detailing all those who responded is included in annex A to this report.

8. The table below shows the responses the Department have received broken down into the questions raised in the document.

| Consultation Questions | Response | Responses from |
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| Question 1 – Do you agree with the Aim? | Agree or Strongly Agree | John Asplin(Time and Tide Group) Martin Norbury, Isle of Man Fire and Rescue Service |
| | No, as it has been done out of context. Demographics have been ignored. Changing retail trends have been ignored, and it is being done as a quick fix in isolation. | Isle of Man Enterprises plc |
| | The aim surely has to not only be the right mix as stated in the document but done in such a way that the constituent parts can standalone | Patricia Newton |

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| | satisfactorily as well as be part of a “corporate” whole. | |
| | <p>Aim is nearly correct, except public transport should be included. Leisure and retail use should be more tightly specified, and current proposals exaggerate need for hotels.</p> <p>Aim is also better than both current use – car parking – and the predominantly office use specified in the 1998 Douglas Plan for Middlemarch and Parade Street sites.</p> | Chris Thomas |
| | Yes, clearly this area of the capital is in need of modernisation and re-development. The Constabulary would welcome the opportunity to work closely on any future development in this area with regards to ‘designing out crime’ and architectural liaison. | Isle of Man Constabulary |
| | <p>The regeneration of these areas is supported.</p> <p>Any development must have merit in their own right and not simply be a case of ‘redevelopment for redevelopment’s sake’. Caution must be exercised to ensure that any development constructed within the defined area is not at ‘cost’ of social sustainability and cohesion, ergo, the greater populace’s quality of life.</p> | Isle of Man Constabulary (Architectural Liaison Officer) |
| | Yes, the intention of the guidance is laudable. | Manx National Heritage |
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| Middlemarch – Question 2 – Do you agree with the Development Opportunities identified? | Agree or Strongly Agree | John Asplin (Time and Tide Group), Martin Norbury, The Isle of Man Fire and Rescue Service and Manx National Heritage |

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| | No issues raised | Dandara Group |
| | <p>If the economy was where it was four years ago then probably yes. What is being proposed are true mixed use schemes which could stimulate further the town centre if there was currently the disposable income and the growth in population to support it.</p> <p>Do not support the demolition of a police station which has been built in the last ten years and we see that as a waste of public money. We see this particular subject being used to build a case for an off island developer to build a car park using public money.</p> <p>Do the public want a town square? When there are other suitable locations in the Douglas area for such gathering.</p> | Isle of Man Enterprises plc |
| | Welcome the suggestion of mixed use retail/leisure and confirm our desire to see the Fort Street Junction remodelled. | Sefton Group |
| | <p>No mention or previous approval on this site – has this time expired?</p> <p>How many possible "Town Squares" are we to have? The Villiers site has never taken off.</p> <p>Police station most moved about building but clearly needs to be in accessible useable position not shut up inside another building with limited opening hours.</p> <p>Retaining narrow lanes as part of redevelopment whether inside (as per Marks and Spencer solution) or outside; they don't need to be vehicular lanes.</p> | Patricia Newton |
| | Middlemarch & Lord sites – Site is not suitable for predominantly offices as it is a gateway needing high quality design. Car, public transport, | Chris Thomas |

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| | pedestrian and cycle routes and facilities should be specified, and the availability of public spaces should be enhanced through guidelines. | |
| | <p>There exists opportunities to relocate Lord Street Police Station within the capital. However, there must be consideration as to strategic location and operational effectiveness. The existing building although no longer operational viable or capable of future expansion is in an ideal place giving ease of public access and operational deployment. A future on site build or relocation must be considered in terms of location, operation effectiveness, capacity for staff both now and in the future and availability of car parking.</p> <p>The positioning of a Police Station off the 'Middlemarch' site would need to be carefully considered regarding its suitability and location. A dilemma may exist with a potential new build in that the current Lord Street Station would need to be vacated to enable the construction of such a new build. This raises the question of where to as the current build could not be occupied as the existing site is developed.</p> | Isle of Man Constabulary |
| Middlemarch – Question 3 – Do you agree with the Development Issues/Constraints identified? | Agree or Strongly agree | John Asplin (Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service |
| | No issues raised | Dandara Group |
| | No – the site is hardly noticeable compared to say Lord Street and certainly the demolition of the Police Station is a pure waste of public money. | Isle of Man Enterprises plc |
| | - Support the recommendation that the Police Station site is included to used as public realm or low rise retail/leisure unit. | Sefton Group |

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| | <ul style="list-style-type: none"> - Car parking – Any requirement to deal with the existing temporary car parking in any proposed development proposal will be extremely negative and could jeopardise any site development potential. In summary this requirement should be removed from Middlemarch in isolation and considered in the context of the overall area. It is for this reason we have proposed as far as Middlemarch is concerned the car parking on the Cambrian Place will deal with the immediate demand but also believe further significant parking will be required in one of the other sites to future proof any commercial development of the other sites. - Public Square – We recognise and have incorporated the desire for a town centre public square within the proposed development on Middlemarch. - Relationship with Lord Street - will continue to work together with Askett Hawk, however would street as outlined in the key objectives that operation should be of a commercial benefit and not a mandatory requirement which could otherwise frustrate and prevent a development of the Middlemarch site proceeding. - Road Layout <ul style="list-style-type: none"> • Support the proposed changes to the Fort Street junction • We have also suggested further changes (including underpass) on the Parade Street junction – but recognise this option may not be commercially viable • Minded to suggest that the existing traffic flow on North Quay (around the Lord Street site) is not necessary – as it only serves to allow traffic to circle the overall site and access the current temporary car park, and better use could be made of the existing quayside as a pedestrian/outdoor recreational use. | |
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| | There perhaps needs to be recognition that not all car parking needs may be met on site and commuted payments to car parking provision elsewhere would enable more practical redevelopment of the site. | Patricia Newton |
| | <p>The Society would wish the development opportunities/constraints to reflect their submission on PA 05/2050 for Muckle's Gate which was</p> <p>"Accordingly the Society would respectfully draw you attention to the fact that the site is considered to be within an area of Douglas being built up prior to 1580 and likely to contain evidence of this underground. This historical research for this area has been undertaken by one of the Society's members and former president, Nigel Crowe ARICS. Initial publication of the site's history is contained in his book Survey of Douglas Volume 1 The Quarterland Rents of Douglas c1705 (Block 9 refers)"</p> <p>The Society believes that further understanding of these sites as would arise from archaeological investigation would aid the detailed design of new development to achieve the general principles of development.</p> <p>The site borders on and includes a small part of The Promenades Conservation Area. The Character appraisal of that area refers to the design of future development on the west side of Walpole Avenue. This should be referred to in the Guidance note.</p> | Isle of Man Natural History & Antiquarian Society |
| | Middlemarch & Lord sites – Site is not suitable for predominantly offices as it is a gateway needing high quality design. Car, public transport, pedestrian and cycle routes and facilities should be specified, and the availability of public spaces should be enhanced through guidelines. | Chris Thomas |
| | A main concern is the impact on traffic management both during site construction and following project completion. The Peveril Square, Lord Street, Loch Promenades areas are already prone to congestion. As | Isle of Man Constabulary |

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| | <p>stated careful consideration needs to be given to traffic management within these areas. Again effective deployment of Police Officers in vehicles to emergency situations may be compromised if traffic management is not considered in regards to these areas.</p> | |
| | <p>It seems disappointing – and hardly in keeping with the aspiration towards sustainability- that the recently constructed police station building should so readily be proposed for demolition.</p> <p>Potential survival, to a considerable depth, of a massive seawall parallel with Fort Street, and the likelihood that ground conditions are significantly different to either side of it. Early archaeological investigation will be necessary, followed by appropriate further investigation ahead of redevelopment.</p> | Manx National Heritage |
| Lord Street – Question 4 – Do you agree with the Development Opportunities identified? | Agree or Strongly agree | John Asplin (Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Manx National Heritage |
| | No Issues raised | Dandara Group, Sefton Group |
| | Yes, but it would be possible to substantially improve an environment that is core to the success of Douglas, however, more of this needs to be leisure lead in line with predicted trends in consumer behaviour. | Isle of Man Enterprises plc |
| | Middlemarch & Lord sites – Site is not suitable for predominantly offices as it is a gateway needing high quality design. Car, public transport, pedestrian and cycle routes and facilities should be specified, and the availability of public spaces should be enhanced through guidelines. | Chris Thomas |

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| | Urban regeneration has benefits for both local residents and the business community. | Isle of Man Constabulary |
| Lord Street – Question 5 – Do you agree with the Development Issues/Constraints identified? | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary |
| | No issues raised | Dandara Group |
| | Yes. It is a difficult area of Douglas to redevelop, however, we think there can be large benefits from doing this purely from a Douglas point of view | Isle of Man Enterprises plc |
| | Relationship to Middlemarch - See response to question 3 Design – support Flood Risk – no comments Car parking – see response to question 3 Road Network – suggest that further pedestrianisation of the quayside adjacent to this area would have a positive effect. | Sefton Group |
| | To be of most use the bus facilities have to be kept near the shops. Bus interchange facilities must have proper utilities e.g. proper cover and provision of WC's | Patricia Newton |
| | They would like the Development Issues/Constraints to reflect the previous correspondence that the Society has had both with the Planning Division and with Askett-Hawk Developments to the effect that the archaeological interest of the site would be taken into account. | Isle of Man Natural History & Antiquarian Society |

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| | <p>Request than any approval should be subject to a condition requiring a scheme for properly organised directed and funded archaeological investigation and reporting on any of the sites prior to any development taking place.</p> <p>Pre-application advice would draw attention to the historical/archaeological/architecturally related interest of the site and the need to undertake controlled archaeological excavation and recording in the area prior to any development of it.</p> | |
| | <p>Middlemarch & Lord sites – Site is not suitable for predominantly offices as it is a gateway needing high quality design. Car, public transport, pedestrian and cycle routes and facilities should be specified, and the availability of public spaces should be enhanced through guidelines.</p> | Chris Thomas |
| | <p>The first edition OS shows complicated streetscape in existence at the time, which is likely to reflect progressive expansion of early Douglas and piecemeal land reclamation, preparation and development. This is likely to impact upon the practicability of redevelopment and the design of foundations, and full understanding, through archaeological investigation, at the earliest stage possible is recommended, together with full investigation ahead of redevelopment.</p> | Manx National Heritage |
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| <p>Parade Street/Freight Marshalling Area – Question 6 – Do you agree with the Development Opportunities identified?</p> | <p>Agree or Strongly agree</p> | <p>John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary, Manx National Heritage</p> |

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| | No issues raised | Dandara Group |
| | As a major user of freight services to the Isle of Man the role of the port must be protected at all times for citizens, for visitors, and for freight. These proposals seem to give very low regard to the needs of freight users; however, this whole area could be used to substantially improve the traffic flows as has been said in terms of Lord Street and Middlemarch and we would suggest that maybe the Middlemarch site and the Parade Street site is used to substantially improve and maybe separate freight from the day to day traffic using the area. | Isle of Man Enterprises plc |
| | To demolish existing Isle of Man Steam Packet Company offices as part of redevelopment of site – concur with this recommendation Car parking Provision – Believe the best way to address this is holistically and the Parade Street site lends itself best to provide this out of all the sites. | Sefton Group |
| | Site needs to be developed following public competition and in conjunction with the development of Promenade and Inner and Outer Harbour uses as well. Leisure and transport usage would seem most appropriate. | Chris Thomas |
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| Parade Street/Freight Marshalling Area – Question 7 – Do you agree with the Development Issues/Constraints identified? | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary |
| | No issues raised | Dandara Group |

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| | Yes especially to guarantee the 24hr operation of the port for freight. | Isle of Man Enterprises plc |
| | Operational needs of the Port – believe these needs could be protected by the ground floor of a car park on the Parade site be retained as car parking/bus terminal/freight marshalling with a min 6m height clearance to cater for all current and future needs. Within the multi-storey parking above additional passenger marshalling could be incorporated with additional entrance/exit down onto the actual landing stage to the rear of the site being possible. Relationship to Lord Street/Middlemarch - support provided it does not stymie other developments. | Sefton Group |
| | At least part of this site could cope with being a multi storey particularly for long term parking to help serve the needs of Middlemarch and Lord Street. | Patricia Newton |
| | General principles with regard to archaeology be applied Any proposal should be required to take into account the context and existence of the Red Pier, which is a Registered Building. | Isle of Man Natural History & Antiquarian Society |
| | Site needs to be developed following public competition and in conjunction with development of Promenade and Inner and Outer Harbour use as well. Leisure and transport usage would seem most appropriate. | Chris Thomas |
| | A massive masonry seawall is recorded running south from Imperial Buildings. Ground conditions to either side will be significantly different. MNH notes the previous development of buildings on this site, in common with the two zones already considered, and recommends archaeological investigation at an early stage, complemented by full investigation ahead of redevelopment. | Manx National Heritage |
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| North Quay – Question 8 – Do you agree with the Development Opportunities identified? | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary |
| | No issues raised | Dandara Group, Sefton Group |
| | Yes, we would expect these to be more leisure than retail focused. | Isle of Man Enterprises plc |
| | Why has West Quay been excluded? Conservation Area Status is important, and all Quays should be developed in conjunction with harbour and general town developments for mixed town centre use | Chris Thomas |
| | Agree, particularly with reference to the historic built heritage. | Manx National Heritage |
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| North Quay – Question 9 – Do you agree with the Development Issues/Constraints identified? | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary, Isle of Man Enterprises plc, Manx National Heritage |
| | No issues raised | Dandara Group, Sefton Group |

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| | General principles with regard to archaeology be applied should there be any proposals for redevelopment of sites | Isle of Man Natural History & Antiquarian Society |
| | Why has West Quay been excluded? Conservation Area Status is important, and all Quays should be developed in conjunction with harbour and general town developments for mixed town centre use | Chris Thomas |
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| South Quay – Question 10 – Do you agree with the Development Opportunities identified? | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary, Isle of Man Enterprises plc, Manx National Heritage |
| | No issues raised | Dandara Group |
| | No comments other than to state from an overall redevelopment of Middlemarch perspective we would prefer to see a move away from light industrial into more mixed use/residential - providing additional population for the proposed redevelopments and a better outlook. | Sefton Group |
| | To the east of all operating service users there has to be the space and opportunity of accommodating multi-storey users and car park. Ground floor car park, piazza level and residential above to make full use of the height at the back of the site. Bridge Tower – How re-use – it's a very technical building – should not | Patricia Newton |

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| | <p>spoil opportunity for seeing how it worked. Consideration might be given to putting a lift if this could be incorporated without detracting from the “experience” of seeing the former bridge control works.</p> <p>Albeit the harbour is not part of the areas under consideration such attraction could be linked to harbour tours and the development of the harbour.</p> <p>To the west open up views of historic buildings but need to keep life in the area; service uses are related to road environment – it is a transport route. Further uses could link to marine environment.</p> | |
| | Why has West Quay been excluded? Conservation Area Status is important, and all Quays should be developed in conjunction with harbour and general town developments for mixed town centre use | Chris Thomas |
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| South Quay – Question 11 – Do you agree with the Development Issues/Constraints identified? | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service, Isle of Man Constabulary, Isle of Man Enterprises plc |
| | No issues raised | Dandara Group |
| | No comments other than to state from an overall redevelopment of Middlemarch perspective we would prefer to see a move away from light industrial into more mixed use/residential - providing additional population for the proposed redevelopments and a better outlook. | Sefton Group |
| | General principles with regard to archaeology be applied should there be any proposals for redevelopment of sites | Isle of Man Natural History & Antiquarian Society |

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| | Why has West Quay been excluded? Conservation Area Status is important, and all Quays should be developed in conjunction with harbour and general town developments for mixed town centre use | Chris Thomas |
| | Whilst recognising that South Quay is a prime site for improvement, MNH notes that the area has a history of industrial uses, including speculative development of a range of herring processing houses by the Dukes of Atholl whilst Lords of Man during the 18 th century. These former uses create a number of constraints on redevelopment, potentially requiring environmental mitigation. MNH would recommend that archaeological investigation is undertaken at the appropriate times and to appropriate levels, and would advise that environment safeguarding may also be required. | Manx National Heritage |
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| General Development Principles – Question 12 – Do you agree with the General Development Principles | Agree or Strongly agree | John Asplin(Time and Tide Group), Martin Norbury, Isle of Man Fire and Rescue Service |
| | No issues raised | Dandara Group. Sefton Group |
| | Suggest that Manx Companies should be used for the majority of work to be carried out in response to any new developments On page 15, the phrase “respect existing businesses” is used. It has been suggested that it is impossible with the scale of development into completely new areas would substantially shift the retail and leisure aspect of the town centre and if this is going to happen then the respect being | Isle of Man Enterprises plc |

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| | shown to these businesses needs to be that they understand that they will no longer have a future in the core locations. | |
| | <p>On all sites where redevelopment is proposed there should be the opportunity of undertaking full archaeological investigations and reporting such that the public are fully able to participate in the experience and learn from it. This is more important than Public Art per se albeit the latter could be used to incorporate the former.</p> <p>Links should be made to the Conservation Areas at both North Quay and The Promenades and all registered buildings.</p> <p>Opportunities may be restricted by having separate car parking for each area. It may make more sense to have the bulk of car parking say in The Parade and or South Quay with fairly minimal car parking elsewhere. Particularly near that part of North Quay in the Lord Street area it may be difficult/extremely expensive to get underground parking due to the possibility of tidal flooding. Therefore without compromising development opportunities it would be better to provide car parking on another site obtaining commuted payments from developer towards the costs.</p> | Patricia Newton |
| | <p>Much of the historic past, Old Douglas, is buried underground. They wish that the opportunity for proper archaeological investigations is emphasised as a "must" for any developer to consider as part of a proposal for any part of the three sites.</p> <p>The Society considers that simply to "demonstrate an awareness of the historic connections to the past" is an inadequate description of what is actually required and this should be more rigorously worded. It should not be up to IOMNHAS or other bodies to have to continually request such work as a condition of planning consent.</p> | Isle of Man Natural History and Antiquarian Society |
| | General Development Principles are acceptable. | Chris Thomas |

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| | MNH notes that 'an awareness of the historic connections to the past' is necessary both within the guidance and in the responses of developers to it. We further note that the proposal to 'include signage and interpretation where appropriate' will of itself require investigation of the cultural and natural heritage of these areas to the standards that we have recommended throughout this response. | Manx National Heritage |

9. In addition comments were received on the wording of the contents of the document as follows.

| Paragraph No. | Response from | Response |
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| 1.0 & 2.0 – Aim and Key Objectives | Wilson Consulting Limited | They have the correct focus both in terms of content and the opportunity sites. |
| 1.0 – Aim | Sefton Group | Support |
| | Isle of Man Chamber of Commerce (Retail Committee) | <p>Wording is too "woolly" and narrow. The aim should be more ambitious and make additional mention of attracting the following key targets:</p> <ul style="list-style-type: none"> - Hotels - Quality nightlife - Multiplex - Bowling alley - More restaurants. <p>In addition, the gateway should be easily accessible by public and private transport. No Master Plan should be relying on bus stops.</p> <p>A quality leisure environment is critical to the Town Centre and suggests wording is added to reinforce the aim that development should "complement other uses in adjoining areas".</p> |

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| 2.0 – Key Objectives | Sefton Group | <p>Support the key objective but are concerned that proposal will have to ...demonstrate consideration of the historic character of the quayside ... achieve strong physical links between the various sites and adjacent areas.</p> <p>To demonstrate consideration of the historic character of the quayside might appear at odds with the concept for the Middlemarch Site</p> <p>The development of sites should not be delayed or made subject to unnecessary and potentially fatal hurdles that require it to be cognisant with adjacent schemes that still may be at the embryonic stage at that point.</p> |
| 3.0 – Existing Situation | Sefton Group | No comments on this section |
| | Patricia Newton | <p>If this is meant to include North and South Quays then reference should also be made to service industries being a key feature of the area (as is evident on South Quay).</p> <p>The facility at Lord Street is meant to be more than a bus stop. It is a bus interchange/terminus and should have facilities that would go with this not just a line of “shelters”.</p> |
| 3.1 – Existing Situation | Isle of Man Chamber of Commerce (Retail Committee) | <p>Disagree with the emphasis on some residential. Some of the most successful regeneration initiatives in the UK and elsewhere have been linked to reintroducing significant residential accommodation back into town centres. Lower Douglas is a large redevelopment area and any Master Plan should have as a specific objective the reintroduction of large number of residents into Douglas Town Centre.</p> <p>Agree with the wording “complement other uses in adjoining area” and would like more emphasis on this within the General Development Principles and any Master Plan.</p> <p>We are unsure of Askett-Hawk current retail proposals, but the original proposals</p> |

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| | | as presented to Government was for modern retail units and retail floor spaces of 20% to 30% of the total retail floor space on Strand Street, Castle Street and Duke Street. No Impact Study was prepared on the effect on the “adjoining area” and we contend if this retail space was taken up in the current economic climate this could only be achieved by relocation of multiple retailers from Strand Street. We contend the impact would be very damaging to the main shopping streets and the Regeneration. |
| 3.2 – Existing Situation | Isle of Man Chamber of Commerce (Retail Committee) | <p>The clear need for a Master Plan is sadly encapsulated in the following statement “There exists a close physical relationship between the sites which are separated by a busy road network and is home to the main bus stop in the town”</p> <p>The Master Plan needs to take the fullest account of quality public transport access to Douglas Town Centre. A quality bus station, or at the very least a quality bus interchange, should be a key part of the Master Plan.</p> <p>There is nothing in the wording of the Document or the General Principles which would stimulate any of the owners of the sites identified to consider the location of a bus station/interchange.</p> |
| 4.2 – Vision for the Future | Isle of Man Chamber of Commerce (Retail Committee) | <p>Comments received about Government’s failure to deliver Lord Street site.</p> <p>North Quay has potential for being the main leisure hub for Douglas, but is still very much work in progress. It is incorrect to state businesses are thriving, but with further redevelopments there is significant potential. The development of a Master Plan would offer further encouragement towards leisure in and around North Quay. Live music venues are in short supply and speculate whether buildings such as the Market Hall would benefit from a change of use to a more leisure/music focus.</p> |
| 4.3 – Vision for the Future | Sefton Group | Comments have been received about possible location for the bus operations. |
| 5.0 – The sites | Isle of Man | Generally support the sites identified, the Development opportunities and |

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| | Chamber of Commerce (Retail Committee) | Issues/Constraints identified. It is highly important the quantum of Lord Street retail (and perhaps any retail proposed in the other sites) should complement the Douglas main stopping Streets. |
| 5.2 – Policy Background (Middlemarch) | Sefton Group | Note the existing land designation as “Predominantly Offices”, would suggest this is widened to “Mixed Use” |
| 5.4 – Development Issues/Constraints (Middlemarch) | Isle of Man Enterprises plc | We do not support wasting public money having built that Police Station and flattening it |
| | Isle of Man Enterprises plc | We do not support the need for a public square. |
| 5.6 - Policy Background (Lord Street) | Sefton Group | No reason to change land use designation |
| 5.8, 5.12, 5.16 and 5.20 – Development Issues/Constraints, 6.0 – General Development Principles | Manx Wildlife Trust | <p>Insert appropriate wording to the need for Environmental Impact Assessments to be carried out in line with the IoM Strategic Plan which states that any proposed schemes likely to impact upon ecology or archaeology of a harbour should be accompanied by an Environmental Impact Assessment</p> <p>Insert new section into Paragraph 6.0, headed Environmental Impact Assessment, with the following wording: “In line with the Isle of Man Strategic Plan, proposals must include an Environmental Impact Assessment in certain cases or be accompanied by suitable supporting environmental information in other cases.”</p> |
| 5.10 – Policy Background (Parade Street/Freight Marshalling Area) | Sefton Group | Suggest site is identified as the prime site for expanded car park provision and new bus station facilities. |
| 6.0 – General Development Principles | Dandara Group | Suggested re-wording to first paragraph by replacing “must” with “should” |

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| | Isle of Man Chamber of Commerce (Retail Committee) | Generally support the sites identified, the Development opportunities and Issues/Constraints identified. It is highly important the quantum of Lord Street retail (and perhaps any retail proposed in the other sites) should complement the Douglas main stopping Streets. |
| 6.0 – General Development Principles (Design Section) | Manx Wildlife Trust | Give examples of the type of signage and interpretation that may be included in the Design Statement. These should include information on wildlife spotting opportunities, particularly in the Parade Street and North and South Quay sites |
| | Manx Wildlife Trust | Add new bullet point relating to the need to include green spaces or spaces for wildlife in any Design Statement. Reference has been made to Living Landscape. |
| | Dandara Group | Suggested the following "In appropriate cases proposals should be accompanied by a Design Statement which shall, if relevant:" |
| 6.0 – General Development Principles (Flood Risk),(Transport and Car Parking), (Consultation), (Plan for the East) | Dandara Group | The emphasis of the wording should be revised from "must to "should" as appropriate. |
| 6.0 – General Development Principles (Transport and Car Parking) | Dandara Group | It has been suggested that "i.e." be replaced with "e.g." |
| Appendix 1 – Consultation Questions | Isle of Man Chamber of Commerce (Retail Committee) | Generally support the sites identified, the Development opportunities and Issues/Constraints identified. It is highly important the quantum of Lord Street retail (and perhaps any retail proposed in the other sites) should complement the Douglas main stopping Streets. |

Summary of Responses – Lower Douglas Master Plan

10. In addition comments were received on specific topic areas as follows

| Topics | Response from | Response |
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| Water Supply | Isle of Man Water & Sewerage Authority | <p>The integration of the system, in that water can be supplied from different directions needs to remain, the ability of the system to provide water at an adequate flow and pressure relies on the system of connect water mains, any redevelopment would need to take these factors into consideration.</p> <p>The Authority would take the opportunity to replace and or improve its infrastructure as part of any wide scale redevelopment of the area.</p> |
| Flood Risk | Isle of Man Water & Sewerage Authority | <p>Early consultation with the Authority is recommended to discuss the full extent of the flood risk assessment that will be needed to be undertaken by any prospective developer in Lower Douglas.</p> <p>Reference has been made to flood risk maps</p> |
| Foul and Surface Water Drainage | Isle of Man Water & Sewerage Authority | <p>The existing drainage infrastructure within the Master Plan area consists of combined foul and surface water sewers of varying diameters. Consultation with the Authority is recommended to discuss the connection locations from the various development sites to the public system in order to ensure the capacity of the Walpole Avenue foul pumping station is not exceeded.</p> |
| Postal Service | Isle of Man Post Office | <p>Any redevelopment needs to been seen from their postal ops point of view in regard to the infrastructure, especially road systems and layout.</p> <p>The following points should be considered:</p> <ul style="list-style-type: none"> - Free flowing traffic system - Loading bays/area that do not interfere with the flow of the traffic - Loading bays that are within reach of delivery points - Delivery points that are accessible to both mail and Parcels |

Summary of Responses – Lower Douglas Master Plan

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| | | <ul style="list-style-type: none"> - Secure 2nd bag drop off boxes - Residential and where possible office multiple delivery points - Access to offices for collections. |
| Vision / Wider Master Plan | Isle of Man Enterprises plc | What seems to be missing in its entirety from this whole consultation is the context in which this set of proposals will exist in a vision for the Isle of Man and its town centres of the future. |
| | Isle of Man Chamber of Commerce (Chief Executive) | <p>This consultation should be carried out in conjunction with a wider Master Plan for Douglas itself. Although Douglas is sprawling, the town centre should be seen as one in terms of overall strategy and vision as far as possible. A holistic approach would be most preferred.</p> <p>A wider Master Plan will consider the broader impact of such a proposal and would undoubtedly broader discussion from a wide variety of parties. An inclusive approach is warranted given the long term nature of the potential impact.</p> |
| | Isle of Man Chamber of Commerce (Retail Committee) | <p>It is not a Master Plan or anything like a Master Plan. There is no mention of the preparation of a Master Plan.</p> <p>Consider a Master Plan for Douglas is essential for guidance of the forthcoming Eastern Area Plan.</p> <p>It is all very well to set out worked that uses of the Key Town Centre Sites identified in the Document should “complement other uses in adjoining areas”, but words are not sufficient without a Master Plan drawing and supporting strategic vision.</p> <p>Suggests the Department employs a leading, experience and proven UK town centre planning firm to consult widely and prepare a truly visionary Master Plan for the Town Centre.</p> |
| Isolation of the guidance | Wilson Consulting | The document correctly makes many references to the fact that the area of Lower |

Summary of Responses – Lower Douglas Master Plan

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| | Limited | <p>Douglas 'cannot be seen in isolation'; however, the guidance provided holistically and on a site specific basis is largely insular and self-contained, focussing on the hurdles to be overcome and the solutions proffered at a micro level.</p> <ul style="list-style-type: none"> - It is felt that the land use zones should be clearly identified across the Capital; this would allow the guidance for Lower Douglas to be developed within this framework. |
| Town Centre Shift | Isle of Man Enterprises plc | <p>The proposals in the consultation will take the town further away from the cultural quarter of Douglas and closer to the quayside.</p> <p>We are not necessarily disagreeing with this, however, there is no mitigation proposed in this document.</p> |
| Ferry Services | Isle of Man Enterprises plc | The need to service the ferry must be paramount and that is not just in terms of visitors and tourism it is in terms of 24 hrs freight. |
| Public Transport | Isle of Man Enterprises plc | There are lots of mentions of car parking but not of public transport and given rising oil costs public transport demand will grow. |
| | Chris Thomas | The Master Plan should include the siting and specifications for a high quality public transport interchange and facilities, and routing of trams and buses in connection with this interchange. |
| Vehicular traffic flow/car parking | Wilson Consulting Limited | <p>Vehicular traffic flow must not cut off and isolate pedestrian areas. Car parking must provide only sufficient capacity but in the correct locations.</p> <ul style="list-style-type: none"> - This aspect should be subject of a specific consultation and report with conclusions and recommendations. - The most vibrant town and city centres in Europe and further afield are pedestrian focussed. |
| | Isle of Man Fire and | It must be noted that both Lord Street and North Quay are primary routes for the Fire |

Summary of Responses – Lower Douglas Master Plan

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| | Rescue Service | and Rescue Service when responding to the Lower Douglas area and the risks contained therein. Whilst proposed improvement to traffic flow arrangements and car parking facilities are most welcomed, careful consideration of potential implications, particularly at peak times will need to be undertaken. Similarly, any increased pedestrianisation and the further encouragement of leisure activities (street fairs/entertainment etc) must take account of access, egress and the positioning of large emergency vehicles should a fire or other emergency incident occur. |
| | Isle of Man Enterprises plc | There is no doubt there is a strong need for modern and convenient car parking in Douglas, however, this must be measured against likely future demand. |
| | Chris Thomas | Minimum and maximum number of car parking spaces to be provided in Lord Street, Parade Street and Middlemarch site, and encouragement for co-ordinated provision should be included. |
| Cycleway | Chris Thomas | The Master Plan should include the route of the long proposed cycleway and associated specifications. |
| Mixed use schemes | Isle of Man Enterprises plc | Support that true mixed uses are being proposed for a number of sites |
| South Quay | Isle of Man Enterprises plc | Support the South Quay regeneration particularly from a residential stand point as we believe it is vital that more people move back into the town centre. This again should support the ageing demographic of the Island. |
| Status of the Document / Need for interim guidance | Wilson Consulting Limited | The document's status as an 'interim measure' is a concern; it is felt that, as a consequence it may be wrongly considered as 'a policy which will do until the 'proper' policy (the Area Plan for the East) has been adopted'. - Rather it is felt that its importance as a policy in its own right should be emphasised. |
| | Patricia Newton | The question has to be asked why is this document needed? Is it because the policy designations on the current local plan are seen to be restricting development by their designations? |

Summary of Responses – Lower Douglas Master Plan

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| | | It would be far better to get on with the eastern Area plan than spend more time, paper and energy on releasing interim guidance. |
| Residential uses | Wilson Consulting Limited | <p>It is a concern that residential use is being considered as appropriate within Lower Douglas</p> <ul style="list-style-type: none"> - Firstly, there are examples of residential development with Planning Permission being stopped within the locality so, even when the market starts to rise, supply will exceed demand for some time. - Secondly, the focus should be to attract ongoing revenue-generating uses into the Capital. |
| Town Square/Public spaces | Wilson Consulting Limited | It could be located much closer to Strand Street to provide complementary space to North Quay. |
| | Chris Thomas | Inclusion of public space and facilities should be included. |
| Key Objectives | Wilson Consulting Limited | <p>It is considered that the guidance policy would be given great emphasis if the Government, separately or as part of this document set out a number of key objectives such as:-</p> <ul style="list-style-type: none"> - Strand Street will remain as the principle 'in town' retail area - South Quay will become the 'out of town' retail area - A traffic flow and car parking strategy will be formulated using innovative ideas to promoted retail, leisure and tourist activities, connecting key areas in Douglas and creating a pedestrian orientated town centre. - |
| Prematurity | Wilson Consulting Limited | <p>It is premature to discuss the specific sites in detail as guidance thereon should take cognisance of the overall aim</p> <ul style="list-style-type: none"> - Government needs to manage any current commitments to ensure that specific proposals do not jeopardise the overall aim; it would be a very short term gain. |
| Development site relationship with the consultation | Isle of Man Chamber of Commerce (Chief Executive) | Note that two of the key sites referred to are in private hands currently, doubtless with proposals formulating. Should such proposals be meritable, with existing Planning aspects observed, then we would comment upon the resultant interplay with this |

Summary of Responses – Lower Douglas Master Plan

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| | | consultation. Should and will the existing intentions prevail? |
| Precedence | Chris Thomas | The Lower Douglas Planning Guidance should take precedence over the Planning Policy Statement on Planning and the Economy. |
| Eastern Area Plan | Chris Thomas | The development of the Eastern Area Plan, or Douglas Plan, should be accelerated, and my four requirements (i.e. public transport interchange, cycle routes, car parking specification, public space) should be incorporated. |
| Perception of crime within Town Centre / Impact on police resources, crime and disorder | Isle of Man Constabulary (Architectural Liaison Officer) | <p>It is imperative that, as required by the General Development Principles, any proposed development 'shows a clear strategy to increase (legitimate activity) in the area'.</p> <p>The inclusion of residential development within the identified area would help, as it would reintroduce 'informal guardians' into the town centre.</p> <ul style="list-style-type: none"> - Need for careful consideration when juxtaposing residential and other uses (such as licensed premises) to prevent unnecessary nuisance and noise disturbance to residents. <p>It is imperative that appropriate consideration is given to the impact that redevelopment on the proposed scale will have upon policing resources.</p> <p>Consideration must be given to the impact that the construction phase of the redevelopment of the identified areas could have upon the incidence of crime and disorder.</p> |
| Consultation on development | Isle of Man Constabulary (Architectural Liaison Officer) | It is imperative that the force is consulted at both a strategic level, as the Master Plan develops, and concomitantly early within the design process for each individual development so as to ensure that every opportunity is taken to identify and appropriately address potential crime and disorder issues. |
| Cultural Heritage | Manx National Heritage | Recommends that any revised guidance includes recognition of the need for appropriate archaeological assessment and evaluation during the design stage of any |

Summary of Responses – Lower Douglas Master Plan

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| | | <p>redevelopment schemes, and appropriate investigation, recording and reporting once groundworks commence.</p> <p>A greater understanding of ground conditions will also have a substantial impact on one other precept of the guidance as currently drafted, specifically the need for sustainability. No development can be sustainably designed and costed if unsuspected ground conditions lead to expensive foundation redesign and construction delay.</p> |
| Natural Heritage | Manx National Heritage | <p>The area has natural assets simply through its connection to the marine environment via the harbour. There is the potential for enhancement and interpretation of this interest for residents and visitors along the quaysides. Consideration could be given to mentioning this opportunity in the planning guidance together with stipulation above avoiding the risk of pollution of the harbour from substances such as diesel, fuel oil, sewage and rubbish, any of which can spoil enjoyment of the waterside setting.</p> |
| Affordable Housing | Department of Social Care | <p>The Department would have no concerns about the Guidance other than the lack of reference to "Affordable Housing" or the interpretation of Housing Policy 5</p> |

The following bodies responded to the consultation but had no comments to make on the document -

- 1) Office of Human Resources, Isle of Man Government
- 2) Patrick Parish Commissioners
- 3) Braddan Parish Commissioners
- 4) Port Erin Commissioners

General Comments outside the scope of the Guidance

| Comment from | General Comments |
|---------------------|--|
| St Matthew's Church | <p>Identified issues with the Lower Douglas Area and they indicated there are two options:</p> <ul style="list-style-type: none"> - The de-populating approach - The repopulation approach <p>Request that car parking charges on Sundays be removed</p> |

Summary of Responses – Lower Douglas Master Plan

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| | Increase in on-street parking in the North Quay Area. |
| Isle of Man Enterprises plc | No reference has been made to the current size of the town centre, the functioning of the town centre, and the feasibility of the town centre continuing as it currently is |
| Isle of Man Enterprises plc | They agree that the promenade is no longer the focal point for leisure activities of visitors and local people. |
| Isle of Man Enterprises plc | The increasing cost of oil has been largely ignored in the context of this consultation. |
| Isle of Man Enterprises plc | The ageing demographic has been ignored in this consultation. The absence of future trend and demographic analysis in any of this work is very concerning because so many generalistic suggestions of building retail and specialist retail are included. |
| Isle of Man Enterprises plc | Given the current economic situation particularly of the public sector in the Isle of Man who will pay for this? |
| Isle of Man Enterprises plc | The town centre shift will seriously damage their business in Douglas. On a parochial basis needs reflecting on the future rent if the DOI's own policies are going to drive more of the footfall away from the store that we actually rent from them. |
| Isle of Man Enterprises plc | A number of proposals for car parking around the Lord Street area seem to just facilitate an off island developer building a car park for Douglas Corporation. |
| Wilson Consulting Limited | Development under licence on Government-owned land would help avoid land banking and ensure that projects are delivered within an acceptable time-frame. |

Conclusion

11. The Department will now make minor amendments to the draft guidance and consider the various suggestions with a view to producing a final version of the Interim Planning Guidance. It is hoped the Department will formally adopt the document as Interim Planning Guidance for the Lower Douglas Area which can then be used as a policy document to assist in the determination of planning applications within the area.

Annex A – List of Respondents to the Consultation

- Sefton Group plc
- Isle of Man Chamber of Commerce
 - Retail Committee
 - Chief Executive
- Manx National Heritage
- Isle of Man Constabulary
- Isle of Man Constabulary (Architectural Liaison Officer)
- Isle of Man Fire and Rescue
- Mr Chris Thomas, Dolls House, Old Castletown Road, Douglas
- Isle of Man Natural History & Antiquarian Society
- Ms Patricia Newton, Planning Consultant
- Isle of Man Enterprises plc
- Mr John Wilson, For and on behalf of Wilson Consulting Limited
- Dandara Group
- Mr Martin Norbury
- St Matthew's Church
- Port Erin Commissioners
- Isle of Man Post Office
- Braddan Parish Commissioners
- Mr John Asplin, Time and Tide Group
- Isle of Man Water and Sewerage Authority
- Patrick Parish Commissioners
- Manx Wildlife Trust
- Office of Human Resources, Isle of Man Government
- Housing Division of Department of Social Care