



Isle of Man
Government

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The response of the Cabinet Office to the representations received on the Draft Isle of Man Strategic Plan 2015 with Modifications

Collated by respondent

Planning Policy
Cabinet Office

5th February 2016

Respondents to the consultation on the Draft Isle of Man Strategic Plan 2015 with Modifications

A total of 4 responses were received in response to the consultation. The names of the respondents are set out in Table 1 below and each has been allocated a respondent number for this specific consultation. Where respondents have commented on earlier consultations, relevant respondent numbers have been identified*. Table 2 which follows, sets out the detailed comments by each party and the Department's response to each comment appears alongside.

Table 1: Names of Respondents

Respondent Number	Respondent
SPM 01	DOI
SPM 02	DEFA (deadline 12pm, comments received 5.30pm)
SPM 03	How Planning (representing Peel (IOM) Land Ltd)
SPM 04 (SPR 29 & DSP 21)	Patricia Newton
<p>*SPR = Respondent has previously submitted comments on the Preliminary Publicity *DSP = Respondent has previously submitted comments on the Draft Isle of Man Strategic Plan 2015</p>	

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Table 2: Detailed Comments

1.	SPM 01	Department of Infrastructure (DOI)		<p>Comments are provided for clarification purposes given the transfer of the Planning Policy function to the Cabinet Office on 1st January 2016.</p> <p>The DoI has no objections to the proposed Modifications.</p>	<p>The Department acknowledges the comments of the DOI which was the responsible Department for: the publication of the Draft Isle of Man Strategic Plan 2015, the case made at the Public Inquiry in September 2015 and the publication of the Modifications in December 2015.</p>
2.	SPM 02	Department of Environment, Food and Agriculture (DEFA)		<p>The Department of Environment, Food & Agriculture agreed at its Policy & Strategy meeting on 6th January 2016 to support the proposed modifications, as presented, to the Draft Isle of Man Strategic Plan 2015. In doing so the Department would like to highlight its concern that the housing provision figures for the South should not constrain the bringing forward of sites for housing development in Castletown as part of the ongoing Area Plan for the South review of housing allocations in and around Castletown.</p>	<p>The Department notes the support for the proposed Modifications.</p> <p>DEFA goes on in its response to highlight a concern regarding the spatial distribution figure for the South, suggesting that this should not constrain site release in Castletown as part of the Castletown Review.</p> <p>To clarify this figure, Housing Policy 3 refers to the need for 1,120 new homes in the South between 2011 and 2026.</p> <p>The Department has yet to decide on the most</p>

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					<p>appropriate approach moving forward with the Castletown Review. The sites suggested as part of the Call for Sites exercise are still being assessed and it is yet to be determined whether any identified need in and around Castletown will be addressed via a 'development order' approach or a 'development plan' approach.</p> <p>Both approaches would necessitate the Department taking into account the figures set out in Housing Policy 1 and Housing Policy 3 in the Isle of Man Strategic Plan. The Department published its intention to 'adopt the Draft Isle of Man Strategic Plan 2015 with Modifications in December 2015. There were no recommendations in the Inspector's Report to change Housing Policy 1 or Housing Policy 3, and the DOI did not propose any changes as part of the 'modifications'. It would be inappropriate to amend the figures or imply that they are in some way irrelevant at the point of the Plan's adoption.</p>

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					DEFA's comment does not relate to a specific modification and in any case, it would not be appropriate to give any reassurance that the housing need figure of 1,120 in the South would not be relevant during the remaining stages of the Castletown Review.
3.	SPM 03	How Planning	Q21 & Q22: Mod 8 proposes to replace Paragraph 5.23 with new text. Do you have any representations or objections to make on Mod 8?	Peel supports the modification and specifically the identification of the East Area as having the greatest level of housing need over the Plan Period.	This comment is noted.
4.	SPM 03	How Planning	Q27 & Q28: Mod 11 proposes to replace Paragraph 5.26 with new text. Do you have any	Paragraph 5.26 requires additional text in the interests of clarifying reference to the Island Spatial Strategy and in view of the fact that not all future development requirements will be capable of being met within existing settlements. This is particularly pertinent in respect of the main centre Douglas, as	The Department does not agree that the Paragraph 5.26 as modified requires additional text for clarification purposes. Paragraph 5.26 provides supporting text and specific Policy direction remains unchanged at

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			representations or objections to make on Mod 11?	recognised in the Strategic Plan Review background evidence, which notes that new development land in the settlement is in short supply. The fourth sentence of paragraph 5.26 should therefore be amended as follows to ensure consistency: "In line with the Island Spatial Strategy, the housing needs of the Island will continue to be met by concentrating new residential development within existing settlements. Where judged to be necessary through the Area Plan process, housing needs will also be met through sustainable extensions on greenfield land in line with the sequential approach."	Strategic Policy 2 and Spatial Policies 1 to 7. Paragraph 5.26 also needs to be read in the context of Paragraph 5.27 which goes on to refer to emphasise that "it is intended that each new Area Plan prepared will continue to undertake urban capacity assessments as part of a sequential approach to the provision of new housing. This approach will seek to develop within existing settlements, or on previously developed land or by the redevelopment, regeneration and conversion of existing housing. Only then will greenfield sites be brought forward, as extensions to existing settlements."

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5.	SPM 03	How Planning	Q29 & Q30: Mod 12 proposes to replace Paragraph 5.27 with new text. Do you have any representations or objections to make on Mod 12?	The use of the phraseology "seek to develop" (third paragraph) is a vague reference and should be replaced with alternative terminology such as: "This approach will focus development within existing settlements....."	<p>The sentence at Paragraph 5.27 which starts: "This approach will seek to develop" when referring to the sequential approach has not changed since the Isle of Man Strategic Plan 2007.</p> <p>The Department accepts that the wording suggested is an alternative phrase. When read in full however, the meaning of the existing sentence is clear. The Department does not agree that the phraseology is vague and needs to be amended.</p>
6.	SPM 03	How Planning	Q37 & Q38: Mod 16 proposes to amend Paragraph 13.1. Do you have any representations or objections to make on Mod 16?	Paragraph 13.1 should be clarified in order to confirm that publication of the respective annual monitoring will also occur annually in order to ensure a fully effective process of monitoring and review.	<p>Chapter 13 identifies that 13.1 that "...it is intended to undertake annual monitoring of progress on the key elements of the Isle of Man Strategic Plan and related strategies and policies and publish the findings of such monitoring as appropriate."</p> <p>The Department recognises that a key element of monitoring will remain the survey work on the Residential Land Availability Study Updates. These will continue. This particular</p>

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					<p>work is essential but can be time consuming and whilst every effort is made to ensure there are regular annual updates, it is not always possible to publish updates during the same month every year. When it comes to the preparation of new Area Plans and the review of the Strategic Plan (in part or in full) the Department will ensure that RLAS data is as up to date as possible.</p> <p>The Department recognises the importance of regular monitoring as a measure which can help assess how elements of the Strategic Plan are performing against the Strategic Plan Objectives. There will not however be monitoring reports on the performance of every Strategic Plan Policy. Paragraph 13.1 recognises the need for monitoring studies, the focus, content and regularity for such are still matters for discussion. The Department does not agree that additional clarification is necessary in Paragraph 13.1.</p>

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7.	SPM 03	How Planning	Q39 & Q40: Mod 17 proposes to modify Paragraph 13.2 Do you have any representations or objections to make on Mod 17?	Peel supports this modification as it is in the interests of ensuring an up to date Plan which is capable of responding to changing circumstances by providing flexibility and ensuring that the development needs of the Island are fully met. For the avoidance of doubt the text (second sentence) would benefit from clarifying the intention of the 5 yearly review process: "Such reviews will consider the implications of any amended population projections in ensuring that the housing requirement is up to date as well as evidence on both employment land requirements and supply in terms of availability, location, quality and demand..."	The Department acknowledges the support for the amended text. The suggestion variation provides an alternative but it is judged that it is not necessary. They are very similar but by adding in a reference to 'housing requirement' may in the future be counterproductive. Clearly, any changes to the population projections will have implications for policies on housing but there may be other implications.
8.	SPM 04	Patricia Newton	Q17 & Q18: Mod 6 proposes to replace Paragraph 5.21 with new text. Do you have any representations or objections to	5.21 "It is important to note that settlements of the same classification e.g. the Service Centres would, under this approach, be allocated the same proportion of the all-Island need figure." Retaining this phrase goes against what is said in 5.20 with regard to character of settlement, proximity to employment centres etc. e.g. Laxey	Paragraph 5.21 as amended explains the approach used to breakdown the all-Island housing need figure. This approach, which used the hierarchy of settlements in the Spatial Strategy as a basis for calculations, was supported by the Inspector. The approach does not imply that all of the settlements which happen to be in the same classification,

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			make on Mod 6?	should not be deemed to have same characteristics or capabilities as Union Mills even though it is the same designation.	e.g. Service Villages have the same characteristics or opportunities for development. Proper site assessment would be undertaken for all sites being considered as part of the preparation of an Area Plan. It is too early to comment on the potential for Union Mills or Laxey but in terms of the general approach as set out in Paragraphs 5.20, 5.21, 5.22 and 5.23, the Department is content that the methodology for the broad spatial distribution of housing across the Island is sound.