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Castletown Housing Land Review

Site Assessment Process Report

October 2017

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For and on behalf of GVA Grimley Limited

1. Introduction

1.1 GVA an Apleona Company (hereafter referred to as GVA) has been commissioned by the Isle of Man Government Cabinet Office to undertake an assessment of potential sites for housing/residential development in Castletown, Isle of Man. This work is intended to feed into the ongoing Castletown Housing Land Review.

Background

1.2 Adopted by the Department of Infrastructure and approved by Tynwald on 20 February 2013, The Area Plan for the South helps to guide development at the local level and provides the impetus for housing development in the area. The Area Plan for the South includes a commitment to explore potential opportunities for additional housing within Castletown.

1.3 As part of this commitment the Isle of Man Government is undertaking the Castletown Housing Land Review which is exploring the following three main areas:

- Housing need – to better understand the need for additional housing in Castletown;
- Possible Sites – to identify potentially suitable sites to satisfy that need;
- A way forward – to identify and implement a pragmatic and practical approach to facilitating those sites being brought forward.

1.4 The work undertaken by GVA supports the identification of potentially suitable sites for housing development in Castletown.

Call for Sites (October – December 2015)

1.5 In October 2015 the Isle of Man Government issued a 'Call for Sites' for housing land in Castletown.

1.6 Between October and December 2015 landowners, developers and those with an interest in Castletown were encouraged to submit any potential residential development sites, via a standardised response form.

1.7 A total of fifteen sites were submitted to the Isle of Man Government as part of the Call for Sites exercise.

1.8 Following the Call for Sites, the Isle of Man Government identified an additional seven sites which they felt should be explored as potential housing development sites.

- 1.9 A total of 22 potential residential development sites in Castletown were therefore identified for further consideration by GVA. A map illustrating these sites is attached at **Appendix 1**.
- 1.10 Sites submitted to the Isle of Man Government have been assigned a numerical reference (1 through to 15). Sites identified by the Isle of Man Government for further exploration have been assigned an alphabetical reference (A through to G).

Initial Consultation (August – October 2016)

- 1.11 The Isle of Man Government undertook an 'Initial Consultation' between August and October 2016. The purpose of this consultation was to seek comments on:
- A Provisional Housing Need Assessment for Castletown;
 - The 15 sites identified by the Castletown 'Call for Sites' exercise;
 - The 7 sites identified by the Government; and
 - A draft Site Assessment Framework, intended to be used to guide the assessment of the sites identified.
- 1.12 A total of 31 responses to the 'Initial Consultation' were received by the Isle of Man Government.
- 1.13 Following close of the 'Initial Consultation' the Site Assessment Framework was updated by the Isle of Man Government in November 2016.
- 1.14 A report detailing the how the consultation was undertaken and the comments received was published by the Government in April 2017¹.

Purpose and Structure of this Report

- 1.15 GVA were instructed by the Isle of Man Government Cabinet Office to assess the 22 potential residential development sites identified in Castletown by the 'Call for Sites' process, applying the finalised Site Assessment Framework.
- 1.16 This report details the outcome of the assessment of the 22 sites.
- 1.17 Alongside the work undertaken by the Government to better understand the need for additional housing in Castletown, the recommendations made in this report will be used to inform the way forward for the Castletown Housing Land Review.
- 1.18 The remainder of this Report is structured as follows:

¹ Castletown Housing Land Review: Initial Consultation Results, April 2017

- Section 2, Site Assessment Methodology
- Section 3, Consultation
- Section 4, Site Assessments
- Section 5, Overall Findings
- Section 6, Recommendations

2. Site Assessment Methodology

Site Assessment Framework and Site Assessment Report Template

- 2.1 The Site Assessment Framework and Site Assessment Report Template (November 2016) prepared by the Isle of Man Government, and subject to public consultation (see Section 1 of this Report for details), has been used to assess each of the 22 sites.
- 2.2 The Site Assessment Report Template has two main stages:
- **Stage 1** (Section B of the Site Assessment Report Template): involves an assessment of the sites location relative to the defined Study Area. Sites which pass Stage 1, automatically pass onto Stage 2 of the Assessment;
 - **Stage 2** (Section D onwards of the Site Assessment Report Template): involves a detailed assessment of the sites constraints, opportunities, availability and deliverability.
- 2.3 The Site Assessment Report template culminates in each site being assigned an overall score, allowing direct comparison between sites.
- 2.4 A copy of the Site Assessment Report Template is attached at **Appendix 2**.

Stage 1 of the site Assessment Report Template

- 2.5 Stage 1 involved an assessment of the sites location relative to the Study Area. The Study Area was defined by the Isle of Man Government and subject to public consultation during the 'Initial Consultation' August – October 2016. The Study Area boundary is equivalent to within 1.5km of the centre of Castletown and is illustrated on the plan attached at **Appendix 1**.
- 2.6 All of the 22 sites, with the exception of Site 10, are located wholly within or at least partially within the defined Study Area.
- 2.7 Site 10 is located entirely outside of the defined Study Area; however, by virtue of the fact that it is directly adjacent to Site 8 (and could therefore theoretically represent an extension of Site 8), it was agreed with the Government that it should proceed to Stage 2.
- 2.8 All 22 sites therefore passed Stage 1.

Stage 2 of the site Assessment Report Template

- 2.9 All 22 sites were subject to the detailed analysis required by Stage 2 of the Assessment (Sections D and E of the Site Assessment Report Template).

- 2.10 GVA visited each of the 22 sites in December 2016. Photographs of each site were taken and key observations were noted.
- 2.11 GVA reviewed all of the consultation responses submitted to the Government's 'Initial Consultation' in August-October 2016, many of which made comments on specific sites.
- 2.12 The information gathered from the sites visits and from the consultation responses was used to inform the assessment of sites against the Stage 2 criteria, alongside desk-based sources of information provided by the Government (see Table 1 below).
- 2.13 Section D of Site Assessment Report Template comprises 15 different criteria. Sites are assigned a score of between 0 (lowest) and 4 (highest) for each criteria, depending upon how they perform. The maximum score that can be achieved by any site against the 15 criteria set out by Section D is 60 points.
- 2.14 If a site is assigned a score of 0 against any of the criteria, this is counted as a 'critical constraint' which cannot be overcome (note: it is only possible to score '0' and therefore a critical constraint against 7 of the 15 criteria²). Any site with at least one 'critical constraint' is to automatically be regarded as unsuitable for development.
- 2.15 The 15 criteria set by Section D of the Site Assessment Report Template and the approach taken to the application of each (including data sources where relevant) is set out in Table 1 below:

Table 1: The application of the 15 criteria set by Section D of the Site Assessment Report Template

Section D criteria	Application of the criteria
<p>1) Proximity to the existing settlement: previously developed sites located within the Castletown Settlement Boundary score the highest. Greenfield sites located outside the Castletown Settlement Boundary score the lowest.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>The Castletown Settlement Boundary is defined on Map 5 of the Area Plan for the South.</p> <p>The classification of a site as greenfield/previously developed was primarily based on the observations of the site visit. Where a site contains an element of both greenfield and previously developed land, the classification is based on the prevailing or majority land type. For example, unless more than 50% of the site boundary contains existing development the site is classified as greenfield.</p> <p>Development is defined as land which is or was occupied by a permanent structure, including the curtilage of the developed land.</p>
2) Compatibility with	Surrounding land uses were examined on maps/plans and

² Critical constraints are possible against the following criteria: 2) Compatibility with adjacent land uses; 8) Landscape Character; 10) Wildlife habitats and species; 11) Historic built environment; 12) Archaeology and ancient monuments; 14) Flood Risk; and 15) Hazardous land uses.

Section D criteria	Application of the criteria
<p>adjacent land uses: the existing land uses surrounding the site are considered. Where these uses are compatible with residential development the site scores highly. Where these uses are incompatible the site is identified as having a 'critical constraint'.</p>	<p>confirmed during GVA's site visits.</p> <p>The compatibility of land uses was based on the application of professional judgement.</p>
<p>3) Requirement for substantial physical works: previously developed sites are prioritised over greenfield sites. Sites not requiring substantial physical works score more highly than those requiring substantial physical works.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>The classification of a site as greenfield/previously developed was primarily based on the observations of the site visit. Where a site contains an element of both greenfield and previously developed land, the classification is based on the prevailing or majority land type. For example, unless more than 50% of the site boundary contains existing development the site is classified as greenfield.</p> <p>Development is defined as land which is or was occupied by a permanent structure, including the curtilage of the developed land.</p> <p>Substantial Physical Works are defined by the Site Assessment Report Template as: site clearance (including demolition), site remediation for contaminated or hazardous material (either improvement of or mitigation for), ground stabilisation, piling, large scale cut and fill works, basement construction, large scale site access/junction works/boundary works.</p> <p>In assessing whether a site will require substantial physical works GVA had regard to the observations made during the site visit, information provided by the site promoter (where applicable), information provided by consultation responses to the 'initial consultation', and professional judgement.</p>
<p>4) Proximity to community services/facilities: sites located within 1km walking distance of 4 or 5 community services/facilities score highest. As the number of community services/facilities within 1km walking distance of the site decreases, so does the score assigned.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>Community services / facilities are defined by the Site Assessment Report Template as: a school, a shop, a GP surgery/health centre, a public park/outdoor sports facilities, indoor sports facilities, a community centre/hall.</p> <p>The Isle of Man Government provided GVA with a map of all schools in Castletown</p> <p>GVA undertook a desk-based assessment to locate community services and facilities in Castletown. The accuracy of this desk-based assessment was confirmed during the site visits undertaken by GVA.</p>
<p>5) Proximity to public transport: sites which are located within 200m of a bus</p>	<p>The Isle of Man Government provided GVA with a map of bus routes and up-to-date bus timetables.</p>

Section D criteria	Application of the criteria
<p>route with a peak time service every 30 minutes score highest. As the distance to the bus stop and frequency of the services increase, the score assigned to the site decreases.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	
<p>6) Proximity to road network: sites which already have an access point onto a road which could be utilised for development and sites which do not require a new access onto a primary or district link road score highly. Sites not located on the highway network score the lowest.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>The Isle of Man Government provided GVA with a map of Primary and District Link roads.</p> <p>The existing access arrangement for each site was observed during the site visit.</p>
<p>7) Open Space: sites which would not result in the loss of open space in an area that is well served score the highest. Sites which would result in the loss of open space, in an area within a deficit, score the lowest.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>Open space is defined by the Site Assessment Report Template as:</p> <ul style="list-style-type: none"> i. Land laid out as a public garden or amenity space or used for the purposes of public recreation. Can include playing space for sporting use (pitches, greens, courts, athletics tracks and miscellaneous sites such as training areas in the ownership or control of public bodies including the Department of Education where facilities are open to the public). ii. Areas which are within the private, industrial or commercial sectors that serve the leisure time needs for outdoor sport and recreation of their members or the public. iii. Land used as childrens' playspace which may contain a range of facilities or an environment that has been designed to provide opportunities for outdoor play, as well as informal playing space within built up areas. <p>Open Space does not include: Verges, woodlands, the seashore, Nature Conservation Areas, allotments, golf courses, water used for recreation, commercial entertainment complexes, sports halls and car parks.</p> <p>Open space in Castletown was identified by GVA using Map 5 of the Area Plan for the South and a desktop based</p>

Section D criteria	Application of the criteria
	appraisal of facilities, verified during the site visits.
<p>8) Landscape character: sites which would fit with the scale, landform and pattern of the landscape score highly. Sites which would not fit the scale, landform and pattern of the landscape, resulting in the total loss of or major alteration to one or more key features, are identified as having a 'critical constraint'.</p>	<p>Map 2 of the Area Plan for the South (Landscape Assessment Areas) was used to identify which Landscape Character Type the site falls within. Reference was then made to the Isle of Man 'Landscape Character Assessment' report (June 2008) to understand the key characteristics and recommended landscape strategy for that Landscape Character Type.</p> <p>Informed by the site visit and information provided by the site promoter and consultation responses to the 'Initial Consultation' GVA made a professional judgement about the potential impact of development upon the scale, landform and pattern of the landscape.</p>
<p>9) Visual amenity: sites which would have no adverse impact on visual amenity score highly. Sites which would have a significant impact on visual amenity score the lowest.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>GVA used professional judgement, informed by the site visit, to assess the potential impact of development upon visual amenity. The presence or absence of existing screening (e.g. vegetation) was taken into account, as was the potential for a sensitive design including the provision of new landscaping.</p> <p>Visual amenity impact was considered in relation to views from all adjacent land uses including residential uses, public footpaths and recreational areas.</p>
<p>10) Protecting wildlife habitats and species: sites which are unlikely to have any impact upon nature conservation interest score highly. Sites which contain or are adjacent to a nationally or internationally designated site are identified as having a 'Critical Constraint'.</p>	<p>The Isle of Man Government provided GVA with mapping of:</p> <ul style="list-style-type: none"> - Designated Wildlife Sites (non-statutory designation); - Manx Wildlife Trust Candidate Wildlife Sites (non-statutory designation) - RAMSAR sites (statutory designation); - Areas of Special Protection (statutory designation); - Areas of Special Scientific Interest (statutory designation); - Bird Sanctuaries (statutory designation); - Manx Wildlife Trust Reserves (non-statutory designation); and - National Nature Reserves (statutory designation); - Registered Trees (statutory designation). <p>There are no Emerald Sites or Marine Nature Reserves in the south of the Island.</p> <p>Manx Wildlife Trust and DEFA (Ecology, Tress and Fisheries) commented on each site during the 'Initial Consultation'. These comments were taken into account when scoring sites.</p>
<p>11) Maintaining the historic built environment: sites which</p>	<p>The Isle of Man Government provided GVA with a map of</p>

Section D criteria	Application of the criteria
<p>will have no adverse effect on a Registered Building and its setting or a Conservation Area score highly. Sites which would likely have a major effect on a Registered Building and its setting or a Conservation Area are identified as having a 'Critical Constraint'.</p>	<p>all Registered Buildings.</p> <p>Conservation Area boundaries are defined on The Area Plan for the South Map 2 (Constraints).</p> <p>DEFA Development Management team (DM) commented on each site during the 'Initial Consultation'. These comments were taken into account when scoring sites.</p>
<p>12) Protecting archaeology and Ancient Monuments: sites which do not contain an Ancient Monument and are unlikely to have any archaeological interest score highly. Sites which are recognised as being of archaeological importance or containing Ancient Monuments are identified as having a 'Critical Constraint'.</p>	<p>The Isle of Man Government provided GVA with a map of all Ancient Monuments.</p> <p>MNH and the Antiquarian Society commented on each site during the 'Initial Consultation'. These comments informed the scoring of sites for this criterion.</p>
<p>13) Protecting agricultural land: land identified as having no agricultural value scores highly. The site score decreases as the agricultural value of the land increases.</p> <p>(There is no opportunity for a Critical Constraint against this criteria)</p>	<p>The Isle of Man Government provided GVA with a map of Agricultural Land classifications, taken from the 'Agricultural Soils of the Isle of Man, Centre for Manx Studies, 2001'.</p>
<p>14) Minimising flood risk: previously developed sites are prioritised over greenfield sites. Sites inside the existing Settlement Boundary and outside the flood zones score highly. Sites which are outside the Settlement boundary and within a flood zone are identified as having a 'Critical Constraint'.</p>	<p>The Isle of Man Government provided GVA with a map showing 2012 Flood Risk Areas and 2016 Interim Flood Risk Areas.</p>
<p>15) Hazardous land uses: sites which are unlikely to be hazardous or contaminated score highly. Sites which are/have the potential to be hazardous/contaminated are identified as having a 'Critical Constraint'.</p>	<p>The Isle of Man Government provided GVA with a list of all dangerous goods sites, which GVA mapped.</p> <p>The potential for contamination was subject to professional judgement, based on observations made during the site visits, as well as information provided by site promoters and responses to the Initial Consultation.</p>

- 2.16 Section E of the Site Assessment Report Template requires a consideration of a sites availability and viability. The responses provided in this Section of the Site Assessment Report Template were informed by the information provided by the site promoter / land owner (where applicable), information provided by consultation responses to the 'Initial Consultation' and GVA's observations during the site visit.

Professional judgement

- 2.17 When applying the SAF criteria, an element of professional judgement was required in scoring the sites and determining their availability and viability.
- 2.18 Where a 'critical constraint' was potentially present on a site, the resulting impact on the whole site was taken into account. Material effects and issues with the site access for example, were judged and ultimately scored based on how this would impact the development of the site.

Reporting

- 2.19 A draft Site Assessment Report Template was completed for each site, with scores judged in line with the Government's published Site Assessment Framework (2016).
- 2.20 The draft site assessments were submitted to the Government for review in March 2017. Amendments to the forms and overall site scores were made, where considered appropriate, in line with the comments received, prior to the draft assessments being shared with the site promoters / landowners in April 2017 (see Section 3 of this Report for further details of the consultation).

3. Consultation

Site Promoters (Sites 1-15)

- 3.1 GVA wrote to the site promoters of Sites 1-15 on 28 April 2017, to provide them with the opportunity to comment on the completed draft Site Assessments and to give opportunity to provide further information if they saw fit. The consultation period closed on 26 May, allowing site promoters a period of 4 weeks to respond.
- 3.2 A copy of the letter which was sent to the promoters of Sites 1 – 15 is attached at **Appendix 3**.
- 3.3 Responses were received from 12 of the site promoters. The table attached at **Appendix 4** summarises the comments received from site promoters and GVA's response to these comments.

Site owners (Sites A – G)

- 3.4 Sites A – G were identified by the Government for assessment, as opposed to being promoted by the landowners.
- 3.5 Where the owners of Sites A-G had not already made themselves known to the Government via the 'Initial Consultation' (August-October 2016), the Government made all reasonable efforts, including undertaking Land Registry searches, to identify the contact details of the landowners.
- 3.6 The Government provided GVA with contact details for the landowner(s) of each site (A – G) – multiple owners were identified for some of the sites, resulting in a total of 10 contacts. GVA wrote to all of these contacts on the 28 April, asking to receive comments back by 26 May (equivalent to a 4 week consultation period).
- 3.7 A specifically tailored letter was sent to the landowners of Sites A – G informing them of the process to date and providing them with a copy of the draft site assessment for comment; a copy of this letter is attached at **Appendix 5**.
- 3.8 Responses received for Sites C and D suggested that the landowners details had changed or were incorrect. Alternative contact details for the landowner of Site D were provided and so a new letter was issued this contact on 14 June 2017. This landowner was given until the 12 July 2017 to respond (equivalent to 4 weeks).
- 3.9 Despite further efforts made by the Government, the landowner of Site C could not be contacted.

- 3.10 All of the landowners contacted responded to the consultation (with the exception of Site C). The table attached at **Appendix 6** summarises the comments received from site owners and GVA's response to these comments.

Changes made as a result of consultation feedback

- 3.11 As a result of comments received from site promoters and landowners, GVA made some changes to the draft Site Assessments. In all cases, the changes involved an increase (as opposed to a decrease) in the site's score.
- 3.12 Changes made to individual site assessments are detailed in the table attached at **Appendix 7** and in Section 4 of this report.
- 3.13 Where a comment made by one site owner / landowner applied to the general application of one of the 15 site criteria in Section D of the Site Assessment Report Template, GVA reviewed the score for this criteria across all of the 22 sites, to ensure a consist approach.
- 3.14 As a result of comments received during the consultation GVA reviewed the application of the following criteria across all of the 22 sites:
- Criteria 3, Requirement for substantial physical works. A number of site promoters challenged the assumption that their site would require a large scale access (defined as substantial physical works). After discussion with the Isle of Man Government, it was agreed that none of the 22 sites would require provision of an access of the scale that would represent 'substantial physical works'. The scores for all sites were reviewed in this light;
 - Criteria 9, Visual Amenity. Several site promoters suggested that impact upon visual amenity could be addressed by low density development and/or restricting the developable area to avoid sensitive boundaries/provide landscape buffers. After discussion with the Isle of Man Government it was agreed that where design mitigation suggested by promoters was considered realistic/viable, the score for Criteria for D9 could be increased, subject to including a commitment to the suggested design mitigation in any Development Brief for the site;
 - Criteria 13, Agricultural Land. One site promoter suggested an error in the agricultural land classification assigned to their site. Upon further investigation GVA discovered an error in the electronic mapping, which once amended changed the dominant agricultural land classification of some sites. In light of this error, GVA reviewed the scoring for Criteria 13 across all 22 sites;
 - Criteria 14, Flood Risk. Several site promoters suggested that the areas of flood risk within their site boundary could be excluded from the developable area, removing the need to identify a 'Critical Constraint' on the site. Having discussed this with the Isle of Man

Government, it is agreed that where the following scenario applies, the critical constraint can be overcome:

- o less than 50% of the site is covered by a flood risk area and excluding the flood risk area from the developable area does not prevent logical/viable development of the site or access being gained.

In light of the approach agreed to the enforcement of Critical Constraints for Criteria 14, it was agreed with the Government that a similar approach should be taken to Criteria 10. Therefore, where sites contain a wildlife designation, if this designation covers only a small part of the site and the site promoter commits to it being excluded from the developable area (and included in a development brief), a Critical Constraint can be avoided. The scoring for Criteria 10 and 14 were reviewed for all 22 sites in this light.

4. Site Assessments

4.1 The following section discusses each of the 22 sites (15 submitted in response to the 2015 Call for Sites and 7 identified by the Cabinet Office) and their assessment against the criteria in the Site Assessment Framework. The scores quoted represent final scores, after changes prompted by the consultation period have been applied.

Site 1

4.2 Site 1 (Redfearns Meadow, Ballalough) passed the Stage 1 assessment as the site is located within the Study Area.

4.3 The site is identified to score 44 with no critical constraints having been applied.

4.4 The key strengths of the site against the framework are considered to be:

- The site scores highly for compatibility with adjacent land uses and should not impinge on the general operation of the adjacent sub-station;
- The close proximity of the site to community services and facilities which are within a 1km radius of the site;
- The development of this site will not result in a loss of Open Space; and
- The development of this site will have no adverse effect on the historic built environment.

4.5 The key weaknesses of the site against the framework are considered to be:

- The sites location outside of the settlement – realistically, this site will only be delivered in conjunction with other adjacent sites (sites E and 2);
- The site is a wholly greenfield site;
- The accessibility to the site, due to its location down a single track lane. Subject to further works to establish a preferred access point, it is not considered that this will preclude development or materially affect the capacity to deliver on the site; and
- The site ownership is split between 3 separate land owners with an equal 1/3 share (although it is noted that the site was promoted to the 'call for sites' by all 3 owners).

4.6 The Site Promoter was notified of the outcome of the draft assessment via email on 28 April 2017, however, a response was not received.

4.7 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for adjacent site E and 2.

Site 2

- 4.8 Site 2 (Gardenfield & adjoining land (Field 434037), Malew Road) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.9 The site is identified to score 45 with no critical constraints having been applied.
- 4.10 The key strengths of the site against the framework are considered to be:
- The site scores highly for compatibility with adjacent land uses and should not impinge on the general operation of the adjacent sub-station.
 - The close proximity of the site to community services and facilities which are within a 1km radius of the site;
 - The development of this site will not result in a loss of Open Space;
 - The development of this site will have no adverse effect on the historic built environment; and
 - The site promoter states that the site is available immediately and that there are no competing land uses.
- 4.11 The key weaknesses of the site against the framework are considered to be:
- A portion of the site has been identified by DEFA as having wildlife/habitat value and has been recommended for protection against future development. However, the site promoter has confirmed this area of the site will be excluded from the developable area – The scoring and recommendations for a development brief reflect this assumption; and
 - Accessibility to the site. The current access road was deemed very narrow so significant improvements will be required. Subject to further work to establish the preferred access arrangements it is not considered that this will preclude development.
- 4.12 The Site Promoter was notified of the outcome of the draft assessment via email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.13 The promoter's response led to the scoring being increased from a score of 2 to a score of 3 for Criterion D10. This was in recognition of the fact that it had been suitably demonstrated that the developable area could be restricted to prevent any development directly abutting the adjacent nature reserve. The promoter confirmed that the area of the site identified as having wildlife/ habitat value will be excluded from the developable area and a suitable buffer would be established. This commitment should be reflected in a development brief for the site.

- 4.14 The respondent questioned the score for Criterion D3 and highlighted two potential access schemes – Scheme A proposing access from the A3 (Malew Road) and Scheme B proposing access from the A5 (Castletown Bypass). Scheme A has been identified as the promoters preferred scheme. However, this would require upgrading works and appears to involve land which is in third party ownership. This has resulted in the retention of a score of 2 for Criterion D3, as the site has been identified as greenfield and requiring physical works.
- 4.15 The respondent questioned the score for Criterion D9 - which relates to the sites impact on the visual amenity of surrounding land uses - suggesting a score increase from 3 to 4. GVA have retained the original score of 3 to reflect the fact that assessment is based on the impact of development without mitigation and we conclude that development of the site would have a limited impact upon visual amenity of the adjacent housing.
- 4.16 The respondent questioned the score for Criterion D14 relating to flood risk – suggesting a score increase from 2 to 3 based on the sites partial inclusion within the settlement boundary (30%) and the partial brownfield nature of the site. GVA have retained the original score which reflects the fact that less than 50% of the site is within the settlement boundary and less than 50% of the site comprises of previously developed land. This reflects the agreed and consistent approach taken to all the sites.
- 4.17 Comments were submitted by Delta Planning (on behalf of Hartford Homes) suggesting that site 2 has a number of constraints (flood risk, ecological value and the presence of overhead lines) and that development of this land would result in an unsustainable settlement expansion. GVA have reviewed these concerns and do not consider this submission to result in a score change on this site.
- 4.18 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites.

Site 3

- 4.19 Site 3 (Qualtrough's Yard, Hope Street) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.20 The site is identified to score 55 with no critical constraints having been applied.
- 4.21 The key strengths of the site against the framework are considered to be:
- The site is previously developed land within the existing settlement boundary;

- The site is within an existing residential area and is therefore compatible with adjacent land uses;
- The close proximity of the site to community services, facilities and public transport;
- The development of this site will not result in a loss of Open Space;
- The development of this site would fit the scale, landform and pattern of the landscape;
- It is considered that development of the site would improve the visual amenity for the surrounding area; and
- The development of this site is judged as having no impact on land with wildlife value.

4.22 The key weaknesses of the site against the framework are considered to be:

- Works to the site access involves the need to accommodate a 3 metre drop in site level by way of a significant ramp. This has the potential to render the site unviable and will need to be subject to further detailed work;
- The site is in active use as a timber yard – this would require relocation or a cease in operations for development to begin. The timescales for achieving this are not currently known; and
- The site is within the 2012 and 2016 flood zones and therefore significant flood mitigation measures would be required to allow development to proceed. Further work will be required to assess the type/scale/viability of such measures.

4.23 The site promoter was notified of the outcome of the draft assessment by email on 28 April 2017; however, a response was not received.

4.24 Comments on Site 3 were submitted by Delta Planning (on behalf of Hartford Homes) questioning the deliverability of the site due to its location within the flood zone. Within Criterion D14, GVA have factored in the fact that any development on this site would need to offer significant flood mitigation measures for it to go forward. The promoter has suggested that the ground floor be utilised for parking and deliveries so as to reduce risk of flood damage. GVA have retained the original score of 3 for this Criterion, which accurately reflects the sites status as brownfield land within the settlement boundary.

4.25 It is considered that the site is developable in the period up to 2026, subject to a viable solution for flood risk and access being found. The site could be taken forward to stage 3, dependent upon the relative performance of other sites.

Site 4

- 4.26 Site 4 (The Buchan School, Westhill, Arbory Road) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.27 The site is identified to score 52 with no critical constraints having been applied.
- 4.28 The key strengths of the site against the framework are considered to be:
- The site is previously developed land within the existing settlement boundary
 - The site is within an existing residential/ employment area and is therefore compatible with adjacent land uses;
 - The proximity of the site to community services, facilities and public transport;
 - The site has direct access to the A5 (Alexandra Road).
- 4.29 The key weaknesses of the site against the framework are considered to be:
- Development of this site would result in the loss of Open Space;
 - The proximity of the site to an area of registered trees, but not to the extent that it will preclude development or materially affect the capacity to deliver on the site;
 - The site is flagged by Manx National Heritage as having archaeological potential.
- 4.30 The deliverability of the site is dependent upon securing the relocation of the existing primary school which is in active operation on site.
- 4.31 Professional judgement has been applied regarding the presence of the Registered Tree Area on the site as these only cover a small area and will not affect access to the site and thus, the overall deliverability of the site.
- 4.32 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded on a private and confidential basis. As a result of reviewing the application of Critical Constraints, GVA have noted that the site has ecological interest in the form of registered trees and a pond; however, applying a common sense approach, around 50% of the site is not covered by registered trees and the site already has an established access point and existing development. It is therefore considered that the site still has development potential and should not be ruled out from further consideration because of the presence of Registered Trees on the eastern portion of the site. Overlooking the presence Registered Trees within the site boundary, a score of 3 was therefore applied.

- 4.33 Comments were submitted by Delta Planning questioning the deliverability of Site 4 due to the active school located on site. GVA have considered this and note that the deliverability, hinged on the location of the school, is already accurately reflected in the site assessment.
- 4.34 It is not considered that the site is developable in the period up to 2026, unless the relocation of the school could be achieved. The site could be taken forward to stage 3 as a strategic reserve site, dependent upon the relative performance of other sites.

Site 5

- 4.35 Site 5 (Great Meadow, Site 1, Fields 432936, 432934, Part 435209, Land East of Malew Road) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.36 The site is identified to score 45 with no critical constraints having been applied.
- 4.37 The key strengths of the site against the framework are considered to be:
- The site scores highly for compatibility with adjacent land uses;
 - The close proximity of the site to community services, facilities and public transport;
 - The site has direct access to the A3 (Malew Road). However, the creation of a site access along this road would result in a new access to a primary road, outside of the settlement boundary;
 - The development of this site would not result in the loss of open space; and
 - The development of this site is judged as having no impact on land with wildlife value.
- 4.38 The key weaknesses of the site against the framework are considered to be:
- Large greenfield site which would require physical works;
 - The development of this site would significantly alter the landscape. However, structure planting and landscaping will play a key part in sensitively developing the site; and
 - A large portion of the site is located underneath the Runway Public Safety Zone. Although the promoter states that this area is envisaged for open space, this would create a clear division between development parcels; and does.
- 4.39 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.40 The promoter's response led to the scoring being increased from a score of 2 to a score of 3 for Criterion D3 - in recognition that although the site is greenfield, 'substantial' physical works will not be required.

- 4.41 The respondent highlighted Criterion D2 – regarding the compatibility of the site with the railway track adjacent to the sites southern boundary – suggesting that due to the sites proposed use as a retirement village, the railway track would serve to add amenity value. GVA do not consider that reliance should be placed upon the railway providing visual interest for future residents as landscaping is required to limit views of any development in the wider landscape, which is likely to limit such views. The site scored the maximum score of 4 for this criterion and this is to be retained.
- 4.42 The respondent highlighted Criterion 14 – which relates to flood risk - suggesting that the portion of the site along the eastern boundary which falls within the flood zone should be excluded from the developable area. GVA have recognised that this part of the site can be excluded from the developable area without impacting upon the viability of development or the provision of access. This is reflected in the score of 2 for Criterion 14, as assigned by GVA.
- 4.43 Comments were submitted by Delta Planning suggesting that site 5 is not considered to represent a sustainable location for long term growth as it would lead to growth of the town in the opposite direction to shops, services and facilities. GVA do not consider that this submission impacts the original scoring of the site.
- 4.44 It is considered that the site is developable in the period up to 2026, subject to the developable area being informed by site constraints including the inclusion of the area of flood risk from the developable area. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites.

Site 6

- 4.45 Site 6 (Great Meadow, Site 2, Fields 432861, 432881, 432880, 432879, 432915, part 435209, East Malew Rd) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.46 The site is identified to score 42 with no critical constraints having been applied.
- 4.47 The key strengths of the site against the framework are considered to be:
- The site has direct access to the A3 (Malew Road) however, this would result in the construction of an access point outside of the development boundary;
 - The site scores highly for compatibility with adjacent land uses;
 - The close proximity of the site to community services and facilities; and
 - The development of this site would not result in the loss of open space.
- 4.48 The key weaknesses of the site against the framework are considered to be:

- The site is outside of the settlement and is greenfield land;
 - The site is very large and visually exposed and it is thought that developments will have an adverse impact on visual amenity.
 - The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.49 The promoter's response to the above request led to the scoring of Criterion D3 being increased from 1 to 2 - in recognition that although the site is greenfield, 'substantial' physical works will not be required. The response also led to the scoring of Criterion D14 increasing from 0 to 2. This reflected the recognition that; although a small portion of this sites north east corner falls just inside the Flood Risk Zone 2012, this represents a very small area of the site (less than 50%) and does not impact upon access. It is therefore considered that the developable area can realistically be reduced to avoid this part of the site and on this basis the site scores 2.
- 4.50 The respondent questioned the scoring of Criterion D8 – suggesting that development of this site would not impact on landscape character any more than any development on open land. GVA consider that owing to the sites size and current context (separated from the established settlement) development of this site would not fit with the scale, landform and pattern of the landscape, regardless of how it is developed.
- 4.51 The respondent questioned the scoring of Criterion D9 noting that development would have a minimal impact on residential amenity. Visual amenity encompasses more than just residential amenity and therefore, views from the A3 have been factored into the scoring for Criterion D9. GVA have retained the original score for Criterion D9.
- 4.52 Comments were submitted by Delta Planning regarding the deliverability of the site. The submitted information did not impact on the scoring of the site.
- 4.53 It is considered that the site is developable in the period up to 2026, subject to the developable area being informed by site constraints including the exclusion of the area of flood risk from the developable site boundary. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for adjacent sites 5 and F.

Site 7

- 4.54 Site 7 (Great Meadow, Site 3, Field 434038, Land to West of Malew Road) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.55 The site is identified to score 44 with no critical constraints being applied.

4.56 The key strengths of the site against the framework are considered to be:

- The site is compatible with adjacent land uses;
- The close proximity of the site to community services and facilities;
- The site is in single ownership and is available for development;
- The site has direct access to the A3 (Malew Road), however this would result in the construction of an access point outside of the development boundary;
- Development of this site would not result in the loss of open space;
- The development of this site will have no adverse effect on the historic built environment; and
- The development of this site is judged as having no impact on land with wildlife value.

4.57 The key weaknesses of the site against the framework are considered to be:

- The site is greenfield land and not within or adjacent to the settlement boundary;
- The development of this site will likely have a significant visual impact on the landscape; however, subject to a sensitive design and the provision of low density housing with adequate on-site landscaping it is considered that the significant visual impact could be mitigated to a degree; and
- The development of this site would only go ahead if the sites adjacent to the settlement boundary (Site E and Site 2) were developed first.

4.58 The Site Promoter was notified of the outcome of the assessment and responded with additional details on the site's deliverability.

4.59 The promoter's response to the above request led to the scoring of Criterion D3 being increased from 1 to 2 - in recognition that although the site is greenfield, 'substantial' physical works will not be required. The response also led to the scoring of Criterion D9 changing from 1 to 2 - in recognition that, subject to a sensitive design and the provision of low density housing with adequate on-site landscaping, it is considered that the significant visual impact could be mitigated to a degree, hence a score of 2 is given.

4.60 Comments were submitted by Delta Planning (on behalf of Hartford Homes) regarding the deliverability of Site 7. The submitted information did not impact on the scoring of the site.

4.61 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for adjacent sites E and 2.

Site 8

- 4.62 Site 8 (Great Meadow, Site 4, Fields 434939, 434940, 435207, 432837, 435208, 432839, 432836, 434062, 432814, West of Malew Road) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.63 The site is identified to score 38 with no critical constraints being applied.
- 4.64 The key strengths of the site against the framework are considered to be:
- The site scores highly for compatibility with adjacent land uses;
 - The close proximity of the site to community services and facilities;
 - The site has direct access to the A3 (Malew Road). However, this would result in the construction of an access point outside of the development boundary;
 - The development of the site would not result in the loss of open space; and
 - The site has one landowner and the site has been promoted as immediately deliverable.
- 4.65 The key weaknesses of the site against the framework are considered to be:
- The site is greenfield and not within or adjacent to the settlement boundary. The northern portion of this site lies outside of the Study Area as it is located more than 1.5km from the centre of Castletown;
 - The proximity of the site to public transport. The site is not within 400m of a Bus Route;
 - There would be a significant visual impact to the landscape due to the exposed position of this site. Subject to a sensitive design and the provision of low density housing with adequate on-site landscaping it is considered that the significant visual impact could be mitigated to a degree;
 - The site is in close proximity to a Registered Tree Area and a Wildlife Site; and
 - The site is in close proximity to a number of historic buildings.
- 4.66 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.67 The promoter's response to the above request led to the scoring of Criterion D3 being increased from 1 to 2 - in recognition that although the site is greenfield, 'substantial' physical works will not be required. The response also led to the scoring of Criterion D9 changing from 1 to 2 - in recognition that, subject to a sensitive design and the provision of low density housing with adequate on-site landscaping, it is considered that the significant visual impact could be mitigated to a degree, hence a score of 2 is given.

- 4.68 Comments were submitted by Delta Planning (on behalf of Hartford Homes) regarding the deliverability of the site. The submitted information did not impact on the scoring of the site.
- 4.69 It is considered that the site is developable in the period up to 2026 subject to a sensitive design which recognises the site constraints. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for adjacent sites D, 7, E and 2.

Site 9

- 4.70 Site 9 (Great Meadow, Reserve Site 1 Fields 434939, 434940,435207, 432837,435208, 432839, 432836, 434062,432814, East of Malew Road) passed the Stage 1 assessment as the site is partially within the Study Area.
- 4.71 The site is identified to score 41 with no critical constraints being applied.
- 4.72 The key strengths of the site against the framework are considered to be:
- The site scores highly for compatibility with adjacent land uses;
 - The close proximity of the site to community services and facilities;
 - The site has direct access to the A3 (Malew Road). However, this would result in the construction of an access point outside of the development boundary and onto a primary road;
 - The development of the site would not result in the loss of open space;
 - The development of this site will have no adverse effect on the historic built environment; and
 - The development of this site is judged as having no impact on land with wildlife value.
- 4.73 The key weaknesses of the site against the framework are considered to be:
- The site is greenfield and not within or adjacent to the settlement boundary. The northern portion of the site lies outside the Study Area as it is located more than 1.5km from the centre of Castletown;
 - The proximity of the site to public transport. The site is not within 400m of a Bus Route;
 - The site will not come forward in isolation of adjacent Sites 6, 5 and F);
 - Potential for archaeological interest on the site; and
 - Due to the current open nature of the site and its proposed scale, future development could have a significant visual impact.

- 4.74 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.75 The promoter's response to the above request led to the scoring of Criterion D14 being increased to a score of 2 – which recognises that by designing out a small portion of the site in the eastern corner of the site, which falls within a flood risk area, the critical constraint can be overcome.
- 4.76 Comments were submitted by Delta Planning (on behalf of Hartford Homes) regarding the deliverability of the site. The submitted information did not impact on the scoring of the site.
- 4.77 It is considered that the site is developable in the period up to 2026 subject to a developable area which recognises the site constraints including the exclusion of the area of flood risk from the developable area. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for adjacent sites 6, 5 and F.

Site 10

- 4.78 Site 10 (Great Meadow Estate, Reserve Site 2 Fields 434065, 434064 and 434063. Land to West of Malew Road, Castletown) passed the Stage 1 assessment as the site has been identified as part of a wider collection of sites that cumulatively fall within the Study Area. This site is outside of the Study Area but it is adjacent to Site 8, which in turn is adjacent to Site D, then 7, then E which is within the Study Area.
- 4.79 The site is identified to score 35 with no critical constraints being applied.
- 4.80 The key strengths of the site against the framework are considered to be:
- The site has direct access to the A3 (Malew Road). However, this would result in the construction of an access point outside of the development boundary and onto a primary road; and
 - The development of this site will not result in the loss of open space;
- 4.81 The key weaknesses of the site against the framework are considered to be:
- The site is greenfield and not within or adjacent to the settlement boundary. The site lies outside of the Study Area as it is located more than 1.5km from the centre of Castletown;
 - The site is within close proximity to a Registered Tree Area;
 - The site is within close proximity to a Designated Wildlife Area;
 - The site is within close proximity to a collection of Registered Buildings;
 - The site is quite remote and relatively poorly served by community services and facilities;

- The proximity of the site to public transport. The site is not within 400m of a Bus Route; and
 - The site will not come forward in isolation of sites 8, D, 7 and E.
- 4.82 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability. The promoter's response did not result in a change to the scoring of the site.
- 4.83 The respondent questioned the scoring of Criterion 9 and suggested a score of 3 not 2 stating that impact on visual amenity will be largely driven by the density of the development. GVA have retained the original score of 2, noting that the impact cannot be considered to be 'limited', even with mitigation, owing to the sites isolated and exposed position in comparison to existing developments.
- 4.84 The respondent questioned the scoring for Criterion 11 and suggested a score of 3 not 2 relating to the impact development would have on the surrounding historic built environment. GVA consider that, even with such mitigation the effect will be moderate rather than minor and thus the score was retained.
- 4.85 Comments were submitted by Delta Planning (on behalf of Hartford Homes) regarding the deliverability of the site. The submitted information did not impact on the scoring of the site.
- 4.86 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for adjacent sites 8, D, 7, E and 2.

Site 11

- 4.87 Site 11 (Mill Court, Hope Street, Castletown, IM99 5HX) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.88 The site is identified to score 55 with no critical constraints being applied.
- 4.89 The key strengths of the site against the framework are considered to be:
- The site is previously developed land within the existing settlement boundary;
 - The site is within an existing residential/ employment area and is therefore compatible with adjacent land uses;
 - The close proximity of the site to community services, facilities and public transport;
 - The development of this site will not result in a loss of visual amenity;
 - The development of this site is judged as having no impact on land with wildlife value;

- The site is currently vacant and under single ownership; and
 - The site is wholly brownfield and has no agricultural value.
- 4.90 The key weaknesses of the site against the framework are considered to be:
- The site would require demolition works of the existing building;
 - The existing access to the site is narrow and will require improvements; and
 - The site is within the 2012 and 2016 flood zones.
- 4.91 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017. however, a response was not received.
- 4.92 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites.

Site 12

- 4.93 Site 12 (Lorne House Field, Lorne House, Douglas Street, Castletown) passed the Stage 1 assessment as the site is located within the Study Area.
- 4.94 The site is identified to score 49. One critical constraint has been identified on this site (impact upon a Registered Building – Criterion D11).
- 4.95 The key strengths of the site against the framework are considered to be:
- The site is within the Castletown settlement;
 - The close proximity of the site to community services, facilities and public transport;
 - The development of this site will not result in the loss of open space;
 - The site is judged as having no impact on visual amenity;
 - Residential development on this site will fit the scale, landform and pattern of the landscape; and
 - The site is slightly raised and does not lie within the 2012 or 2016 flood zones.
- 4.96 The key weaknesses of the site against the framework are considered to be:
- The sites proximity to a Registered Building (critical constraint). However, it must be taken into account that the registration for this house is under contention
 - There is the potential for archaeological interest on the site;
 - The site is within a Conservation Area; and

- The close proximity to a Registered Tree Area.
- 4.97 The Site Promoter was notified of the outcome of the assessment and responded with additional details on the site's deliverability.
- 4.98 The promoter's response led to the scoring of Criterion D9 being increased from a score of 1 to a score of 4. This recognises that views from the adjacent site are restricted by the presence of the boundary wall which runs around the wider Lorne House site which the site promoter committed to retaining. The response also resulted in the scoring for Criterion D10 increasing from 2 to 3, in recognition that the presence of registered trees on site does not prevent the whole of the site from being considered 'developable'.
- 4.99 Owing to the identification of a critical constraint it is not recommend that the site is progressed any further.

Site 13

- 4.100 Site 13 (Lorne House Kitchen Garden, Lorne House, Douglas Street, Castletown) passed the Stage 1 assessment as the site is located within the Castletown Study Area.
- 4.101 The site is identified to score 50. One critical constraint has been identified on this site (impact upon a Registered Building)
- 4.102 The key strengths of the site against the framework are considered to be:
- The site is within the Castletown settlement;
 - The proximity of the site to community services, facilities and public transport;
 - The development of this site will not result in the loss of open space
 - The site is wholly non-agricultural land; and
 - The site is slightly raised and does not lie within the 2012 or 2016 flood zones.
- 4.103 The key weaknesses of the site against the framework are considered to be:
- The sites proximity to a Registered Building. However, it must be taken into account that the registration for this house is under contention;
 - The sites close proximity to a Registered Tree Area;
 - There is the potential for archaeological interest on the site; and
 - The site is within a conservation zone.
- 4.104 The Site Promoter was notified of the outcome of the assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.

- 4.105 The promoter's response to the above request led to the scoring of Criterion D9 being increased from a score of 1 to a score of 4. This is in recognition that views from the adjacent site are restricted by the presence of the boundary wall which runs around the wider Lorne House site and which the Site Promoter commits to retaining. The response also resulted in the scoring for Criterion D10 increasing from 2 to 3; in recognition that the presence of registered trees on site does not prevent the whole of the site from being considered 'developable'.
- 4.106 Owing to the identification of a critical constraint it is not recommend that the site is progressed any further.

Site 14

- 4.107 Site 14 (Land south west of Castletown off Arbory Road, consisting of Castle Rushen School, Castletown Swimming Pool and adjacent fields consisting of 434008, 434011, 433109, 434016 and 433126) passed the Stage 1 assessment as the site is within the Study Area.
- 4.108 The site is identified to score 48 with no critical constraints being applied.
- 4.109 The key strengths of the site against the framework are considered to be:
- The majority of the site falls within the settlement boundary;
 - Development of this site is deemed compatible with adjacent land uses;
 - The close proximity of the site to community services, facilities and public transport;
 - The site has direct access to Arbory Road, however access will require improvement due to the size of the proposed development; and
 - The site is located outside of the flood risk zone.
- 4.110 The key weaknesses of the site against the framework are considered to be:
- Relocation of the school and the deliverability of access dependent upon securing relocation of the existing school and playing fields;
 - A restrictive covenant restricts development on fields 43416 and 433109 and the company which owns this restrictive covenant does not support development of the site. This could restrict access to the site and overall deliverability;
 - The site would require substantial physical works;
 - The majority of the site is currently open countryside. Such a significant change to the landscape is considered to have an impact on visual amenity;
 - There is the potential for archaeological interest on the site; and
 - The site is within close proximity to Knock Rushen Burial Mound.

- 4.111 The Site Promoter and the Landowners were notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.112 The promoter's response to the above request led to the scoring of Criterion D7 increasing from 2 to 4; recognising that the development of this site would not result in a loss of open space subject to the proposed re-provision of playing fields associated with the proposed site plans.
- 4.113 It is not considered that the site is developable in the period up to 2026. The land is in multiple ownerships and based on consultation responses received from one of the landowners, they are not willing to see their land developed. Without agreement between the 2 landowners there is serious doubt surrounding the relocation of the school and the deliverability of access. The site could be considered as a reserve site in the event that a solution for relocation of the school can be secured in the longer term.

Site 15

- 4.114 Site 15 (Phase 2, Field No 434010, 434007, 433128) passed the Stage 1 assessment as the site is within the Study Area.
- 4.115 The site is identified to score 38 with no critical constraints being applied.
- 4.116 The key strengths of the site against the framework are considered to be:
- Development of this site is deemed to be compatible with adjacent land uses;
 - The close proximity of the site to community services and facilities;
 - Development of this site will not result in the loss of open space
 - The development of this site is not considered to have an adverse effect on the historic built environment; and
 - Site is not within the 2012 or 2016 flood zones.
- 4.117 The key weaknesses of the site against the framework are considered to be:
- The site is greenfield and outside of the settlement boundary;
 - The site would require substantial physical works, by virtue of the fact that it is dependent upon Site 14 also being developed;
 - The site will not come forward in isolation of Site 14;
 - The development of this site is considered to have an impact on the visual amenity along the coastal route;

- The proximity to public transport. The site is more than 400m from a bus route;
 - The site has the potential for archaeological interest;
 - The site is not accessible via either a primary or district link and would require the development of Site 14 to allow access through to this site; and
 - Visual impact will be significant if it is developed as Phase 2 of a wider development scheme (alongside Site 14), due to the large scale of this proposal.
- 4.118 The Site Promoter was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.119 The promoter's response led to the scoring of Criterion D8 increasing to from a score of 0 to a score of 3. In recognition that the development of this site would not result in a total loss of landscape character.
- 4.120 The respondent questioned the scoring for Criterion D3 relating to the sites requiring substantial physical works – suggesting a score of 2 instead of 1. GVA have retained the original score of 1, on account of the sites association with Site 14 (the delivery of Site 14 requires extensive demolition).
- 4.121 It is not considered that the site is developable in the period up to 2026. The land will only ever come forward for development in conjunction with or after the development of Site 14. It is not considered that Site 14 is developable in the plan period. The site could be considered as a reserve site in conjunction with Site 14.

Site A

- 4.122 Site A passed the Stage 1 assessment as the site is within the Study Area. The prospect of development is dependent on the potential changing of settlement boundary and the cumulative development of Site B, Site 14, Site 15 and Site G.
- 4.123 The site is identified to score 40 with no critical constraints being applied.
- 4.124 The key strengths of the site against the framework are considered to be:
- The close proximity of the site to community services and facilities;
 - It has been judged that the development of this site will have no adverse effect on the historic built environment; and
 - Development of this site will not result in the loss of open space.
- 4.125 The key weaknesses of the site against the framework are considered to be:

- The site is greenfield and outside of the settlement boundary;
 - The site would require substantial physical works (by virtue of its association with Site 14);
 - The site is not deliverable in isolation of Site B and/or Site 14;
 - The site is currently only accessible through other fields; and
 - The site is prominent on the western approach into Castletown, given its current open character. Any development on it would create a significantly different entry point into the town and have an impact on the visual amenity.
- 4.126 The landowner for the site was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.127 The respondent questioned the scoring for Criterion D3 – suggesting a score of 2 instead of GVA's score of 1. GVA have retained the original score on account of the fact that the site would require substantial works to achieve access given that the site cannot be delivered without the adjacent Site 14, which requires large scale demolition.
- 4.128 It is not considered that the site is developable in the period up to 2026. The site is not capable of being delivered as a standalone development, without Site B and/or 14 being developed first. Site B has been confirmed as not available for development and Site 14 is not considered to be developable during the plan period. Depending upon the level of development required in Castletown the site could be considered as a reserve site alongside Site 14.

Site B

- 4.129 Site B passed the Stage 1 assessment as the site is within the Study Area.
- 4.130 The site is identified to score 43 with no critical constraints being applied.
- 4.131 The landowner for the site was notified of the outcome of the draft assessment on 28 April 2017 and responded with additional details on the site's deliverability.
- 4.132 The landowner has confirmed that the site is not available for development. The site can therefore not be taken any further.

Site C

- 4.133 Site C (Site Identified by Isle of Man Government) passed the Stage 1 assessment as the site is within the Study Area.
- 4.134 The site is identified to score 41. However, owing to the identification of a critical constraint it is not recommend that the site is progressed any further.

- 4.135 We were unable to identify the landowner for the site C.
- 4.136 Owing to the identification of a critical constraint on account of over half of the site being identified to be classified as a Manx Wildlife Trust Reserve and a National Nature Reserve, it is not recommend that the site is progressed any further.

Site D

- 4.137 Site D passed the Stage 1 assessment as the site is located within the Study Area. The site has been assessed on the basis of assumed collective delivery with Sites 2, E and 7 (which sequentially / cumulatively provide physical adjacency to the settlement boundary).
- 4.138 The site is identified to score 42 with no critical constraints being applied.
- 4.139 The key strengths of the site against the framework are considered to be:
- The site is deemed to be compatible with surrounding land-uses;
 - The close proximity of the site to community services and facilities;
 - The site has direct access to the A3 (Malew Road) however, this would result in the construction of an access point outside of the development boundary and on to a primary road; and
 - Development of this site will not result in the loss of open space.
- 4.140 The key weaknesses of the site against the framework are considered to be:
- The site is wholly greenfield in nature and is outside of the settlement and forms part of the open countryside;
 - The site would not come forward in isolation of Sites 7, E and 2;
 - The proximity of the site to public transport; and
 - There would be a significant visual impact to the landscape due to the exposed position of this site.
- 4.141 The landowner for the site was notified of the outcome of the draft assessment and responded by letter with additional details on the site's availability. The landowner's response did not result in a change to the original score.
- 4.142 The respondent questioned the scoring for Criterion D5 relating to the proximity of the site to public transport. As the A5 is over 400m from the site, the original score of 1 has been retained.

4.143 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites and the outcome for the adjacent sites 7, E and 2.

Site E

4.144 Site E passed the Stage 1 assessment as the site is within the Study Area.

4.145 The site is identified to score 44 with no critical constraints being applied.

4.146 The key strengths of the site against the framework are considered to be:

- The sites close proximity to the Castletown settlement;
- The close proximity of the site to community services and facilities;
- The site has direct access to the A3 (Malew Road) however, this would result in the construction of an access point outside of the development boundary and on to a primary road;
- It has been judged that the development of this site will not impact an area which has wildlife/ habitat value.
- It has been judged that the development of this site will have no adverse effect on the historic built environment;

4.147 The key weaknesses of the site against the framework are considered to be:

- The development of this site would result in the loss of open space (over half of the site comprises playing fields);
- The site is in multiple ownership; and
- If developed this site would significantly change the visual appearance of the northern boundary of Castletown. Whilst the playing fields are in place, the site is partially raised and therefore development would be prominent.

4.148 The landowners for the site were notified of the outcome of the draft assessment by email and post on 28 April 2017. Two of the landowners responded with additional details on the site's deliverability. The landowner's response resulted in no changes to the site score.

4.149 The land is in multiple ownerships and based on consultation responses received from 2 of the landowners there is not agreement as to the potential for future development. It is not therefore recommended that the site be progressed any further.

Site F

- 4.150 Site F passed the stage 1 assessment as the site is within the Study Area.
- 4.151 The site is identified to score 41 with 2 critical constraints being applied.
- 4.152 The majority landowner for the site was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability. The landowner requested that the site should be removed from the list of available sites.
- 4.153 Critical constraints (flooding and heritage) have been identified and the majority landowner has stated that the site is not available for development. In light of this, it is not therefore recommended that the site be progressed any further.

Site G

- 4.154 Site G passed the stage 1 assessment as the site is within the Study Area.
- 4.155 The site is identified to score 43 with no critical constraints being applied.
- 4.156 The key strengths of the site against the framework are considered to be:
- The development of this site is considered to be compatible with the surrounding land uses;
 - The sites close proximity to community services and facilities;
 - It has been judged that the development of this site will have no adverse effect on the historic built environment; and
 - The development of this site would not result in a loss of open space.
- 4.157 The key weaknesses of the site against the framework are considered to be:
- The site is wholly greenfield;
 - The sites proximity to public transport;
 - Manx National Heritage has noted that any further development along the coast would conflict with the Landscape Character Assessment in the Area Plan for the South; and
 - Manx National Heritage believes that the land has archaeological potential.
- 4.158 The landowner was notified of the outcome of the draft assessment by email on 28 April 2017 and responded with additional details on the site's deliverability.

- 4.159 The landowners response led to the scoring of Criterion D6 being increased from a score of 2 to a score of 4. This score change is in recognition that an alternative access route to the site has been proposed from the adjacent Knock Rushen site, rather than from the narrow coastal road (Queens Road). This access would be within the settlement boundary.
- 4.160 It is considered that the site is developable in the period up to 2026. Whether the site is shortlisted as a potential site allocation will depend upon the relative performance of other sites.

5. Overall Findings

5.1 The final scores arising from the Stage 2 site assessments are shown in Table 2 below and a map illustrating these scores is attached at **Appendix 8**.

Table 2: Site Assessment Findings (as at July 2017)

Site No.	Score (max = 60)	Site Name	Size (ha)
Sites without Critical Constraints and considered developable up to 2026			
11	55	Mill Court, Hope Street, Castletown, IM99 5HX	0.041
3	55	Qualtrough's Yard, Hope Street	1.61
2	45	Gardenfield & adjoining land (Field 434037), Malew Road	3.43
5	45	Great Meadow, Site 1, Fields 432936, 432934, Part 435209, Land East of Malew Road	4.48
1	44	Redfearns Meadow, Ballalough	0.80
7	44	Great Meadow, Site 3, Field 434038, Land to West of Malew Road	4.08
G	43	Area identified by Cabinet Office	2.43
6	42	Great Meadow, Site 2, Fields 432861, 432881, 432880, 432879, 432915, part 435209, East Malew Rd	19.48
D	42	Area identified by Cabinet Office	4.00
9	41	Great Meadow, Reserve Site 1 Fields 434939, 434940, 435207, 432837, 435208, 432839, 432836, 434062, 432814, East of Malew Road	31.48
8	38	Great Meadow, Site 4, Fields 434939, 434940, 435207, 432837, 435208, 432839, 432836, 434062, 432814, West of Malew Road	13.74
10	35	Great Meadow Estate, Reserve Site 2 Fields 434065, 434064 and 434063. Land to West of Malew Road, Castletown	6.15
Sites without Critical Constraints and not considered developable up to 2026			
4	52	The Buchan School, Westhill, Arbory Road	5.17
14	48	Land south west of Castletown off Arbory Road, consisting of Castle Rushen School, Castletown Swimming Pool and adjacent fields consisting of 434008, 434011, 433109, 434016 and 433126	24.62
E	44	Site identified by Cabinet Office	3.49
B	43	Area identified by the Department	12.95
A	40	Area identified by the Department	5.34
15	38	Phase 2, Field No 434010, 434007, 433128	15.97
Sites with Critical Constraints			
12	49	Lorne House Field, Lorne House, Douglas Street, Castletown	0.56
13	50	Lorne House Kitchen Garden, Lorne House, Douglas Street, Castletown	0.28
C	41	Area identified by the Department	2.06
F	41	Area identified by the Department	9.67

6. Recommendations

Site Recommendations

Recommendation 1

It is recommended that Sites 11, 3, 2, 5, G, 6 and 9 are considered in Stage 3.

- 6.1 The above sites are free from Critical Constraints and have been considered developable in the period up to 2026. It is important to note that Site 6 and Site 9 would only be delivered in association with the development of Site 5 (which is located adjacent to the settlement boundary) and is therefore subject to the relative performance and development of Site 5, as well as the level of housing need identified for Castletown.

Recommendation 2

It is recommended that Sites 1, 7, D, 8 and 10 are not progressed to Stage 3.

- 6.2 The above sites are free from Critical Constraints and have been considered developable in principle; however, these sites have been assessed on the basis of assumed collective delivery associated specifically with Site E. As Site E (located adjacent to the existing settlement boundary) has been judged as not deliverable (in the period up to 2026), the above sites will remain isolated from the existing settlement and therefore, Sites 1, 7, D, 8 and 10 should not progress to Stage 3.

Recommendation 3

It is recommended that Sites 4, 14, E, B, A and 15 are not progressed to Stage 3, but are considered in reserve.

- 6.3 The above sites are free from Critical Constraints. However, they have been judged as not developable in the period up to 2026. These sites should be considered as longer term reserve development sites.

Recommendation 4

It is recommended that the assessment of Sites 12 and 13 are not progressed to Stage 3.

- 6.4 Although Sites 12 and 13 score relatively highly, it has not been possible to consider Sites 12 and 13 as developable owing to the application of a Critical Constraint on Criterion D11, which relates to Lorne House being a Registered Building.

*Recommendation 5***a. It is recommended that no further action be taken in respect to Site C.**

- 6.5 This site will not progress to the shortlisting stage as a Critical Constraint has been applied on Criterion D10 owing to over half of the site being classified as a Manx Wildlife Trust Reserve and a National Nature Reserve. Furthermore, a response from the landowner was not received and it cannot therefore be assumed that the site is available for development.

b. It is recommended that no further action be taken in respect to Site F.

- 6.6 This site will not progress to the shortlisting stage as a number of Critical constraints (flooding and heritage) have been identified on this site and the majority landowner has stated that the site is not available for development.
- 6.7 It is the responsibility of the Cabinet Office following consideration of these reports findings to decide the next steps.

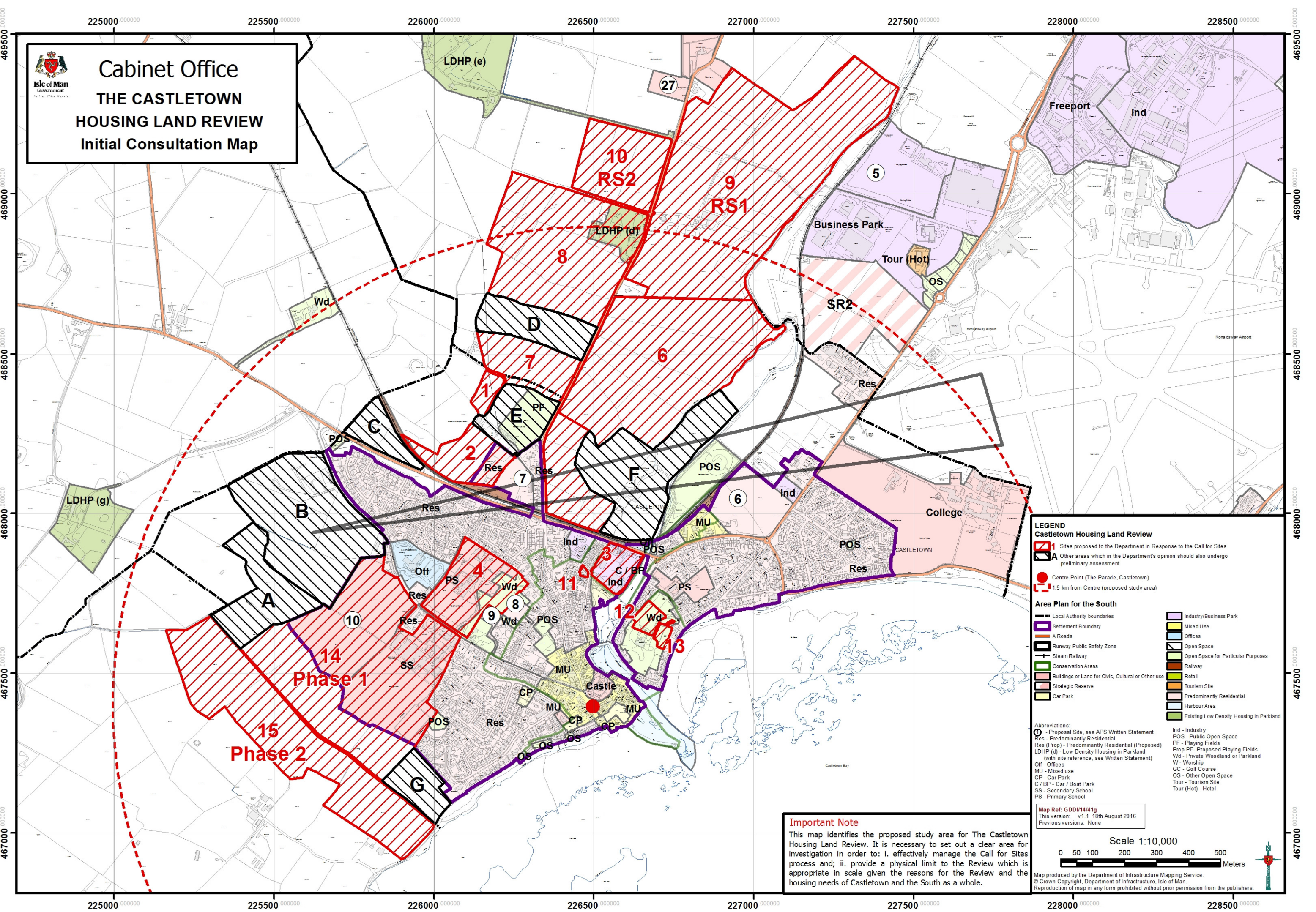


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Appendix 1
Map of
Castletown
Housing Land
Review Sites
and Study
Area



Cabinet Office
THE CASTLETOWN
HOUSING LAND REVIEW
Initial Consultation Map



LEGEND
Castletown Housing Land Review

- 1 Sites proposed to the Department in Response to the Call for Sites
- A Other areas which in the Department's opinion should also undergo preliminary assessment
- Centre Point (The Parade, Castletown)
- 1.5 km 1.5 km from Centre (proposed study area)

Area Plan for the South

- Local Authority boundaries
- Settlement Boundary
- A Roads
- Runway Public Safety Zone
- Steam Railway
- Conservation Areas
- Buildings or Land for Civic, Cultural or Other use
- Strategic Reserve
- Car Park
- Industry/Business Park
- Mixed Use
- Offices
- Open Space
- Open Space for Particular Purposes
- Railway
- Retail
- Tourism Site
- Predominantly Residential
- Harbour Area
- Existing Low Density Housing in Parkland

Abbreviations:

- O - Proposal Site, see APS Written Statement
- Ind - Industry
- POS - Public Open Space
- Res - Predominantly Residential
- PF - Playing Fields
- Res (Prop) - Predominantly Residential (Proposed)
- Prop PF - Proposed Playing Fields
- LDHP (d) - Low Density Housing in Parkland (with site reference, see Written Statement)
- Wd - Private Woodland or Parkland
- W - Worship
- MU - Mixed use
- GC - Golf Course
- CP - Car Park
- Tour - Tourism Site
- OS - Other Open Space
- C / BP - Car / Boat Park
- SS - Secondary School
- PS - Primary School
- Tour (Hot) - Hotel

Important Note
 This map identifies the proposed study area for The Castletown Housing Land Review. It is necessary to set out a clear area for investigation in order to: i. effectively manage the Call for Sites process and; ii. provide a physical limit to the Review which is appropriate in scale given the reasons for the Review and the housing needs of Castletown and the South as a whole.

Map Ref: GDDI/14/41g
 This version: v1.1 18th August 2016
 Previous versions: None

Scale 1:10,000

0 50 100 200 300 400 500 Meters

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Appendix 2
Site
Assessment
Report
Template



Isle of Man
Government

Reiltys Ellan Vannin

The Castletown Housing Land Review: Site Assessment Report Template

Cabinet Office

November 2016

Site Reference Number:

Site Name:

Note: This Site Assessment Report sets out the consideration of a site submitted in response to the Castletown Housing Land Review. It should be read in conjunction with the relevant Call for Sites Response Form submitted by the site promoter (hereafter 'CfS Response Form').

Summary

S1 Status of assessment:

- Internal Draft
- Draft for Review by Cabinet Office
- Draft for Review by Site Promoter
- Final

Date of This Version of Assessment:

Name/Job Title/Organisation of Assessor:

Note: See CfS Response Form Q1-5 for details of Landowner/agent/developer and Q7 for Site Address.

Outcome for Stage 1

Outcome for Stage 2

Outcome for Consideration for Stage 3

Section A - Site Details and Planning History

A1 Has i. A Location Plan and ii. A Site Plan been submitted which clearly identify the site with an unbroken red line?

Yes

No

A1.1 Please attach a copy of the site boundary used to carry out this assessment

A2 Site Size (ha):

Note: See CfS Response Form Q10 for site promoter's stance on site size

A3 Location of site:

A4 Current designation and use:

Note: See CfS Response Form Q8 and Q9 for site promoter's stance on current land use and designation

A5 Proposed use:

Note: See CfS Response Form Q12 - 15 for site promoter's detail on proposal

A6 Was the site considered, in any way, as part of the Area Plan for the South?

- Yes
- No

A7 If the site was considered as part of the Area Plan for the South, what was the outcome?

A8 Planning History

Note: See CfS Response Form Q11 for site promoter's stance on planning history

A9 Are there any relevant planning applications to take into account?

- Yes
- No

A10 Relevant planning applications

Section B: Stage 1

B1 Is the proposed site located within the Study Area Identified on Map CR1?

Yes

No

Note: See CFS Response Form Q6 for site promoter's stance on this question.

B2 Will this site progress to a Stage 2 Assessment?

Yes

No

Note:

If the answer to QB1 is 'Yes' proceed to Section C.

If the answer to QB2 is 'No', there should be no further consideration of the site at this stage. The site shall not progress to a Stage 2 Assessment unless individual circumstances dictate that the site should undergo a fuller assessment.

B3 Please provide comments in relation to response to question B2

Section C: Site Visit

C1 Has a site visit been undertaken?

Yes

No

C2 State who undertook site visit and date

C3 State key observations from site visit

Note: Observations may relate to matters such as: the accuracy of the submission information; issues relevant for the Stage 2 Scoring; issues relevant for assessing the deliverability of the site; and/or points of detail which may be relevant for a site brief (in the event that the site is taken forward).

C3.1 Please attach site visit photo 1

C3.2 Please attach site visit photo 2

C3.3 Please attach site visit photo 3

C3.4 Please attach site visit photo 4

Section D: Stage 2 - Scoring

D1.1 **Criterion 1:** Selecting the most appropriate locations to minimise the need to travel and protect the countryside

- 4
- 3
- 2
- 1

Score 4	Site is within the identified settlement of Castletown
Score 3	Site is outside the identified settlement of Castletown but is previously developed land
Score 2	Site is greenfield land and adjoins the outer boundary of the identified settlement of Castletown
Score 1	Site is outside the identified settlement of Castletown in the open countryside or would encourage the merging of settlements
Score 0 (Critical Constraint)	Not applicable

Note: Settlement Boundary is as shown on Map 5 of the Area Plan for the South

D1.2 Comments in relation to Criterion 1

D2.1 **Criterion 2:** Selecting sites which are compatible with adjacent land uses ('compatibility' can be defined as two or more uses existing without conflict) ***If the site scores 0, a Critical Constraint applies***

- 4
- 3
- 0

Score 4	Score 4 - Existing uses on surrounding land are generally able to operate in close proximity to the residential uses proposed (uses are compatible)
Score 3	Score 3 - Existing uses on surrounding land can only operate in close proximity to the residential uses proposed where effects are mitigated (uses could be compatible but only when mitigation measures are undertaken - such mitigation measure must be achievable).
Score 2	Not applicable
Score 1	Not applicable
Score 0 (Critical Constraint)	Existing uses on surrounding land cannot operate in close proximity to the residential uses proposed (uses are incompatible and cannot be made compatible by mitigation measures)

D2.2 Comments in relation to Criterion 2

D3.1 **Criterion 3:** Prioritising sites that are vacant and do not need substantial physical works

- 4
- 3
- 2
- 1

Score 4	Previously developed land (vacant) and would not require substantial physical works
Score 3	Previously developed land but would require substantial physical works
Score 2	Greenfield land and would not require substantial physical works
Score 1	Greenfield land and would require substantial physical works
Score 0 (Critical Constraint)	Not applicable

Note: Physical works include: site clearance (excluding demolition), internal road construction, creation or improvement of site access, drainage/sewerage works, other utility and telecommunications infrastructure, landscaping.

Substantial physical works include: site clearance (including demolition), site remediation for contaminated or hazardous material (either improvement of or mitigation for), ground stabilisation, piling, large scale cut and fill works, basement construction, large scale site access/junction works/boundary works.

If physical works involve the removal of internal or outer field boundaries (which may include hedgerows, stone walls or sod banks), the extent of and implications of such works, will be addressed in the Assessment Report.

D3.2 Comments in relation to Criterion 3

D4.1 **Criterion 4:** Maximising access to community services and facilities

- 4
- 3
- 2
- 1

Score 4	Site is located within 1 km walking distance of 4 or 5 of the services/facilities listed above and is within 1 km of a school bus route
Score 3	Site is located within 1 km walking distance of 2 or 3 of the services/facilities listed above
Score 2	Site is located within 1 km walking distance of 1 of the services/facilities listed above
Score 1	Site is more than 1 km walking distance from all of the services/facilities listed above
Score 0 (Critical Constraint)	Not applicable

Community services and facilities are, for this exercise taken to include: a school, a shop, a GP surgery/health centre, a public park/outdoor sports facilities, indoor sports facilities, a community centre/hall.

D4.2 Comments in relation to Criterion 4

D5.1 **Criterion 5:** Encouraging the use of public transport

- 4
- 3
- 2
- 1

Score 4	The site is within 200m of a bus route with a peak time service every 30 minutes
Score 3	The site is within 400m of a bus route with a peak time service every 30 minutes
Score 2	The site is within 400m of a bus route with an at least hourly peak time service
Score 1	None of the above apply
Score 0 (Critical Constraint)	Not applicable

Note: Potential of site to have an internal bus route on completion of development or a new bus stop added to the existing highway network close to the site will be addressed as part of any Assessment Report

D5.2 Comments in relation to Criterion 5

D6.1 **Criterion 6:** Ensuring sites are accessible via the existing road network

- 4
- 3
- 2
- 1

Score 4	Nature and location of site: <ul style="list-style-type: none">• will not require a new access to a Primary or District Link; and• will not result in a significant increase in the volume (or nature) of vehicle traffic movements on Local or Local Access Roads.
Score 3	Nature and location of site: <ul style="list-style-type: none">• will not require a new access to a Primary or District Link outside existing settlement boundaries; and• will not result in a significant increase in the volume (or nature) of vehicle traffic movements on Local or Local Access Roads.
Score 2	Nature and location of site: <ul style="list-style-type: none">• would require a new access to a Primary or District Link outside existing settlement boundaries; or• will result in volume/nature of vehicle traffic movements on Local or Local Access Roads that would be inappropriate.
Score 1	Site is not located on the existing road network and would require a significant access route (relative to the scale of the proposal) to be constructed to link to the existing road network
Score 0 (Critical Constraint)	Not applicable

Note: Potential of site to have an internal bus route on completion of development or a new bus stop added to the existing highway network close to the site will be addressed as part of any Assessment Report

D6.2 Comments in relation to Criterion 6

D7.1 **Criterion 7:** Ensuring there is sufficient provision of open space

- 4
- 3
- 2
- 1

Score 4	Development would not result in the loss of open space in an area well served
Score 3	Development would not result in the loss of open space in an area currently deficient
Score 2	Development would result in the loss of open space in an area that is currently well-served
Score 1	Development would result in the loss of open space in an area that is currently deficient
Score 0 (Critical Constraint)	Not applicable

Open Space - For the purposes of this exercise shall be taken to be

- i. Land laid out as a public garden or amenity space or used for the purposes of public recreation. Can include playing space for sporting use (pitches, greens, courts, athletics tracks and miscellaneous sites such as training areas in the ownership or control of public bodies including the Department of Education where facilities are open to the public).*
- ii. Areas which are within the private, industrial or commercial sectors that serve the leisure time needs for outdoor sport and recreation of their members or the public.*
- iii. Land used as childrens' playspace which may contain a range of facilities or an environment that has been designed to provide opportunities for outdoor play, as well as informal playing space within built up areas.*

Open Space does not include: Verges, woodlands, the seashore, Nature Conservation Areas, allotments, golf courses, water used for recreation, commercial entertainment complexes, sports halls and car parks.

D7.2 Comments in relation to Criterion 7

D8.1 **Criterion 8:** Maintaining Landscape Character (taking into account the Landscape Character Assessment 2008) ***If the site scores 0, a Critical Constraint applies***

- 4
- 3
- 0

Score 4	Development of the site would fit with the scale, landform and pattern of the landscape
Score 3	Development of the site would not fit the scale, landform and pattern of the landscape, resulting in the partial loss of one or more key features
Score 2	Not applicable
Score 1	Not applicable
Score 0 (Critical Constraint)	Development would not fit the scale, landform and pattern of the landscape, resulting in the total loss of or major alteration to one or more key features

D8.2 Comments in relation to Criterion 8

D9.1 **Criterion 9: Protecting Visual Amenity**

- 4
- 3
- 2
- 1

Score 4	Development would have no adverse impact on visual amenity as viewed from adjacent land uses such as residential areas, public footpaths or recreational areas
Score 3	Development would have limited impact on visual amenity as viewed from adjacent land uses such as residential areas, public footpaths or recreational areas but could be mitigated through design and layout
Score 2	Development would have an impact on visual amenity as viewed from adjacent land uses such as residential areas, public footpaths or recreational areas and could not be easily mitigated through design and layout
Score 1	Development would have a significant impact on visual amenity as viewed from adjacent land uses such as residential areas, public footpaths or recreational areas
Score 0 (Critical Constraint)	Not applicable

D9.2 Comments in relation to Criterion 9

D10.1 **Criterion 10:** Protecting valued wildlife habitats and species ***If the site scores 0, a Critical Constraint applies***

- 4
- 3
- 2
- 0

Score 4	Site and adjoining area is unlikely to have any nature conservation interest
Score 3	Site and adjacent area are identified or recognised as having potential for nature conservation value but have not been designated as such
Score 2	Site and adjacent area are identified as having nature conservation value and has a nonstatutory designation attached to it e.g. a Wildlife Site or AEI (Area of Ecological Interest)
Score 1	Not applicable
Score 0 (Critical Constraint)	Site or adjacent area is a nationally or internationally designated site (see list below)

RAMSAR, ASSI (Areas of Special Scientific Interest), MNR (Marine Nature Reserves), NNR (National Nature Reserves), Emerald Site, Bird Sanctuary or ASP (Areas of Special Protection) or is a site which contains Registered Trees or is vital for the protection of a species

D10.2 Comments in relation to Criterion 10

D11.1 **Criterion 11:** Maintaining the historic built environment ***If the site scores 0, a Critical Constraint applies***

- 4
- 3
- 2
- 0

Score 4	Development of site will have no adverse effect on a Registered Building and its setting or a Conservation Area
Score 3	Development of site likely to have a minor effect on a Registered Building and its setting or a Conservation Area
Score 2	Development of site likely to have a moderate effect on a Registered Building or its setting or a Conservation Area
Score 1	Not applicable
Score 0 (Critical Constraint)	Development of site likely to have a major effect on a Registered Building and its setting or a Conservation Area

D11.2 Comments in relation to Criterion 11

D12.1 **Criterion 12:** Protecting archaeology and Ancient Monuments protected under the MMNT Act 1959 ***If the site scores 0, a Critical Constraint applies***

- 4
- 3
- 2
- 0

Score 4	There are no Ancient Monuments on site and there is unlikely to be any archaeological interest
Score 3	There is some potential for archaeological interest on the site although there is no recorded evidence of 'finds' on the site or in the general area
Score 2	There is potential for archaeological interest on the site and there is some evidence of past 'finds' on the site or in the general area
Score 1	Not applicable
Score 0 (Critical Constraint)	The site is a recognised site of archaeological importance and/or Ancient Monument(s) are present on site

D12.2 Comments in relation to Criterion 12

D13.1 **Criterion 13:** Protecting high quality agricultural land (publication ref: Agricultural soils of the Isle of Man, Centre for Manx Studies, 2001)

- 4
- 3
- 2
- 1

Score 4	Non-agricultural land with limited agricultural value
Score 3	Soil in the area supports low levels of crop production/agricultural use/soil quality falls into Classes 4 and 5
Score 2	Soil in the area supports moderate levels of crop production/agricultural use/soil quality falls into Class 3
Score 1	Soil in the area supports high levels of crop production/agricultural use/soil quality is Class 1 and 2
Score 0 (Critical Constraint)	Not applicable

D13.2 Comments in relation to Criterion 13

D14.1 **Criterion 14:** Minimising the risk of flooding *If the site scores 0, a Critical Constraint applies*

- 4
- 3
- 2
- 1
- 0

Score 4	Brownfield or Greenfield Site inside the existing settlement boundaries and outside the Fluvial Flood Zone (irrespective of whether inside the Tidal Flood Zone)
Score 3	Brownfield site inside the existing settlement boundaries and inside the Fluvial Flood Zone (irrespective of whether inside the Tidal Flood Zone)
Score 2	Brownfield or Greenfield Site outside the existing settlement boundaries and outside both the Fluvial and Tidal Flood Zones
Score 1	Greenfield site inside the existing settlement boundaries and inside the Fluvial Flood Zone (irrespective of whether inside the Tidal Flood Zone)
Score 0 (Critical Constraint)	Outside the existing settlement boundaries and inside either the Fluvial or Tidal Flood Zones?

D14.2 Comments in relation to Criterion 14

D15.1 **Criterion 15:** Hazardous land uses *If the site scores 0, a Critical Constraint applies*

- 4
- 3
- 2
- 0

Score 4	Site and surrounding land is unlikely to be hazardous or contaminated
Score 3	Site and surrounding land was previously hazardous or contaminated but has been successfully and fully remediated
Score 2	Site and surrounding land was previously hazardous or contaminated but has not been fully remediated
Score 1	Not applicable
Score 0 (Critical Constraint)	Site is hazardous/contaminated or has potential to be hazardous/contaminated

D15.2 Comments in relation to Criterion 15

Section E: Consideration of whether or not the site is Developable

Developable sites are those which are potentially acceptable in planning terms and where there is a reasonable prospect that, at the point envisaged, they will be available (i.e. landowner willingness and no competing land uses) and could be viably developed (having regard to issues such as the cost and practicality of access, services and other infrastructure). Deliverable sites are Developable sites that could be brought forward in the short-term (sites with planning approval will normally be considered to be Deliverable).

It is acknowledged that there are a number of issues which relate to whether a site is developable. Steps 1 and 2 (in relation to Critical Constraints) will inform whether a site is potentially acceptable in planning terms. The scoring of Step 2 (where not a Critical Constraint) considers relative merits of sites which are potentially acceptable in planning terms. This section is therefore intended to add the remaining two aspects of whether a site is developable – whether they are available within the plan period (i.e. by 2026) and could be viably developed .

E1 **Availability (Land Use):** Are there any existing land uses which are unlikely to cease within the Strategic Plan period (i.e by 2026)?

- Yes
 No

E2 Comments on availability

Note: See CfS Response Form Q24 for site promoter's stance on availability

E3 **Availability (Ownership):** Are there any concerns in relation to shared or adjacent land ownership?

- Yes
 No

E4 If there are ownership issues, please give details and consideration of whether they could be resolved

Note: See CfS Response Form Q16 - 23 for site promoter's stance on ownership issues

E5 **Viability (Infrastructure and Services):** Does the proposed site require new or amended infrastructure/services? Are these achievable within the plan period (i.e. by 2026)?

	Required	Not Required	Achievable	Not Achievable
Telecommunications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electricity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Highways	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drainage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

E6 Please provide comments in relation to infrastructure and services

Note: See CfS Response Form Q27 - 30 for site promoter's stance on infrastructure issues

E7 Is further advice required from any Government Department/Statutory Board or private service providers?

	Required	Not required	Response sought	Response Received
DOI Highways	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DOI Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DED Inward Investment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DEFA Planning & Building Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DEFA Biodiversity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DEFA Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MNH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manx Gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manx Utilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Communications Providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others (please clarify in E8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

E8 Summarise key questions or advice received

E8.1 Please attach copy of advice received

E8.2 Please attach copy of advice received

E8.3 Please attach copy of advice received

E8.4 Please attach copy of advice received

Section F: Consideration for Stage 3 - Shortlisting

F1 Total Score from Stage 2 (Criteria 1 - 15)

F2 Does the Site have 1 or more Critical Constraints?

	Yes	No
Criterion 2 (Adjacent Land Use)	<input type="checkbox"/>	<input type="checkbox"/>
Criterion 8 (Landscape)	<input type="checkbox"/>	<input type="checkbox"/>
Criterion 10 (Wildlife)	<input type="checkbox"/>	<input type="checkbox"/>
Criterion 11 (Historic Environment)	<input type="checkbox"/>	<input type="checkbox"/>
Criterion 12 (Archaeology)	<input type="checkbox"/>	<input type="checkbox"/>
Criterion 14 (Flood Risk)	<input type="checkbox"/>	<input type="checkbox"/>
Criterion 15 (Hazardous Land Uses)	<input type="checkbox"/>	<input type="checkbox"/>

F3 Total number of Critical Constraints for the site

If Critical Constraints are identified, site will not proceed automatically to the next stage (i.e. Assessment Report). Reports will be completed for sites which have no Critical Constraints first.

F4 Is the site developable within the Strategic Plan period (i.e. by 2026)?

- Yes
 No

F5 Comments on whether the site is developable

Note: The answer to question F4 should be informed by the questions on ownership, availability and infrastructure. See CfS Response Form Q25 - 26 for site promoter's stance on deliverability issues.

F6 If the site is not developable within the Strategic Plan period (i.e. by 2026) should it be considered as a reserve site?

Yes

No

F7 Comments on site as potential reserve site

Note: Sites will not be allocated if they are considered to be undevelopable. Where there are doubts about a site being (or becoming) deliverable during the plan period (i.e. by 2026) it may be considered for allocation as a 'Strategic Reserve' Site.

F8 Could the site proceed to Stage 3?

Yes

No

F9 Explanation of outcome of Consideration of Site for progressing to stage 3

F10 In the event that the site progresses to stage 3 and is shortlisted, are there any issues relating to the design or whether the site could be developed which should be highlighted (for example for inclusion within a site brief)?

Section G: Other observations/points

G1 Are there any other observations/points to be recorded?

- Yes
- No

G2 Summarise further observations/points

G2.1 Please attach copy of any additional material

G2.2 Please attach copy of any additional material

G2.3 Please attach copy of any additional material

G2.4 Please attach copy of any additional material

Section H: Provision of Draft Assessment to Site Promoter

H1 Has the site promoter been sent a copy of the draft assessment (sections A - F) for comment?

Yes

No

H2 Summarise comments from site promoter (if no comments or no response state accordingly)

H2.1 Please attach copy of response from site promoter

H3 Have changes been made to the assessment as a result of comments from the site promoter

Yes

No

H4 Summarise changes (if no changes state accordingly)

End of Assessment



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Appendix 3
Consultation
letter sent to
the promoters
of Sites 1 – 15

Our Ref: 04B702342/HB07

28 April 2017

Norfolk House
7 Norfolk Street
Manchester
M2 1DW

T: +44 (0)8449 02 03 04
F: +44 (0)161 956 4000

gva.co.uk

xxxx

SENT BY EMAIL TO xxxx

Dear xxxx

xxxx
The Castletown Housing Land Review

Thank you for previously submitting the above site as part of the Call for Sites for the Castletown Housing Land Review.

I write to seek your views on a draft assessment which has been carried out for this site (attached). The Deadline for comments is **26th May 2017**.

Background

Between August and October 2016 the Isle of Man Government undertook an Initial Consultation on the submitted sites and a draft Site Assessment Framework (SAF). Following the close of the consultation, on behalf of the Government, GVA have been undertaking an assessment of each submitted site in line with the SAF.

The SAF has been subject to targeted updating since the consultation and the updated version, used for the assessments, can be viewed on the website (www.gov.im/chlr). Please note that the assessments have been informed by the responses received to the Initial Consultation which are also available to view on the website.

Step 1 of the SAF is a Preliminary Screening exercise which screens sites 'in' or 'out' based on their location. Specifically this exercise was designed to identify sites which should not be considered further due to being too detached from existing settlement boundary.

All sites submitted to the Initial Consultation have progressed to Step 2 of the assessment which involved a review of the information submitted to the Initial Consultation; a desk top review of the site and its surroundings; and a site visit.

Using the information obtained, the potential of the sites for residential development has been considered by scoring the sites against the SAF criteria, including accessibility, compatibility of adjacent land uses, landscape character and ecology. Where a site scores zero against any criteria this is noted as representing a 'critical constraint' which could preclude development of the site.

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

Birmingham Bristol Cardiff Dublin
Edinburgh Glasgow Leeds Liverpool
London Manchester Newcastle



How to Comment

We are writing to you now to give you the opportunity to comment on our draft assessment and ask you to provide any further information which may assist us. In particular, we are keen to know:

- If you have any further information which you believe would change the scores given?
- If you consider the site to be 'available' now? (and if not, at what point in the future would the site be available). Available is defined as "Where there is a landowner willing to develop and no existing uses which cannot cease"
- If you consider the site to be 'viable'? Viable is defined as being, "Where there are no serious barriers to delivery in terms of the cost and practicality of issues such as: ground-works/remediation; access, services and other infrastructure; and any necessary developer contributions in relation to affordable or social housing/open-space etc."
- If you think the site should be considered as a 'Strategic Reserve Site'. A Strategic Reserve Site is defined as one which "is considered suitable for development but is held 'in reserve' until a time when there are compelling reasons to release it. 'Reserves' could be sites which are considered likely to become Developable after the end of the current Plan Period (after 2026) and/or where additional allocations are considered appropriate in order to provide flexibility to maintain supply beyond the current Plan Period"
- Is there any other information which you believe should be considered in the assessment of this site?

The deadline for commenting on the draft SAF and/or providing further information in response to this letter is 26th May 2017. Please send responses to CastletownHLR@gva.co.uk. Alternatively, if you wish to post hard copies of this information, please address responses to:

Castletown Housing Land Review
GVA (PDR)
Norfolk House
7 Norfolk Street
Manchester
M2 1DW

Following the receipt of additional information we will finalise the initial site assessments and report our findings to the Isle of Man Government. Please note that copies of any comments received will be passed onto the Government and may be made public in due course.

We look forward to hearing from you. In the meantime, if you have any questions about this process please do not hesitate to contact us on 0161 956 4000.

Yours faithfully



GVA Grimley Ltd.

International Property Advisors



An **APLEONA** company

Appendix 4
Consultation
responses for
Sites 1 – 15

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
1	No consultation responses received for this site	n/a	n/a	Finalise form
2	Cre8 architecture on behalf of Mr and Mrs Cubbon	<p>D3.1 Promoter suggests a revised score of 3 (PDL requiring substantial works) not 2 (Greenfield land not requiring substantial works).</p> <p>The promoter has queried the sites classification of Greenfield due to the existing dwelling in the east of the site, as well as trenching for cabling across the remaining field.</p> <p>The promoters preferred access is from A3 Malew Road. This would require significant upgrading works and appears to involve land which is in third party ownership.</p>	<p>The existing dwelling occupies 30% of the site according to the promoter. GVA accept that this portion of the site represents previously development land. Trenching for cabling is not considered to represent development – the cables do not represent a permanent structure visible above ground.</p> <p>GVA has taken a consistent approach to the classification of greenfield/brownfield sites – where less than 50% of a site is previously developed it is classified as greenfield.</p> <p>The promoter suggests a score of 3 which suggests that substantial physical works would be required to deliver the site. GVA do not consider that the works required are 'substantial'. The score of 2 therefore remains relevant.</p>	Score remains unchanged
		<p>D9.1 Promoter suggests a revised score of 4 (no adverse impact on visual amenity) not 3 (limited impact on visual amenity).</p> <p>Promoter has suggested that the site is 'exceptionally well naturally screened' and that modest additional landscaping would avoid any visual impact.</p> <p>Visual amenity is discussed within appendix 5, p2.1 – 2.3:</p>	<p>We have not suggested that proposal will result in an adverse impact upon residential amenity and we accept that the provision of landscaping would mitigate for the limited impact identified once it establishes (which would take some time).</p> <p>The assessment is based on the impact of development without mitigation and we conclude that development of the site would have a limited impact upon visual amenity of the adjacent housing.</p>	Score remains unchanged

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		<p>Y Vaarney Yiarg Housing Estate: Promoter states that some intermittent landscaping adjacent to the railway would essentially eliminate any remaining visual impact. It is suggested that development will obscure views of the primary substation and that the resulting development would be unlikely to offend the existing residents of the housing estate.</p> <p>Adjacent Railway Line: Promoter notes that the introduction of intermittent landscaping can only benefit the railway line view as well as the railway.</p> <p>Ballacagen Monument: The monument is approximately 250m from the site and, as discussed in appendix 5, p1.1, the introduction of landscaping to the North-West corner of the site would mitigate any visual impact.</p>		
		<p>D10.1 Promoter suggests a score of 3 (site and adjacent area identified as having potential for nature conservation value, but not designated as such) not 2 (site and adjacent area identified as having nature conservation value and has a non-statutory designation attached to it).</p> <p>Promoter suggests that the responses provided by DEFA, MWT and MNH) are understandable but may in places be overstated.</p> <p>The promoter recognises the significance</p>	<p>Land adjacent to the western corner of the site is a designated MWT reserve. On this basis the applicable score would be 2 (site and adjacent area identified as having nature conservation value and has a non-statutory designation attached to it).</p> <p>However, the site promoter states that the woodland in the west corner of the site is excluded from the developable area. In this case, no development would take place directly adjacent to the MWT reserve and the site can score 3 (site and adjacent area identified as having potential for nature conservation value, but not designated as such). As the woodland itself also has ecological value, a suitable buffer between the retained woodland and development would be</p>	<p>Revise score to 3 and update Design brief to state that developable area must be restricted</p>

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		<p>of the adjacent Dumb River Reed Bed Nature Reserve managed by MWT. It is the promoters intention to retain the area of woodland included in the site boundary and would consider gifting this land, and an adjacent strip of land to be managed as a combined reserve.</p>	<p>required. Development brief section to be updated to make clear that the developable area must be restricted so that it is smaller than the red line boundary.</p>	
		<p>D13.1 The promoter states that 'following consultation with the Board of Agriculture at DEFA we cannot agree with the classification of soil.</p> <p>An email (see appendix 4) from Andrew Willoughby – a Field Officer for DEFA - has been attached which suggests that the soil classification for field 435210 is Class 3/2, with Class 3 being dominant. Field 434035 has been identified as urban. The source used is a book called 'Agricultural Soils of the Isle of Man' published in 2001.</p>	<p>GVA have used the same source. Agree that dominant soil is Class 3 and therefore the site should score 2 rather than 1.</p>	<p>Revise score to 2</p>
		<p>D14.1 The promoter suggests a score of 3 (brownfield site in the settlement boundary and inside the fluvial FZ) and not 2 (Brownfield/Greenfield site outside the existing settlement boundaries and outside the fluvial and tidal FZ).</p>	<p>As discussed above, because less than 50% of the site is previously developed, GVA has classified this site as greenfield. This is consistent with the approach applied to all sites.</p> <p>The flood map GIS layer provided does not suggest that this site is within either the tidal or fluvial flood zone</p> <p>The residential house and surrounding land is within the settlement boundary however, the rest of the site is outside. The promoter states that the house occupies 30% of the site. The majority of the site is therefore outside of the settlement boundary. Where less than</p>	<p>Score remains unchanged</p>

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
			50% of a site is outside of the settlement boundary GVA has classified the site as being outside of the settlement boundary. The site assessment form does not allow for us to consider variance across a site boundary.	
	Delta Planning on behalf of Hartford Homes	<p>Notes that the APS Constraints Map shows that there is a fluvial flood risk to the north of the site and the southern part is within the draft Area of Ecological Importance, additionally there are high voltage overhead lines and the site is adjacent to a nature reserve.</p> <p>The response further notes that a further constraint is the sites location to the north of the railway line and the A5 Bypass road which separates the site from Castletown.</p> <p>Conclude that Site 2 has a number of site constraints and that development of this land would result in an unsustainable settlement expansion as the town's main services and facilities are situated further southwards.</p>	<p>The flood map GIS layer provided does not suggest that this site is within either the tidal or fluvial flood zone. We have reviewed the APS Site Constraints Plan and it does not show the site as being within an area of flood risk.</p> <p>Draft Areas of Ecological importance were not assessed. The Assessment already takes account of the fact that the site boundary is adjacent to a MWT nature reserve and that the site itself has ecological potential (albeit not designated).</p> <p>The other potential constraints identified have no effect on the scores given. The impact of the overhead power lines are flagged for further investigation, to establish the implications for development.</p>	Score remains unchanged
3	Delta Planning on behalf of Hartford Homes	State that the site is within the tidal floodplain and that the suitability of this site is therefore in doubt, unless suitable flood mitigation can be agreed.	Suitable mitigation would be required for the development of this land to go ahead. This has been factored into the original form at D14.2): 'development on this site would still need to offer significant flood mitigation measures for it to go forward.	No change in scores proposed

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
			The promoter has suggested that the ground floor would be utilised for parking and deliveries so as to reduce risk of flood damage'.	
4	Mr A Lloyd-Davies on behalf of King William's College	D7 Promoter states that the school is private and therefore the 'open space' is limited to access by school users only (no public access).	Noted, but no change needed. Private school open space relates to part ii of the definition of public open space in the operational definition of open space. Nevertheless, the site scores the highest possible score as it is in an area deemed to be well served.	No change in scores proposed
		D10 The promoter has no knowledge of this area being registered within a designation of Wildlife site or area of ecological interest and therefore suggests a revised score of 3 given that the pond and trees would be retained as part of any future development. Wish to have site included within the list for consideration for stage 3 as they state that the site could be deliverable before 2026.	The site assessment confirms that the site is not a designated site and has given the site the highest possible score in light of DEFA comments which do not identify any significant ecological potential. The promoter suggests that the site has ecological interest in the form of trees and a pond, however these would be retained by development. The promoter suggests a score of 3 is given (a lower score than GVA gave the site). It is not considered that the habitats identified by the site promoter are rare or valued highly enough to be subject to a designation.	Change score to 3
	Delta Planning on behalf of Hartford Homes	The site is currently in use and zoned as a Junior School. There is no question that this is a suitable site but the main constraint is deliverability which is dependent upon the relocation of the school. King William's College is identified as a suitable relocation site in this regard.	The deliverability of the site, hinged upon relocation of the school, is already accurately reflected in the site assessment. No evidence is presented to demonstrate that Kings William College is a suitable and deliverable relocation site.	No change in scores proposed
5	Savage & Chadwick on behalf of the site promoter	Section A5 State that the site is considered suitable for a private retirement village with bungalows, care home and sheltered apartments having central community open space and facilities. This is not	We have notes that the site is promoted for retirement housing but will clarify that this does not represent a form of 'general housing'.	Wording of proposed use to be amended (no change to score)

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		general housing.		
		<p>Section C3 and D14.2 The 2012 Flood Risk map showed no flood risk to the site from the Silverburn River. The 2016 Flood Risk map added the effect of tidal flooding resulting in a small area of the eastern boundary of the site being within the flood zone. This should be considered in the context of the Castletown Tidal Flood Defence work being implemented May 2017. It is therefore an issue that can be designed out or will be resolved by the flood defence works.</p>	GVA recognise in 14.2 that a small portion of the sites eastern corner is within the tidal flood zone. However in recognition that it is a very small part of the site which could be excluded from the developed area, the site has been scored 2 for D14.1 (greenfield site outside of the flood zones). The score assigned has therefore already taken account of the fact that this small area of flood risk could be designed around.	No change in scores proposed
		<p>Section D2 The railway, in relation to the use of this site as a retirement village, was considered by the Department of Health, as a benefit to the residents as it will provide visual interest.</p>	<p>No conflict with adjacent uses has been identified and the site already scores the highest possible score for Section D2. It is not considered that reliance should be placed upon the railway providing visual interest for future residents as landscaping is required to limit views of any development in the wider landscape, which is likely to limit such views (see GVA comments in relation to D9).</p>	No change in scores proposed
		<p>Section D3 Agree that substantial works required but that these are nothing extraordinary to what would be a normal part of residential development. Discussion with highways has confirmed that provision of access onto the A3 is not seen as an issue. Suitable visibility could be achieved within land controlled by the land owner.</p>	The site is greenfield land (no dispute). Agree that the works required would not be extraordinary. The works would not be substantial in terms of the definition provided therefore emend score to 2. We have not questioned the deliverability of these works.	Change score to 2.

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		Field boundaries would need to be considered as part of possible structure planting – however there are few boundaries.		
		Section 4 Agree that the site is well serviced and located for access to public transport, public facilities, highway network and pedestrian distance from Castletown.	Noted	No change in scores proposed
		Section 6.2 Whilst north of the bypass the site is well within the target zone and surrounded by residential and commercial development.	Noted. No evidence presented to challenge score	No change in scores proposed
		Section 8.2 Whilst the site represents greenfield development it would be sympathetic and largely low rise.	Noted. No evidence presented to challenge score	No change in scores proposed
		Section 9.2 Whilst the landscape outlook would change the degree of impact needs to be considered in relation to the scale. In terms of views from the railway, the track change in level progresses quickly along the A5/Alexandra Road to being in a cutting and the outlook from that diminishes quickly from S&S Motors in a westerly direction eventually passing under the A3/Malew Road.	We agree that in the long term, once development and landscaping becomes established, the impact on visual amenity would be limited. However the site is very large and is currently visually exposed on the eastern and western boundaries due to a lack of existing landscaping. The provision of additional landscape to shield views of development would in itself represent a significant change in view and therefore an impact (as opposed to limited impact) upon visual amenity in the immediate/short term.	No change in scores proposed
		Section 11.2 Agree that structure planting and landscaping will play key part in sensitively developing the site.	Noted	No change in scores proposed

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		<p>Section E6 Confirms that the utilities companies have been consulted and all were available without major upgrade.</p>	Noted	No change in scores proposed
		<p>Section F The Airport authority were consulted about the safety zone. This has been taken into account in the feasibility and development is not proposed within that area, which will instead be used for public open space/landscape and access. The gas pipeline route along the railway line was also established in ensuring there was an adequate gas supply to serve the site.</p>	<p>The assessment already notes that no development would be permitted within the safety zone. It is noted that this affects a significant portion of the site.</p> <p>The assessment notes the presence of the high pressure gas pipe and states that the implications of this and any stand-off/safety zone need to be considered. No information has been provided to satisfy GVA with regards the impact of this gas pipe upon future development.</p>	No change in scores proposed
	Delta Planning on behalf of Hartford Homes	Notes that residential development has previously been refused in principle on this site in 2000 (ref: 99/01034/A) and the runway safety zone covers the majority of the site. It is severed from the settlement by the airport safety zone, the bypass and railway line. We do not consider this to be a sustainable location for long term growth as it would lead to the growth of the town in the opposite direction to shops, services and facilities.	Noted. No new information presented to that already picked up in the assessment form.	No change in scores proposed
6	Savage & Chadwick on behalf of the site promoter	<p>Section A7 Disagree with the suggestion made that the site would represent as extension of site 6.</p>	This is not stated. The site is adjacent to site 5 and is reliant upon this relationship to progress to stage 2.	No action required.
		<p>Section C3 and D14.2 The flood risk area affecting the site is minimal and confined to the top corner of field 432861. It seems inappropriate to down score the</p>	We scored the site 0 but recognise that it would score more if the area of flood risk were removed. Agree with site promoter that this score should be adjusted to reflect a common sense approach. The area of flood risk is very small and does not affect access to the site.	Increase score to 2

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		site for a very small area at the north east tip of the site. The score should be revised to 3 and that corner omitted.	By excluding this area of the site from the developable area the critical constraints can be overcome.	
		Section D3.2 Disagree that substantial physical work required. The site has good access and visibility onto Malew Road. Based on consultations held no request has been made for a roundabout. Score should be 2.	We have scored this as 1 (greenfield requiring substantial works) however on reflection, agree with the promoter that although significant, the works do not meet the definition of 'substantial'.	Change score to 2
		Section D8.1 Would not impact on the character any more than any development of open land (see Ballakilly Port Erin by Heritage Homes). The method of development and retention of some of the landscape features would need to be assessed as part of any development brief for the site.	Owing to scale of this site and its current context (no adjacent large scale development and some distance from the established settlement) it is not considered that it would fit with the scale, landform and pattern of the landscape, regardless of how it is developed.	No change to score
		Section D9.2 and D11.2 Impact on residential amenity is minimal in that there is no development on the opposite side and levels of development in Castletown is lower in level. Even Golden Meadow farm buildings are unlikely to see the development of this land particularly with the inclusion of landscaping. Where there are key views these could be sight corridors within the site.	Section 9.2 is not solely concerned with residential amenity, it is concerned with 'visual amenity'. This includes views from the A3. It is considered that owing to the scale of the site and the significant change that development would represent that the development would have an impact (as opposed to minimal impact) on visual amenity. The text at 11.2 already recognises that with appropriate landscaping, the impact upon views from Golden Meadow Mill would be limited.	No change to score
	Delta Planning on behalf of Hartford Homes	Notes that residential development has previously been refused in principle on this site in 2000 (ref: 99/01034/A). Site 6 is reliant on being adjacent to site 5 in order to be connected to the existing settlement;	Noted. No new information to change scoring.	No change required

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		however development on site 5 is heavily restricted by the public safety zone which would effectively result in a significant separation between the settlement and development on site 6. This would have an impact upon sustainability. Overall, the site is severed from the settlement by the airport safety zone, the bypass and railway line. We do not consider this to a sustainable location for long term growth as it would lead to the growth of the town in the opposite direction to shops, services and facilities.		
7	Savage & Chadwick on behalf of the site promoter	<p>Section B3 Correction to statement "site is adjacent to site 7" – the site under consideration is site 7.</p> <p>Section D3.2 The scope of works should be physical and not substantial physical. There are no requirements for demolition, site remediation, ground stabilisation etc. The score should be 2.</p> <p>Section 9.2 The score assessment is based on the site being viewed from adjacent land uses such as residential areas. That is not the case and adjacent land is also agricultural land and the views, if any, are distant. Such views could be managed with structure planting. Suggest a revised score to 2 or 3.</p>	<p>Noted. GVA to correct to read adjacent to Site 6.</p> <p>Agree that works are significant, but not substantial. Adjust score accordingly.</p> <p>Section 9.2 is not solely concerned with residential amenity, it is concerned with 'visual amenity'. This includes views from the A3. It is considered that owing to the scale of the site and the significant change that development would represent that the development would have an impact (as opposed to minimal impact) on visual amenity.</p>	<p>Correct reference to site 7</p> <p>Adjust score to 2</p> <p>Adjust score to 2</p>

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
	Delta Planning on behalf of Hartford Homes	We do not consider this to be a sustainable location for long term growth as it would lead to the growth of the town in the opposite direction to shops, services and facilities. The site is separated from the existing settlement by the airport safety zone, the bypass and railway.	Noted. No new information to change scoring.	No change required
8	Savage & Chadwick on behalf of the site promoter	Section A4 Noted that north-east area is designated for low density housing in parkland. May be appropriate to consider such designation for the whole of site 8.	The presence of low density housing in parkland is acknowledged by text in A4. This historical designation was removed by the South Area Plan Inspector as being inappropriate for continuation.	No change required
		Section D3.2 The site will not require substantial physical works given the nature of the land it should be rescored to 'physical' score 2.	Agree that works are significant, but not substantial. Adjust score accordingly.	Adjust score to 2
		Section D9.2 The suggested impact is based on assumed close proximity of residential development. Views of the site would topographically be limited from main residential development in Castletown. Score should be 2 rather than 1.	Section 9.2 is not solely concerned with residential amenity, it is concerned with 'visual amenity'. This includes views from the A3 and the railway line. It is considered that owing to the scale of the site and the significant change that development would represent that the development would have an impact (as opposed to minimal impact) on visual amenity.	Adjust score to 2
	Delta Planning on behalf of Hartford Homes	We do not consider this to be a sustainable location for long term growth as it would lead to the growth of the town in the opposite direction to shops, services and facilities. The site is separated from the existing settlement by the airport safety zone, the bypass and railway.	Noted. No new information to change scoring.	No change required
9	Savage & Chadwick on behalf of the	Section B3 Promoter states that the site is offered as a reserve area being contiguous to other	Noted	No change required

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
	site promoter	sites that may be developed, allowing for long term strategic growth.		
		Section D8.2 Suggest that the question of fit largely depends upon a development brief and required density.	GVA agree that the impact of development can be managed by a development brief and density, however, given the size of the site and its distance from the existing settlement it is not considered reasonable to suggest that development would ever fit with the scale, landform and pattern of the landscape.	No change to scores proposed
		Section 9.2 The score presupposes impact upon adjacent residential development whereas in fact the main neighbour to this area is the business park.	Section 9.2 is not solely concerned with residential amenity, it is concerned with 'visual amenity'. This includes views from the A3 and the railway line. It is considered that owing to the scale of the site and the significant change that development would represent that the development would have an impact (as opposed to minimal impact) on visual amenity.	No change to scores proposed
		Section 14.2 The areas of flood risk are confined to the eastern edges of the site which would be omitted and therefore would raise the score.	We scored the site 0 but recognise that it would score more if the area of flood risk were removed. Agree with site promoter that this score should be adjusted to reflect a common sense approach. The area of flood risk is very small and does not affect access to the site. By excluding this area of the site from the developable area the critical constraints can be overcome.	Revise score to 2
	Section F9 The suggested critical constraint ignores how the site could be developed within a set of constraint and as such the question needs to be whether the site can be development in light of the constraints.	We scored the site 0 but recognise that it would score more if the area of flood risk were removed. Agree with site promoter that this score should be adjusted to reflect a common sense approach. The area of flood risk is very small and does not affect access to the site. By excluding this area of the site from the developable area the critical constraints can be overcome.		
	Delta Planning on behalf of Hartford	We do not consider this to a sustainable location for long term growth as it would lead to the growth of the town in the opposite direction to shops, services and	Noted. No new information to change scoring.	No change required

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
	Homes	facilities. The site is separated from the existing settlement by the airport safety zone, the bypass and railway.		
10	Savage & Chadwick on behalf of the site promoter	Site name missing field number 434063 on cover sheet	Noted. GVA to update.	Update site name to include field 434063
		Section C3 The adjacent site is an area of low density housing in parkland which may well be the appropriate designation for any future development.	Noted. The low density housing in parkland allocation was found to be inappropriate by the SAP Inspector and has not therefore been taken forward as an allocation"	No change required
		Section D8.1 The noted score is presumably based in a presupposition as to the type and density of housing – whereas it may well be low density housing in parkland.	GVA agree that the impact of development can be managed by a development brief and density, however, given the size of the site and its distance from the existing settlement it is not considered reasonable to suggest that development would ever fit with the scale, landform and pattern of the landscape.	No change to scores proposed
		Section D9.1 Question the score and whether this should be 3 given such impact, if any, will be driven largely by density.	Given the size of the site and its proximity from the existing settlement it is considered that development, even at a low density would significantly change views of the site from adjacent land including the A3. Impact is not considered to be 'limited', even with mitigation, and the score of 2 is therefore considered appropriate.	No change to scores proposed
		Section D11.1 Suggest a score of 3 linked to low density house.	Accept that low density and housing and on-site landscaping would mitigate impact upon the setting of the registered building to the south, however, even with such mitigation it is considered that the effect will be moderate rather than minor.	No change to scores proposed
	Delta Planning on behalf of Hartford Homes	We do not consider this to a sustainable location for long term growth as it would lead to the growth of the town in the opposite direction to shops, services and facilities. The site is separated from the	Noted. No new information to change scoring.	No change required

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		existing settlement by the airport safety zone, the bypass and railway.		
11	No consultation responses received for this site	n/a	n/a	Finalise form
12	A Lloyd-Davies on behalf of the site promoter	Section A7 There is reference to the site being adjacent to the flood zone. The site is the highest in Castletown and this should not be factored into any decision on scoring.	The commentary at A7 summarises the outcome of the Area Plan for the South's consideration of the site. As confirmed by the score given to the site at D14, the fact that the site is adjacent to an area of flood risk has not influenced the scoring of the site under the current assessment.	No change required.
		Section D9 Sensitive design adjacent to a registered building would not have a detrimental impact on the visual amenity as viewed from adjacent land, from which views are restricted by the tall walls in all respects adjacent to the site.	GVA accept that the views of the site from adjacent land are restricted by presence of the boundary wall which runs around the wider Lorne house site and existing landscaping. Subject to the retention of this boundary wall and the existing landscaping (some of which falls outside the sites red line boundary) it is accepted that development would have no adverse impact on visual amenity as viewed from adjacent land uses. A score of 4 could therefore be given however this will be dependent upon the site promoter committing to the preservation of the existing site boundary wall and landscaping (the site promoter has indicated that the boundary wall would be retained).	Amend score to 4.
		Section D10 The Kitchen Garden, other than minor fruit trees, is largely free from any mature trees and those which are visible are present on the surrounding gardens within Lorne house and the vehicular access thereto. The site is not therefore part of the	Registered Trees represent a statutory designation. If a site is adjacent to land which has Registered Trees on it then it would theoretically be caught as having a 'critical constraint'. However, applying a common sense approach, we recognise that the presence of Registered Trees on adjacent land will not in this case prevent the whole of site 12 from being considered	Amend score to 3.

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		identified woodland.	<p>'developable'.</p> <p>DEFA Trees have advised that the registered trees on the boundary of the site would restrict development potential to the central areas of the site. DEFA Ecology identified potential for bat roosts in the trees.</p> <p>There are no designated wildlife sites on or adjacent to the site.</p> <p>On this basis a score of 3 is considered appropriate.</p>	
		<p>Section D11</p> <p>Sensitive development can occur adjacent to a registered building. The ongoing appeal into the extent of the registered building known as Lorne house has no bearing on the Kitchen Garden as this is not proposed for inclusion and creates a self-contained area for development potential. As such, this is not a critical constraint on the kitchen garden adjacent to Lorne House.</p>	<p>The development site is located directly in front of Lorne House on land which has historically been associated with Lorne House and its setting, within the Castletown Conservation Area.</p> <p>The score given is based on the current status of Lorne House although it is recognises that this status may change which would require the revisiting the criteria.</p>	No change required
		<p>Section D12</p> <p>The proposer has commissioned and carried out an archaeological dig on the adjoining site which has identified constraints for an area to be free from subterranean finds. This has been identified in the submission for Lorne House Field and clearly identifies where the expected areas of finds are located. Accordingly, there is no critical constraint on the Kitchen Garden.</p>	<p>GVA have reviewed the report prepared by Durham University/CGMS dated 2011. The work undertaken did not cover the entirety of Site 12, but did cover the majority.</p> <p>The report confirms the presence of a potential early Christian cemetery to the north of the site. Finds on the site itself included pottery. The relationship of these finds to the cemetery is unknown. The report indicates that carefully located development can be achieved on the site without harming the archaeological finds.</p> <p>GVA accept that archaeology does not represent a critical constraint, as reflected in the score.</p>	No change to score proposed.

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
			Nevertheless, the archaeological survey does record archaeological finds of interest on the site and the general area hence the score given is considered accurate.	
		<p>Section F9 It is accepted that the only critical constraint on this site is the registered building issue. This is well documented and with the correct registration of the building and its surrounding wall there is an opportunity on this site for modest residential development. Until the outcome of the appeal is fully determined, no decision can be made on the suitability of the site for exclusion from the Castletown Housing Land Review. On the other hand its inclusion can be supported entirely.</p>	The score given for D11 is based on the current status of Lorne House although it recognises that this status may change which would require the revisiting the criteria.	
13	A Lloyd-Davies on behalf of the site promoter	<p>Section D3 It is averred that the site consists of previously developed land which would not require substantial physical works to release for development.</p>	<p>We have agreed that substantial works would not be required.</p> <p>We have classified the site as greenfield land owing to the fact that the site consists of undeveloped garden land. The outbuilding included in the garden land covers less than 50% of the site.</p>	No change to score proposed.
		<p>Section D9 Has been incorrectly proportioned as there is no physical view into the site other than extremely distant views from across the bay as there are significant high walls bounding the site which prevent inward visibility.</p>	GVA accept that the views of the site from adjacent land are restricted by presence of the boundary wall which runs around the wider Lorne house site and existing landscaping. Subject to the retention of this boundary wall and the existing landscaping (some of which falls outside the sites red line boundary) it is accepted that development would have no adverse impact on visual amenity as viewed from adjacent land	Amend score to 4.

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
			uses. A score of 4 could therefore be given however this will be dependent upon the site promoter committing to the preservation of the existing site boundary wall and landscaping (the site promoter has indicated that the boundary wall would be retained).	
		<p>Section D10 Other than minor fruit trees the site is largely free from any mature trees and those which are visible are present on the surrounding gardens within Lorne House and the vehicular access thereto.</p>	<p>Registered Trees represent a statutory designation. If a site is adjacent to land which has Registered Trees on it then it would theoretically be caught as having a 'critical constraint'. However, applying a common sense approach, we recognise that the presence of Registered Trees on adjacent land will not in this case prevent the whole of site 13 from being considered 'developable'.</p> <p>DEFA Trees have noted that there are many large mature broadleaf trees on the boundary of the site which would restrict the space suitable for development.</p> <p>The wildlife map GIS layer provided indicates that there are no-statutory designations on the site or adjacent area.</p> <p>On this basis a score of 3 is considered appropriate.</p>	Amend score to 3.
		<p>Section D11 Sensitive development can occur adjacent to a registered building. The ongoing appeal into the extent of the registered building known as Lorne house has no bearing on the Kitchen Garden as this is not proposed for inclusion and creates a self-contained area for development potential. As such, this is not a critical constraint on the kitchen garden</p>		

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		adjacent to Lorne House.		
		<p>Section D12</p> <p>The proposer has commissioned and carried out an archaeological dig on the adjoining site which has identified constraints for an area to be free from subterranean finds. This has been identified in the submission for Lorne House Field and clearly identifies where the expected areas of finds are located. Accordingly, there is no critical constraint on the Kitchen Garden.</p>	<p>GVA have reviewed the report prepared by Durham University/CGMA dated 2011. The work undertaken did not cover Site 13.</p> <p>The report confirms the presence of a potential early Christian cemetery on the adjacent site. A score of 2 is therefore considered accurate.</p>	No change to score proposed.
14	OCORIAN / Baraddan Limited	<p>The company (formally known as Bedell Trustees) own part of the Land constituting Site 14 (Field 434016) and has the benefit of a restrictive covenant over another part of the site (Field 433109).</p> <p>The proposer, as landowner, states that their land is not now available and they are unwilling to develop the land. They also will not agree to the release of the restrictive covenant. The proposer suggests that as the site is greenfield land it would require material expenditure before it could be developed and that there are other sites in the review which should be developed first. They do not wish to see their land included within the reserve list.</p>	<p>It is understood that the restrictive covenant restricts development to education us on fields 43416 qnd 433109. It is noted that these fields are earmarked for educational development by the Hartford Homes masterplan – therefore the restrictive covenant would not prevent such development.</p> <p>Nevertheless, the landowner’s response clearly states that their land is unavailable for development (it is assumed this is regardless of the use class proposed). Fields 434016 and 433109 must be excluded from the development boundary. Without this land there is limited opportunity for relocation of the existing school, sports playing fields and community swimming pool. The exclusion of these fields could also prohibit access to the site, as field 434016 abuts Arbory Road to the north. The other main access route is currently through the existing school.</p>	Revise form to reflect that the site is not considered to be developable.
	Delta Planning	<p>Section D3</p> <p>Given that the site is part brownfield (part of the site is the school) and the remainder is a relatively flat uncontaminated</p>	<p>Because less than 50% of the site is previously developed, GVA has classified this site as greenfield. This is consistent with the approach applied to all sites.</p>	No change to score proposed.

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		<p>greenfield site without the need for substantial physical works (as defined in the assessment document), it is the proposer's opinion that the site should score a 2, not 1.</p>	<p>The submitted assessment states that 'the development of this site would require the demolition of the current high school and substantial site clearance' and while it does not specifically state the requirement for substantial physical works, it has been implied through the description of works required: 'The majority of the land is greenfield so would require significant infrastructure works. Further to this, the large scale of this site would require the addition of large scale site access and junction works as the only current access to this site is through the school entrance and agricultural gates along Arbory Road'.</p>	
		<p>Section D7 Disagree that development would result in the loss of an area of public open space. Assert that it has been demonstrated within the site masterplan proposals that the existing school playing fields would be completely re-provided within the proposals as part of the new school. The landowners also control adjacent land (site 15) which could be used to increase public open space and enhance provision. Score should be 4, not 2.</p>	<p>Subject to the existing playing fields being re-provided to the same level of provision (both quantity and quality) by the redevelopment of the school site, a score of 4 can be applied.</p> <p>The requirement to re-provide the existing playing fields must be reflected in any development brief for the site.</p>	<p>Amend score to 4.</p>
		<p>Section F Proposers assert that the site should be deliverable by 2026 and that ownership issues raised by landowners are not in conflict with the proposals for the site. 'The objections from Bedell Trustees Limited and Braddan Limited relate to the preservation of fields 434016 and 433109 for educational use. The sites are already zoned for 'civic, cultural or other use' in</p>	<p>Noted. Deliverability of the site is contingent on the rebuilding of the school in a new location.</p>	<p>No change required</p>

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		<p>the Adopted Area Plan for the South and this is precisely what is included for within the Master Plan, which shows the fields as part of the rebuilt Castle Rushen High School.</p> <p>The proposer asserts that even in circumstances where the Bedell Trustees and Braddan Land decide not to include their land within the scheme, the other land owners working with Hartford Homes own sufficient Land to ensure all aspects of the proposal can be delivered.</p> <p>The proposer notes that part of the Site was zoned for housing in the 1982 Development Plan and the Castletown Local Plan 1990. Therefore part of the Site has a history of being considered acceptable for housing.</p> <p>Finally, the proposer asserts that 'since it is deliverable by 2026' they would fully support it being taken forward to the Stage 3 assessment for an allocation, or at the very least as a reserve site.</p>		
15	Delta Planning	<p>Section D3 Disagree with the assertion that the site would require substantial physical works, on account of the Site being flat, uncontaminated, greenfield land. Site should score a 2, not 1.</p>	<p>The site is greenfield land. Development of this site would only ever be achieved if the adjacent land (Site 14) was developed - without this the site is isolated from the existing settlement and access cannot be achieved. The development of Site 14 would require demolition of the existing school and creation of a large scale access, amounting to substantial physical works. By virtue of its dependence upon site 14, the</p>	No change to scores proposed

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
			development of site 15 would therefore require substantial physical works. This is reflected in the score given	
		<p>Section D8 Disagree that the development would result in the total loss of landscape character such that it is a critical constraint; rather they consider it would have partial loss and the score for this should be 3, not 0.</p>	GVA have agreed that the development of this site would result in only a partial loss of landscape character (although it would have a significant impact) and have therefore revised the score to 3. We have made the decision to consider the site as a reserve site linked to the adjacent site if suitable and brought forward.	Adjust score to 3.
		<p>Section F Proposer accepts the wider comments on Site 15 and the lack of short term deliverability due to access and wishes to confirm that it was promoted to demonstrate the potential for long term growth as an extension of Site 14. Requests that the site is not completely ruled out and is considered as a Reserve Site.</p>	Noted.	No change required.



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Appendix 5
Consultation
letter sent to
the
landowners for
Sites A - G

Our Ref: 04B702342/HB07

28 April 2017

Norfolk House
7 Norfolk Street
Manchester
M2 1DW

T: +44 (0)8449 02 03 04
F: +44 (0)161 956 4000

gva.co.uk

xxxx

SENT BY EMAIL TO xxxx

Dear Sir/Madam

**Land in your ownership in Castletown
The Castletown Housing Land Review**

We are writing to you in relation to an area of land xxxx in Castletown which we believe to be in your ownership / that you are promoting on behalf of the landowner.

As you are hopefully aware, the Isle of Man Government has recently undertaken the first stage of a Housing Land Review exercise for Castletown which has considered the potential suitability of a number of sites to accommodate housing development. As part of this process the Cabinet Office invited landowners to put sites forward during a 'Call for Sites' exercise. Following the Call for Sites, the Cabinet Office further identified a number of sites which they felt may be future potential development sites. Your site was identified by the Cabinet Office as part of this process.

For all sites promoted or identified a draft site assessment has been undertaken. We write to seek your views on the findings of this assessment (which is attached to this letter), and to test your appetite to bring your site forward for development in the future. The Deadline for your response is **26th May 2017**.

Background

Between August and October 2016 the Isle of Man Government undertook an Initial Consultation on the submitted and identified sites and a draft Site Assessment Framework (SAF). Following the close of the consultation, on behalf of the Government, GVA have been undertaking an assessment of each submitted site in line with the published SAF.

The SAF has been subject to targeted updating since the consultation and the updated version, used for the assessments, can be viewed on the website (www.gov.im/chlr). Please note that the assessments have been informed by the responses received to the Initial Consultation which are also available to view on the website.

Step 1 of the SAF is a Preliminary Screening exercise which screens sites 'in' or 'out' based on their location. Specifically this exercise was designed to

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Birmingham Bristol Cardiff Dublin
Edinburgh Glasgow Leeds Liverpool
London Manchester Newcastle



identify sites which should not be considered further due to being too detached from existing settlement boundary.

All sites submitted to the Initial Consultation or identified by the Cabinet Office have progressed to Step 2 of the assessment which involved a review of the information submitted to the Initial Consultation (where appropriate); a desk top review of the site and its surroundings; and a site visit.

Using the information obtained, the potential of the sites for residential development has been considered by scoring the sites against the SAF criteria, including accessibility, compatibility of adjacent land uses, landscape character and ecology. Where a site scores zero against any criteria this is noted as representing a 'critical constraint' which could preclude development of the site.

How to Comment

We are writing to you now to give you the opportunity to comment on our draft assessment and ask you to provide any further information which may assist us. In particular, we are keen to know:

- If you have any further information which you believe would change the scores given?
- If you consider the site to be 'available' now? (and if not, at what point in the future would the site be available). Available is defined as, "Where there is a landowner willingness to develop and no existing uses which cannot cease".
- If you consider the site to be 'viable'? Viable is defined as being, "Where there are no serious barriers to delivery in terms of the cost and practicality of issues such as: ground-works/remediation; access, services and other infrastructure; and any necessary developer contributions in relation to affordable or social housing/open-space etc."
- If you think the site should be considered as a 'Strategic Reserve Site'. A Strategic Site is defined as being one a site which "is considered suitable for development but is held 'in reserve' until a time when there are compelling reasons to release it. 'Reserves' could be sites which are considered likely to become Developable after the end of the current Plan Period and/or where additional allocations are considered appropriate in order to provide flexibility to maintain supply beyond the current Plan Period".
- Is there any other information which you believe should be considered in the assessment of this site?

The deadline for commenting on the draft SAF and/or providing further information in response to this letter is 26th May 2017. Please send responses to CastletownHLR@gva.co.uk. Alternatively, if you wish to post hard copies of this information, please address responses to:

Castletown Housing Land Review
GVA (PDR)
Norfolk House
7 Norfolk Street
Manchester
M2 1DW

Following the receipt of additional information we will finalise the initial site assessments and reporting our findings to the Isle of Man Government. Please note that copies of any comments received will be passed onto the Government and may be made public in due course.

We look forward to hearing from you. In the meantime, if you have any questions about this process please do not hesitate to contact us on 0161 956 4000.

Yours faithfully



GVA Grimley Ltd.

International Property Advisors



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Appendix 6
Consultation
responses for
Sites A – G

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
A	Delta Planning on behalf of Hartford Homes	<p>Section D3 Given that the site is a relatively flat uncontaminated greenfield site without the need for substantial physical works it is our opinion that the site should score 2 under this criterion, not 1.</p>	GVA consider that the site would require substantial works to achieve access given that the site cannot be delivered without the adjacent sites.	No change to score proposed
		<p>Section D14 We do not dispute that part of the site is within the fluvial flood plain but this covers only part of the northern field and would not prevent the southern section coming forward for development. The critical constraint only partially covers the site and should not prevent the remainder being considered further.</p>	We accept that it would be possible to exclude the flood risk areas (they cover less than 50% of the site and do not prevent access) from the developable area.	Amend score to 2
		<p>Section F6 We accept the wider comments on Site A and the lack of short term deliverability due to access and wish to confirm that it was promoted to demonstrate the potential for longer term growth as an extension of site 14. We therefore request that Site A is considered as a reserve site.</p>	No critical constraints identified on the site. The site would only ever come forward as an extension to site 14. Whether the site can be considered as a reserve will therefore be dependent upon the outcome for site 14.	No changes required
B	Ocorian (site owner, formerly known and Bedell Trustees Limited)	<p>The site is not available now, as land owner Ocarion are not willing to develop the land. The land is used in connection with the Southern 100 motorcycle races and that is a use which we would wish to continue to support. The site should not feature in a reserve list. This is a greenfield site which would require material expenditure before it could be developed and there are other sites in the Review which should be developed first.</p>	Noted.	Update and finalise form

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
C	No consultation responses received	NA	NA	Finalise form
D	Simon Rigall	Simon Rigall does not own this site. Mr Davidson is believed to be landowner however no contact details for Mr Davidson were known.	GVA to discuss with CO whether attempts to contact Mr Davidson have/can be made.	Finalise form
E	Mr McHarrie	Mr McHarrie owns field number 2235 and does not wish for this land to be included in with Castletown football club stadium. Who is the site promoter? I require a copy of a C15 response form in order to understand the scoring.	Noted. Cabinet Officer replied to Mr Mc Harrie's questions on 23/05/17.	No changes required
	Mrs Colvin	Suggests that, if other family members agree that the land be offered to the football club house officials as extra parking space, or the adjacent Manx Utilities for storage etc, for an agreeable cost.	Noted.	No changes required
F	Cornelius O'Sullivan	Welcome the proposal not to take Site F any further and suggest that it should be removed from the list of available sites for future development within Castletown. Whilst it may fall within the area identified by the Cabinet Office, the Mill is a registered building and structure including the mill pond and threshing house which is considered one of the finest on the island. We have been passionate about the preservation of this property, its immediate surroundings and its extended setting within contextually correct fields, continuing the legacy of our father which	Noted. The impact of the site upon the Registered Building is reflected in the assessment.	No changes required

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		died suddenly in 1994.		
G	Delta Planning on behalf of Hartford Homes	Section A4 It should be noted that this site, together with some adjacent land within Site 14, was zoned for housing in the 1982 Development Plan and the Castletown Local Plan 1990. It therefore has a history of being considered acceptable for housing and it would therefore be appropriate to restate this earlier zoning.	The site is not allocated in the Southern Area Plan (SAP). The SAP replaced the 1982 Development Plan and Castletown Local Plan 1990.	No changes required
		Section D3 Given that the site is a relatively flat uncontaminated greenfield site without the need for substantial physical works, it is our opinion that the site should score 2 under this criterion, not 1.	Agree that the works required would not be substantial as per the agreed definition.	Amend score to 2
		Section D6 We are aware that access from Queen street is limited but this route could accommodate a small amount of development. Furthermore, options include access from Knock Rushen, and in the longer term, access could be secured via Site 14 to the north,	The text in box 6.2 recognises that access could be taken from Queen Street (although this access is likely to be constrained) or from Site 14. Access from Knock Rushen would allow access to Site G from within the settlement boundary, The level of development delivered by site G in isolation would not be significant.	Amend score to 4
		Section D9 In relation to the potential conflict with the recently developed Knock Rushen housing, this could be resolved through a carefully designed housing layout and the use of a green buffer between the new and existing housing.	The text in D9.2 recognises that screening would need to be provided as a minimum given that the houses on Knock Rushen, to the east of the site, directly overlook the site. There is also visual impact from the coast/coastal road. It is not considered that this impact would be 'limited', hence the score given.	No change in score proposed
		Section D10 The site has been subject to ecological	The site is greenfield land. All greenfield land has potential for nature conservation value, as reflected in	No changes required

Site no.	Consultee name	Summary of consultee comments	GVA Response	Next Step
		<p>evaluation when the adjacent Knock Rushen development was built and it is understood the area was deemed of no significant interest. The score for this criterion should be 4, not 3.</p>	<p>the score assigned.</p> <p>Planning permission for Knock Rushen was granted in 2009 and therefore the ecological survey undertaken at that time cannot be relied upon as up to date.</p>	
		<p>Section D12 The site has been subject to archaeological evaluation when the adjacent Knock Rushen development was built and it is understood the area was deemed of no significant interest. The score should therefore be 3, not 2.</p>	<p>The score given reflects the fact that there is some evidence of past finds in the general area (as advised by MNH).</p>	<p>No change required</p>



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Appendix 7
Table
depicting the
changes
made to the
individual Site
Assessments

OVERALL	Site reference																					
Stage 2 Criterion	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	A	B	C	D	E	F	G
1	1	2	4	4	2	1	1	1	1	1	4	4	4	4	1	1	2	2	1	2	2	2
2	4	4	4	4	4	4	4	4	4	3	4	3	4	4	4	3	4	3	4	3	4	4
3	2	2	3	3	2	2	2	2	2	2	3	2	2	1	1	1	1	2	2	2	2	2
4	4	4	4	4	4	4	4	4	4	2	4	4	4	4	4	4	4	4	4	4	4	4
5	3	3	4	4	4	3	3	1	1	1	4	4	4	4	1	3	4	4	1	3	4	1
6	2	3	3	4	2	2	2	2	2	2	3	3	3	4	1	1	2	3	2	3	4	4
7	4	3	4	2	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	2	4	4
8	3	3	4	4	3	3	3	3	3	3	4	4	4	3	3	3	3	3	3	3	3	3
9	3	3	4	3	2	2	2	2	2	2	4	4	4	2	2	2	1	2	2	3	3	2
10	3	3	4	3	4	3	4	2	4	2	4	3	3	3	3	3	3	0	4	4	3	3
11	4	4	3	3	3	3	4	2	4	2	3	0	0	3	4	4	4	4	4	4	0	4
12	3	3	3	2	3	3	3	3	2	3	3	2	2	2	2	3	3	2	3	3	2	2
13	2	2	4	4	2	2	2	2	2	2	4	4	4	2	2	2	2	2	2	2	2	2
14	2	2	3	4	2	2	2	2	2	2	3	4	4	4	2	2	2	2	2	2	0	2
15	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
Total	44	45	55	52	45	42	44	38	41	35	55	49	50	48	38	40	43	41	42	44	41	43

Note: yellow denotes critical constraint. Green denotes a score has changed following the consultation period.

RANKED (exc. sites with critical constraints)

Site	Score	Rank
11	55	1
3	55	1
4	52	2
14	48	3
2	45	4
5	45	4
1	44	5
7	44	5
E	44	5
B	43	6
G	43	6
6	42	7
D	42	7
9	41	8
A	40	9
8	38	10
15	38	10
10	35	11

D	ND
X	
X	
	X
	X
X	
X	
X	
X	
	X
	X
X	
X	
	X
X	

D denotes Developable
 ND denotes Not developable



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Appendix 8
Map of
Castletown
depicting the
developable
and non-
developable
sites

Castletown site Scores

- 50 to 55 (4)
- 44 to 50 (6)
- 40 to 44 (9)
- 35 to 40 (3)

Site has at least one Critical Constraint

Site not considered developable up to 2026

