

# **The Department of Infrastructure's response to the representations received on the Preliminary Publicity to the Isle of Man Strategic Plan Review** (Response Table PP1)

**Preliminary Publicity - 6<sup>th</sup> December 2013 to 31<sup>st</sup> January 2014**

**Collated by respondent**

Planning Policy Team  
Strategy, Policy and Performance Division  
Department of Infrastructure  
16<sup>th</sup> January 2015





## Respondents to the Preliminary Publicity Consultation on the Isle of Man Strategic Plan Review

A total of 36 responses were received in response to the consultation. The names of the respondents are set out in the table below and each has been allocated a respondent number. The comprehensive table which follows, groups comments by respondent and the Department's response to each comment appears alongside.

Respondent No.	Respondent	Respondent No.	Respondent
SPR01	Ballasalla and District Residents Associations	SPR21	Mr Charles Howard Keith Kerruish*
SPR02	Chamber of Commerce (Chris Allen)	SPR22	Mr Hugh Logan
SPR03	Chamber of Commerce (Jane Dellar)	SPR23	Malew Commissioners (Barry Powell)
SPR04	Chamber of Commerce (Stephen Bradley)	SPR24	Manx National Heritage
SPR05	Mr Nigel Crowe	SPR25	Manx Wildlife Trust
SPR06	Mr Richard Davis	SPR26	Maughold Parish Council *
SPR07	Department of Home Affairs *	SPR27	Mr Morris
SPR08	Department of Social Care (Phil Halliwell)	SPR28	Dr and Mrs Naylor
SPR09	Derbyhaven Residents Society (Nora Cullen)	SPR29	Ms Patricia Newton
SPR10	Douglas Borough Council	SPR30	Mr Ashely Pettit
SPR11	Mr Norman Dowd	SPR31	Ramsey Town Commissioners *
SPR12	Mr John Edwin	SPR32	Mrs Sally Roberts
SPR13	Mr Terry Groves	SPR33	Santon Commissioners
SPR14	Hartford Homes	SPR34	Mr Tomlinson *
SPR15	Heritage Homes (David Humphrey)	SPR35	Mr Ian Bleasdale*
SPR16	Mr Bill Hogg	SPR36	Marown Parish Commissioners*
SPR17	Mr Peter Horsthuis		
SPR18	Mr Paul Hotchkiss		
SPR19	Isle of Man Enterprises (Keith Hargest)		
SPR20	Isle of Man Natural History and Antiquarian Society		

*\* These responses were received after the deadline of 5pm Friday 31st January 2014. The responses have been logged into the consultation response but they will be flagged up as being late*

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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1.	SPR01	Ballasalla and District Residents Association	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
2.	SPR01	Ballasalla and District Residents Association	Should Housing Policy 1 included in the Review	Yes		Comment noted.
3.	SPR01	Ballasalla and District Residents Association	Should Housing Policy 3 included in the Review	Yes		Comment noted.
4.	SPR01	Ballasalla and District Residents Association	Should the matters to be addressed by the Strategic Plan be widened	Yes	The Island Spatial Strategy as a whole needs to be addressed, in particular Spatial Policy 3, so as to: 1. Define more specifically the term 'local' as it is applied in the context of: a. the Isle of Man b. the Southern Area Plan c. Ballasalla 2. Re-classify Ballasalla from 'Service Village' to 'Service Centre'. See letters to BADRA regarding this current review and these issues from: Mr M Gallagher, Director of Planning (31 Jul 12), Mr D Cretney MHK, Minister of Infrastructure (30 Aug 12), Mr A Bell MHK, Chief	It is not the Department's intention to review the Spatial Strategy at this time. The Department is aware that the term 'local needs' as set out in Spatial Policy 3 and Spatial Policy 4 has been raised by BADRA previously.  The Department is satisfied that the term 'local needs' in the context of Spatial Policy 3 refers to that <i>Area</i> of the Island that each specified village is within i.e. North,

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					<p>Minister (5 Oct 12), Ms M Griffin, Secretary to the Chief Minister (29 Oct 12). In addition, this review should provide for the introduction and implementation of the 'Localism' Private Members' Bill. This should embody the aims and structures of the Act introduced in England in 2011. As part of that, 'Neighbourhood Planning' would make the IOM planning system more democratic and more effective.</p>	<p>South, East or West and that this is sufficient to guide the Area Plans in the allocation of appropriate and sufficient sites for development. The Department is aware that the Department of Health and Social Care when assessing its requirement for social and affordable housing do not identify the need for such at village scale, but rather identify housing 'need' more broadly.</p> <p>For the time being, it is proposed that Ballasalla's status as a Service Village will not be reviewed. It will remain in place; the intention being that the full Review of the Strategic Plan will address the classification of all of the Island's settlements and determine whether any part of the Spatial Strategy needs to change.</p> <p>In terms of the suggestion that the Island needs to follow the example of England and have a Localism Act, proper consideration needs to be given to the question of whether such an Act is actually necessary?</p> <p>The Localism Act introduced in the UK by the Department for Communities and Local Government in 2011, set out a series of measures to shift power away from central government and towards local people. The Review of the Strategic</p>

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						<p>Plan is not the forum to debate any possible Localism Act and is not directly linked to the Strategic Plan Review.</p> <p>Please also see the Department's response to Comment 230.</p>
5.	SPR01	Ballasalla and District Residents Association	Should 'The Foreword form part of the Review	Yes		Comment noted.
6.	SPR01	Ballasalla and District Residents Association	Should 'The Preface' form part of the Review	Yes		Comment noted.
7.	SPR01	Ballasalla and District Residents Association	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
8.	SPR01	Ballasalla and District Residents Association	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
9.	SPR01	Ballasalla and District Residents Association	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
10.	SPR01	Ballasalla and District Residents Association	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
11.	SPR01	Ballasalla and District Residents Association	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.

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12.	SPR01	Ballasalla and District Residents Association	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
13.	SPR01	Ballasalla and District Residents Association	Do you think other text should form part of the Review	Yes	See also previous comments at Q14 and in addition: 1. Chapter 5 - 'Island Spatial Policy' in which 'local' must be specifically defined. Also, Ballasalla should be re-classified as a 'Service Centre'. 2. Chapter 11 - 'Transport, Infrastructure and Utilities' - to be reviewed to reflect up to date traffic counts and SAP recommendation for a Ballasalla bypass. 3. Sewer and drainage capacity for SR2 development needs to be addressed. 4. Public Sector Housing - review of waiting lists required. 5. Private Sector Housing - review current needs given the great number of unsold properties on the market and on-going housing developments.	<p>It is the intention to update, where necessary, Chapter 11 'Transport, Infrastructure and Utilities' (paragraphs 11.1.7 to 11.1.13), to include the number and location of Strategic Links around the Island and junctions under pressure from congestion. It may be appropriate to make reference to the Ballasalla By-pass in this section; this will be considered in the preparation of the Draft Strategic Plan.</p> <p>In terms of SR2, the Development Brief set out in the Area Plan for the South requires a Drainage Master Plan to be provided as part of any application. It is not necessary to address this issue as part of the Strategic Plan Review.</p> <p>Public Sector Housing is currently undergoing major reform. Queries on any issues including public sector waiting lists are best directed to the Department of Health and Social Care.</p> <p>In terms of monitoring all forms of housing</p>



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						<p>development across the Island, the Department's Residential Land Availability Study Updates keep track of planning approvals, the take up of those approvals, and availability of residential land.</p> <p>In calculating the broad housing needs for the Island in the future, household projections take into account the findings of the Census. The housing requirement calculations do take into account a vacancy factor which in 2007 was set at 4%. None of the studies undertaken on the Island in recent years identify a significant problem with empty properties on the Island although the level of this vacancy factor will be reviewed as part of the preparation of the Draft Strategic Plan.</p> <p>Please also see the Department's response to Comment 4 which deals with the issue of the 'Spatial Strategy'.</p>
14.	SPR01	Ballasalla and District Residents Association	What year do you think the review should look ahead to?	2026		<p>The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.</p>

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15.	SPR02	Chamber of Commerce (Chris Allen)	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
16.	SPR02	Chamber of Commerce (Chris Allen)	Should Housing Policy 1 included in the Review	Yes		Comment noted.
17.	SPR02	Chamber of Commerce (Chris Allen)	Should Housing Policy 3 included in the Review	Yes		Comment noted.
18.	SPR02	Chamber of Commerce (Chris Allen)	Should the matters to be addressed by the Strategic Plan be widened	Yes	As a committee representing manufacturing on the Isle of Man we are keen to ensure that the Strategic Plan also considers not only the number of homes but also the spatial policy with regard to housing stock v economic activity v affordability. As much of these houses will support employees of the sector their relationship to transport links, road and utility infrastructure and location of the businesses that support the economic activity is important. There is also a need to review housing stock v an ageing population - there could be issues here if they were placed too near to industrial locations for example. The review process	The Strategic Plan 2007 established the number of new residential units needed in the Isle of Man between 2001 and 2016. The 6000 additional units identified were distributed amongst the 4 'Areas' of the Island which the Strategic Plan 2007 identified for planning purposes. This revision of the Strategic Plan will continue to set the broad housing figures and will take into account the 2011 Census and the population projection modelling and assumptions that flow from it. The specific locations for development have always, and will continue to be, allocated in development plans at a more local level; the intention being to produce

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					<p>refers to using census as a reference - this is wrong. There needs to be a longer term view based upon the economic climate, government Vision 2020 strategy and population plan to support the necessary growth. Census looks backwards - we need to look forward. Using census data is already flawed as the 6000 extra homes by 2016 that are identified is based on a population forecast from census of 85k people. We are already at those numbers today!</p>	<p>more 'Area Plans' (there is a current mix of Local and Area Plans on the Island until the remaining Area Plans are produced). Thorough assessments are carried out at the Area Plan stage to identify the best sites for development whether this be for housing or employment uses. Issues such as: access to transport links, the relationship with other land uses and infrastructure requirements, form part of this overall assessment process which is looking for the most sustainable sites achieving the right mix of uses.</p> <p>The Department recognises that housing affordability is a key issue. There is however no intention to review Housing Policy 5 at this time which requires 25% of housing developments on residential land over 8 dwellings to be affordable. The DHSC will continue to:</p> <ul style="list-style-type: none"> <li>i. assist first time buyers - which currently is through the House Purchase Assistance Scheme (HPAS) 2012 and –</li> <li>ii. manage its stock of public sector housing. The current Scheme for 1<sup>st</sup> timer buyers as well as the current approach to social housing provision and management have recently been under review through a major Housing Needs Study.</li> </ul>

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						<p>The 2011 Census clearly shows that the population of the Island is ageing. This is an issue for government generally and will need decisions to be made about how the elderly are looked after, whether this is in their own homes or in sheltered or nursing accommodation. The Department recognises that the ageing population is an issue which should be taken into account in the preparation of development plans. It is not the intention to add any specific Policies to the Strategic Plan as part of this review regarding the ageing population but this doesn't mean that little or no regard will be had to the issue in the Area Plans.</p> <p>The Area Plan for the South discussed the issue of providing housing for an ageing population. There was input from the then Department of Social Care, and in its site allocation, the Plan provided opportunities for affordable housing including sheltered housing. The eventual scheme approved at Ballakilly included 19 public sector sheltered housing units to be run by Marashen Crescent Housing Committee and 20 affordable properties which would qualify under the HPAS scheme. It is judged that a focussed review will not hinder the provision of affordable housing which may include</p>

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						<p>premises suitable for ageing residents.</p> <p>In terms of the Census, this is considered to be a reliable evidence source when looking at the demographics of the Island. Estimating future population change involves modelling. This is a normal method of predicting what is likely to happen in the future. By using assumptions about migration and fertility and numbers in prison/nursing homes, the model is able to estimate 'total residents' and 'total residents living in private households' expected in the years ahead. Further assumptions about household size allow figures to be calculated about likely housing need Island-wide. Clearly the figures become more uncertain, the further into the future ones looks but given the regularity of the Censuses and Interim Censuses, the accuracy of the modelling is able to be properly checked. The Census (and the population modelling which flows from it) is the most accurate and reliable method of projecting the Island's population available.</p> <p>It is important to note that the Strategic Plan 2007 recognises an approach of 'Plan, Monitor and Manage'. This is defined as:</p> <p>"A broad approach to planning the provision of</p>

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						<p>housing (and in particular to determining the amount of land needed to be allocated for housing in Area Plans). It involves:</p> <ul style="list-style-type: none"> <li>• Planning for an overall annual rate and geographical spread of housing need and demand on the one hand and environmental, infrastructure, and constraints on development on the other;</li> <li>• Monitoring actual provision of housing against targets and indicators and</li> <li>• Managing the process to modify the release of land for development (e.g. via revising Area Plans and rates of planning permission) if targets either have to be amended or are not met (e.g. if there is either under or over provision)."</li> </ul> <p>Changes in and implications of government economic policy could be integrated into the modelling but care has to be taken not to falsely influence the basic assumptions. For planning purposes, the basic modelling and assumptions built to estimate future households and therefore housing need are considered sufficient.</p> <p>To demonstrate how projection figures have fared in the past, projected and actual data for 2011 and</p>

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						<p>projections to 2016 are set out below.</p> <p><b>Strategic Plan 2007 (projections)</b></p> <table border="0"> <thead> <tr> <th></th> <th style="text-align: right;"><b>2011</b></th> <th style="text-align: right;"><b>2016</b></th> </tr> </thead> <tbody> <tr> <td>Residents living in private households</td> <td style="text-align: right;">81,133</td> <td style="text-align: right;">83,916</td> </tr> <tr> <td><b>2011 Census (Actual)</b></td> <td style="text-align: right;">83,026</td> <td></td> </tr> <tr> <td><b>2011 Census (Projection)</b></td> <td></td> <td style="text-align: right;">86,073</td> </tr> </tbody> </table> <p>Population estimates for both 2011 and 2016 were both underestimated in the Strategic Plan.</p> <p>The increase in 'residents living in private households' in 2011 compared to 2006 (Interim Census Year) were actually 5.8% not 3.4% as predicted.</p> <p>The predicted increase in 'residents living in private households' in 2016 (compared to 2006) was originally predicted to be 6.9%. This now stands at 9.7%.</p>		<b>2011</b>	<b>2016</b>	Residents living in private households	81,133	83,916	<b>2011 Census (Actual)</b>	83,026		<b>2011 Census (Projection)</b>		86,073
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						The projections in the 2007 Strategic Plan underestimated the 'residents living in private households' in 2011 and the latest Population Model has altered predictions for this category for 2016. This highlights the importance of regularly reviewing and updating the figures.
19.	SPR02	Chamber of Commerce (Chris Allen)	Should 'The Foreword form part of the Review	Yes		Comment noted.
20.	SPR02	Chamber of Commerce (Chris Allen)	Should 'The Preface' form part of the Review	Yes		Comment noted.
21.	SPR02	Chamber of Commerce (Chris Allen)	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
22.	SPR02	Chamber of Commerce (Chris Allen)	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
23.	SPR02	Chamber of Commerce (Chris Allen)	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
24.	SPR02	Chamber of Commerce (Chris Allen)	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
25.	SPR02	Chamber of Commerce (Chris Allen)	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
26.	SPR02	Chamber of	Should Appendix 8 (in	Yes		Comment noted.

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		Commerce (Chris Allen)	its entirety) form part of the Review			
27.	SPR02	Chamber of Commerce (Chris Allen)	Do you think other text should form part of the Review	Yes	Any element impacted by our earlier comments	Please see Department's response to Comment 18.
28.	SPR02	Chamber of Commerce (Chris Allen)	What year do you think the review should look ahead to?	Other	Every ten years	The Department considers that the most appropriate approach is to change the lifetime of the Strategic Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
29.	SPR03	Chamber of Commerce (Jane Dellar)	Should the matters to be addressed by the Strategic Plan be widened	Yes	This has raised a concern that if anyone fails to respond to the consultation it will be seen that all aspects of the existing 2007 Strategic Plan Report are therefore accepted for the foreseeable future, so I have been asked to clarify if this consultation is actually only about housing or could there be more fundamental questions being asked? From Chambers perspective the issue I would like to be clear on, is that regardless of the consultation, the Isle of Man Chamber of Commerce has and will continue to ask for clarification of the following	The Department has given considerable thought to how to approach the Strategic Plan Review at this point in time. The aim of the Preliminary Publicity was to identify those elements of the current Strategic Plan which the Department felt should be reviewed now and those elements which could be left to a later, full review. Views on this approach were invited to ensure that the Department's approach is sound and credible.  Where respondents have taken the time to

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					<p>Business Policies contained in the Strategic Review:            Business Policy 5: On land zoned for industrial use, permission will be given only for industrial development or for storage and distribution; retailing will not be permitted except where either: (a) the items to be sold could not reasonably be sold from a town centre location because of their size or nature; or(b) the items to be sold are produced on the site and their sale could not reasonably be severed from the overall business; and, in respect of (a) and (b), where it can be demonstrated that the sales would not detract from the vitality and viability of the appropriate town centre shopping area. Business Policy 9: The Department will support new retail provision in existing retail areas at a scale appropriate to the existing area and which will not have an adverse effect on adjacent retail areas. Major retail development proposals will require to be supported by a Retail Impact Assessment (1). To avoid any possible confusion over this, I would please ask you to note that failure to participate in the current consultation is not an acceptance by Chamber of the rest of the Strategic Review in its entirety.</p>	<p>comment on the approach, any suggestions/recommendations are being taken into account. The Chamber is, however, right in its assumption that those elements that are not being looked at now will have to wait until the next review which is most likely to be extensive and will either be based on the 2016 or 2021 Census.</p> <p>The Department acknowledges the Chamber's views on Business Policy 5 and Business Policy 9 in that these Policies would benefit from clarification. For the time being, the Department is prepared to retain these Policies in their current form without review.</p> <p>Please also see Department's response to comment 32.</p>

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30.	SPR04	Chamber of Commerce (Stephen Bradley)	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
31.	SPR04	Chamber of Commerce (Stephen Bradley)	Should Housing Policy 1 included in the Review	Yes		Comment noted.
32.	SPR04	Chamber of Commerce (Stephen Bradley)	Should the matters to be addressed by the Strategic Plan be widened	Yes	<p>The Retail Committee of the Chamber of Commerce and other associated groups concerned with regeneration and town centre development would like to see an urgent review/clarity of business policy 5 and business policy 9 of the 2007 Isle of Man Strategic Plan. The Retail Committee of The Chamber of Commerce would recommend that these policies are included in the review that is presently now being considered. We understand that the review of the 2007 Strategic Plan is being undertaken to facilitate the speedy progression of the Eastern Area Plan and so to promote economic development, all Chamber Members would encourage strategies that facilitate economic growth. The Retail Committee of the Chamber of Commerce believe that including Business Policy 5 and Business Policy 9 in the review of The Strategic</p>	<p>In terms of planning for future retail requirements the most important Policies within the Strategic Plan are Business Policy 10 (BP 10), Business Policy 9 (BP 9) and Business Policy 5 (BP 5).</p> <p>BP 10 sets out the fundamental Policy direction that "retail development will be permitted only in established town and village centres." It then goes on to give two exceptions to this:  (a) the development of neighbourhood shops in large residential areas; and  (b) those instances identified in BP 5.</p> <p>This direction is seemingly supported by the recently agreed Retail Sector Strategy which states as its first Strategy Recommendation - "Ensure strong planning policy supports town centres as the</p>

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					<p>Plan would further promote economic growth by providing important policy clarity. Business Policy 5 of the 2007 Strategic Plan outlines in detail the retail uses permitted on Industrial land, and so is a keystone in the present planning policy of directing all but the exceptional aspects of retailing to our existing centres, that is Business Policy 9. In recent years these long standing policies have been tested at appeal and The Departments interpretation overturned. Following these decisions The Retail Committee and the Chamber of Commerce Council have sort clarification from the department by means of a Planning Policy Statement, such requests date back to 2010. Minister's Gawne and Shimmin as respective Ministers with responsibility for Planning endorsed our request at the time. We were told at that juncture that we would need to wait for a review of the Isle of Man Strategic Plan 2007, hence our request now. Clarity on such issues/policies is vital we believe to the continued regeneration of our towns and villages, in particular to private sector investment. Investors and retailers alike will only commit to projects when there is a reasonable degree of security and clarity in planning policy. Planning Inspector Bushby in 2010 saw business policy 5 and its guidelines unclear and confusing in a planning appeal report and as such</p>	<p>location for retail activity.”</p> <p>Therefore, unless there are exceptional circumstances as identified in BP 10, the presumption is that retail development will be located in established centres.</p> <p>BP 5 does give some further detail about the use of zoned industrial land for retail purposes. This sets out three criteria:  (a) the items to be sold could not reasonably be sold from a town centre location because of their size or nature; or  (b) the items to be sold are produced on the site and their sale could not reasonably be severed from the overall business;  and, in respect of (a) or (b), where it can be demonstrated that the sales would not detract from the vitality and viability of the appropriate town centre shopping area.</p> <p>The overall aim of Business Policies 5, 9 and 10 are to: direct most retail uses to town centre locations, support new retail development which is at an appropriate scale and reserve and protect land for its designated purpose, such as industrial land.</p> <p>The Department acknowledges recent Inspector’s</p>

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					<p>dismissed Isle of Man policy preferring to rely on UK definitions, such definitions and interpretations would we feel bring very different uses to industrial land than those originally intended by Tynwald. The present position of uncertainty needs to be explored and more meaningful definitions and guidance notes underpinning present policy should we believe be included in the Strategic Plan.</p>	<p>decisions which have required close inspection of Business Policies 5 and 9. It accepts that where future proposals require interpretation of these Policies this will need to be a thorough exercise undertaken by future decision makers.</p> <p>The Department is not persuaded by the arguments presented as part of this Preliminary Publicity that it is necessary to review Business Policies 5 and 9 now. Of course, regeneration of our town centres is a key goal and attracting new businesses to the right areas is vitally important. And of course, Policy needs to be clear and concise.</p> <p>For future applications, the Department's approach will be to take into account any Business Policies in the current Strategic Plan relevant to the application. A practical and sensible approach will be taken when it comes to assessing individual shopping items. Regard will be also be had, where it would aid decision making, to the form of any retail development proposed.</p> <p>The Inspector's decision for PA 08/02135 (Approval in Principle to demolish an existing unit and erection of retail units – Unit 6 Spring Valley Industrial Estate) which was approved at Appeal</p>

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						<p>guided decision makers to think about</p> <p>i. the availability of town centre sites or buildings for a proposed development; and</p> <p>ii. whether, if a proposal is for bulky goods, the retail warehouse/unit could be accommodated in the nearest town centre?</p> <p>The Department is conscious of the wording of the current Policies and how these are being interpreted by Planning Inspectors at Appeal. Decisions will continue to be made using current policy advice and taking into account the specifics of each case.</p>
33.	SPR04	Chamber of Commerce (Stephen Bradley)	Should 'The Foreword' form part of the Review	Yes		Comment noted.
34.	SPR04	Chamber of Commerce (Stephen Bradley)	Should 'The Preface' form part of the Review	Yes		Comment noted.
35.	SPR04	Chamber of Commerce (Stephen Bradley)	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form	Yes		Comment noted.

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		Bradley)	part of the Review			
36.	SPR04	Chamber of Commerce (Stephen Bradley)	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
37.	SPR04	Chamber of Commerce (Stephen Bradley)	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
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40.	SPR04	Chamber of Commerce (Stephen Bradley)	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
41.	SPR04	Chamber of Commerce (Stephen Bradley)	Do you think other text should form part of the Review	No		Comment noted.
42.	SPR04	Chamber of Commerce (Stephen Bradley)	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
43.	SPR05	Mr Nigel Crowe	Should Strategic Policy	No	As part of its response to matters raised at the	The Area Plan for the South (at paragraph 3.3.2)

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			11 included in the Review		<p>Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.</p>	<p>includes the statement that 'historic landscape character remains to be addressed and this will be considered at the time of the partial review of the Strategic Plan.'</p> <p>Despite this assurance, the Department has judged that the best approach now is to undertake a very focused review and this does not include addressing the issue of historic landscape character.</p> <p>For planning purposes, judgements about landscape value have traditionally referred to the Isle of Man (Development Plan) Planning Scheme Order 1982. The associated Map showed areas of the Island which fell within the designation 'Area of High Landscape Value and Coastal and Scenic Significance' (AHLVCSS) and the remaining areas which did not. The AHLVCSS designations were subsequently identified on a number of Local Plans which served to replace parts of the 1982 Plan coverage. Occasionally, the designations in the Local Plans covered a wider geographical area than what was originally shown on the 1982 Plan.</p> <p>The purpose of the Landscape Character Assessment (LCA) of the Isle of Man produced in</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>2008 was to update the baseline of environmental information to enable a better understanding of the Island's landscapes. The LCA is an improvement to the information previously available on the Isle of Man about landscape character.</p> <p>The LCA was used to inform the Landscape Proposals for the Area Plan for the South and will serve the same purpose for the remaining Area Plans in due course.</p> <p>Until such time as the remaining Area Plans are prepared the AHLVCSS will be taken into account when planning applications are assessed.</p> <p>The Landscape Character Assessment will also be taken into account where relevant when planning applications are assessed but it should be noted that Planning Policy Statement on Landscape Character and Appearance is currently in draft form and requires approval by the Department.</p> <p>The Department judges that there is no urgent requirement for a separate study to be undertaken now on historic landscape character which normally involves the production of area based pictures of how places have developed over time. Such a</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>Study would require significant resources.</p> <p>Whilst some sites on the edge of towns and villages may well be released for development as part of the development of new Area Plans (e.g. Ballakilly on the edge of Port Erin in the South), it is considered that the detailed assessment of the sites, which will take into account the views of Manx National Heritage, is sufficient to protect the best of the Island's landscapes and historic identity.</p> <p>There must be a balance between recognising and protecting the landscape and releasing sufficient development land within and around the edge of identified settlements. Area Plan allocations and decisions on planning applications will continue to take into account landscape impact and it is often the case that important field boundaries as well as archaeologically important sites and landscape features are taken into account during site allocation, the preparation of development briefs and in site design and layout at application stage. It is also important to note that existing field boundaries, many of which are sod banks, require planning approval to be removed as such development would normally be classed as an engineering operation. In the absence of a full</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>assessment of the Isle of Man's historic landscape character, judgements of this nature will continue to be made on a site by site basis.</p> <p>The Department is therefore content that the issue of 'historic landscape character' should be considered for inclusion as part of a full review in the future but it cannot guarantee that a full government sponsored assessment will be undertaken as it may be deemed that it is not required.</p> <p>It should also be noted that the Department has undertaken a full LIDAR survey of the Island. This has numerous benefits to Government one of which is to have the potential to highlight otherwise non-visible archaeological and historic features in the landscape. It will be an important information source during future Area Plan preparation.</p>
44.	SPR05	Mr Nigel Crowe	Should Housing Policy 1 included in the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans	Please see the Department's response to Comment Number 43.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
					is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	
45.	SPR05	Mr Nigel Crowe	Should Housing Policy 3 included in the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	Please see the Department's response to Comment Number 43.
46.	SPR05	Mr Nigel Crowe	Should the matters to be addressed by the	No		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			Strategic Plan be widened			
47.	SPR05	Mr Nigel Crowe	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	Please see the Department's response to Comment Number 43.
48.	SPR05	Mr Nigel Crowe	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially	Please see the Department's response to Comment Number 43.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	
49.	SPR05	Mr Nigel Crowe	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	Please see the Department's response to Comment Number 43.
50.	SPR05	Mr Nigel Crowe	Should Chapter 11 'Transport, Infrastructure and	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic	Please see the Department's response to Comment Number 43.



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review		Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	
51.	SPR05	Mr Nigel Crowe	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	Please see the Department's response to Comment Number 43.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
52.	SPR05	Mr Nigel Crowe	Should Appendix 8 (in its entirety) form part of the Review	No	As part of its response to matters raised at the Public Inquiry into the SALP the Department undertook to address the issue of Historic Landscape Character at the next Strategic Plan Review. It was said that the issue could not be dealt with in isolation in the SALP. The new landscape policy being rolled out in the Area Plans is defective. It is based on an outmoded, essentially visual conception of landscape, and would not comply with current UK guidance, although the authors so asserted. If the Department insists on proceeding at this point, their actions will be vitiated by their failure to comply with the condition precedent.	Please see the Department's response to Comment Number 43.
53.	SPR05	Mr Nigel Crowe	Do you think other text should form part of the Review	Yes	I would draw your attention to Para 3.3.2 of the adopted Southern Area Plan, and would remind you that your Department gave an undertaking to address the issue of Historic Landscape Character when the Strategic Plan was reviewed. The Inspector took the undertaking into account when making his recommendation in respect of the Plan.	The Area Plan for the South (at paragraph 3.3.2) includes the statement that 'historic landscape character remains to be addressed and this will be considered at the time of the partial review of the Strategic Plan.'  Despite this assurance, the Department has judged that the best approach now is to undertake a very focused review and this does not include addressing the issue of historic landscape character.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>What the statement in the Area Plan for the South does not do is commit to the production of a specific Historic Landscape Character Assessment for the Island. Given:</p> <ul style="list-style-type: none"> <li>i. the time that it would take to commission and complete such an Assessment/Study;</li> <li>ii. the availability of the Landscape Character Assessment 2008;</li> <li>iii. the current array of policies in place to protect the countryside;</li> <li>iv. the thorough site assessment process during area planning; as well as,</li> <li>v. the general level and broad location of land that may be affected by new allocations,</li> </ul> <p>the Department strongly believes that it is not necessary to delay this particular Review of the Strategic Plan to undertake such additional historic landscape work which would consequentially delay the Area Plan for the East.</p> <p>Please see the Department's response to Comment Number 43.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
54.	SPR05	Mr Nigel Crowe	What year do you think the review should look ahead to?	Other	Premature at present	<p>The Department judges it sensible to identify a date in any revised Strategic Plan to indicate the lifetime for the Plan. It is sensible to tie this date in with either a full Census year or an Interim Census year in the future. It helps with estimating future housing need, as at a certain date in the future, and allows Area Plans to allocate sufficient land for development.</p> <p>The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.</p>
55.	SPR06	Mr Richard Davis	Should Strategic Policy 11 included in the Review	Yes		
56.	SPR06	Mr Richard Davis	Should Housing Policy 1 included in the Review	Yes		Comment noted.
57.	SPR06	Mr Richard Davis	Should Housing Policy 3 included in the	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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			Review			
58.	SPR06	Mr Richard Davis	Should the matters to be addressed by the Strategic Plan be widened	Yes	An integrated strategy should encompass all areas having an impact on future development such as transport and roads/footpaths (including parking), the availability (or potential) of work, drainage and flooding issues, community facilities including retail outlets, banks, post offices, medical and sporting/recreational facilities. Any likely impact on the environment and natural scenic aspects/conservation areas should also be taken into account.	<p>The elements of the Strategic Plan highlighted for revision will not hinder the operation of the remaining parts of the Plan which will be unaffected. On completion of the Review the 'reviewed' elements and the existing plan should mesh together and form a coherent document. The Strategic Plan, following Review, will continue to provide an over-arching, strategic land use planning framework for the Island.</p> <p>The Strategic Plan will continue to:</p> <ul style="list-style-type: none"> <li>i. provide general policies which the Area Plans can take forward in the allocation of development sites for various types of land use;</li> <li>ii. identify the key strategic transport links and junctions which may be affected by future development;</li> <li>iii. set parking standards;</li> <li>iv. address how flooding risks are to be dealt with in planning terms;</li> <li>v. set out policies on sport, recreation and communities facilities; and,</li> <li>vi. set out clear environmental policies.</li> </ul> <p>It is the responsibility of Development Management to assess planning applications in line with the</p>

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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						Strategic Plan and any Area Plan/Local Plan and any other material considerations.
59.	SPR06	Mr Richard Davis	Should 'The Foreword form part of the Review	Yes		Comment noted.
60.	SPR06	Mr Richard Davis	Should 'The Preface' form part of the Review	Yes		Comment noted.
61.	SPR06	Mr Richard Davis	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
62.	SPR06	Mr Richard Davis	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
63.	SPR06	Mr Richard Davis	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
64.	SPR06	Mr Richard Davis	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
65.	SPR06	Mr Richard Davis	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
66.	SPR06	Mr Richard Davis	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
67.	SPR06	Mr Richard Davis	Do you think other text should form part of the Review	No		Comment noted.
68.	SPR06	Mr Richard Davis	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
69.	SPR07	Department of Home Affairs (Late Response)	Detailed Comments submitted instead of using a questionnaire form		Submission offered support to the current Strategic Plan which has been of assistance to the Police Force.	It is noted that the Strategic Plan in its current form has been of use to the Police Force.
70.	SPR08	Department of Social Care	Should Strategic Policy 11 included in the Review	No	<p>2016 is very near so the timescale needs to be extended for at least 10 years. The 6000 figure should be reviewed and should take into account the opportunity for a proportion of new additional housing to be designated "affordable" The Department of Social Care believes that a minimum average of 100 affordable homes per annum would be required per annum. Given the uncertainties of development proceeding zoning for affordable housing should exceed this number. In addition to affordable housing the DSC, under its Social Services functions, also requires residential accommodation for elderly persons, adults with special needs and other specialist groups in need of support. Many of the existing residential units are in need of replacement and growth and these may require to be met on residential zoned sites and could therefore have a small impact on the assessment of household numbers.</p>	<p>Support for a Review which looks at least 10 years into the future is noted.</p> <p>The review intends to update the 6000 overall housing need figure set out in the current Strategic Plan. Whilst it is the intention to update Housing Policy 3 which breaks down the overall figure into 'Areas' of the Island (North, East, South and West), it is not the Department's intention to break this figure down further and suggest what proportion or number (either Island-wide or by Area) should be affordable. If each Area had to provide a certain number of affordable housing units, there is a risk that once this figure was reached, it could be argued that no more affordable units were needed in that Area.</p> <p>Housing Policy 5 is considered to be fair and equitable. The Department of Social Care (which is now the Department of Health and Social Care (DHSC) does not address in its submission, how a new/amended Policy which sets out the proportion</p>



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>of the Island total which should be affordable, would fit in with the current Housing Policy 5 (HP 5)? The Department believes that the current HP 5 is straightforward and easily interpreted by the development industry and decision makers alike, and therefore does not propose to include it in the Review.</p> <p>Housing Policy 5 which normally requires 25% of residential developments over 8 dwellings on zoned residential land or in predominantly residential areas to be affordable is considered by the Department to be sufficient and it will continue to take this requirement into account in development briefs in future Area Plans and in the assessment of planning applications. The Department will continue to take into account the views from the DHSC; about the most suitable form of affordable housing required on particular sites, and the Department understands the current targets of the DHSC to achieve a minimum average of 100 affordable homes per year.</p> <p>The Department acknowledges that the units provided via HP5 are supported by those units provided directly by the DHSC on government owned land which serves to renew the current</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>public sector housing stock and provide new units for public sector housing. The DHSC also administers the House Purchase Assistance Scheme (HPAS) 2012.</p> <p>The Department also acknowledges the current major Housing Needs Study which is taking place by the DHSC, the results of which will need to be carefully considered by the Department. The Department judges that this Strategic Plan Review can run alongside the Housing Needs Study and needn't be held up by it or conflict with any findings.</p> <p>On this basis the Department concludes that there is no requirement to expand the Review.</p>
71.	SPR08	Department of Social Care	Should Housing Policy 1 included in the Review	No	The timescale should be updated to reflect longer term need and the 6000 figure should be reviewed in the light of my previous response	<p>The Department acknowledges the wish to have the lifetime of Plan extended by a minimum of 10 years. One of the main aims of the Review is to update the 6000 'housing need' figure set out in the existing Strategic Plan.</p> <p>Please see the Department's response to Comment 70 which deals with the issue of how the updated Island - wide figure will be broken down.</p>
72.	SPR08	Department of Social Care	Should Housing Policy 3 included in the	No	The distribution needs to be reviewed to reflect the needs for a revised longer term period. In addition	It is not the Department's intention for the distribution figures in any revised Plan to include a

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			Review		<p>if the distribution figures are to reflect affordable housing need then Planning and DSC Housing Division should agree the weighting for affordable housing in each area. For example the East currently accounts for 2500 out of 6000 properties being just over 40%. On Housing Waiting lists the percentage for Douglas/Braddan/Onchan is 609 out of 1418 (Sept 2013) being 43% and on the First Time buyer register held by DSC Douglas represents 406 out of 655 being 61%</p>	<p>proportion or specific number to be identified as being needed for 'affordable' units. It is suggested by the DHSC that there should be an agreed weighting for affordable housing in each Area. To do so would imply:</p> <ul style="list-style-type: none"> <li>i. Different weightings may be applied to different Areas around the Island</li> <li>ii. Weightings would be based on waiting lists for social housing and for first time buyers.</li> </ul> <p>The risks of such an approach would be:</p> <ul style="list-style-type: none"> <li>i. Some Areas may lose out on the provision of affordable housing.</li> <li>ii. Waiting lists are regularly updated which would introduce an element of uncertainty into any weightings. There is also the risk that that by using waiting lists, allocations would be based on meeting 'aspirational' need rather than 'actual' need.</li> <li>iii. Once such figures are in the Strategic Plan it would be difficult to amend them.</li> <li>iv. There is uncertainty about how such an approach would affect Housing Policy 5 – would it be retained? Would it have to be linked to any distribution policy which relates to affordability?</li> </ul>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>v. What would be the implications for planning approvals already granted which had an element of affordable housing?</p> <p>The Department does not think it necessary to apply weightings to affordable housing for each Area.</p> <p>The matter of affordable housing will be investigated at the time of a full Review of the Strategic Plan. In the meantime, the Departments will continue to work together to secure the provision of affordable housing through HP 5.</p>
73.	SPR08	Department of Social Care	Should the matters to be addressed by the Strategic Plan be widened	Yes	I believe that Housing Policy 5 needs to be reviewed to clarify the interpretation and understanding. In view of the forthcoming changes proposed by the DSC in terms of Housing Policy a review of the definition of affordable housing will be required. Recreation Policy 3 also has a significant impact on the development of residential areas and can have an adverse impact on the affordability of affordable housing if fully applied in accordance with Appendix 6. This approach does not necessarily recognise any other strategic investment by Government in infrastructure nor is	<p>The Definition of affordable housing in the Strategic Plan 2007 is simple and where it refers to the HPAS 2004 states "and any successor schemes approved by Tynwald." Given that the implications of the Housing Needs Study are still being worked through the Department is content not to amend the definition of affordable housing in the Plan.</p> <p>In terms of Recreation Policy 3, this Policy seeks to ensure that where new housing development takes place, schemes over a certain size need to give proper consideration to the provision of adequate</p>

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
					there an overarching Recreation Strategy to target where facilities are best applied which may be a weakness in the Strategic Plan Policy.	recreational and amenity space. Such space adds to the quality of the development, is intended for long term use by residents of the development and benefits the area generally. The Department acknowledges that to forego the requirement to provide such space may make a development more viable if looked at in simple monetary terms, but the quality of individual schemes would clearly suffer, the environment of new housing developments generally would be harmed and there would be no guarantee that the cost savings realised by a developer would be passed on to the new occupiers of the properties. It would not be equitable to have a system of open space requirements for the private sector and a different system for government projects.
74.	SPR08	Department of Social Care	Should 'The Foreword form part of the Review	No	The Foreword is just a bland thank you and is not impacted by the changes!	An updated Foreword would set any updated Policies and text in context and is thought to be useful.
75.	SPR08	Department of Social Care	Should 'The Preface' form part of the Review	Yes		Comment noted.
76.	SPR08	Department of Social Care	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
77.	SPR08	Department of	Should Chapter 5	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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		Social Care	'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review			
78.	SPR08	Department of Social Care	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
79.	SPR08	Department of Social Care	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
80.	SPR08	Department of Social Care	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			of the Review			
81.	SPR08	Department of Social Care	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
82.	SPR08	Department of Social Care	Do you think other text should form part of the Review	Yes	Recreation Section 10.3 and Appendix 6	Please see the Department's response to Comment 73.
83.	SPR08	Department of Social Care	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
84.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Strategic Policy 11 included in the Review	No	Unnecessary. The underestimate of the increase in population to 2016 is fully balanced by the overestimate in the decrease of household size, so that the Strategic Plan total provision is still valid.	The Population Projection Modelling based on the 2011 Census data would suggest that the Strategic Plan figures require updating to meet the long term population projections. The purpose of the Strategic Plan is to set out a long term spatial vision and development strategy for the Island. Population on the Isle of Man is increasing and Government has a responsibility to ensure that this is acknowledged and planned for and that sufficient opportunities to accommodate this growth are provided through the Area Plans. The numbers at present relate to overall population – 'resident population' and 'residents living in private households'; further work

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						will be carried out by the Department to take these overall numbers and calculate the number of households that are expected i.e. the number of new homes required. Assumptions will be made about household formation/size based on recent trends and final figures will take into account other factors. All of which will be summarised in the Draft Strategic Plan and explained where necessary in background documents.
85.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Housing Policy 1 included in the Review	No	Unnecessary. See Question 8.	Please see the Department's response to Comment 84.
86.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Housing Policy 3 included in the Review	No	<p>Answered No because that is the only way to open up this window on the questionnaire. Our answer to this question is "YES" for the following reason: The housing provision for the South is excessive, therefore it needs to be reviewed. More detail is provided in the submission we have provided in hard copy. A summary of the submission is detailed below.</p> <p>They have a number of concerns about the general methodology and approach applied to the Review.</p> <ul style="list-style-type: none"> <li>- Do not agree that the Census data should be the sole evidence base.</li> </ul>	<p>The allocations in the recently adopted Area Plan for the South were not seen as being excessive by the Planning Inspector for that Plan. Indeed in relation to Castletown the Inspector argued for a greater allocation.</p> <p>The Census data is a reliable and well tested evidence base. It has proved to be a robust and credible foundation for the preparation of the Strategic Plan 2007 and it will continue to play this role moving forward.</p> <p>Different jurisdictions calculate their housing needs in different ways. Whilst it is important to be aware</p>



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<ul style="list-style-type: none"> <li>- Over and above the raw estimate of the number of additional dwellings required during the Plan period derived from the census data, other factors should be considered – see point 2 of letter for factors.</li> <li>- It seems appropriate to consider other neighbouring jurisdictions have approached this issue. The Scottish Government 2008 document "Housing Need and Demand Assessment provides one example of a comprehensive framework to provide a more comprehensive analysis of the housing market.</li> <li>- Having refined the data about future housing need, this information may then help to inform the Island Spatial Strategy and where appropriate, in the context of other Strategic Plan policies.</li> <li>- Turning to Housing Policy 3 and Paragraph 8.5.3, No evidence of a "sound and robust evidence base" to justify the allocation of housing to the different areas, and</li> </ul>	<p>of this, there is also a need to realise that the Island has its own unique circumstances and often it is possible to reach a level of analysis on the Island that is comparable with other places even if that information is gained via different methods.</p> <p>The Department's attention has been drawn to Scotland's Housing Need and Demand Assessment Guidance 2008. This provides guidance to Local Authorities for assessing need and demand to help inform housing strategies and development plans. The Isle of Man does not have a direct equivalent of such guidance. All planning is administered centrally but Local Authorities are consulted and are able to question the Department's approach. There are currently no proposals to transfer responsibilities for addressing housing need and the preparation of development plans from Central Government to Local Authority level.</p> <p>In Scotland, areas such as the Shetland Islands use the Assessment Guidance to produce their own specific assessments. Work is undertaken to realise key outputs such as estimations of:</p> <ul style="list-style-type: none"> <li>i. the breakdown of current dwellings;</li> <li>ii. future number of households;</li> <li>iii. household groups with specific household</li> </ul>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>specifically, it would appear that the allocation to the South is arbitrary and excessive.</p> <ul style="list-style-type: none"> <li>- The excessive allocation to the South puts an unfair burden on residents and infrastructure in the South.</li> <li>- Support the Department's overarching statement, "towards a sustainable Island" and agree that sustainability must remain the cornerstone of the Strategic Plan. Housing must be directed to the identified development nodes and not be permitted in unsustainable locations such as Derbyhaven or Langness.</li> <li>- Would urge that 'rush-hour' traffic surveys on the main arterial routes of the Island should form part of the evidence base for this review.</li> </ul>	<ul style="list-style-type: none"> <li>iv. requirements;</li> <li>v. households in housing need;</li> <li>vi. households in need of affordable housing;</li> <li>vii. households that will require market housing; as well as analysis of past and current housing market trends</li> </ul> <p>The Isle of Man does not follow the approach of Scotland or elsewhere but has access to a similar level of information gained from:</p> <ul style="list-style-type: none"> <li>i. the Census which Government has committed to retaining;</li> <li>ii. the Residential Land Availability Study which is regularly updated;</li> <li>iii. advice from and the work of the Department of Health and Social Care;</li> <li>iv. other specific studies which are produced as required to fill any gaps in knowledge; and,</li> <li>v. a clear and straightforward planning process in the form of a Strategic Plan and Area Plans which allow for key stakeholder involvement, such as Local Authorities, and resident groups at every stage.</li> </ul> <p>An assessment of the Strategic Highway Network will be undertaken to the standard that is required</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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						for the Isle of Man and this will be used to inform the revision of the Strategic Plan.
87.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
88.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should 'The Foreword form part of the Review	No	Unnecessary.	An updated Foreword would set any updated Policies and text in context and is thought to be useful.
89.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should 'The Preface' form part of the Review	No	The content is still valid	The Preface will require updating to cover the partial Review.
90.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes	Answered No because that is the only way to open up this window on the questionnaire. Our answer to this question is "YES" for the following reason: Data from the 2011 Census should be included to update the evidence base.	The Department agrees with this statement.
91.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	No	Answered No because that is the only way to open up this window on the questionnaire. Our answer to this question is "YES" for the following reason: The figures for planning approvals etc. need to be brought up to date. In the case of Paragraph 5:22, the overall distribution for the South is excessive. More detail is provided in the submission we have	Please see response to comment 86.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>provided in hard copy. A summary of the submission is detailed below.</p> <p>They have a number of concerns about the general methodology and approach applied to the Review.</p> <ul style="list-style-type: none"> <li>- Do not agree that the Census data should be the sole evidence base.</li> <li>- Over and above the raw estimate of the number of additional dwellings required during the Plan period derived from the census data, other factors should be considered – see point 2 of letter for factors.</li> <li>- It seems appropriate to consider other neighbouring jurisdictions have approached this issue. The Scottish Government 2008 document "Housing Need and Demand Assessment provides one example of a comprehensive framework to provide a more comprehensive analysis of the housing market.</li> <li>- Having refined the data about future housing need, this information may then</li> </ul>	

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>help to inform the Island Spatial Strategy and where appropriate, in the context of other Strategic Plan policies.</p> <ul style="list-style-type: none"> <li>- Turning to Housing Policy 3 and Paragraph 8.5.3, No evidence of a "sound and robust evidence base" to justify the allocation of housing to the different areas, and specifically, it would appear that the allocation to the South is arbitrary and excessive.</li> <li>- The excessive allocation to the South puts an unfair burden on residents and infrastructure in the South.</li> <li>- Support the Department's overarching statement, "towards a sustainable Island" and agree that sustainability must remain the cornerstone of the Strategic Plan. Housing must be directed to the identified development nodes and not be permitted in unsustainable locations such as Derbyhaven or Langness.</li> <li>- Would urge that 'rush-hour' traffic surveys on the main arterial routes of the Island</li> </ul>	

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					should form part of the evidence base for this review.	
92.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	No	<p>Answered No because that is the only way to open up this window on the questionnaire. Our answer to this question is "YES" for the following reason: These parts will need to be updated in terms of the 2011 Census and also updated in terms of planning consents granted etc. Also in terms of paragraph 8.5.3, the housing allocation for the South is excessive and should be reduced. More detail is provided in the submission we have provided in hard copy. A summary of the submission is detailed below.</p> <p>They have a number of concerns about the general methodology and approach applied to the Review.</p> <ul style="list-style-type: none"> <li>- Do not agree that the Census data should be the sole evidence base.</li> <li>- Over and above the raw estimate of the number of additional dwellings required during the Plan period derived from the census data, other factors should be considered – see point 2 of letter for</li> </ul>	Please see response to comment 86.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>factors.</p> <ul style="list-style-type: none"> <li>- It seems appropriate to consider other neighbouring jurisdictions have approached this issue. The Scottish Government 2008 document "Housing Need and Demand Assessment provides one example of a comprehensive framework to provide a more comprehensive analysis of the housing market.</li> <li>- Having refined the data about future housing need, this information may then help to inform the Island Spatial Strategy and where appropriate, in the context of other Strategic Plan policies.</li> <li>- Turning to Housing Policy 3 and Paragraph 8.5.3, No evidence of a "sound and robust evidence base" to justify the allocation of housing to the different areas, and specifically, it would appear that the allocation to the South is arbitrary and excessive.</li> <li>- The excessive allocation to the South puts an unfair burden on residents and</li> </ul>	

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>infrastructure in the South.</p> <ul style="list-style-type: none"> <li>- Support the Department's overarching statement, "towards a sustainable Island" and agree that sustainability must remain the cornerstone of the Strategic Plan. Housing must be directed to the identified development nodes and not be permitted in unsustainable locations such as Derbyhaven or Langness.</li> <li>- Would urge that 'rush-hour' traffic surveys on the main arterial routes of the Island should form part of the evidence base for this review.</li> </ul>	
93.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	No	Unnecessary.	The Department considers it a sensible approach to update, where necessary, Chapter 11 on 'Transport, Infrastructure and Utilities' (paragraphs 11.1.7 to 11.1.13). These paragraphs identify the number and location of 'Strategic Links' around the Island and highlight the junctions under pressure from congestion. As it is anticipated that the Strategic Plan (as reviewed) will need to allow for further development opportunities than the 2007 Plan, it is important to update Chapter 11 especially when it comes to identifying junctions that may



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						suffer greater congestion as a result.
94.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	No	Unnecessary.	This Chapter consists of 1 page on 'Implementation, Monitoring and Review.' References are made to the 2006 Census and the lifetime of the Strategic Plan being from 2001 to 2016. An update of this Chapter would be helpful and links well with the other parts of the Plan identified for review.
95.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Should Appendix 8 (in its entirety) form part of the Review	Yes	Answered No because that is the only way to open up this window on the questionnaire. Our answer to this question is "YES" for the following reason: Needs to be updated with latest data.	Agreed and it is the Department's intention to update this in full to reflect the current situation.
96.	SPR09	Derbyhaven Residents Society (Nora Cullen)	Do you think other text should form part of the Review	No		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
97.	SPR09	Derbyhaven Residents Society (Nora Cullen)	What year do you think the review should look ahead to?	Other	Stick to 2016 and then review when area plans have been completed.	<p>The Department does not agree with this comment as there is a need to review the housing figures in the Strategic Plan ahead of being able to prepare the remaining Area Plans.</p> <p>The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.</p>
98.	SPR10	Douglas Borough Council	Should the matters to be addressed by the Strategic Plan be widened	Yes	The Executive Committee of Douglas Borough Council has considered the preliminary publicity in relation to the revision of the Isle of Man Strategic Plan and has directed me to convey to you Members' very strong feeling that instead of simply adjusting those elements of the Plan affected by changes in Census data, the whole plan should be re-examined. The Committee was mindful that the Plan has not been full reviewed for seven years, and that the Area Plans that should complement it, have not yet been produced. The Committee considered that the Area Plans needed to be expedited as well as a full review of the overall Strategic Plan.	In preparation of the Review of the Strategic Plan the Department did consider a number of options including carrying out a full Review of the Strategic Plan. This would have to be completed ahead of the preparation of any of the remaining Area Plans. This is because in order to comply with the Town and Country Planning Act 1999, the Area Plans have to be in conformity with the Strategic Plan. The Strategic Plan must therefore be in an agreed and approved format before the Area Plans can be produced. This approach i.e. a full Review, was estimated to take a number of years to achieve which was considered too long to wait before preparing the Area Plan for the East which would

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
						<p>be the mechanism to release much needed land for residential and employment purposes.</p> <p>For these reasons the Department cannot support these comments from Douglas Borough Council.</p>
99.	SP11	Mr Norman Dowd	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
100.	SP11	Mr Norman Dowd	Should Housing Policy 1 included in the Review	Yes		Comment noted.
101.	SP11	Mr Norman Dowd	Should Housing Policy 3 included in the Review	Yes		Comment noted.
102.	SP11	Mr Norman Dowd	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
103.	SP11	Mr Norman Dowd	Should 'The Foreword form part of the Review	Yes		Comment noted.
104.	SP11	Mr Norman Dowd	Should 'The Preface' form part of the Review	Yes		Comment noted.
105.	SP11	Mr Norman Dowd	Should Chapter 1 'Introduction' –	Yes		Comment noted.

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			Paragraph 1.8.1 form part of the Review			
106.	SP11	Mr Norman Dowd	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
107.	SP11	Mr Norman Dowd	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
108.	SP11	Mr Norman Dowd	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
109.	SP11	Mr Norman Dowd	Should Chapter 13 'Implementation,	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review			
110.	SP11	Mr Norman Dowd	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
111.	SP11	Mr Norman Dowd	Do you think other text should form part of the Review	No		Comment noted.
112.	SP11	Mr Norman Dowd	What year do you think the review should look ahead to?	No preferred date		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
113.	SP12	Mr John Edwin	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
114.	SP12	Mr John Edwin	Should Housing Policy 1 included in the Review	Yes		Comment noted.
115.	SP12	Mr John Edwin	Should Housing Policy 3 included in the Review	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
116.	SP12	Mr John Edwin	Should the matters to be addressed by the Strategic Plan be widened	Yes		Comment noted.
117.	SP12	Mr John Edwin	Should 'The Foreword form part of the Review	Yes		Comment noted.
118.	SP12	Mr John Edwin	Should 'The Preface' form part of the Review	Yes		Comment noted.
119.	SP12	Mr John Edwin	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
120.	SP12	Mr John Edwin	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
121.	SP12	Mr John Edwin	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			5.22 form part of the Review			
122.	SP12	Mr John Edwin	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
123.	SP12	Mr John Edwin	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
124.	SP12	Mr John Edwin	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
125.	SP12	Mr John Edwin	Do you think other text should form part of the Review	No		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
126.	SP12	Mr John Edwin	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
127.	SPR13	Mr Terry Groves	Detailed Comments submitted instead of using a questionnaire form		<p>Supports the proposal to review the Island Strategic Plan as outlined by the Department. It is vital that this plan, for at least a 10 year forward view, recognises the future demands of the Island both economically and socially.</p> <p>Suggests that a new policy is included into the Strategic Plan would enable development to occur outwith the Area Plan process. The suggested wording is:</p> <p>"It is recognised that, having regard to community and economic need, where an area plan is not in existence, development can occur providing that there is a recognised need and the size and scale of development would not materially affect the outcome of an area plan yet to be determined."</p> <p>Suggests the review includes Policy 8.8 Groups of</p>	<p>The intention behind General Policy 3 in the Strategic Plan is to allow for some development to occur, in exceptional circumstances, on un-zoned land. The Department is satisfied that this level of flexibility is appropriate and that the Plan led approach of the Area Plans is still the preferred method of releasing land for development.</p> <p>The current approach in the Strategic Plan is to allow small groups of houses in the countryside to be investigated through the preparation of the Area Plans. This approach, which assesses the suitability of identified groups to accommodate additional housing development, was used in the preparation of the Area Plan for the South and the Department has no intention to alter Section 8.8 of the Strategic Plan as this is unwarranted.</p>



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					House in the Countryside. A statement should be made that suggests the approval of limited development in such as small villages and hamlets.	
128.	SPR14	Hartford Homes	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
129.	SPR14	Hartford Homes	Should Housing Policy 1 included in the Review	Yes		Comment noted.
130.	SPR14	Hartford Homes	Should Housing Policy 3 included in the Review	Yes		Comment noted.
131.	SPR14	Hartford Homes	Should the matters to be addressed by the Strategic Plan be widened	Yes	<p>Outlines the need for development land in the East both for residential and employment purposes. Suggests there should be a temporary policy until adoption of Eastern Plan that provides for more flexibility for developing un-zoned land for residential use, as long it can be demonstrated that the development of land would not prejudice the up and coming Area Plan and would be environmentally acceptable.</p> <p>There is a need to review Permitted Changes of Use. Consideration should be given to out of town</p>	There is no scope to include temporary policies within the Strategic Plan. Given that it is the intention to bring forward a Draft Area Plan for the East by 2016, such a Policy is likely to be superfluous. The site assessment process for the Area Plan for the East will enable all potential development sites to be assessed, not only individually, but against one another meaning that the most suitable sites will be put forward into the Area Plan. This process is clear and transparent and to try and develop a policy to circumvent this would have no overall benefit. For these reasons, the

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					bulk sales.	<p>Department cannot support the inclusion of a 'temporary policy' within the Strategic Plan to allow development of un-zoned land.</p> <p>The Department is committed to undertaking a review of the Use Classes Order which will cover permitted changes of use. This will take place outside of the Review of the Strategic Plan.</p>
132.	SPR14	Hartford Homes	Should 'The Foreword form part of the Review	Yes		Comment noted.
133.	SPR14	Hartford Homes	Should 'The Preface' form part of the Review	Yes		Comment noted.
134.	SPR14	Hartford Homes	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
135.	SPR14	Hartford Homes	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
136.	SPR14	Hartford Homes	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review			
137.	SPR14	Hartford Homes	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
138.	SPR14	Hartford Homes	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
139.	SPR14	Hartford Homes	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
140.	SPR14	Hartford Homes	Do you think other text should form part of the	Yes	Outlines the need for development land in the East both for residential and employment purposes.	See response to comment 131 above.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			Review		<p>Suggests there should be a temporary policy until adoption of Eastern Plan that provides for more flexibility for developing un-zoned land for residential use, as long it can be demonstrated that the development of land would not prejudice the up and coming Area Plan and would be environmentally acceptable.</p> <p>There is a need to review Permitted Changes of Use. Consideration should be given to out of town bulk sales.</p>	
141.	SPR14	Hartford Homes	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
142.	SPR15	Heritage Homes (David Humphrey)	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
143.	SPR15	Heritage Homes (David Humphrey)	Should Housing Policy 1 included in the Review	Yes		Comment noted.
144.	SPR15	Heritage Homes	Should Housing Policy	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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		(David Humphrey)	3 included in the Review			
145.	SPR15	Heritage Homes (David Humphrey)	Should the matters to be addressed by the Strategic Plan be widened	Yes	<p>The Department should consider updating sections 7.4 to 7.6 of the Plan, which deal with landscape, in order to reflect the publication of the Landscape Character Assessment Report in 2008. The use of Census data should be consistent throughout the Plan and as such 2011 Census data should be used to update the supporting text of the Business and Tourism chapter, and the Department's Employment Land Availability Studies should be used to update Appendix 9. In respect of the sections which have been identified for revision by the Department, a succession of independent Inspectors (and subsequently Ministers and CoMin) have considered the issue of housing provision in the light of IoMSP policies. They have concluded that neither the overall housing figure (currently 6000) nor the distribution figures of the Plan should be seen as a maximum and as such para 5.22 should be revised to reflect this. It has also been consistently concluded that projected conversion and windfall properties should not be taken into account ahead of dwellings which are proposed on allocated (zoned) sites, and reference should be made to this (for example at paras 5.19 &amp; 8.1.4). It may help to consider the Inspector's reports for PAS</p>	<p>The Landscape Character Assessment produced in 2008 did not in itself replace the current system of landscape designation i.e. Areas of High Landscape Value and Coastal or Scenic Significance (AHLVCSS). For the Area Plan for the South however, the Assessment was used to inform a number of Landscape Proposals and Map 2 showed the landscape character 'areas' and 'types'. The LCA will serve the same purpose for the remaining Area Plans in due course.</p> <p>Until such time as the remaining Area Plans are prepared the AHLVCSS will be taken into account when planning applications are assessed.</p> <p>The Landscape Character Assessment will also be taken into account where relevant when planning applications are assessed but it should be noted that Planning Policy Statement on Landscape Character and Appearance is currently in draft form and requires approval by the Department.</p> <p>Now that the legal proceedings associated with the Area Plan for the South have been concluded (which focussed in the main on one of the</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>07/02303/A, 09/00521/B, 10/00544/B, 10/01558/B, 11/01250/B &amp; 12/00573/B.</p>	<p>landscape proposals), the PPS can now be progressed. It is prudent therefore to retain paragraph 7.4 – 7.6 as currently set out; Environmental Policy 1 in any case which sits below paragraph 7.5.1 would not necessarily need to be updated as a result of any change to landscape classification on the Island.</p> <p>The Department accepts that there may be points within the existing document that refer to former Departments or outdated statistical information or reports. However, the Department is confident that such references do not render the Strategic Plan unfit for purpose to the extent that the review should be widened to include additional parts.</p> <p>In terms of updating information on employment land, there is a separate study underway which is looking at this. It has yet to be completed and thus it would be premature to include any suggested policy/supporting text changes at this time.</p> <p>Paragraph 5.22 which includes the reference 'maximum' was identified in the Preliminary Publicity to form part of the Review.</p> <p>Paragraphs 5.19 and 8.1.4 were identified in the</p>

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
						Preliminary Publicity to form part of the Review. The next step i.e. the preparation of the Draft Plan, will consider the most appropriate way to calculate housing need in the future and re-examine the methodology previously used for the Strategic Plan 2007 to determine whether it remains suitable. This will include the way projection figures for conversions and windfalls are dealt with.
146.	SPR15	Heritage Homes (David Humphrey)	Should 'The Foreword form part of the Review	Yes		Comment noted.
147.	SPR15	Heritage Homes (David Humphrey)	Should 'The Preface' form part of the Review	Yes		Comment noted.
148.	SPR15	Heritage Homes (David Humphrey)	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
149.	SPR15	Heritage Homes (David Humphrey)	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
150.	SPR15	Heritage Homes (David Humphrey)	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review			
151.	SPR15	Heritage Homes (David Humphrey)	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
152.	SPR15	Heritage Homes (David Humphrey)	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
153.	SPR15	Heritage Homes (David Humphrey)	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
154.	SPR15	Heritage Homes (David Humphrey)	Do you think other text should form part of the Review	Yes	Para 1.4.1 - does not make reference to Area Plan for the South. Paras 2.1 to 2.4 - references require updating. Page 9, footnote (1) - requires updating.	As referred to in Response 145, the Department accepts that there are elements of the supporting text in the current Strategic Plan that could be



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>Paras 5.1, 5.3, 5.7, 5.13, &amp; 5.16 - references require updating. Sections 7.4 to 7.6 - require updating to refer to Landscape Character Assessment Report 2008. Para 8.6.2 - affordable housing statistics are out of date. Paras 9.1.8 to 9.1.12, para 9.21 &amp; Tables One &amp; Two - Census (and other) data requires updating. Para 11.6.2 - requires updating. Appendix 9 - requires updating.</p>	<p>updated. Deciding the extent of the Review has been difficult: a full Review would bring all of the text up to date, would re-examine all of the Policies and would reduce the risk of omitting important information to a minimum. But, it would be time consuming.</p> <p>A partial Review, which re-examines a limited number of Policies but makes textual updates in addition to those identified in the Preliminary Publicity may be helpful in some ways, but the risk of missing consequential changes to other parts of the Plan would be greater. The resultant Plan could be disjointed and potentially contradictory.</p> <p>A tightly focused Review, where it is clear which elements are up for review, which elements have changed and which sticks to essential changes only, carries a much lower risk of failing to identify consequential.</p> <p>There are really only 2 sensible options - a full Review or a focused Review. The Department is content to stick to the approach of a focused Review, but with awareness that elements of the supporting text will not be up to date.</p>

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
155.	SPR15	Heritage Homes (David Humphrey)	What year do you think the review should look ahead to?	2036		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
156.	SPR16	Mr Bill Hogg	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
157.	SPR16	Mr Bill Hogg	Should Housing Policy 1 included in the Review	Yes		Comment noted.
158.	SPR16	Mr Bill Hogg	Should Housing Policy 3 included in the Review	Yes		Comment noted.
159.	SPR16	Mr Bill Hogg	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
160.	SPR16	Mr Bill Hogg	Should 'The Foreword' form part of the Review	Yes		Comment noted.
161.	SPR16	Mr Bill Hogg	Should 'The Preface' form part of the Review	Yes		Comment noted.
162.	SPR16	Mr Bill Hogg	Should Chapter 1	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			'Introduction' – Paragraph 1.8.1 form part of the Review			
163.	SPR16	Mr Bill Hogg	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
164.	SPR16	Mr Bill Hogg	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
165.	SPR16	Mr Bill Hogg	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
166.	SPR16	Mr Bill Hogg	Should Chapter 13	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review			
167.	SPR16	Mr Bill Hogg	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
168.	SPR16	Mr Bill Hogg	Do you think other text should form part of the Review	No		Comment noted.
169.	SPR16	Mr Bill Hogg	What year do you think the review should look ahead to?	Other	2018	The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
170.	SPR17	Mr Peter Horsthuis	Detailed Comments submitted instead of using a questionnaire form		Keen that the Strategic Plan review is as narrow as possible to enable the Area Plan for the East to commence. Should consider embedding the PPS on Planning and the Economy into the Strategic Plan review.	The Department has identified what it sees to be the most essential Policy and text changes to enable: i. the Strategic Plan, as reviewed, to remain a coherent and useable document; and ii. the Area Plan for the East to commence without undue delay.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>The Department's response to other commentators explains that whilst it accepts that there may be some disadvantages to the approach identified in the Preliminary Publicity, it will enable the remaining Area Plans to get underway and is the most straightforward approach when it comes to producing an updated, coherent Plan.</p> <p>In terms of the PPS on Planning and the Economy, a number of changes in the way Planning operates and improvements in joint working with DED officials and developers have taken place since the original draft Planning &amp; Economy PPS was published for consultation in 2012. As a consequence, work is underway to develop an alternative approach to a PPS on this issue.</p> <p>Please also see the Department's response to Comment 154.</p>
171.	SPR18	Mr Paul Hotchkiss	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
172.	SPR18	Mr Paul Hotchkiss	Should Housing Policy 1 included in the Review	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
173.	SPR18	Mr Paul Hotchkiss	Should Housing Policy 3 included in the Review	Yes		Comment noted.
174.	SPR18	Mr Paul Hotchkiss	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
175.	SPR18	Mr Paul Hotchkiss	Should 'The Foreword form part of the Review	Yes		Comment noted.
176.	SPR18	Mr Paul Hotchkiss	Should 'The Preface' form part of the Review	Yes		Comment noted.
177.	SPR18	Mr Paul Hotchkiss	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
178.	SPR18	Mr Paul Hotchkiss	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
179.	SPR18	Mr Paul Hotchkiss	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review			
180.	SPR18	Mr Paul Hotchkiss	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
181.	SPR18	Mr Paul Hotchkiss	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
182.	SPR18	Mr Paul Hotchkiss	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
183.	SPR18	Mr Paul Hotchkiss	Do you think other text should form part of the Review	No		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
184.	SPR18	Mr Paul Hotchkiss	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
185.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
186.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Housing Policy 1 included in the Review	Yes		Comment noted.
187.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Housing Policy 3 included in the Review	Yes		Comment noted.
188.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should the matters to be addressed by the Strategic Plan be widened	Yes	Wants a review of all of the Retail policies in the Strategic Plan. Current Policies are out of date. The Sector and health of town centres has been affected by changes in retailing since 2008. Evidence is of date and Plan needs to take on board recommendations of recent Studies. Approach to business and industry based on simplistic assessment of supply and historic demand for employment land – existing employment land supply is increasingly inappropriate for the needs of the modern Isle of Man economy. Seeks to include	The respondent suggests that the retail sector and health of the town centres has been affected by changes in retailing in recent years but does not expand on what these are? And how they affect the current policies in the Strategic Plan? Reference is made to Studies including the Retail Study 2009 and the Retail Sector Strategy 2013 and highlights some of the main findings of the latter namely recommendations 1, 4, 5, 6, 7, 8 and 10. The Department supports these recommendations referred to which, in summary, recommend that:



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					sections 9.1, 9.2, 9.3 and 9.4 in the Review.	<ul style="list-style-type: none"> <li>i. planning policy supports town centres for the location of retail;</li> <li>ii. a Central Douglas Master Plan is prepared;</li> <li>iii. opportunities for redevelopment in town centres are identified;</li> <li>iv. town centres are accessible;</li> <li>v. there are better links across the town centres;</li> <li>vi. vacant premises are improved; and</li> <li>vii. businesses are involved in the improvement of town centres.</li> </ul> <p>None of these recommendations are inhibited by the existing Strategic Plan nor would be by a focused Review.</p> <p>The Department agrees that retailing plays an important part in the Island's economy. The respondent seems to be concerned about the risk that more jobs could be lost from the retail sector but doesn't go on to explain which elements of policy direction need to be addressed to tackle this alleged risk?</p> <p>In terms of the comments made about Business and Industry, the current Strategic Plan Policies</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>enable the Area Plans to designate land for industrial purposes as well as land for Business Parks. It is important to note that it is the Area Plans which allocate land for development and not the Strategic Plan.</p> <p>The respondent seems concerned about the scale of land allocations but this is not a Strategic Plan issue. The respondent highlights that more land is needed for commerce including financial services and other sectors. It may be that a Business Park environment would be suitable for some of these uses; it is not understood what is meant by reference to 'other sectors'. It is therefore difficult to understand from these arguments how the Strategic Plan is currently lacking?</p> <p>The current Department approach is criticised as being too simplistic - arguing that greater recognition should be given to the types of land and premises required for different sectors. The Department would contend that the policy approach used remains effective. It is straightforward and it is flexible.</p> <p>The Area Plans are much more suited to identifying land for specific uses and can take account of</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>changes amongst commercial sectors. Being too specific in the Strategic Plan about employment land required may in fact be more of a hindrance to business growth. The Department acknowledges that it would be beneficial to update the supporting text and acknowledge new and ongoing Studies on retail and employment land. However, it is not essential and the Strategic Plan Policies in their current form will still be able to allocate land as required for employment purposes in Area Plans and where necessary or appropriate, de-allocate land.</p> <p>The latest Employment Land Review is not yet complete, but it is likely that it will enable the Area Plans to do a better job, rather than find fundamental flaws with the Policies in the Strategic Plan. The key importance now is to proceed with the Area Plan for the East and release sufficient land of the right quality and in the right places.</p>
189.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
190.	SPR19	Isle of Man Enterprises	Should Chapter 5 'Island Spatial	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
		(Keith Hargest)	Strategy' – Paragraphs 5.18 to 5.22 form part of the Review			
191.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
192.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
193.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
194.	SPR19	Isle of Man Enterprises (Keith Hargest)	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
195.	SPR19	Isle of Man Enterprises (Keith Hargest)	Do you think other text should form part of the Review	No		Comment noted.
196.	SPR19	Isle of Man Enterprises (Keith Hargest)	What year do you think the review should look ahead to?	2036		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
197.	SPR20	Isle of Man Natural History and Antiquarian Society	Should the matters to be addressed by the Strategic Plan be widened	Yes	There needs to be a sound landscape policy based on the Landscape Character Assessment and historic landscape character. PPS 02/09 needs to be completed with the historic landscape review undertaken and added in, tightened up and applied. Concerns raised about Housing Policies 11-16 and how they are being applied. They are applied inconsistently and incorrectly. The loss of traditional houses and farmsteads is disturbing to the Society and contrary to the findings of the Landscape Character Assessment.	In terms of landscape character, the purpose of the Landscape Character Assessment (LCA) of the Isle of Man produced in 2008 was to update the baseline of environmental information to enable a better understanding of the Island's landscapes. The LCA is an improvement to the information previously available on landscape character.  The LCA was used to inform the Landscape Proposals for the Area Plan for the South and will serve the same purpose for the remaining Area Plans in due course.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>Until such time as the remaining Area Plans are prepared the AHLVCSS will be taken into account when planning applications are assessed.</p> <p>The Landscape Character Assessment will also be taken into account where relevant when planning applications are assessed but it should be noted that Planning Policy Statement on Landscape Character and Appearance is currently in draft form and requires approval by the Department.</p> <p>In terms of historic landscape character, the Area Plan for the South (at paragraph 3.3.2) includes the statement that this topic remains to be addressed and that this will be considered at the time of the partial review of the Strategic Plan. Despite this assurance, the Department has judged that the best approach now is to undertake a very focused review and this does not include addressing the issue of historic landscape character.</p> <p>The Department judges that there is no urgent requirement for a separate study to be undertaken now on historic landscape character which normally involves the production of area based pictures of how places have developed over time. Such a Study would require significant resources.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>The Department is content that the issue of 'historic landscape character' should be considered for inclusion as part of a full Review in the future but it cannot guarantee that a full government sponsored assessment will be undertaken as it may be deemed that it is not required.</p> <p>It should also be noted that the Department has undertaken a full LIDAR survey of the Island. This has numerous benefits to Government one of which is to have the potential to highlight otherwise non-visible archaeological and historic features in the landscape.</p> <p>In terms of concerns about the application of Housing Policies 11-16, this cannot be addressed by a review of these Policies. The Department does not consider that there is justification to widen the review to include other Housing Policies at this time.</p> <p>Please also see responses to Comments 43, 53 and 145.</p>
198.	SPR21	Mr Charles Howard Keith	Should Strategic Policy 11 included in the	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
		Kerruish (Late Response)	Review			
199.	SPR21	Mr Charles Howard Keith Kerruish	Should Housing Policy 1 included in the Review	Yes		Comment noted.
200.	SPR21	Mr Charles Howard Keith Kerruish	Should Housing Policy 3 included in the Review	Yes		Comment noted.
201.	SPR21	Mr Charles Howard Keith Kerruish	Should the matters to be addressed by the Strategic Plan be widened	Yes	Backdated 6 years to 2001 to provide 400 houses per annum over 15 years to 2016. (What figures to date; local authority/private sector housing) (What are the current waiting lists - local authority and first time buyers?) Distribution: 50% of the population choose to live in Douglas and Onchan - 40,000, so the 2,500 designation for East was too low and in the absence of East zoning, West has gained against the wishes of buyers who have been forced there.	The Strategic Plan was approved in 2007 but the date of 2001 was kept as the baseline date as the population and household projections were based on information from the 2001 Census. As set out in Comment 211 below (and reported elsewhere in this document), the Department supports a change in the lifetime of the Strategic Plan from 2001-2016 to 2011-2026. This would still allow continuity in the housing figures but would alter the baseline date from 2001 to 2011 to reflect the recent Census and the most up to date population projections.  Waiting list information was included in the Strategic Plan 2007 and whilst any full Review



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>would update this information, it is not considered essential to update these figures now. The Department of Social Care (now the Department of Health and Social Care) has recently undertaken a major Housing Needs Study. The implications of this Review are still being worked through and topic work is ongoing. The section on affordable housing in the Strategic Plan will be updated as part of a full Review and will reflect changes brought about by the Housing Needs Study. Queries on any issues including public sector waiting lists are best directed to the Department of Health and Social Care.</p> <p>The spatial distribution of new housing in the Strategic Plan 2007 was based on broad population concentrations. Housing Policy 3 which set out this distribution is to be reviewed as part of this Review. The proportions may change or they may stay the same. It is unlikely however, that one Area, such as the East will be identified as having to provide 100% of the Island's future housing.</p>
202.	SPR21	Mr Charles Howard Keith Kerruish	Should 'The Foreword form part of the Review	Yes	Yes, it proves that everything the Department does is impossibly slow, i.e. the July 2001 Draft Strategic Plan was adopted June 2007 without adjustment for 6 years retrospective, i.e. 6000 – 2001-2016. In same vein Minister Shimmin said four Areas would	The Department accepts that it has not met the deadlines for plan production committed to in the past. By undertaking a focused Review of the Strategic Plan, this will allow the Area Plan for the East to proceed in an expedient manner and a

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					be completed by 2011; only the South has yet been completed after 7 years.	<p>further timetable produced which gives a better indication of the work programme for the remaining Area Plans and Strategic Plan Full Review.</p> <p>The Environment and Infrastructure Committee has given the Department of Infrastructure the objectives of:</p> <ol style="list-style-type: none"> <li>i. completing the Review of the Strategic Plan by 31<sup>st</sup> December 2015;</li> <li>ii. delivering a Draft Area Plan for the East by 2016; and</li> <li>iii. completing preparatory work on the North and West Plans by 2016.</li> </ol>
203.	SPR21	Mr Charles Howard Keith Kerruish	Should 'The Preface' form part of the Review	Yes		Comment noted.
204.	SPR21	Mr Charles Howard Keith Kerruish	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
205.	SPR21	Mr Charles Howard Keith Kerruish	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
206.	SPR21	Mr Charles Howard Keith Kerruish	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
207.	SPR21	Mr Charles Howard Keith Kerruish	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes	It is nonsense that so many have been forced to Peel and West because of Douglas containment/blockade. Ch.5.22	<p>The Residential Land Availability Study (RLAS) Update 6 shows that between January 2001 and June 2013, there were 2626 approvals for new dwellings in the East which represents 47% of the Island total. There were 1098 approvals in the West which represents 19.5% of the Island total. For Douglas alone, there were 1859 approvals (including conversions) representing 71% of the Eastern total. Development in Peel represents 79% of the total in the West.</p> <p>Update 6 also showed that between 2001 and 2013 43.13 ha of land was zoned for residential development in the East, 28.73 ha of which was either developed or had planning approval for development. As at 30<sup>th</sup> June 2013, 14.4 ha</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>remained available for development in the East with no planning approval. Land that remained available in Douglas as at June 2013 stood at 2.4 ha (land zoned stood at 11.9 ha).</p> <p>These figures demonstrate that residential land has been available in Douglas and the East. Only 20% of land available in the current Douglas Local Plan remains available however.</p> <p>The commentator suggests that land allocations in Douglas are unduly containing, but the statistics show that there have been a significant number of new units approved. What this also shows is that there has been developer interest in pursuing proposals in Douglas. There is evidence therefore that the current policy framework has encouraged development schemes to be undertaken which, together, have been optimising the use of land within the Town and overall have been positive for Douglas. Douglas has clearly had the capacity for additional housing.</p>
208.	SPR21	Mr Charles Howard Keith Kerruish	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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			of the Review			
209.	SPR21	Mr Charles Howard Keith Kerruish	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
210.	SPR21	Mr Charles Howard Keith Kerruish	Do you think other text should form part of the Review		<p>There is a shortage of current information in the review, viz:-</p> <p>Since 2001 how many (i) houses and (ii) flats have been built:-</p> <p style="padding-left: 40px;">(a) Local Authority Housing</p> <p style="padding-left: 40px;">(b) Private Sector</p> <p>Since 2001 how many retirement units have been built to enable local authority houses to be available to families and how many are in the pipeline?</p>	<p>The existing Strategic Plan includes some statistical information. It does not include breakdowns of house approvals compared to flats or numbers of public sector housing compared to the private sector. The Plan did not record in 2007 numbers of 'retirement' units whether this related to private bungalow units or sheltered housing in private or public ownership.</p> <p>These numbers, simply because of their nature often change and it is important to consider what the benefit would be of including such statistics in the Strategic Plan. Detailed information about planning approvals are recorded in the Residential Land Availability Study Updates (RLAS) and will pick up, with this data, information about net increases in public sector properties as well as private. The Housing Needs Study Review being led by the Department of Health and Social Care is addressing the issue of the renewal and management of its public housing stock as well as the current House</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						Purchase Assistance Scheme, and so much of the statistical information that is produced is better placed in supplementary guidance to the Strategic Plan.
211.	SPR21	Mr Charles Howard Keith Kerruish	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
212.	SPR21	Mr Charles Howard Keith Kerruish	General Comments		<p>Government has consistently funded local authority housing (up to £250,000 per unit) and consistently failed to zone sufficient land for first time buyers ("FBTs") so that demand has for 40 years outstripped supply with twofold consequence:-</p> <ul style="list-style-type: none"> <li>(i) Difficulty for FTBs to access market at figures much higher than UK so that:-</li> <li>(ii) The Isle of Man has a higher proportion of rental property and flats unsuitable for families, than any comparable market town scale in the UK.</li> </ul> <p>I urge that consideration be given to adopting UK measures:-</p> <ul style="list-style-type: none"> <li>(a) Intended to increase supply by making an</li> </ul>	<p>The Department of Health and Social Care (DHSC) is now responsible for progressing the outcomes of the Housing Needs Study. This looked at:</p> <ul style="list-style-type: none"> <li>i. the need for additional affordable housing over next 10 years;</li> <li>ii. the role of alternative forms of affordable housing; and</li> <li>iii. housing options for older people.</li> </ul> <p>The Study reported that households in housing need were relatively stable at a level of 1% but suggested this may increase in the next 10 years.</p> <p>The Housing Needs Study made a number of recommendations which are currently being taken forward. These include proposals to replace the existing Housing Purchase Assistance Scheme.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>assumption in favour of development even in areas of high landscape value;</p> <p>(b) To support the difficult transition from renter to buyer where rents at £800 per calendar month create difficulty in saving 10% (or more for deposit). Tougher rental controls will likely extend the housing lists;</p>	<p>The DHSC has introduced the Voluntary Landlord Registration Scheme 2013 which aims to ensure that properties for rent in the private sector meet minimum standards. This is likely to become mandatory later in 2014 by the Landlord and Tenant (Private Housing) Bill which is currently progressing through Tynwald.</p> <p>In terms of assessing applications for development the Town and Country Planning Act 1999, and policy guidance in the Strategic Plan do not explicitly state that there is "a presumption in favour of development" but the Act sets out that in dealing with an application for planning approval, the Department shall have regard to the provisions of the development plan so far as material to the application, any relevant statement of planning policy and all other material considerations.</p> <p>The Strategic Plan at General Policy 2 states that "Development which is in accordance with the land-use zoning and proposals in the appropriate Area Plan and with other policies of this Strategic Plan will normally be permitted provided that the development...." This Policy goes on to list a number of criteria.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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213.	SPR22	Mr Hugh Logan	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
214.	SPR22	Mr Hugh Logan	Should Housing Policy 1 included in the Review	Yes		Comment noted.
215.	SPR22	Mr Hugh Logan	Should Housing Policy 3 included in the Review	Yes		Comment noted.
216.	SPR22	Mr Hugh Logan	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
217.	SPR22	Mr Hugh Logan	Should 'The Foreword' form part of the Review	No	Review of the essential matters will not require any change.	The Department judges that it may be sensible to update the Foreword. It will recognise a new Minister being in place, it help to set the context for the final document - which will be dated differently to the original 2007 Plan - and have some specific policy/text changes.
218.	SPR22	Mr Hugh Logan	Should 'The Preface' form part of the Review	Yes		Comment noted.
219.	SPR22	Mr Hugh Logan	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
220.	SPR22	Mr Hugh Logan	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
221.	SPR22	Mr Hugh Logan	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
222.	SPR22	Mr Hugh Logan	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
223.	SPR22	Mr Hugh Logan	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to	Yes		Comment noted.

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			13.1 to 13.4 form part of the Review			
224.	SPR22	Mr Hugh Logan	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
225.	SPR22	Mr Hugh Logan	Do you think other text should form part of the Review	No		Comment noted.
226.	SPR22	Mr Hugh Logan	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
227.	SPR23	Malew Parish Commissioners	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
228.	SPR23	Malew Parish Commissioners	Should Housing Policy 1 included in the Review	Yes		Comment noted.
229.	SPR23	Malew Parish Commissioners	Should Housing Policy 3 included in the Review	Yes		Comment noted.
230.	SPR23	Malew Parish Commissioners	Should the matters to be addressed by the	Yes	Spatial Policy 3 should be reviewed. The term 'Local Needs' needs to be defined in appendix 1.	It is not the Department's intention to review the Spatial Strategy at this time which includes Spatial

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			Strategic Plan be widened			<p>Policy 3. The Department is aware that the term 'local needs' as set out in Spatial Policy 3 and Spatial Policy 4 was an issue discussed previously.</p> <p>The Department is satisfied that the term 'local needs' in the context of Spatial Policy 3 refers to that <i>Area</i> of the Island that each specified village is within i.e. North, South, East or West and that this is sufficient to guide the Area Plans in the allocation of appropriate and sufficient sites for development. The Department is aware that the Department of Health and Social Care, when assessing its requirement for social and affordable housing, do not identify the need for such at village scale but rather identify need more broadly.</p> <p>It is not necessary to define the term 'local' in the Appendix.</p> <p>Please also see the Department's response to Comment 4.</p>
231.	SPR23	Malew Parish Commissioners	Should 'The Foreword form part of the Review	Yes		Comment noted.
232.	SPR23	Malew Parish Commissioners	Should 'The Preface' form part of the	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			Review			
233.	SPR23	Malew Parish Commissioners	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
234.	SPR23	Malew Parish Commissioners	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
235.	SPR23	Malew Parish Commissioners	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
236.	SPR23	Malew Parish Commissioners	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			Review			
237.	SPR23	Malew Parish Commissioners	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
238.	SPR23	Malew Parish Commissioners	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
239.	SPR23	Malew Parish Commissioners	Do you think other text should form part of the Review	Yes	Spatial Policy 3 should be reviewed. The term 'Local Needs' needs to be defined in appendix 1.	Please see Department's response to Comment 230.
240.	SPR23	Malew Parish Commissioners	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
241.	SPR24	Manx National Heritage	Should Strategic Policy 11 included in the Review		We reiterate our view that housing need and projected population statistics must be carefully analysed in order to produce justified and sustainable housing policy. Government as a whole should work toward development that causes least environmental impact, whilst recognising our	The Department agrees that housing need and the projected population figures need to be as accurate as possible.  For the next stage in producing the Draft Strategic Plan, proper consideration will need to be given to:

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					moral responsibility to compensate for impact where it is unavoidable.	<ul style="list-style-type: none"> <li>i. identifying changes in household size in the future using the most likely scenarios;</li> <li>ii. working out household numbers on the Island in the future;</li> <li>iii. identifying a vacancy factor to apply if still required; and</li> <li>iv. working out the best spatial distribution for new housing across the Island.</li> </ul> <p>Much of the existing Strategic Plan will remain in place as it stands, at the heart of which is the Strategic Aim:</p> <p>“To plan for the efficient and effective provision of services and infrastructure and to direct and control development and the use of land to meet the community’s needs, having particular regard to the principles of sustainability whilst at the same time preserving, protecting, and improving the quality of the environment, having particular regard to our uniquely Manx natural, wildlife, cultural and built heritage.”</p>
242.	SPR24	Manx National Heritage	Should Housing Policy 1 included in the Review		We reiterate our view that housing need and projected population statistics must be carefully analysed in order to produce justified and sustainable housing policy. Government as a	Please see Department Response to Comment 241.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					whole should work toward development that causes least environmental impact, whilst recognising our moral responsibility to compensate for impact where it is unavoidable.	
243.	SPR24	Manx National Heritage	Should Housing Policy 3 included in the Review		We reiterate our view that housing need and projected population statistics must be carefully analysed in order to produce justified and sustainable housing policy. Government as a whole should work toward development that causes least environmental impact, whilst recognising our moral responsibility to compensate for impact where it is unavoidable.	Please see Department Response to Comment 241.
244.	SPR24	Manx National Heritage	Should the matters to be addressed by the Strategic Plan be widened		<p>It is our view that the Department should resist pressures to alter parts of the Strategic Plan other than those currently identified. In particular, we believe that the Department must not remove or reduce the effectiveness of policies designed to safeguard our cultural and natural heritage and the built and rural environments as a whole. As stated above, a more effective means of dealing with perceived barriers to development is, put simply, to avoid sites where difficult constraints exist.</p> <p>However, we can see merit in a revised Strategic Plan acknowledging the Landscape Character Assessment which has been undertaken since the Plan was drafted. The Manx Marine Environmental</p>	<p>The Department, having given thought to how it should approach a review of the Strategic Plan now, is content that a focused Review is the best approach.</p> <p>The purpose of the Landscape Character Assessment (LCA) of the Isle of Man produced in 2008 was to update the baseline of environmental information to enable a better understanding of the Island's landscapes. The LCA is an improvement to the information previously available on the Isle of Man about landscape character.</p> <p>The LCA was used to inform the Landscape Proposals for the Area Plan for the South and will</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>Assessment has also been undertaken and may soon be substantive.</p>	<p>serve the same purpose for the remaining Area Plans in due course.</p> <p>Until such time as the remaining Area Plans are prepared the AHLVCSS will be taken into account when planning applications are assessed. The Landscape Character Assessment will also be taken into account where relevant when planning applications are assessed but it should be noted that Planning Policy Statement on Landscape Character and Appearance is currently in draft form and requires approval by the Department.</p> <p>In terms of the Manx Marine Environmental Assessment, this will be used to inform the work relating to the developments within the sea. Where relevant it may also feed into the preparation of the Area Plans.</p> <p>It should also be noted that the Department has undertaken a full LIDAR survey of the Island. This has numerous benefits to Government one of which is to have the potential to highlight otherwise non-visible archaeological and historic features in the landscape. This has the potential to assist in the allocation of sites as part of the Area Plan process.</p>



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
245.	SPR24	Manx National Heritage	Should 'The Foreword form part of the Review		In our view the Foreword of the Strategic Plan only requires alteration to take account of the revised production and delivery of the Area Plans.	An update to the Foreword will: recognise a new Minister being in place, help to set the context for the final document - which will be dated differently to the original 2007 Plan - and have some specific policy/text changes.
246.	SPR24	Manx National Heritage	Should 'The Preface' form part of the Review		In our view the Preface of the Strategic Plan only requires alteration to extend the historical narrative up to the present.	It is intended that the Preface will be altered along such lines.
247.	SPR24	Manx National Heritage	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review		This paragraph will require alteration acknowledging the 2011 Census.	It is intended that this paragraph will be altered to reflect the 2011 Census and will set out updated information on the lifetime of the Plan.
248.	SPR24	Manx National Heritage	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review		This part of the Plan will obviously need to take account of figures revised in the light of the 2011 Census. Our overarching concern, as previously stated, is that the census information is correctly used. Additionally, we note that the last two sentences at paragraph 5.20 strongly reflect our own views as expressed above under 'General Comments'	The Department is confident that the 2011 Census is a sound evidence base. It is also confident that the Population Projection Model which has revealed anticipated future population levels is an accurate and sound evidence base.  Figures in the Model are used across government for a number of purposes. The Department is able to take the Census and the figures revealed by the Model and make further calculations to identify the number of new households required in the future. This methodology has been used before and has proved to be a reasonable, sensible and accurate approach.

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						Whilst there was a difference between the actual 2011 Resident Population and that predicted by the 2006 Population Projection Model, the margin of error was judged to be acceptable by the Department.
249.	SPR24	Manx National Heritage	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review		This section will obviously require significant alteration to take the 2011 Census into account.	The Department agrees with this statement.
250.	SPR24	Manx National Heritage	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review		It will be important to acknowledge from the outset that the Island's existing infrastructure, and the cost of its future improvement, will be a potential constraint upon residential development, and will need to be factored into the desirability of developing each individual site. It is appropriate that this part of the Plan is scrutinised, whilst acknowledging that the Area Plan process also allows for fine-tuning.	The Department does not intend to change any of the current Policies in the Transport Chapter. By updating the paragraphs selected for review, the Department will be able to identify any changes to the status of the strategic links and key junctions as well as identifying any changes in the pressure on those links/junctions in terms of potential for traffic congestion.  The Area Plans will be able to identify specific

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						<p>highway issues and weigh up the merits of individual sites.</p> <p>The acknowledgement or otherwise of the cost of improving or building new infrastructure will be a matter for the preparation of the Draft Strategic Plan. Specific infrastructure requirements and costs associated with these are matters that will need to be addressed in the Area Plans.</p>
251.	SPR24	Manx National Heritage	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review		It is obvious that is part of the Plan will require to acknowledge the 2011 Census.	The Department agrees with this statement.
252.	SPR24	Manx National Heritage	Should Appendix 8 (in its entirety) form part of the Review		It is similarly obvious that is part of the Plan will need to acknowledge the 2011 Census and resulting revisions of data.	The Department agrees with this statement.
253.	SPR24	Manx National Heritage	Do you think other text should form part of the Review		We do not as a principle see reason to alter other parts of the Plan as a consequence of revising the sections already proposed.	The Department acknowledges the views of Manx National Heritage on this point.
254.	SPR24	Manx National Heritage	What year do you think the review should look ahead to?		Of the proposed dates, we would suggest that the current review should look ahead to c.2026, with the proviso that the Department continues with its proposed monitoring schedule. We suggest that to look further ahead would not be practicable.	The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						Census results.
255.	SPR24	Manx National Heritage	General Comments		Need to have assurance that the projections are correct. Feel that the Department should resist pressures to alter parts of the plan other than those identified. Believe that the Department must not remove or reduce the effectiveness of policies designed to safeguard our cultural and natural heritage and the built and rural environments as a whole. Can see some merit in the review looking to embed the Landscape Character Assessment.	<p>In addition to the Department's response to Comment 248, it is agreed that the projection modelling needs to be as accurate as possible. Fortunately, Government is committed to the continuation of the Census Survey as a means of collecting data on the Island's population and demographic structure and this applies to both the full Census every 10 years and the Interim Census taken every 5 years.</p> <p>In terms of any alteration to the 6000 figure referred to in Strategic Policy 11 and Housing Policy 1 and the spatial distribution of this figure set out in Housing Policy 3, all of the calculations, whether they are taken from the 2011 Census, the 2011 Population Projection Model provided by Treasury, or further assumptions made by the Department, will be set out at the time of the Draft Strategic Plan to enable scrutiny of the figures.</p> <p>There is no intention to alter or amend any of the current Strategic Plan Policies on the Environment.</p> <p>Please also see the Department's response to Comment 244.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
256.	SPR25	Manx Wildlife Trust	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
257.	SPR25	Manx Wildlife Trust	Should Housing Policy 1 included in the Review	Yes		Comment noted.
258.	SPR25	Manx Wildlife Trust	Should Housing Policy 3 included in the Review	Yes		Comment noted.
259.	SPR25	Manx Wildlife Trust	Should the matters to be addressed by the Strategic Plan be widened	Yes	<p>Following the Island's inclusion in the UK's ratification of the Convention on Biodiversity and the recent drafting of the Island's first Biodiversity Strategy, as well as the current desire for the whole of the Isle of Man to become a UNESCO Biosphere, it would make sense for the following parts of the Strategic Plan to be reviewed now: Chapter 3 - Strategic Objectives, specifically 3.3 Environment; Chapter 7 - The Environment, specifically 7.8 Wildlife and Nature Conservation, 7.18 Environmental Impact Assessment, 7.21 Environmental Enhancement, 7.34 Existing Settlements, 7.35 Urban Regeneration; Appendix 6 - Open Space Requirements for New Residential Development. A full review of the above would give the opportunity for future Area Plans to be prepared in the light of current thinking in terms of environmental issues and sustainable development.</p>	<p>The Department is aware of the work undertaken by Government generally – specifically the Department of Environment, Food and Agriculture – to produce the Island's first Biodiversity Strategy "Managing our Natural Wealth to 2020". This Strategy will help DEFA to draw up a Biodiversity Plan for the next 6 years.</p> <p>It is aware that the Convention on Biological Diversity was extended to the Island in August 2012 which prompted the development of the Biodiversity Strategy.</p> <p>The current Strategic Plan includes a number of Environmental Policies which are in place to protect wildlife and nature conservation. Environment Policy 4 states:</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>In addition, bullet point 11.1.13 doesn't quite make sense given that neither in the extract from the Isle of Man Strategic Plan published for the purposes of this consultation, nor in the full version of the Strategic Plan, are there any policies detailed directly below this particular point.</p>	<p><i>Development will not be permitted which would adversely affect:</i></p> <p><i>(a) species and habitats of international importance:</i></p> <p><i>(i) protected species of international importance or their habitats; or</i></p> <p><i>(ii) proposed or designated Ramsar and Emerald Sites or other internationally important sites.</i></p> <p><i>(b) species and habitats of national importance:</i></p> <p><i>(i) protected species of national importance or their habitats;</i></p> <p><i>(ii) proposed or designated National Nature Reserves, or Areas of Special Scientific Interest; or</i></p> <p><i>(iii) Marine Nature Reserves; or</i></p> <p><i>(iv) National Trust Land.</i></p> <p><i>(c) species and habitats of local importance such as Wildlife Sites, local nature reserves, priority habitats or species identified in any Manx Biodiversity Action Plan which do not already benefit from statutory protection, Areas of Special Protection and Bird</i></p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p><i>Sanctuaries and landscape features of importance to wild flora and fauna by reason of their continuous nature or function as a corridor between habitats.</i></p> <p><i>Some areas to which this policy applies are identified as Areas of Ecological Importance or Interest on extant Local or Area Plans, but others, whose importance was not evident at the time of the adoption of the relevant Local or Area Plan, are not, particularly where that plan has been in place for many years. In these circumstances, the Department will seek site specific advice from the Department of Agriculture, Fisheries and Forestry if development proposals are brought forward.</i></p> <p>Given that the final Biodiversity Delivery Plan is still being worked on, and that there are current Strategic Plan Policies in place to protect wildlife and conservation, and that the Area Plans have the ability to identify recognised sites of importance, the Department is prepared to wait until a full Review to consider how best to reflect the findings of the latest Biodiversity Plans.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						In terms of 11.1.13, this paragraph was intended to refer to all of the Transport Policies. It is accepted that the wording of this could be improved as part of this partial Review.
260.	SPR25	Manx Wildlife Trust	Should 'The Foreword form part of the Review	Yes		Comment noted.
261.	SPR25	Manx Wildlife Trust	Should 'The Preface' form part of the Review	Yes		Comment noted.
262.	SPR25	Manx Wildlife Trust	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
263.	SPR25	Manx Wildlife Trust	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
264.	SPR25	Manx Wildlife Trust	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4	Yes		Comment noted.



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			(last paragraph in Section 8.5 only) to 5.22 form part of the Review			
265.	SPR25	Manx Wildlife Trust	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
266.	SPR25	Manx Wildlife Trust	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
267.	SPR25	Manx Wildlife Trust	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
268.	SPR25	Manx Wildlife Trust	Do you think other text should form part of the Review	No		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
269.	SPR25	Manx Wildlife Trust	What year do you think the review should look ahead to?	Other	2016	<p>The lifetime of the current Strategic Plan is 2001 – 2016. Given the 2011 Census, this is an opportune time to look further ahead. This will allow land to be allocated beyond 2016 in the Area Plans. There would be no point in updating the Strategic Plan if the end date of the Plan was not going to be extended. It would simply further delay the preparation of the remaining Area Plans and complicate the timescale for the existing Area Plan for the South.</p> <p>The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.</p>
270.	SPR26	Maughold Parish Commissioners  (Late Response)	Should Strategic Policy 11 included in the Review	Yes	Do these include sheltered/EMI facilities?	<p>The figures include all but the most vulnerable of the population who are in residential care with high levels of supportive care. The Department will continue to rely on the Department of Health and Social Care for advice regarding the need for the most appropriate breakdown of housing need across the Island and advice about Social Care Policy generally.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
271.	SPR26	Maughold Parish Commissioners	Should Housing Policy 1 included in the Review	Yes		Comment noted.
272.	SPR26	Maughold Parish Commissioners	Should Housing Policy 3 included in the Review	Yes	The Commissioners note, however that Maughold lacks the infrastructure for any significant development. The new sewerage equipment is being installed on the basis of single figure increases in population.	<p>Maughold is a rural parish which only has one settlement as identified in the Strategic Plan – Glen Mona. The village of Maughold has some characteristics of a village but was not listed as a 'settlement' in Appendix 3 of the Strategic Plan. This level is, according to the Strategic Plan, more akin to a 'group of houses in the countryside.'</p> <p>The existing Strategic Plan does not indicate any further breakdown of residential numbers below the 'Area' level, i.e. North, South, East or West. It is the intention to retain this strategic breakdown and thus as the Parish of Maughold falls in the North, future housing requirement will be identified for the North rather than at individual Parish level.</p> <p>The Strategic Plan will continue to direct new development to be allocated in and around existing identified settlements. When making recommendations regarding the allocation of land for development consideration will be given to any advice from the Manx Utilities Authority (MUA) regarding infrastructure capacity.</p>

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						When it comes to specific land allocations in the relevant Area Plan for the North, the Department will take into account the status of Glen Mona as well as Maughold Village. It is not the intention to change this status as part of this focused Review.
273.	SPR26	Maughold Parish Commissioners	Should 'The Foreword form part of the Review	Yes		Comment noted.
274.	SPR26	Maughold Parish Commissioners	Should 'The Preface' form part of the Review	Yes		Comment noted.
275.	SPR26	Maughold Parish Commissioners	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
276.	SPR26	Maughold Parish Commissioners	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
277.	SPR26	Maughold Parish Commissioners	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			Section 8.5 only) to 5.22 form part of the Review			
278.	SPR26	Maughold Parish Commissioners	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
279.	SPR26	Maughold Parish Commissioners	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
280.	SPR26	Maughold Parish Commissioners	Should Appendix 8 (in its entirety) form part of the Review	No	As stated earlier, Maughold has no sewerage capacity increases planned that would allow growth beyond the 0.3% figure.	The Department acknowledges this point. When assessing potential sites for development purposes advice will be sought from the Manx Utilities Authority with regards to any capacity limits. Please see response to Comment 272.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
281.	SPR26	Maughold Parish Commissioners	What year do you think the review should look ahead to?	No preferred date		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
282.	SPR27	Mr Morris	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
283.	SPR27	Mr Morris	Should Housing Policy 1 included in the Review	Yes		Comment noted.
284.	SPR27	Mr Morris	Should Housing Policy 3 included in the Review	Yes		Comment noted.
285.	SPR27	Mr Morris	Should the matters to be addressed by the Strategic Plan be widened	Yes	Housing Policy 14 is restricting the building of good quality sizeable houses. This means that the Island will no prosper and future generations will look back and wonder why we keep stopping growth. Unless satisfactory housing is generated we cannot expect new people to come to the Island. This Island is stagnating and without a concerted effort we will go back to the economy of the 1960's. The wording of Policy 14 needs to allow for good quality sizeable houses that the Island will be proud of.	Housing Policy 14 sets out policy direction and specific criteria for the replacement of dwellings in the countryside.  A recent Study conducted by the Department has shown that:  Between 2001 and 2013, 469 residential units were approved in the countryside. 133 (or 28%) of these were for replacement dwellings. Some approvals

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					The criteria that it cannot be and more visual means the new ends up not much better than the old. We need to be proud of our new houses.	<p>were granted before the Strategic Plan 2007 came into operation.</p> <p>Out of the 95 replacement dwelling approved after 2007, 56 (or 59%) were for dwellings which represented an increase in floor area of over 50%.</p> <p>The Department does not agree that the prosperity of the Island is being hindered by the existence of, or application of, Housing Policy 14. The Department is content that there is no need to review this Housing Policy as part of this current Review.</p>
286.	SPR28	Dr and Mrs Naylor	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
287.	SPR28	Dr and Mrs Naylor	Should Housing Policy 1 included in the Review	Yes		Comment noted.
288.	SPR28	Dr and Mrs Naylor	Should Housing Policy 3 included in the Review	Yes		Comment noted.
289.	SPR28	Dr and Mrs Naylor	Should the matters to be addressed by the Strategic Plan be widened	Yes	In the present IOM Strategic Plan, the meaning of the numbers is unclear. Are they targets, maximums, limits or simply recommended numbers? This question has occupied several	The Department is aware of the confusion that has been caused by some of the wording in the existing Strategic Plan and the interpretation of some of the figures - i.e. whether the figures are targets or not,

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					Planning Inspectors recently. This needs to be clarified in the review.	or 'maximums' as is quoted in the current Plan. Paragraph 5.22 which includes the reference 'maximum' was identified in the Preliminary Publicity to form part of the Review. It is the intention that any figures in this Section will be explained and any current ambiguous terms reviewed and/or explained.
290.	SPR28	Dr and Mrs Naylor	Should 'The Foreword form part of the Review	Yes		Comment noted.
291.	SPR28	Dr and Mrs Naylor	Should 'The Preface' form part of the Review	Yes		Comment noted.
292.	SPR28	Dr and Mrs Naylor	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
293.	SPR28	Dr and Mrs Naylor	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
294.	SPR28	Dr and Mrs Naylor	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3	Yes		Comment noted.



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review			
295.	SPR28	Dr and Mrs Naylor	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
296.	SPR28	Dr and Mrs Naylor	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
297.	SPR28	Dr and Mrs Naylor	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
298.	SPR28	Dr and Mrs Naylor	Do you think other text should form part of the Review	No		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
299.	SPR28	Dr and Mrs Naylor	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
300.	SPR29	Ms Patricia Newton	Should Strategic Policy 11 included in the Review	No	The Policy in itself it is a perfectly valid policy statement. However it does not relate to the "justification" that precedes it, (the policy after does) and is, somewhat confusingly, repeated in Housing Policy 1. Therefore it either should be deleted altogether or made more relevant to its context and the figures left to housing policy.	<p>It would have been remiss of the Strategic Plan 2007 not to include broad housing figures in the Strategic Policy Chapter. It is acknowledged that it is repeated at Housing Policy 3 but given its importance and the fact that these figures have such an impact on the Plan, the Department judges that it is justified in including them at two locations in the Plan.</p> <p>In any case, the objective of Chapter 4 was to illustrate that there are two types of Policies within the Plan: i. the overarching Strategic Policies and ii. More detailed Strategic Policies.</p>
301.	SPR29	Ms Patricia Newton	Should Housing Policy 1 included in the Review	No	In itself it remains a perfectly valid policy statement. The Strategic Plan is about creating a rolling programme; therefore to demonstrate that it is rolling it should be followed by an update not deleted in itself.	The Department agrees that Housing Policy 1 should be updated and not deleted. This Policy (and the wording of this Policy elsewhere in the Plan) will reflect how many new homes are required between 2001 and a future revised date (most

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						likely 2026). The supporting text will reflect the previous and updated numbers.
302.	SPR29	Ms Patricia Newton	Should Housing Policy 3 included in the Review	No	As above this should be demonstrated to be a rolling programme so any update is added on, not the original deleted. It may turn out to be appropriate to indicate the figures as %s of Island total as until one round of Area Plans is completed it will be difficult to find additional land to allocate if it is needed.	The Department's intention is to 'roll forward' the numbers in Housing Policy 1 and Housing Policy 3. How best to show the figures (as numbers, percentages, or both) will be dealt with through the preparation of the Draft Strategic Plan.
303.	SPR29	Ms Patricia Newton	Should the matters to be addressed by the Strategic Plan be widened	Yes	I don't actually believe that "associated strategic highway network matters should be considered at all" as in an IOM context they themselves are as much a reflection of land allocations rather than pre-determining the allocations. - See attached Sheet. Other issues which need to be addressed really relate to the inconsistency or sometimes incorrectness with which planning policy as it exists is being applied especially in matters relating to Housing Renovation and Landscape. Landscape policies Island Wide need to be firmed up before greenfield sites release - Circular/PPS? Housing Policy 12 - Renovation (or Non Registered Buildings) needed not demolition. No other section in this questionnaire which is extremely biased towards giving a Xmas package to the building industry gives the opportunity to comment on the	<p>An assessment of the strategic highway network is required to ensure that if there are likely to be any capacity issues, these are highlighted in the Strategic Plan to help anticipate future issues or potential problem areas. This will help in the production of the Area Plans.</p> <p>Please also see response to Comment 250.</p> <p>The Department did not include a question asking for comments on the best methodology to use for estimating future housing requirements. It has, however, been open about its intention to use the 2011 Census and the Isle of Man Population Projection Model which flows from it.</p> <p>The method adopted by the Department will be</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>method by which it seems the population/households calculations are to be undertaken. - See also attached sheet.</p> <p>Has concerns about the methodology used to estimate the number of dwellings required.</p>	<p>open to scrutiny at the time of the publication of the Draft Strategic Plan. Assumptions will be explained in respect of:</p> <ul style="list-style-type: none"> <li>i. future household size (the Census 2011 recorded a continuing downward trend in average household size);</li> <li>ii. vacancy rates;</li> <li>iii. distribution of new households; and</li> <li>iv. migration rates.</li> </ul> <p>It should be noted that the Census and the basic Population Projection Model which are produced by Treasury are evidence sources in their own right and it is only the Department's interpretation of these data sources which will be open to scrutiny.</p> <p>In terms of the definitions of 'Resident Population' and Residents living in private households', the Department's understanding is as follows:</p> <p>Resident Population = Isle of Man residents present on Census night plus residents absent from the Island on Census night.</p> <p>'Residents living in private households' = Resident Population excluding those living in prison and in nursing homes with high levels of supportive care.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>Paragraph 5.18 in the Strategic Plan 2007 was simply intended to show that the existing spatial pattern would not be significantly different following the addition of 6000 more dwellings.</p> <p>Both Paragraph 5.18 and 5.19 are to be included in the current Review.</p> <p>As part of the Strategic Plan 2007, allowance was made for a vacancy factor of 4%. The Department still accepts that there will be a proportion of the housing stock that are:</p> <ul style="list-style-type: none"> <li>i. in the process of being sold,</li> <li>ii. awaiting renovation,</li> <li>iii. in various states of disrepair and cannot be occupied,</li> <li>iv. 'second' homes, or</li> <li>v. simply unoccupied</li> </ul> <p>The Department still sees merit in using a vacancy factor. Assumptions about this as well as other issues will be made by the Department and are intended to be addressed in the Draft Plan as well as in supporting evidence to the Draft Plan. What can be made clear at the moment is that the Empty Homes Survey in 2005 did not find empty</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>properties to be a significant problem on the Island.</p> <p>The Department remains in favour of using a vacancy factor.</p> <p>Other comments set out in the consultation response suggest that the population figures need to be looked at differently. Government needs a reliable data set on which to base calculations. The IoM Population Projection Model provides this and uses 'resident population' and 'residents living in private households'. Every Model will have its weaknesses but the Department is conscious about being consistent with the calculation of the figures unless there is a good reason to change and there is evidence to suggest that the figures could be more accurate if done another way. Government is committed to the Census Survey and producing the projection modelling.</p>
304.	SPR29	Ms Patricia Newton	Should 'The Foreword form part of the Review	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
305.	SPR29	Ms Patricia Newton	Should 'The Preface' form part of the Review	Yes		Comment noted.
306.	SPR29	Ms Patricia Newton	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
307.	SPR29	Ms Patricia Newton	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	No	Para 5.20 does not need to be part of the Review. Care needs to be taken that "forming part of the Review" is not automatically taken as meaning "needs changing". The figures may prove to be alright in terms of housing units are against the "household" figure being applied. See comments on Question 14.	The Department accepts that even though parts of the Plan have been identified as being part of the Review, such as Paragraph 5.20, that not all of these identified elements will need to be changed.
308.	SPR29	Ms Patricia Newton	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	No	There is no Section 8.5 beyond a sub title so reference to the last paragraph does make sense.	In the existing Strategic Plan 2007, there are two paragraphs numbered 8.5.4. The intention is to review the second paragraph and amend the numbering in the process.
309.	SPR29	Ms Patricia	Should Chapter 11	No	The facts stated in these paragraphs have not	The Department considers that it is prudent to

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
		Newton	'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review		changed. Until Area Plans i.e. one round of them are undertaken or another Transport Study progressed like the JMP Study 2006, the changes needed will not be known. No transport study is actually proposed.	ensure that the strategic highway network is capable of accommodating any anticipated increases in population. Reviewing the identified paragraphs is a sensible approach and consideration of any updated information on the Island's highway network/key junctions will be a valuable exercise.
310.	SPR29	Ms Patricia Newton	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
311.	SPR29	Ms Patricia Newton	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
312.	SPR29	Ms Patricia Newton	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
313.	SPR30	Mr Ashley Petit	Should Strategic Policy 11 included in the	Yes		



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			Review			
314.	SPR30	Mr Ashley Petit	Should Housing Policy 1 included in the Review	Yes		Comment noted.
315.	SPR30	Mr Ashley Petit	Should Housing Policy 3 included in the Review	Yes		Comment noted.
316.	SPR30	Mr Ashley Petit	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
317.	SPR30	Mr Ashley Petit	Should 'The Foreword form part of the Review	Yes		Comment noted.
318.	SPR30	Mr Ashley Petit	Should 'The Preface' form part of the Review	Yes		Comment noted.
319.	SPR30	Mr Ashley Petit	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
320.	SPR30	Mr Ashley Petit	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
321.	SPR30	Mr Ashley Petit	Should Chapter 8	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
			'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review			
322.	SPR30	Mr Ashley Petit	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
323.	SPR30	Mr Ashley Petit	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
324.	SPR30	Mr Ashley Petit	What year do you think the review should look ahead to?	No preferred date		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
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325.	SPR31	Ramsey Town Commissioners  (Late Response)	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
326.	SPR31	Ramsey Town Commissioners	Should Housing Policy 1 included in the Review	Yes		Comment noted.
327.	SPR31	Ramsey Town Commissioners	Should Housing Policy 3 included in the Review	Yes		Comment noted.
328.	SPR31	Ramsey Town Commissioners	Should the matters to be addressed by the Strategic Plan be widened	Yes	All topics contained within original Strategic Plan 2007 should form part of the review process. The Consultation Document - Planning and the Economy February 2012 should be taken into consideration	In preparation of the Review of the Strategic Plan the Department did consider a number of options including carrying out a full Review of the Strategic Plan. This would have to be completed ahead of the preparation of any of the remaining Area Plans. This is because in order to comply with the Town and Country Planning Act 1999, the Area Plans have to be in conformity with the Strategic Plan. The Strategic Plan must therefore be in an agreed and approved format before the Area Plans can be produced. This approach was estimated to take a number of years to achieve which was considered too long to wait before preparing the Area Plan for the East, North and West which would be the mechanism to release much needed land for residential and employment purposes.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>For these reasons the Department cannot support these comments from Ramsey Town Commissioners.</p> <p>In terms of the PPS on Planning and the Economy, a number of changes in the way Planning operates and improvements in joint working with DED officials and developers have taken place since the original draft Planning &amp; Economy PPS was published for consultation in 2012. As a consequence, work is underway to develop an alternative approach to a PPS on this issue.</p>
329.	SPR31	Ramsey Town Commissioners	Should 'The Foreword form part of the Review	Yes		Comment noted.
330.	SPR31	Ramsey Town Commissioners	Should 'The Preface' form part of the Review	Yes		Comment noted.
331.	SPR31	Ramsey Town Commissioners	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
332.	SPR31	Ramsey Town Commissioners	Should Chapter 5 'Island Spatial	Yes		Comment noted.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			Strategy' – Paragraphs 5.18 to 5.22 form part of the Review			
333.	SPR31	Ramsey Town Commissioners	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
334.	SPR31	Ramsey Town Commissioners	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
335.	SPR31	Ramsey Town Commissioners	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
336.	SPR31	Ramsey Town Commissioners	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
337.	SPR31	Ramsey Town Commissioners	Do you think other text should form part of the Review	No		Comment noted.
338.	SPR31	Ramsey Town Commissioners	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
339.	SPR32	Mrs Sally Roberts	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
340.	SPR32	Mrs Sally Roberts	Should Housing Policy 1 included in the Review	Yes		Comment noted.
341.	SPR32	Mrs Sally Roberts	Should Housing Policy 3 included in the Review	Yes		Comment noted.
342.	SPR32	Mrs Sally Roberts	Should the matters to be addressed by the Strategic Plan be	Yes	Firstly there has been no opportunity to say why a review of Strategic Policy 11 is needed so may I use this space to request that a review produces	The figure of 6000 is an overall housing requirement and was derived from population projections and anticipated household numbers.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			widened		<p>much clearer language about the numbers of proposed houses. Numerous reports from planning inspectors reveal that enormous time, energy and expense is spent debating and trying unsuccessfully to interpret the Strategic Plan's intentions regarding the 6,000 number of houses and the allocation between North, South, East and West. The existing wording is "overall maximum housing requirement" of 6,000 houses between 2001 and 2016 and whilst this is clear to me it is regarded by developers as being negotiable and variable. Similarly the statement that the proposed overall distribution "is based on the continuation of the containment policy around Douglas and the provision of a range of housing opportunities in the other areas supported by the provision of additional employment and regeneration opportunities" is not taken as definitive by developers and much argument in planning submissions has been based on how these numbers are only indicative." The Plan, Monitor and Manage Approach defined in Appendix 1 of the Strategic Plan seems to be interpreted by developers as providing flexibility to the overall numbers of housing required rather than to the supply of land. The policy of containment around Douglas and development in other areas being supported by employment and</p>	<p>The 6000 figure was not meant to be a target but rather was intended to have some degree of flexibility within it. It is, however, recognised that parties have interpreted the figure differently and this has led to housing numbers and the meaning of Strategic Plan figures and terminology being discussed at length at some planning appeals.</p> <p>The Department maintains that the use of housing figures has a vital role to play and the Plan, as reviewed, is likely to contain (updated) broad figures. It is pertinent to note that much of the supporting text in respect of the 'Spatial Distribution' Section in Chapter 5 and the Sections on 'The Need for Housing' and 'The Distribution of Housing' in Chapter 8, will be reviewed which may help improve the interpretation of Housing Policies 1 and 3.</p> <p>In addition, it is important to recognise that figures are particularly important so as to ensure sufficient opportunities to meet the projected demand through the allocation of sites for residential development in the Area Plans. The Island Spatial Strategy sets out that new development should be focused in and around settlements identified in the Strategic Plan.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>regeneration opportunities must involve the review of the whole chapter Transport, Infrastructure and Utilities (Chapter 11) and Sport, Recreation, Open Space and Community Facilities (Chapter 10). Transport issues to be considered are:- lack of public transport and a likely further reduction in services outside of Douglas. Issues surrounding the TT course and road closures for racing, repairs and weather, traffic congestion at key junctions en route to Douglas. Infrastructure - housing development must be appropriately supported by main services especially sewerage, shops, schools and medical facilities. Community facilities - Open space needs review so that previous deficiencies can be rectified or at least that existing open space is not claimed by new developments when it serves existing housing. The use of existing school fields or other public open space should be reviewed to ensure that developers do not dilute existing provision so standards for all are improved upon not reduced. There should be provision for future expansion of Government owned facilities.</p>	<p>Any issues relating to the TT Road closures and road closures necessary for repairs and/or bad weather, is not a factor which will inform the long term spatial planning on the Island.</p> <p>The allocation of sites for development through the Area Plans will take into consideration a range of factors including proximity to services and infrastructure provision.</p> <p>There are already standards for Open Space included within the Strategic Plan.</p>
343.	SPR32	Mrs Sally Roberts	Should 'The Foreword form part of the Review	Yes		Comment noted.



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
344.	SPR32	Mrs Sally Roberts	Should 'The Preface' form part of the Review	Yes		Comment noted.
345.	SPR32	Mrs Sally Roberts	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
346.	SPR32	Mrs Sally Roberts	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	No	This strategy sets out the hierarchy of towns and villages and smaller developments and seems about right to determine the concentration of housing around the existing highway network and employment opportunities. The spatial distribution of 6,000 houses might need adjustment from one area to another when containment within Douglas, employment and regeneration opportunities are realistically considered but the strategy is sound.	It is the Department's intention that the Draft Plan will include a broad regional breakdown of the (updated) 6000 figure – North, East, South and West.
347.	SPR32	Mrs Sally Roberts	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
348.	SPR32	Mrs Sally Roberts	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
349.	SPR32	Mrs Sally Roberts	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	No	An ongoing process of review is required and the wording of this chapter would continue to be relevant if there was a revision either up or down of the 6000 additional dwellings to be built over the Plan period 2001 to 2016.	It is the Department's intention to review this Chapter to ensure that it is relevant and up to date. It is likely that the overall intent of the Chapter will not alter, i.e. the ongoing commitment to 'monitor and review' will remain.
350.	SPR32	Mrs Sally Roberts	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
351.	SPR32	Mrs Sally Roberts	Do you think other text should form part of the Review	Yes	Chapter 9 - Business and Tourism should be reviewed so that development is strategically planned and the mix of housing and commercial development is appropriately planned and in accordance with the highway network, and all in keeping with the prospect of a diverse economy.  Chapter 11 - Transport, Infrastructure and Utilities. It is not clear from the design of this consultation	The Department is content that Chapter 9 is sufficient to assist in the economic development of the Island. What is crucial is the ongoing allocation of land for employment uses. This will be achieved through the Area Plans.  The Department does not intend to review any of the current Transport Policies. The associated strategic highway matters relate to the identified

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>whether all of Transport policies will be reviewed. 'Associated strategic highway matters' have not been defined. It is important that the areas of daily congestion at peak times are taken into account when considering new development as such congestion impacts on economic growth and the quality of life particularly of young families who all have to be in different places by say 8 - 9 am and say from 4 - 6 pm.</p> <p>With regard to infrastructure the Strategic Plan should require the siting of Sewerage Treatment Works whether Government or private developer ones to be appropriately situated so that the amenity value for nearby residents is not diminished. Private developer works should be kept to a minimum.</p> <p>Appendix 6 - Open Space Requirement - as mentioned above. The opportunity for developers to use existing public open space including that owned by the Department of Education appears to be limiting the potential for school expansion as well reducing the open space available to existing developments, which were built pre the 2007 requirements.</p>	<p>strategic links and junctions. The review will simply look at the ability of the highway network to accommodate additional growth and whether there are any significant 'pinch points' not already identified which will need addressing in future years. It is hoped that other service providers will be able to use the information regarding future population growth and plan accordingly. It is the Department's intention to engage across Government to ensure that requirements are adequately addressed.</p> <p>Specific requirements for drainage arrangements for potential sites are examined through the site assessment process and Area Plan process generally.</p> <p>The use of school playing fields by the general public outside of school times is a legitimate use of these areas. The expansion of schools which can result in the overall loss of playing fields can be avoided by ensuring that sufficient expansion room for schools is anticipated, through the Area Plans.</p> <p>In terms of footpath provision, Transport Policy 6 in the Strategic Plan 2007 states "In the design of new development and transport facilities, the needs</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>Appendix 7 - Car Parking. A review is required of the 2007 requirements which are not adequate to accommodate the number of vehicles which are parked in housing developments e.g. boats, motor homes, works vans, motor bikes and cars especially in rural areas. The parking pattern in rural estates is such that delivery vehicles/emergency services can't carry out their function easily. Requirement for footpaths. There should be footpaths provided. Shared space for vehicles and pedestrians gives priority to vehicles making the shared space hazardous for pedestrians particularly in bad weather. Children's independence and ability to socialise is compromised by the absence of footpaths.</p> <p>Appendix 9 - IOM Employment Land Availability. It would seem that this should be brought up to date by any revision to the Strategic Plan. Peel has significantly changed since the 2007 Plan.</p>	<p>of pedestrians will be given similar weight to the needs of other road users." Where shared space is proposed as part of individual schemes, such schemes will be considered on their merits.</p> <p>The Department judges that the best approach in respect of updating the Employment Land availability is to integrate the findings of the Employment Land Review at the time of a full Review of the Strategic Plan.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
352.	SPR32	Mrs Sally Roberts	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results
353.	SPR33	Santon Commissioners	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
354.	SPR33	Santon Commissioners	Should Housing Policy 1 included in the Review	Yes		Comment noted.
355.	SPR33	Santon Commissioners	Should Housing Policy 3 included in the Review	Yes		Comment noted.
356.	SPR33	Santon Commissioners	Should the matters to be addressed by the Strategic Plan be widened	Question answered 'Yes' and 'No'		

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
357.	SPR33	Santon Commissioners	Should 'The Foreword form part of the Review	Yes		Comment noted.
358.	SPR33	Santon Commissioners	Should 'The Preface' form part of the Review	Yes		Comment noted.
359.	SPR33	Santon Commissioners	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
360.	SPR33	Santon Commissioners	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes		Comment noted.
361.	SPR33	Santon Commissioners	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
362.	SPR33	Santon	Should Chapter 11	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
		Commissioners	'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review			
363.	SPR33	Santon Commissioners	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
364.	SPR33	Santon Commissioners	Should Appendix 8 (in its entirety) form part of the Review	Yes		Comment noted.
365.	SPR33	Santon Commissioners	Do you think other text should form part of the Review	No		Comment noted.
366.	SPR33	Santon Commissioners	What year do you think the review should look ahead to?	2026		The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
367.	SPR34	Mr Tomlinson	Should Strategic Policy 11 included in the Review	Yes		Comment noted.
368.	SPR34	Mr Tomlinson	Should Housing Policy 1 included in the Review	Yes		Comment noted.
369.	SPR34	Mr Tomlinson	Should Housing Policy 3 included in the Review	Yes		Comment noted.
370.	SPR34	Mr Tomlinson	Should the matters to be addressed by the Strategic Plan be widened	No		Comment noted.
371.	SPR34	Mr Tomlinson	Should 'The Foreword form part of the Review	Yes		Comment noted.
372.	SPR34	Mr Tomlinson	Should 'The Preface' form part of the Review	Yes		Comment noted.
373.	SPR34	Mr Tomlinson	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes		Comment noted.
374.	SPR34	Mr Tomlinson	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part	Yes		Comment noted.



<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
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			of the Review			
375.	SPR34	Mr Tomlinson	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5 only) to 5.22 form part of the Review	Yes		Comment noted.
376.	SPR34	Mr Tomlinson	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes		Comment noted.
377.	SPR34	Mr Tomlinson	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes		Comment noted.
378.	SPR34	Mr Tomlinson	Should Appendix 8 (in	Yes		Comment noted.

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			its entirety) form part of the Review			
379.	SPR34	Mr Tomlinson	Do you think other text should form part of the Review	No		Comment noted.
380.	SPR34	Mr Tomlinson	What year do you think the review should look ahead to?	Other	2021	The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021 Census results.
381.	SPR35	Mr Ian Bleasdale	Detailed Comments submitted instead of using a questionnaire form		<p>It is essential that the resulting document is much shorter and more precise. Policies, once adequately stated, should not be repeated again and again under different headings with slightly different wordings.</p> <p>It should be comprehensive, i.e. Big projects should be included instead of just the everyday minutiae of planning.</p> <p>Road proposals should be defined and protected on the Maps.</p> <p>Policies need to be stated much more firmly. Less</p>	<p>A full Review would enable the length and content of the Strategic Plan to be given proper consideration. A focused review, such as that proposed now, would not significantly change the overall layout and content.</p> <p>The Department strives to produce precise documents and Plans but considers it important to support any Policies with supplementary text. This text helps to set the context for each Chapter and, in turn, each Policy where it would help set out the reasoning and need for such a Policy approach.</p> <p>Very occasionally, a Policy may be repeated, for</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p><i>mays</i> and more <i>musts</i> (or must nots!)</p> <p>What is 'Countryside' needs to be clarified. Is it 'white' or un-zoned land? Is it land outside settlement envelopes? If it is; those envelopes need to be assessed and marked. Is reasonable infilling in a settlement to be allowed? If not, the reasoning behind it should be set out.</p> <p>Is there to be any differentiation in allowing development between ordinary countryside and AHLV or other designations?</p> <p>The exception s for agricultural workers dwellings should be deleted.</p> <p>Need for Permitted development for genuine agricultural development.</p> <p>There needs to be a policy on indoor Arenas and associated features for 'Horseiculture'.</p>	<p>instance Strategic Policy 11 and Housing Policy1, but the Department believes this is justified given that it sits well in both Chapter 4 (Strategic Policies) and Chapter 8 (Housing) and is such a central Policy to the entire Plan.</p> <p>The Department agrees that the Strategic Plan must be comprehensive. Achieving the right balance of document length and detail is important and the Department judges that the existing Strategic Plan is an appropriate balance. This is not to say that the layout, content or general approach to the Plan will not change following a full Review. It is not considered essential now and thus a focused Review is an acceptable way forward at this point.</p> <p>It is important to note that the Area Plans will pick up any ongoing, planned and anticipated infrastructure schemes such as specific road proposals and it will not always be necessary to mention such schemes in the Strategic Plan.</p> <p>The precise wording of a Policy is considered very carefully. There should not be any ambiguity. However, every Policy serves a purpose and may call for slightly different emphasis. The Department</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>will strive to ensure any Policies to come out of this Review will be precise and usable and any supporting text is relevant and serves a purpose.</p> <p>The Draft Plan will be able to be scrutinised and the Department will consider any comments regarding the drafting of the Policies.</p> <p>The Manx countryside is defined by General Policy 3 and Environment Policy 1. Essentially, the countryside comprises all land which is outside the settlements defined in Appendix 3 at A.3.6 or which is not designated for future development on an Area Plan.</p> <p>The difference between ordinary countryside and those areas designated as Areas of High Landscape Value and Coastal and Scenic Significance is addressed by Environment Policy 2. This Policy also addresses any change to the AHLVCSS system by any other Landscape Classification System. It should be noted that the latter was taken into account for the Area Plan for the South and it is envisaged that it will be again for the remaining Area Plans.</p> <p>Until such time as the remaining Area Plans are prepared the AHLVCSS will be taken into account</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>when planning applications are assessed.</p> <p>The Landscape Character Assessment will also be taken into account where relevant when planning applications are assessed but it should be noted that Planning Policy Statement on Landscape Character and Appearance is currently in draft form and requires approval by the Department.</p> <p>In terms of new agricultural dwellings, the Department believes that there should be an opportunity to allow such dwellings where there is an essential need. It is not currently proposed to review General Policy 3 which sets out exceptions to development outside of areas zoned for development.</p> <p>A recent Department Study has shown that between 2001 and 2013, approval was granted for 56 agricultural worker's dwellings in the countryside. This amounted to 12% of the total number of dwellings approved in the countryside. Other statistics show that conversions made up 43%, replacements 28% and new dwellings 13%. Only 4% of new properties in the countryside were as a result of agricultural ties being removed or certificates of lawful use being granted.</p>

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
						<p>There may be a time to review how the need for agricultural dwellings is assessed but the Department is content that there should be an opportunity for such development where there is proven agricultural need.</p> <p>The Permitted Development Order can be amended outside of the Strategic Plan Review process. There is no need to address this issue as part of this current Review. Limits on permitted development are in place, in part, to protect the countryside from inappropriate development.</p> <p>In terms of 'horseiculture', this issue is dealt with by Environmental Policies 19, 20 and 21 in the current Strategic Plan. The Department is satisfied that these Policies are sufficient and therefore do not propose to address this issue further.</p>
382.	SPR36	Marown Parish Commissioners	Should Strategic Policy 11 included in the Review		The Plan needs to look ahead than 2016. The Commissioners believe that the number of allocated for the west has been exceeded significantly already.	The Department considers that the most appropriate approach is to change the lifetime of the Plan from 2001 - 2016 to 2011 - 2026. It is expected that a full review will take place before 2026 taking into account either the 2016 or 2021

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
						Census results.
383.	SPR36	Marown Parish Commissioners	Should Housing Policy 1 included in the Review		The Plan needs to look ahead than 2016. The Commissioners believe that the number of allocated for the west has been exceeded significantly already.	Please see response to Comment 382.
384.	SPR36	Marown Parish Commissioners	Should Housing Policy 3 included in the Review		The Plan needs to look ahead than 2016. The Commissioners believe that the number of allocated for the west has been exceeded significantly already.	Please see response to Comment 382.
385.	SPR36	Marown Parish Commissioners	Should the matters to be addressed by the Strategic Plan be widened		A review that does not include everything is not a proper job	In preparation of the Review of the Strategic Plan the Department did consider a number of options including carrying out a full Review of the Strategic Plan. This would have to be completed ahead of the preparation of any of the remaining Area Plans. This is because in order to comply with the Town and Country Planning Act 1999, the Area Plans have to be in conformity with the Strategic Plan. The Strategic Plan must therefore be in an agreed and approved format before the Area Plans can be produced. This approach was estimated to take a number of years to achieve which was considered too long to wait before preparing the Area Plan for the East which would be the mechanism to release much needed land for residential and employment purposes.

<b>Comment no.</b>	<b>Respondent no.</b>	<b>Name</b>	<b>Question</b>	<b>Response</b>	<b>Detailed Comments</b>	<b>Department Response</b>
						For these reasons the Department cannot support these comments from Marown Parish Commissioners.  Please also see Department's response to Comments 98 and 328.
386.	SPR36	Marown Parish Commissioners	Should 'The Foreword form part of the Review		A review that does not include everything is not a proper job	Please see Department's response to Comment 385.
387.	SPR36	Marown Parish Commissioners	Should 'The Preface' form part of the Review		A review that does not include everything is not a proper job	Please see Department's response to Comment 385.
388.	SPR36	Marown Parish Commissioners	Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review		A review that does not include everything is not a proper job	Please see Department's response to Comment 385.
389.	SPR36	Marown Parish Commissioners	Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review		A review that does not include everything is not a proper job	Please see Department's response to Comment 385.
390.	SPR36	Marown Parish Commissioners	Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4		A review that does not include everything is not a proper job	Please see Department's response to Comment 385.



Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
			(last paragraph in Section 8.5 only) to 5.22 form part of the Review			
391.	SPR36	Marown Parish Commissioners	Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review		A review that does not include everything is not a proper job	Please see response to Comment 385.
392.	SPR36	Marown Parish Commissioners	Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review		A review that does not include everything is not a proper job	Please see response to Comment 385.
393.	SPR36	Marown Parish Commissioners	Should Appendix 8 (in its entirety) form part of the Review		A review that does not include everything is not a proper job	Please see response to Comment 385.
394.	SPR36	Marown Parish Commissioners	Do you think other text should form part of the Review		A review that does not include everything is not a proper job.  Most importantly, the Commissioners continue to believe that the interests of Marown are best	Please see response to Comment 385.  The Department acknowledges the view of Marown Parish Commissioners in that it would prefer to be in the 'West' for planning purposes and specifically

Comment no.	Respondent no.	Name	Question	Response	Detailed Comments	Department Response
					<p>served by its inclusion in the West for planning purposes as it is for Policing, Highways, Refuse collection and disposal, Housing, Schools (Marown students attend QE2 in Peel) and pretty much everything else.</p>	<p>when it comes to Area Plan boundaries. It is not proposed to look at this issue as part of this focused Review.</p> <p>The Area Plan for the East will be started next and Marown will form part of that Plan. Specific planning issues will be able to be addressed as part of this Plan. Marown need not be disadvantaged by remaining in the East for planning purposes.</p>

## SUMMARY

Should Strategic Policy 11 included in the Review	Yes	24
	No	4
Should Housing Policy 1 included in the Review	Yes	24
	No	4
Should Housing Policy 3 included in the Review	Yes	21
	No	4
Should the matters to be addressed by the Strategic Plan be widened	Yes	21
	No	8
	Yes/No	1
Should 'The Foreword form part of the Review	Yes	22
	No	3
Should 'The Preface' form part of the Review	Yes	24
	No	1
Should Chapter 1 'Introduction' – Paragraph 1.8.1 form part of the Review	Yes	24
	No	2
Should Chapter 5 'Island Spatial Strategy' – Paragraphs 5.18 to 5.22 form part of the Review	Yes	23
	No	3
Should Chapter 8 'Housing' – Table 8.1, Table 8.2 and Table 8.3. Paragraphs 8.1.3 to 8.1.5, 8.4.1 to 8.4.9, 8.5.3 and 8.5.4 (last paragraph in Section 8.5	Yes	24

only) to 5.22 form part of the Review	No	3	
Should Chapter 11 'Transport, Infrastructure and Utilities' Paragraphs to 11.1.7 to 11.1.13 form part of the Review	Yes	24	
	No	3	
Should Chapter 13 'Implementation, Monitoring and Review' Paragraphs to 13.1 to 13.4 form part of the Review	Yes	23	
	No	3	
Should Appendix 8 (in its entirety) form part of the Review	Yes	24	
	No	3	
Do you think other text should form part of the Review	Yes	8	
	No	15	
What year do you think the review should look ahead to?	2026	16	
	2036	2	
	No Preferred Date	3	
	Other	6	
		2016	1
		2018	2
		2021	1
		Every ten years	1
	Premature at present	1	

**The following representations also submitted supplementary information which has been reviewed by the Department in forming the Departmental Response. Full copies of these submissions are available for public viewing by arrangement with the Planning Policy Team. The Response Table includes a summary of the main points raised in the representations.**

<b>Respondent Name</b>	<b>Comment Numbers</b>
Derbyhaven Residents Society	84-97
Mr Groves	127
Hartford Homes Ltd	128-141
Mr Horsthuis	170
Isle of Man Enterprises	185-196
Mr Kerruish	198-212
Manx National Heritage	241-255
Mrs Patricia Newton	300-312
Mr Bleasdale	381