



**Department's response to
representations received on the
consultation on the draft Development
Brief for the Former Victoria Road Prison
Site**



**Isle of Man
Government**

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Introduction

1. The consultation document, titled "Consultation on the Draft Development Brief for the Former Victoria Road Prison Site" was published on 28th February 2014.
2. The Development Brief aims, pending the preparation of the Area Plan for the East, to provide interim planning guidance to developers and the public alike on Government's vision for the site.
3. This record of responses provides an overview of the consultation process and analysis of all responses received during the consultation exercise.

The Consultation Exercise

4. The 6 week consultation began on the 28th February 2014 and ran until the 11th April 2014.
5. The consultation document was published by the Planning and Building Control Division of the Department of Infrastructure. A news release and coverage in the local media made the public aware that the document was available for consultation, and it was listed on the main Government website within the 'Current Consultations' section.
6. The Department also consulted all parties listed within paragraph 7.1 of the Code. In addition, letters/emails seeking comments on the document were sent to Members of the Planning Committee, and other interested bodies (as listed in Annex B).

The Responses

7. A total of 68 (52 online + 16 written) responses were received in respect of this consultation exercise, which can be broken down into the following groups:

Table 1:- Respondents broken down into groups:-

Government Departments/Agencies	1
Members of Tynwald	2
Joint response from MHK's/Local Authority Councillor	1
Local Authorities/Clerks to the Local Authority	4
Members of the Public	48
Developers	2
Chamber of Commerce	1
Public Limited Company	1
Children's Nursery	1 (Late Response)
Churches	2
Anonymous Respondents	5

Out of these 68 respondents the following bodies replied to say that they resolved that individual members should respond if they so wished:

- i. Port Erin Commissioners
 - ii. Isle of Man Chamber of Commerce
8. A list detailing all those who responded is included in annex A to this report.
9. The table in Annex C shows the responses which the Department received. The responses have been recorded against the questions contained in the consultation document. It should be noted that each respondent did not have to answer every single question of the survey; so in some instances the number of responses against each question will not equal 68.
10. The survey asked two questions which were as follows:

Question 1 - Do you agree with the aim for the former prison site?

Question 2 - Do you agree with the Development Brief, as identified detailed in paragraph 6.0?

11. Detailed submissions were received from both Broadway Baptist Church and the Living Hope Community Church. Both organisations were keen to see the site used as a place of worship. This was echoed by a number of individual submissions made by members of the public. It would appear that some of these members of the public may also be members of the church groups. This may have resulted in a seemingly unrepresentative slant to the response. However they are all comments which the Department has considered. Consultation should not simply be a referendum with the Department placing equal weight on all representations made.
12. The overall numbers do indicate that:
 - In respect of Question 1, 51 respondents answered this question. Out of the 51 respondents, 19 respondents agreed with the aim for the former prison site. The remaining 32 respondents disagreed; and
 - In respect of Question 2, 49 respondents answered this question. Out of the 49 respondents, 16 respondents agreed with the Development Brief for the former prison site. The remaining 33 respondents disagreed.
13. However, the Department has taken the time to consider all the representations made fully before deciding how to proceed.
14. Where comments were submitted in response to a particular question these have been recorded verbatim but in a manner which is not attributable to an individual respondent.
15. There were also comments made which were more general and not in response to a specific question. These responses are in a table at paragraph C 1 of Annex C.

Conclusion & Next Steps

16. The Department will now implement changes to the development brief and publish the final version of the Development Brief. A schedule of all the changes that came about as a result of the consultation are shown in a table attached to Annex D.

Annex A – List of Respondents to the Consultation

- Department of Health and Social Care
- Marown Parish Commissioners
- Patrick Parish Commissioners
- Mr. T. Wild MLC
- Mr R W Henderson MHK/ Mr J R Houghton MHK/ Councillor Mr David Ashford
- Mr David Griffiths
- Mr Ian Lewandowskyj
- R P Smith
- J Tarpey
- Ms Ruth Baker
- Chris & Carole Staples
- Mr Robbie Ripamonti
- Joel Brockett
- Mr Lance Lindenberg Tomlinson
- Mr Antony Kelsey
- Cheryl
- Mr Alec Berber
- Mr Neil Thompson
- Mr Trevor Kirk
- Mr Robert Ripamonti
- Chris Baker
- Lukas Nakos
- Mr & Mrs T Staples
- Ms Victoria Deuchar
- Hartford Homes
- Mr Jonathan Stanfield
- Ms Erika Robertson
- L Harrison
- Mr James Curtis
- Pat Wiles
- Mr Graham Smith
- J. Collis
- Adriana Watson
- Mr Brett Cullen
- Mr David Humphrey - Heritage Homes Limited
- Ms Susan Smith
- Mr Gary Kieswetter
- Ms Alison Curtis
- Ms Amy Farrell
- Mrs C Teece
- Ms Sarah Rouse
- Mr James Smeed
- Ms Rebecca DalGLISH
- Mr Neil Johnson
- Ms Caron Walton
- Mr Stuart Nelson
- Ms Regina Ripamonti
- C Teece
- Mr Andrew Johnson
- Ms Tiana Smith
- Mr Ben DalGLISH
- Victoria House Nursery
- Isle of Man Enterprises plc
- Living Hope Community Church
- Broadway Baptist Church
- Mr Geoff Corkish MBE MLC
- Douglas Borough Council
- Isle of Man Chamber of Commerce
- Port Erin Commissioners
- Mr Tim Norton
- J M Watson
- Ms Jackie Robinson
- Ms Diane Hughes
- 5 Respondents who wanted to remain anonymous

Annex B – List of Consultees

- All Tynwald Members
- All Chief Officers of Government Departments
- All Local Authorities
- Attorney General
- Isle of Man Chamber of Commerce
- Planning Committee Members
- Manx National Heritage
- Manx Electricity Authority
- Isle of Man Water and Sewerage Authority
- Communications Commission
- Office of Fair Trade
- Isle of Man Post Office Authority
- Architects and Agents based in the Isle of Man
- Dandara/Heritage Homes
- Hartford Homes
- Principal of Victoria House Nursery
- Owners/Occupiers of 1-11 Poplar Terrace (all inclusive)
- Owners/Occupiers of 1 and 2 Victoria Avenue
- The Manager of the Eastcliffe Adult Training Centre
- Chief Executive of Shoprite Group Plc

Annex C – Analysis of Responses

Consultation Questions	Response		Department's Response
<p>Question 1</p> <p>Do you agree with the aim for the former prison site?</p>	Yes	19	<p>The Department notes the majority of respondents to the question do not agree with the aim for the former prison site and the variety of alternative uses for the site.</p>
	No	32	<p>Evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area.</p>
<p>Any comments?</p>	<p>This would be an ideal site for the TT Museum that has been talked about for so many years. Close to the TT Grandstand and at the heart of the event. Too good an opportunity to miss.</p>		<p>Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p> <p>However, in light of these responses and the existing land use zoning of the site within the Douglas Local Plan 1998, the</p>
	<p>activity centre swimming pool for all to use</p>		
	<p>Indifferent- I think that the site should be used for a more community orientated project such as sports, if it was my decision alone I would lean towards possibly building an astroturf pitch to enable sports fixtures, clubs, and schools to utilise. This would be an added bonus and incentive to utilise the current facilities in the area for instance make it an expansion of Nobles park. The return you would make from charging fees to use the pitch for fixtures, training sessions and other extra curricular activities would easily allow the department to break even on this project in little time.</p>		

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	<p>I think there are enough vacant residential properties around the island (both new builds and older properties) without building any more. This site has previously been used to serve the community and should retain that use. Either as a community building, place of worship or recreational or educational facility.</p>	<p>Department is of the view that the aim for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p>
	<p>Our view would be that the site should remain available for community purposes. There is a real shortage of affordable locations for Douglas based community groups and changing this site to residential purposes means an opportunity lost.</p>	<p>The Development Brief aim will be amended as follow:</p>
	<p>Build what you want, but preferably not a "church" for the local cult (LHCC) whose congregants are going to totally spam this consultation</p>	<p>"To encourage and influence the redevelopment of vacant former prison site in Douglas for residential use, which may incorporate some residential care/day care uses, and/or any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses."</p>
	<p>Due to growth in the number of attendees, the church that I attend (Living Hope Community Church), has a need to acquire a property or a plot to construct a purpose-built property to serve as a community-focused church in Douglas. Perhaps the Government might consider this as a possible aim for the site?</p>	<p>Following the introduction of the Development Brief the site will remain zoned as an "Area of Buildings for Civic, Cultural & Other Special Uses". The re-zoning of the site is a matter for the Area Plan for the East.</p>
	<p>I love the Isle of Man, but there is a distinct lack of community focused 'hubs' in Douglas. People are often just living commuting between home and office. Rather than more residential property's I would like to encourage the gov if I may to investigate offering land to a community centre /or allowing a community focused church to be established, that would serve the community and bring it together with activities for young people, old people and young families. There is something nice about the idea of a former prison site being reshaped into a community centre or community church. Thanks</p>	<p>However the Development Brief will also enable applications for the uses identified in the Development Brief to be accommodated on the site provided that they conform to</p>
	<p>I am of the belief that the site should be used for recreational use</p>	

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	<p>to service the Douglas and Onchan communities as it is situated perfectly to cover and meet the needs specifically of those in need.</p>	<p>the requirements of the Brief.</p>
	<p>Why change the use when iom gov has not even tried to find a user for the site under its current usage? Douglas has enough properties in its town boundaries but the major issue is the lack of facilities to deliver community / leisure events to the existing properties. Douglas needs more facilities not more property. If more property is required then use land where there is plenty of space not a relatively small site.</p>	<p>In simple terms this means that a wide range of uses could be successfully accommodated on the site, subject to planning approval.</p>
	<p>We lived at 1 Falcon Cliff Terrace which is very close to the old prison site before moving to our current home in Mount Murray. Having been part of that community, we feel it would be a wonderful idea to build something on that site which could benefit the community (both young and old) as a whole. Turning that ground into a residential area will have no benefits for the surrounding community. I am sure that piece of ground which in the past has been a place of despair could be turned into a place which brings much joy to others.</p>	<p>The draft development brief would allow sheltered accommodation to be developed on the site; however, for clarity purposes the development brief will be amended to make it clearer that sheltered accommodation can be developed on the site.</p>
	<p>I am opposed to change of use of this site to 'residential'. My ideal would be that it is used in some way that benefits the broader community (e.g. civic, recreational and/or cultural use) rather than to give it to a housing developer for the building of yet more residential accommodation. This is a uniquely positioned site, right in the middle of existing residential areas, and ideas should be sought from individuals/groups that seek to develop something that supports the community (be it cultural, recreational or civic)</p>	<p>In light of the amendment to the aim. Paragraph 6.1 a) has been also be amended as: follows:</p> <p>a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing.</p>
	<p>It should be used for civic use as before. I believe the land would be best used for the establishment of a modern church that is community orientated, has a strong outreach program, is relevant</p>	<p>b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other</p>

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	<p>to our modern way of life, and that it will serve the community in a beneficial manner providing facilities that all members of the community can enjoy, e.g. youth centre, mums and tots facilities, a rehabilitation area for the poor and destitute etc. This is the perfect site for such a facility: a place to "set the captives free", a stark contrast to its former prison status!</p>	<p>special uses</p>
<p>I'd like to see this site gifted to a church community to put something back for the people. Housing would be a sad mistake when the aim of the prison was to rehabilitate and reform. A vibrant church would regenerate the community in a similar way. Please don't miss this opportunity to allow Living Hope to breathe life into the area and our island capital</p>		
<p>Civic use should remain in my opinion.</p>		
<p>I believe the area should be kept for the good of the community providing a centre of excellence for social, community and spiritual care and made available to the whole Manx community.</p>		
<p>I think that the land should instead be used as an area of buildings for civic, cultural & other special uses. I think that there is enough residential in the area, and that the community would benefit from a use that is more community focussed.</p>		
<p>We feel this site should be for the whole community not just some.</p>		
<p>I believe that the site should be used for "Area of Buildings for Civic, Cultural & Other Special Uses. It is a large site and I understand there are many people interested in this site for this reason.</p>		

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	<p>It is a highly dense residential area with some recreational facilities and change of use to include more housing would miss a great opportunity to further meet the many and varied needs of the community in which it is situated.</p>	
	<p>I would like to see it used for a centre that serves the community 7 days a week rather than for purely residential purposes due to its central location.</p>	
	<p>It should be used for cultural, leisure or religious use. We do not need more apartments in Douglas.</p>	
	<p>To turn this into residential use would sell the community short of what could be a valuable community space.</p>	
	<p>No I don't. There needs to be space for Civic, Cultural and Special Uses land close to Douglas.</p>	
	<p>I understand that the original intention was for the site to be used for community use. I think that intention should continue as there are very few sites in Douglas suitable for building a community amenity, and it would be a great shame to lose this one.</p>	
	<p>I believe that there is a urgent need for care facilities for older people on the Island, particularly more proper independent/assisted care but with medical and care support, the site is in a good position for this. And a 2/3 storey building with proper accessibility will not dominate the current landscape. With current public transport routes convenient to the position it seems a sensible option. If used for purely residential purposes PLEASE PLEASE PLEASE make it AFFORDABLE and don't let developers get their hands on the site.</p>	

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	I believe the site should be retained primarily for civic / community use. Douglas is lacking in a community centre and youth or culturally focused activities.	
	I believe it should retain it's original designation for 'civic, cultural and other special uses'.	
	I feel that the land would better serve the community if it was designated for a church. A church with the focus on the community, where the lost and destitute can find a safe place in which to restore their lives. Where a church will provide facilities for the youth of Douglas can enjoy while instilling socially accepted values. An area that can keep the youth entertained, serving the community and away the iniquities on offer around Douglas. Where moms and toddlers can meet regularly over a cup of coffee. Where single moms can find support. I believe that a church provides the best support for the community and the prison site is ideally positioned to reach the borough of Douglas.	
	This site is ideally located for use as a community resource. To use the site for residential purposes would limit the potential of the land.	
	Sheltered accommodation for the elderly please.	
	For residential use - a community centre. One that connects and outreaches. A charity. Certainly not commercial with First Names and Shoprite across the road.	
	I feel that the site could be utilised effectively as a site to build a church building, that will be a place of worship and have facilities to	

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	<p>serve the local community. The Church should be at the heart of the community serving that community, and this site would enable a church build in a central and accessible location. The church that I attend (Living Hope Community Church) is looking for new premises and I feel would be able to use this site and location to the communities' advantage.</p>	
	<p>I would love the site to be used by Living Hope Community Church. It is a church centred around developing the community and enriching the lives within it through living out the Gospel truth. By introducing a vibrant, hands-on church the community will, no doubt, flourish. Love God, love PEOPLE, love Life. Surrounding businesses, such as ShopRite, will benefit from the increased flow of people attending the church who would otherwise have gone elsewhere. A church always adds value as the power of prayer envelopes the streets.</p>	
	<p>I think there is sufficient residential property and land in and around Douglas. Key challenge is to find land for cultural use, where there are parties keen to develop in line with existing plan regulations I believe we should not be changing</p>	
	<p>This is a key Government Site and its potential uses should be maximised for essential Government Use. The Department of Health and Social Care (DHSC) does in future require sites for development of affordable housing and other residential uses associated with its Social Care needs and is currently in the midst of a review of Government sites in the Douglas Area to try to identify where its various requirements in the future can be met. Ideally finalisation of a site development brief for this site would await a completion of such studies (if Government interests are to be optimised) but if a site brief is required at this stage then the Department could support this aim in principle. The Department will</p>	

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	<p>share its appraisal of the potential uses with the DoI for the Former Prison site when completed.</p>	
	<p>I believe the site should not be used for Residential purposes.</p>	
	<p>On the whole - yes. Certainly not for commercial offices etc. with it being so close to town. We already have Shoprite H.Q. and first names. Another commercial complex would be overbearing. I would like to see some community services here. There needs to be more charitable / community focused organisations in Douglas, and this is an ideal site for that purpose. Particularly with it being a community rehab institution previously. Care for the family centre, counselling, a church, youth work centre would be ideal.</p>	
	<p>I believe the site should retain its current Civic, Cultural and other uses. Specifically a community church which would greatly benefit the residents of the area, socially and with personal and spiritual needs.</p>	
	<p>I think the site should be released for different uses such Park with few housing areas.</p>	
	<p>We need other facilities available to the community. Too much prime land is being used for housing purposes and causes overcrowding of the area.</p>	

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Question 2 Do you agree with the Development Brief, as identified detailed in paragraph 6.0?	Agree	16	The Department notes the majority of respondents to the question do not agree with the Development Brief.
	Disagree	33	
Any Comments?	Activity centre swimming pool, far too many flats for rent/sale now. Rename us Dandara land		Evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area. Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.
	This approach seems to close the option of a more community based development before consideration has been given to any suggestions of this nature. Surely community groups should be given the opportunity to communicate their ideas. Our own group has had to "lodge" in an unsuitable rented location and urgently needs a permanent site.		
	As previous comment – which was: Build what you want, but preferably not a "church" for the local cult (LHCC) whose congregants are going to totally spam this consultation		
	As previous use of site for community focus rather than residential please.		

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	<p>Similar to previous response. This smacks of 1 dimensional thinking by iom gov. The hard job with this site is to get creative, find something that can deliver something of value to the existing community of Douglas. The easy job is to think let's just sell it to developers for housing. I expect politicians to work harder than that. I am sure sale to a property developer would earn more money but it is a one off hit of money that adds no value to Douglas or its community on an ongoing basis. Relatively that amount of money is a drop in the ocean but a facility that can provide ongoing value to residents and the Douglas community would be much better in the long term.</p>	<p>However, in light of the response and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department is of the view that the development opportunities for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p> <p>Paragraph 6.1 a) has been also be amended as follows:</p> <p>a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing.</p> <p>b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses</p>
<p>This site is wasted if it is to be used as a residential site- there are plenty of other residential opportunities- whereas there are not so many appropriate civic use locations.</p>		
<p>I want to see the land gifted for the use of community. A prison site would symbolically speak so powerfully if it is used to build lives and be a place designed for good.</p>		
<p>No, I believe a community use such as church would be best use for the site and for the Island. Living Hope Community Church benefits the community in many ways including helping people to overcome various addictions and destructive lifestyles. More residential in this area is not needed.</p>		
<p>I personally think that residential uses should not be prioritised over community uses. A facility that can be used by the community would be more appropriate for this site.</p>		

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	<p>As stated in previous question - I believe that the site should be used for "Area of Buildings for Civic, Cultural & Other Special Uses. It is a large site and I understand there are many people interested in this site for this reason.</p>	
	<p>The weight of the brief points significantly towards a total change of use of housing with only the possibility of some alternative uses for part of the site. There is a great opportunity to leverage existing usage criteria as an area for buildings for civic, cultural & other special uses in which faith/3rd sector could partner with government for a flagship venue and help meet the increasing needs within our community for children, families and youth etc.</p>	
	<p>Do not agree to residential. Agree want building on site to be high quality with some public space and taking into account the residential property at No11 Poplar. Agree there needs to be a Development brief for the prison site but that it should be for Civic, Cultural, Special uses.</p>	
	<p>See earlier comments - I understand that the original intention was for the site to be used for community use. I think that intention should continue as there are very few sites in Douglas suitable for building a community amenity, and it would be a great shame to lose this one.</p>	
	<p>I believe the site should be retained primarily for civic / community use. Douglas is lacking in a community centre and youth or culturally focused activities. Use for residential / Day care would complement such a community focus.</p>	

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	<p>I believe that the site has great potential as a community resource, fostering and developing community spirit and providing support and care for those in need as well as strengthening family life. Ideas might include a community centre, a 'one-stop shop for families, with health visitors, ante-natal, parenting and relationship workshops, mother and toddler groups, youth groups, support groups, fun days etc. This creative type of development is preventative and could ultimately save government money and resources, thus building together for enhanced outcomes for the whole community.</p>	
	<p>Residential use should not just be restricted to day care facilities. Needs to also cater for community centre which is essentially for Douglas. More work needs to be done with the young. Charity work etc. Definitely needs to fit in with the character of the street</p>	
	<p>A residential development will create a great deal more traffic 'footfall' in the area. Whilst housing provision is important for the community, it only serves the purpose of fulfilling one criteria whereas I believe that an active church serving the local community could fulfil many areas of need for the community such as the provision of toddler groups for children, facilities to accommodate young people, a place of worship etc amongst many other things.</p>	
	<p>I would like the site to be considered for development by Living hope church IOM. We would put the site to good use within the community for many social and charity purposes, bringing the local community together working within all social groups. Especially the youth generation and the vulnerable who need help. The building proposed is for use 7 days a week, and would be a great asset to the local and island community. Also the church has many worldwide visitors which could bring in a valuable revenue for the</p>	

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	Civic use as in a community Church would allow the greatest exposure to all of the site and would provide support in needs such as a venue for youth clubs, mums and toddlers groups, substance abuse support groups, concerts, and many other events that would enhance the well-being of local residents.	
	I think a facility that benefits the society would be better	
	Adequate parking and well planned site access / exits / entrances is important. Victoria Road is already very hazardous for pedestrians with no ped crossing. The problem is made worse by the fact that it is a hill and a lot of the time the traffic is flowing in excess of 30 MPH (checked by comparing with my own vehicle).	The comments are noted. The Development Brief already recognises that an assessment of the car parking and servicing needs of the development should be included in any planning application. Furthermore, the Brief states that the car parking provision must be in accordance with Appendix 7 of the Isle of Man Strategic Plan 2007.

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	<p>paragraphs 6.1 & 6.2 NO paragraphs 6.3, 6.4,6.5 YES</p>	<p>The Department notes the comments.</p> <p>The Department is not able to comment on why the respondent does not agree with paragraphs 6.1 (Development Opportunities) and 6.2 (Affordable Housing) as no explanation has been given to their disagreement to the paragraphs.</p>
	<p>As already stated in Q1, I am opposed to the building of more residential properties in this particular area. It is not currently zoned for residential use and I don't see any good reason to re-zone it. Seek input from individuals/groupings that want to develop the site for community use rather than residential.</p>	<p>Evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area. Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p>
	<p>I believe the best use of this land would be to create a community resource that can be enjoyed by everyone, rather than re-zoning the land for residential use just to line the government's coffers. Selling off this land for residential use for short term financial gain, will sell the people of the Isle of Man short on what could have been a great long term community asset.</p>	<p>However, in light of the response and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department</p>

	<p>I believe because of the accessible location of the land a far greater part of the community will receive the benefits from the land if the land be zoned for the building of a community focused church.</p>	<p>is of the view that the development opportunities for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p> <p>Paragraph 6.1 a) has been also be amended as: follows:</p> <ul style="list-style-type: none"> a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing. b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses <p>It should be noted that the development brief does not change the land use zoning of the former prison site. The site remains zoned as an "Area of Buildings for Civic, Cultural & Other Special Uses". The re-</p>
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		zoning of the site is a matter for the Area Plan for the East.
	There are many houses and properties for sale on the Isle of Man and I feel there is no reason to add more stock to the market in this central location. I do agree that the design needs to be one of high quality, a show piece for Douglas the surrounding area will be drawn to.	The comments are noted.

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	<p>6.2a) Affordable housing should not be required to be provided if the proposed development is for any form of elderly or sheltered housing , as this is addressing a recognized need. 6.3c) Building heights should not be prescribed and the proposals should be assessed on their merits. 6.3h) The site is next to a park, therefore the requirement to provide POS should not be applied. 6.4ii) Consideration should be given to whether 2 car parking spaces per unit should be required. A lower level of parking requirement may encourage bus or cycle use and produce a more sustainable development.</p>	<p>The Department does not accept that affordable housing should not be required if the proposed development is for any form of elderly or sheltered housing, as this is addressing a recognized need. Elderly or Sheltered Housing may or may not fall within the definition of affordable housing.</p> <p>Affordable housing is defined as housing which is either:</p> <ul style="list-style-type: none"> - Directly provided by the Department; or - Directly provided by Local Authorities; or - Meets the criteria for the Department's House Purchase Assistance Scheme. <p>Therefore, any proposal will be assessed on its own merits and if it does not fall within any of the above criterion, an element of affordable housing will need to be provided.</p> <p>It has been suggested that building height should not be prescribed. Paragraph 6.3C) does not set height limits. The</p>
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		<p>Department only advises that any scheme should not be more than two storeys in height when abutting the back of the footpath of Victoria Road.</p> <p>It has been suggested that the site is next to a park, therefore the requirement to provide POS should not be applied. However, the suggestion would not accord with the provisions of the Isle of Man Strategic Plan 2007. Any residential development needs to be assessed against Recreation Policy 3 of that plan.</p> <p>It has been suggested that consideration should be given to whether 2 car parking spaces per unit should be required. A lower level of parking requirement may encourage bus or cycle use and produce a more sustainable development. However, it should be noted that the Development Brief states that any car parking provision must be in accordance with Appendix 7 of the Isle of Man Strategic Plan. The appendix does allow for some relaxation of the policy.</p>
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	<p>In general I think the development brief is sensible, but I find it strange that para 6.3, (c) limits development to two storeys when the former building was three storeys, with extremely high perimeter walls to the sides and rear. I personally think three storeys would be appropriate for the location, particularly as the land behind is higher.</p>	<p>It has been suggested the Development Brief limits development to two storeys. This is not the case. The Development Brief only advises that any scheme should not be more than two storeys in height when abutting the back of the footpath of Victoria Road.</p>
	<p>Again - please keep any development AFFORDABLE to those of us who cannot afford the hugely inflated cost of housing on the Island</p>	<p>Comments are noted. The Development Brief states that "Affordable housing must be provided in accordance with Housing Policy 5 of the Isle of Man Strategic Plan 2007 or its replacement."</p>
	<p>Whilst we have no comment to make regarding much of the proposed Development Brief, we consider that the following sections should be revised; 6.3 (g)(v) Energy efficiency is only one of a number of factors that will need to be taken into account when a redevelopment scheme is designed for the site and must be considered against other design requirements and restrictions. This should be recognised by amending the wording, we suggest along the lines of; "demonstrate that the scheme takes into account the principles of energy efficiency in terms of minimal use of energy in construction and use. In doing so the design of the building should, as far as possible given other design constraints, make use of building width, depth and orientation to maximise the active frontage, daylight and ventilation etc." 6.3 (h) The IoMSP makes it clear that open space in new developments may be provided on site, off-site but nearby, or in the form of a commuted</p>	<p>The Department acknowledges the comments regarding design requirement and restrictions need to be taken into account. The suggested wording for paragraph 6.3(g)(v) will be incorporated into the Development Brief.</p> <p>In respect of the comments relating to paragraph 6.3(h), the suggested wording is broadly acceptable subject to further refinement. The paragraph will be amended as follow: "The</p>

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	<p>sum. Further, the standards of the Plan will be applied having regard to a number of factors, including the particular needs of the resident population and the proximity and availability of existing open space (the site is adjacent to Noble's Park). It would therefore be more appropriate for the Development Brief to simply state; "The development should provide open space in accordance with the provisions of the Isle of Man Strategic Plan." 6.4 (a)(iii) Whilst the principal access for any new scheme may be off Victoria Road, in a similar fashion to energy efficiency (above) access is only one of a number of important factors to be taken into account. It could be, for example, that an access from the highway to the north east would allow the creation of a more visually appropriate frontage to Victoria Road and enable the site to be used more efficiently. We therefore consider that it would be more appropriate at this stage for 6.4(a)(iii) to require access to the site to be in accordance with Transport Policy 4 of the IoMSP.</p>	<p>development must provide open space in accordance with Recreation Policies 3 and 4 of the Isle of Man Strategic Plan 2007 or its replacement."</p> <p>The respondent acknowledges the principal access may be off Victoria Road; however, their comments have indicated other ways of accessing the site. Therefore it would be appropriate at this stage indicate in the Development Brief that any access to the site must be in accordance with Transport Policy 4 of the Isle of Man Strategic Plan.</p>
	<p>Any buildings put on the site, would need to be considerably designed but to limit this to residential would be a great loss of a community resource.</p>	<p>The site is currently vacant. The redevelopment of the site would not result in a great loss of a community resource.</p>
	<p>I agree with the building restrictions, but not the use</p>	<p>Comments are noted.</p>
	<p>There are lots of parts I agree with, however I do not think that it should be purely residential</p>	<p>Comments are noted.</p>

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	<p>As long as the DHSC's residential care uses (which might not just be day care) can be met if required the principal aims are supportable however there are some clarifications required. para 6.2 If the DHSC developed the site for some form of residential facility for adults requiring care would it be still bound to make provision for affordable housing under Housing Policy 5 to meet its affordable housing needs. Should the inclusion of this requirement be qualified for these circumstances. para 6.3 c) It is assumed that away from the Victoria Road boundary more than 2 storey would be acceptable. Alternatively would this preclude accommodation within the roof space (perhaps a maximum eaves height could be defined) This might need clarification. para 6.3 e) "residential amenity" does that mean what is stated in the next sentence? para 6.3 g) ii) Mistyped. "ito and go" not clear. para 6.3 h) In terms of Recreation Policy 3) it is unlikely that much land will be released on site for public open space - especially if the DHSC was to develop some form of Residential Facility. It would be more appropriate to make a specific requirement (e.g. if x family homes built then a playground for specific age group be provided. or If housing for elderly developed then controlled gardens for residents use would be appropriate. or a commuted sum of £y be paid to Douglas Borough Council to assist in maintenance of facilities at Nobles Park- adjacent.) Para 6.4 iii). Why is the only vehicular access from Victoria Road. The prison had secondary access from Victoria Avenue, and given the levels of the site access from opposite Nobles Park might be an easier option. Should the site brief give greater choice even if only one access point allowed? My recollection is that there is a main sewer running across the site. Should there be mention of this in the site brief?</p>	<p>If the DHSC were to develop the site for a residential facility for adults requiring care, this development may fall within Class 8 (Hospitals, nursing homes and residential institutions) of Schedule 4 of the Town and Country Planning (Permitted Development) Order 2012) this would not be classed as a dwellinghouse and therefore Housing Policy 5 is not applicable. It is not necessary to clarify this within the Development Brief.</p> <p>The comments in relation to paragraph 6.3 c) are noted. However, the paragraph is meant to provide a degree of flexibility to the height of any buildings on the site but at the same time acknowledging the height of any buildings abutting the back of the footpath on Victoria Road is restricted to two storeys.</p> <p>The comments in relation to paragraph 6.3 e) are noted. The paragraph highlights a number of factors which could impact on the residential amenity of No.11</p>
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		<p>Poplar Terrace.</p> <p>The comments in relation to paragraph 6.3 g) ii) are noted. The typographical error will be amended.</p> <p>The comments in relation to paragraph 6.3 h) are noted. However, the suggestion would be too prescriptive and premature. The provision of open space is best dealt with at the application stage when the full details of the scheme are known.</p> <p>The comments in relation to access are noted. Therefore it would be appropriate at this stage to indicate in the Development Brief that any access to the site must be in accordance with Transport Policy 4 of the Isle of Man Strategic Plan. This is to ensure there is some flexibility into how the site can be accessed.</p> <p>In respect of the comment relating to a main sewer running across the site, the Manx Utilities Authority has indicated that a</p>
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		<p>surface water sewer runs down the south-western boundary of the former prison site. Furthermore, a foul sewer partially crosses the south-western boundary of the 'Edale' site. These sewers will now be mentioned in the Development Brief.</p>
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C 1. In addition to the questionnaire responses, comments have been received not using the online or paper versions of the questionnaire:

Response	Department's Response
<p>The Council's view is that the most appropriate use of the site is for it to be developed as sheltered housing, operated by the local authority; and any provision of public open space within the development (if it is to be maintained by the Council) should be agreed between the developer and the Council.</p>	<p>The development of sheltered housing on the site would accord with the Development Brief.</p> <p>Any provision of public open space would be dealt with under Recreation Policies 3 and 4 of the Isle of Man Strategic Plan 2007</p>
<p>My view is sheltered housing</p>	<p>The development of sheltered housing on the site would accord with the Development Brief.</p>
<p>I write following the invitation to comment upon a proposed development for the above site. Some time ago I wrote to the then Minister Adrian Earnshaw with my proposal to build a residential "village" on the site. In my experience, I have found many people looking to downsize from a house to small premises. My proposal would be to construct low rise buildings which would incorporate 1/2/3 bedroomed apartments quite distinct from other developments classed as "sheltered accommodation".</p>	<p>The development of the site for residential purposes would accord with the Development Brief.</p>

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<p>Such apartments could be bought through part equity via a housing alliance arrangement or as a straight sell. Included in the complex could be a small clinic whereby residents would be able to access a nurse to attend to minor health problems thus freeing up GP time.</p> <p>The area in question is on a bus route, near to Shoprite and Nobles Park, so would be well placed for residents of any age. People who have owned their own property but because of age or need to 'downsize' could do so here by purchasing an apartment within a small and centrally situated complex.</p> <p>I have spoken to a developer who shares my view and who may offer a similar proposal for this site.</p> <p>The former prison site is virtually surrounded by private dwellings and privately owned apartments, so such a view as described here would fit well within the property stock already in the immediate area.</p>	
<p>Following notification from your former Minister Mr Cretney that there was to be a public consultation regarding the usage of the former prison site on Victoria Road, please find set out below a set of joint views from the MHK's and Councillor on the matter and on behalf of the residents:-</p> <ol style="list-style-type: none"> 1. We have been calling for a very long time in the House of Keys and Tynwald for the site to be re-developed together with the views of Councillor Ashford, to the effect that this site should be re-developed as a 'sheltered housing project' for older people. This should be in keeping with the area and respect 'the neighbours' in terms of design, general impact and on any amenity; 2. We would point out that the site is next to a bus stop and a supermarket. These ready-made facilities make the site ideal for 	<p>The development of sheltered housing on the site would accord with the Development Brief.</p>

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<p>this type of development. It would be connected to public transport links and have readily accessible shopping in terms of food, clothing and other household products but also of importance within Shoprite there is a Lloyds Pharmacy as well.</p> <p>3. We would develop this view further by offering ideas for a joint private and public project to the site but recognising the conditions as laid out at (1). This has worked well in Willaston where we see public and private sector housing in the same 'street zone'.</p> <p>4. Of considerable national strategic importance is the fact generally and locally to North Douglas there is a dire shortage of accommodation for older people by way of single person units, two person units and sheltered housing units/flats, thus freeing up valuable larger housing units.</p> <p>We would strongly urge you, not only to take our views in to consideration, but to work with Douglas Corporation on this pressing matter.</p>	
<p>The Commissioners consider that the site should be used to provide sheltered or first-time buyer homes or a combination of the two.</p>	<p>The development of the site for residential purposes would accord with the Development Brief.</p>
<p>On this occasion, we will not be submitting a collective Chamber response as it has no business implications.</p>	<p>Comments are noted.</p>
<p>The Board has resolved that individual members should respond if they so wish.</p>	<p>Comments are noted.</p>
<p>Given the current designation of the site as "Civic, Cultural and other Special Uses", the Commissioners believe that a suitable use might be for sheltered housing with a particular regard to accommodation for those with Mental Health problems. There is a shortage of suitable or any accommodation for such peoples on the island currently.</p>	<p>The development of sheltered housing on the site would accord with the Development Brief.</p>

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<p>The Commissioners note that the former "Glenside" site remains unused with empty buildings thereon. The Commissioners consider that a combined view of the two sites might be useful.</p>	
<p>I would like to make a suggestion for a possible use for the site of the old prison on Victoria Road.</p> <p>The Department of Social Care closed the Glenside Residential Home a few years ago, and has recently announced plans to close the Reayrt ny Residential Home and replace it with a new residential hose which meets current standards, before handing it over to a Third Sector organisation to run.</p> <p>When older people are no longer able to live in their own homes, there are several options open to them:</p> <ul style="list-style-type: none"> - Sheltered accommodation - Extra-care sheltered accommodation - Residential care - Nursing care <p>Most people, if they do have to move, usually move in one direction only – down the list – but sometimes older people only need more care temporarily – e.g. after an accident, illness or operation – and can return home. Moving from one care setting to another can be very traumatic, and it would be better if the care settings could be situated within one complex, so the transitions could be smoother. I think it would be good to develop such a complex – incorporating sheltered accommodation, extra-care sheltered accommodation, residential care and nursing care – on the former prison site on Victoria Road.</p>	<p>The suggested uses for the site would accord with the Development Brief.</p>

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<p>Having read the excellent draft brief my only comment is that the proposed land use should not be too prescriptive. I should have thought that something on the lines of 'uses appropriate to a residential area' might be more flexible. I say this in the light of the experience of our doctor's surgery, the Palatine Practice' moving out to Braddan away from the bulk of its patients because an appropriate site in the town could not be found.</p>	<p>Evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area. Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p>
<p>How about a multi storey car park where the height of the floors could allow Transit Van size vehicles to park maybe on the first 2 floors as well as others. It is on a bus route so park and ride may be useful.</p>	<p>However, in light of the response and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department is of the view that the development opportunities for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p> <p>Paragraph 6.1 a) has been also be amended as: follows:</p> <ul style="list-style-type: none"> c) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing. d) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses
<p>I think the land should be sold as prime building land. Government may want to do something with it but there is no money to run Education and Health effectively which needs to be addressed before considering the spending of funds on land no longer in use.</p>	<p>The comments are noted.</p>

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<p>The Leaders of Broadway Baptist Church currently wish it to be known that they "Object" to the proposed change of use of the former prison site in principle for a number of reasons:</p> <p>a) At a time when Government through the Department of Health and Social Care is seeking to widen the range of support services provided by community organisations such as BBC and is actively canvassing the support of "Third Sector" organisations, the loss of this site to residential housing (which we also accept is required) would reduce significantly the scope for such organisations to respond to the challenge set by depriving them of opportunities to develop suitable premises from which to viably operate.</p> <p>b) Whilst we accept that change of use and consequential sale of the site to a Developer or Contractor would support the Isle of Man Treasury in the short term, we are of the view that Government should consider more closely the longer term benefits and real financial value which could be derived over the longer term from the site through its use to support a community based organisation serving the people of East Douglas and wider afield. The Leaders of BBC are keen to pursue discussions with the Isle of Man Government in this respect.</p> <p>c) The Development Appraisal undertaken by BBC has indicated broadly that the site currently occupied by the Broadway congregation could be redeveloped for residential purposes and the Leaders have obtained written advice from DoI Planning on what it considers could be constructed on the site. The redevelopment of the BBC site could also facilitate other adjoining development providing a greater economic stimulus to the economy. The Leaders are of a view that the former Prison site could be a suitable development site for the Broadway congregation to develop new premises and that Government's wider aspirations to support residential development could still be achieved through the redevelopment of the current BBC site.</p>	<p>Evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area. Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p> <p>However, in light of the response and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department is of the view that the development opportunities for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p> <p>Paragraph 6.1 a) has been also be amended as: follows:</p> <p>a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing.</p> <p>b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses</p> <p>The Department is not applying for a change of use for the former Prison to residential use. The development brief does not change the land use zoning of the former prison site. The site remains zoned as an "Area of Buildings for Civic, Cultural & Other Special Uses". The re-zoning of the site is a matter for the Area Plan for the East.</p> <p>The request for further discussions with Government over the</p>
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<p>4.0 Other Issues</p> <p>4.1 The Leaders of BBC are aware that another church, Living Hope Community Church (LHCC), have expressed an interest in the use of the former prison site for the development of new church premises.</p> <p>4.1.1 The Leaders of BBC have discussed with the leadership of LHCC their interest in the site and have acknowledged their earlier discussions with Government. LHCC and BBC hold some of the same community and faith aspirations, and we share a belief that building a church on the former Prison Site would be the best option to serve the people of Douglas and beyond, and to meet many of the Government's aspirations.</p> <p>5.0 Summary</p> <p>5.1 The Leaders of BBC "object" to the Department of Infrastructure's proposal to apply for a change of use for the former Prison Site, Victoria Road from that indicated on the Douglas Local Plan 1998 (Civic, Cultural and Special Uses) to Residential Use on the basis of the reasoning set out in this document.</p> <p>5.2 Broadway Baptist Church's long establishment in Douglas, its extensive community involvement over many decades and its aspirations for further community involvement alongside numerous partners, are significant factors which we believe to be worthy of highlighting in any discussions regarding the potential use of the former Prison Site.</p> <p>5.3 The Leaders request further discussions with Government over the potential future purchase and development of the former prison site by Broadway Baptist church.</p> <p>5.4 The Leaders offer for consideration and incorporation in the proposed Area Plan for the East premises currently owned by BBC which it believes could be redeveloped for residential purposes.</p>	<p>potential future purchase and development of the former prison site by Broadway Baptist church is not a matter which can be considered as part of the Development Brief. The disposal of the site is a matter to be dealt with under a different process.</p>
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<p>LHCC's vision for the site is to develop a mixed use development, including the following:</p> <ul style="list-style-type: none"> • A 750 seater auditorium, which we believe will provide us with an appropriate venue for the needs of our growing congregation in a few years time. • The balance of the main building will incorporate the following spaces: <ul style="list-style-type: none"> - A coffee shop/restaurant - A youth zone - A children's play area - Various multi-use rooms which could be used for training and counselling etc. • Residential Housing comprising of 6 double storey terraces • Sheltered accommodation comprising of 10 x 1 bedroom flats <p>(The development includes of 2 levels of off street parking and 1 level of surface car parking and 1 level of semi basement. The total provision has been worked out relating to parking standards and the required development operational uses)</p> <p>The main complex will be designed to suit the needs of the church by careful thought will also be undertaken to ensure the venue is flexibly designed to facilitate much wider community needs, and outside of the church's main services and events, we would anticipate that the building is open and available to the community.</p> <p>Please see below a detailed response to sections 4, 5, and 6 of the consultation document.</p>	<p>Evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area. Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p> <p>However, in light of the response and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department is of the view that the development opportunities for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p> <p>Paragraph 6.1 a) has been also be amended as: follows:</p> <ul style="list-style-type: none"> a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing. b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses <p>The Department is not applying for a change of use for the former Prison to residential use. The development brief does not change the land use zoning of the former prison site. The site remains zoned as an "Area of Buildings for Civic, Cultural & Other Special Uses". The re-zoning of the site is a matter for the Area Plan for the East.</p>
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<p>4.1 – Noted</p> <p>4.2 (a) – We believe that with good design, recognition of the previous building forms which have been demolished, the adjacent built environment, the topography and its wider context, a successful design proposal could be brought forward for this site.</p> <p>4.2 (b) – We agree with this clause and support the efficient use of development sites especially such as this 'brownfield' site.</p> <p>4.2 (c) – We strongly agree with this clause and believe that our proposal would maximise the use of the existing infrastructure and capitalise on the wide range of facilities in the adjacent area, for our proposal we would believe no better site exists.</p> <p>4.3 – Noted</p> <p>4.4 – We believe that the designation "Area of Buildings for Civic, Cultural & Other Special Uses" is ideally suited for this location. In the attached Appendix 1, we have provided an aerial photo showing the local context to the site. We believe this demonstrates that the site is in the heart of a community and existing widely used civic and community facilities. We also believe that with the use designation remaining as it is currently, our intended uses and openness to partner with others such as housing associations or elderly care operators can bring enhancement, community value, sense of place and heart.</p> <p>4.5 – In our consideration we too widely acknowledge the diverse nature of the site context and it is with this in mind we choose this as our preferred location even prior to this consultation response being issued. By nature of these uses we believe that our proposal can identify a community focal point in this area and bring strong, vibrant uses which bring community social investment and benefits to the wider community.</p>	
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4.6 – Taking recognition of the adjacent uses and context as well as the current zoning, our proposal would seek to use this area of the site for social or elderly housing, we believe that such use is ideal for this area of the site.

4.7 – Noted.

5.1 – As previously mentioned, we believe that the site should retain its current use as Civic, Cultural & Other Special Uses but do agree that a mixed use site incorporating some residential use would make sense.

6.1 (a) – We strongly disagree with the limited use which this places on such a key site in the heart of a community and feel that it is contrary to planning policy context as outlined and commented on in section 4. We do acknowledge and agree that there should be an element of residential on this site making it a truly mixed use development and this shall reflect a development demonstrating uses that are central and key to a development at the heart of a community.

Having reviewed several opportunity sites over the past 9 months we selected this site as our preferred location and it is with reference to THE ISLE OF MAN STRATEGIC PLAN and clause 10.5 'Civic and Community Facilities' on which we have based the suitability of the site for our mixed use proposal. The following clauses from this document have comments below them appropriate to our proposals:

10.5.1 Community facilities are those services or facilities that provide for the needs of the Island population. As such, they should be appropriate to the needs of the island's population and be located as to be easily accessible. Community facilities include community centres, medical facilities, places of worship, schools, nurseries, library services and premises which provide an element of care for those sectors of the

community that are in need of this.

The proposed uses contained within the proposal cover many of the aforementioned use, see section 2 of our response document for the aspects of our intended uses and programs for this development.

10.7.1 Community centres, meeting places, and village/parish halls are an important focal point in community life. Where perceived lack of provision is identified, land will be safeguarded in the relevant Area Plan. The following policy is therefore adopted:

Community Policy 2: New community facilities should be located to serve the local population and be accessible to non-car users, and should where possible re-use existing vacant or underused buildings.

We believe that in identifying this site before we even knew of this consultation process we understood how our aspirations and vision for LHCC and its location to this site, match perfectly the Strategic Plan for development on the island. We believe that our plans and vision will strategically create a safe, rich, valuable and vibrant community development which will become invaluable to "community life" and provide long term community benefit to people of all ages. Our proposals encompass imaginative spaces, uses and programs that in part already exist in other areas. However, in this location and with these facilities we believe that this site and what we plan to do through its facilities can bring wider social benefit, enhanced support to the community, personal benefit to many and impact generations for good.

6.2 Affordable Housing

a) – Noted

6.3 General

a) Agreed and our development would reflect such criteria

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<p>b) Agreed c) We agree with such a design strategy d) Agreed and we believe that the proposal we would bring forward would clearly demonstrate its ideal suitability to this site and how it would blend and enhance the surrounding land uses and reinforce this community. e) Agreed f) Agreed and although we have attached a design concept demonstrating our initial thoughts for the site we would be keen to develop our thoughts through pre-planning discussion with the local council, its officials and the planning department. g) Agreed and this would be included within any application we would be submitting. h) This will be incorporated.</p> <p>6.4 Transport and Car parking a) i) Agreed a) ii) Agreed a) iii) Agreed</p> <p>6.5 Area Plan for the East a) Agreed.</p>	
<p>Observations on this Development Brief</p> <p>6.3 (d) As outlined on the development brief, any development will "have to demonstrate consideration of the surrounding land uses." As there is current planning approval for a business park on the site opposite, it is important that this site development is supported by this brief as it will provide important high end offices, which will have long term benefits for the economy. A further phase is planned for this site and associated traffic movements should be considered.</p>	<p>The Development Brief is clear that proposals will have to demonstrate consideration of surrounding land uses. There is no need for any specific reference to "Any development of the old prison site should take into consideration the planning approval for a Business Park on the site opposite". The Development Brief requires the traffic implications of any proposed development to be assessed.</p> <p>In respect of comments relating to paragraph 6.3 (g) (iii), the Development Brief does not include any key views. Under</p>

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<p>Recommendation – Any development of the old prison site should take into consideration the planning approval for a Business Park on the site opposite.</p> <p>6.3 (g) (iii) Reference is made to “retention/enhancement of identified key views”, as these were not included in the Brief, it would be important to consider these and how they will change as the business park is developed.</p> <p>Recommendation - Key views have not been included in the development brief, but scale and massing of the development should be in keeping with the built and planned for environment.</p> <p>6.4 (ii) Servicing needs of the development –</p> <p>(a) Surface water drainage, the surface water catchment of which the old prison site is part of, is outdated and subject to over capacity as outlined in plans from 2012 prepared by Hyder and Douglas Corporation, to address this. Due to the excessive storm water and under provision of drainage in the vicinity, much of this has found its way into the stream on the Business Park site, as the foul water system capacity has difficulty in peak flow periods. Hyder, Douglas Corporation and the Manx Utilities Authority are all aware of this historic over capacity and have developed plans and schemes to address this therefore this would be an appropriate time to review capacity over the network and take remedial action prior to any development.</p> <p>Recommendation – As part of the development brief the surface water must be directed to an appropriate alternative disposal route</p> <p>(b) Foul drainage, the increase in capacity on the Victorian infrastructure could lead to over capacity at peak times and it may necessitate peak flow attenuation tanks</p>	<p>paragraph 6.3 (g) (ii), it is a requirement for an assessment to identify those views. The scale and massing of the development has been dealt with by paragraph 6.3 C). There is no need to make reference to “... scale and massing of the development should be in keeping with the built and planned for environment”.</p> <p>It has been suggested that the surface water drainage and foul drainage must be directed to appropriate alternative disposal routes. However, this may not be necessary depending on how the development proposal is designed. This matter would be considered in greater detail at the application stage. The Development Brief has been amended to highlight that a drainage plan must be included as part of any application for development.</p> <p>The comments in relation to paragraph 6.4 iii) are noted. Therefore it would be appropriate at this stage indicate that any access to the site must be in accordance with Transport Policy 4 of the Isle of Man Strategic Plan. This is to ensure there is some flexibility into how the site can be accessed.</p>
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<p>Recommendation – As part of the development brief the foul water flow must be managed and directed to an appropriate alternative disposal route.</p> <p>6.4 (iii) – Transport and car parking – there is likely to be an increased Traffic & Pedestrian Risk as access is planned to be via Victoria Road only and this will lead to additional traffic onto an already busy road. It will also be increasing capacity of the junction of the business park and Victoria Road at peak periods. Due to the risks associated with increased flow in this area, access for demolition of the old prison was via Upper Dukes Road. For the same reason the main access should be Upper Dukes Road or failing that Victoria Avenue.</p> <p>Recommendation – The use of Upper Dukes Road as entrance/exit options would ensure traffic movements are on to the quieter road, as per the prison demolition access.</p>	
<p>1.4 Thank you for your consideration in including the Nursery. We are currently registered for 54 children at any given time and have between 70 and 80 families accessing our nursery. This in turn impacts on the flow of traffic on an already busy road which often ends up as a bottleneck, particularly between 8am and 9am travelling down Victoria Road to join Broadway and any time after 5pm travelling up Victoria Road to join Glencrutchery Road.</p> <p>May we suggest that any main entrance into the former prison site is located on the opposite side i.e. Dukes Road where there is scope to travel up past the Police Station or Dukes Road or turn onto Victoria Road.</p> <p>4.3 It has been suggested that it may be sheltered housing. May I ask you to consider a communal garden to encourage and support the community to meet a build a local community relationship? Also to</p>	<p>The comments in relation to the access are noted. Therefore it would be appropriate at this stage indicate in the Development Brief that any access to the site must be in accordance with Transport Policy 4 of the Isle of Man Strategic Plan. This is to ensure there is some flexibility into how the site can be accessed.</p> <p>The Department notes the suggestion for a communal garden be included in the brief. The brief can't specify that a communal garden be provided; however, the provision of a communal garden may be achieved through the application of Recreation Policy 3 of the Isle of Man Strategic Plan 2007.</p> <p>However, there is a need for residential land within our urban areas. This site is in a sustainable location. In order to make</p>

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<p>support lonely and vulnerable people who may be living alone (e.g. St Ninians Court).</p> <p>4.4 Also a Children's Centre for Early Learning (Victoria House)</p> <p>4.5 Is this to be a separate consideration or inclusive with the Prison Site Plan</p> <p>Impact on Nursery – height/noise/access/parking Surface water drainage – drains inside Victoria House gardens</p> <p>6 reference to height – please define. c) Two storeys would be in keeping with other buildings on the road.</p> <p>Proposal for trees to be planted ASAP to fringe the existing development and enhance site aesthetically.</p> <p>6e) No mention of Victoria House Nursery which is a former listed residential dwelling. The same consideration could be given as to that of 11 Poplar Terrace.</p> <p>G iii – Query</p> <p>6.4 iii – I believe that vehicular access should not be onto Victoria Road (see above)</p> <p>Appendix 1, Question 1 – 'Yes' Providing the plans have the best acceptable outcomes for the residents of the area and also any new residents that buy homes there.</p> <p>Please incorporate an outdoor living community space and each dwelling must have at least 2 car parking spaces incorporated into each home built.</p>	<p>the best use of the site, the Department considers the site should be developed for residential purposes which may also feature residential care /day care uses.</p> <p>It is noted the respondent has referred to paragraph 4.4; however, based on the comment, it appears this may relate to paragraph 4.5 which relates to the surrounding land use. Paragraph 4.5 relates to specific land use zonings not individual land uses such as the Children's Centre for Early Learning (Victoria House).</p> <p>It is noted the respondent has referred to paragraph 4.5; however, based on the comment, it appears this may relate to paragraph 4.6 which relates to 'Edale'. 'Edale' forms part of the development site.</p> <p>It is noted the respondent is concerned about the impact on the Nursery. However, any residential development on the site will have very limited impact since the Nursery is a commercial use.</p> <p>The respondent has requested the height of any buildings be limited to two storey. A number of the prison buildings were three storey in height. There is a need for a degree of flexibility to allow the site to be developed in the most efficient way without compromising the visual amenities of the locality. This is achieved through paragraph 6.3 c).</p> <p>The respondent has suggested that trees be planted ASAP to fringe the existing development. The Development Brief does not cover the existing development. The purpose of the Development Brief is to provide guidance on the future development of the site. Therefore, it is not appropriate to include the tree planting suggestion.</p>
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<p>Development Brief</p> <p>6.0 As planning approval has been given for a business park opposite the site in Victoria Road there will already be considerable increased traffic.</p>	<p>In relation to comments relating to 6e), it is assumed this is reference to 6.3e), the respondent is requesting that the same consideration be given as to that of No.11 Poplar Terrace. There is a difference between No.11 Poplar Terrace and the Nursery in that one property is a residential use and the other is in a commercial use, i.e. Nursery. However, issues of overlooking and loss of privacy from a child protection view can be a valid material consideration. Therefore, the Development Brief will be amended to ensure overlooking does not occur.</p> <p>The comments relating to G iii are noted. However, there is no explanation to why the respondent is querying this paragraph; the Department is not able to respond to this comment.</p> <p>The comments about parking are noted. Any development must provide car parking in accordance with Appendix 7 of the Isle of Man Strategic Plan 2007.</p>
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Annex C – Schedule of changes

Draft Development Brief	Summary of respondent's representations	Department's response	Changes
<p>"To encourage and influence the redevelopment of vacant former prison site in Douglas for purely residential use, which may incorporate some residential/day care uses."</p>	<p>The majority of respondents to the question do not agree with the aim for the former prison site and the variety of alternative uses for the site such as:</p> <ul style="list-style-type: none"> - TT Museum - activity centre swimming pool - community orientated project such as sports - astroturf pitch to enable sports fixtures, clubs, and schools to utilise. - community building/centre, - place of worship - recreational or educational facility - site should remain available for community purposes. - Recreational, cultural or religious use - Care facilities for older people - Sheltered accommodation for the elderly please 	<p>The Department notes the majority of respondents to the question do not agree with the aim for the former prison site and the variety of alternative uses for the site.</p> <p>The Department believes there is a need for additional residential sites within the Douglas area. The Residential Land Availability Study (update 6) has identified that 2.4 ha of remaining land for residential development with no planning approvals is available. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p> <p>However, in light of these responses and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department is of the view that the aim for the prison site should be amended to take into account</p>	<p>The aim for the prison site has been amended as follows:</p> <p>"To encourage and influence the redevelopment of vacant former prison site in Douglas for residential use, which may incorporate some residential care/day care uses, and/or any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses."</p> <p>Paragraph 6.1 has been amended:</p> <p>c) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing.</p> <p>d) Any uses as identified in the extant Douglas Local Plan, i.e.</p>

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		<p>of those uses that conform with the existing land use zoning of the site.</p> <p>The Development Brief aim will be amended as follow:</p> <p>"To encourage and influence the redevelopment of vacant former prison site in Douglas for residential use, which may incorporate some residential care/day care uses, and/or any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses."</p> <p>Following the introduction of the Development Brief the site will remain zoned as an "Area of Buildings for Civic, Cultural & Other Special Uses". The re-zoning of the site is a matter for the Area Plan for the East. However the Development Brief will also enable applications for the uses identified in the Development Brief to be accommodated on the site provided that they conform to the requirements of the Brief.</p> <p>In simple terms this means that a</p>	<p>Civic, cultural and other special uses</p>
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		<p>wide range of uses could be successfully accommodated on the site, subject to planning approval.</p> <p>The draft development brief would allow sheltered accommodation to be developed on the site; however, for clarity purposes the development brief will be amended to make it clearer that sheltered accommodation can be developed on the site.</p> <p>In light of the amendment to the aim. Paragraph 6.1 a) has been also be amended as: follows:</p> <p>a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing.</p> <p>b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and</p>	
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		other special uses	
<p>Paragraph 6.1</p> <p>(a) The use of the site shall be limited to the creation of a residential development which may also feature residential/day care uses. Any residential development may include sheltered housing.</p>	<p>Various alternative uses have been suggested including</p> <ul style="list-style-type: none"> - activity centre swimming pool - community building/centre, - place of worship - recreational or educational facility - site should remain available for community purposes. - Recreational, cultural or religious use - Care facilities for older people - Sheltered accommodation for the elderly please - youth or culturally focused activities. - Mixed use development comprising of church, residential, community facilities - Multi storey car park/park and ride <p>No good reason to rezone or change the use of the land for</p>	<p>The Department notes the alternative use. However, evidence from the Residential Land Availability Study (Update 6) would suggest that there is a need for additional residential sites within the Douglas area. Update 6 sets out that only 2.4 ha of land in Douglas remain available for residential development with no valid planning approvals in place. Therefore the redevelopment of the former prison site for residential purposes would help to contribute to the provision of housing within the Douglas area.</p> <p>However, in light of the response and the existing land use zoning of the site within the Douglas Local Plan 1998, the Department is of the view that the development opportunities for the prison site should be amended to take into account of those uses that conform with the existing land use zoning of the site.</p> <p>Paragraph 6.1 a) has been also</p>	<p>Paragraph 6.1 has been amended:</p> <ul style="list-style-type: none"> a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing. b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses

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	<p>residential purposes.</p> <p>The proposed land use should not be too prescriptive. The should say something on the lines of 'uses appropriate to a residential area' might be more flexible.</p>	<p>be amended as: follows:</p> <p>a) The use of the site shall be limited to the creation of a residential development which may also feature residential care and/or day care uses. Any residential development may include sheltered housing.</p> <p>b) Any uses as identified in the extant Douglas Local Plan, i.e. Civic, cultural and other special uses.</p>	
<p>Paragraph 6.3 g) v):</p> <p>"demonstrate a scheme based upon the principles of energy efficiency in terms of minimal use of energy in construction and use. In doing so the design of building should make use of building width, depth and orientation to maximize the active frontage, daylight and ventilation etc.</p>	<p>Suggested rewording of the paragraph along the along the lines of; "demonstrate that the scheme takes into account the principles of energy efficiency in terms of minimal use of energy in construction and use. In doing so the design of the building should, as far as possible given other design constraints, make use of building width, depth and orientation to maximise the active frontage, daylight and ventilation etc."</p>	<p>The Department acknowledges the comments regarding design requirement and restrictions need to be taken into account. The suggested wording for paragraph 6.3(g)(v) will be incorporated into the Development Brief.</p>	<p>"demonstrate that the scheme takes into account the principles of energy efficiency in terms of minimal use of energy in construction and final use. In doing so the design of the building should, as far as possible given other design constraints, make use of building width, depth and orientation to maximise the active frontage, daylight and ventilation etc."</p>

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<p>Paragraph 6.3 h):</p> <p>"The development must provide public open space either on site or a mix of on/off site provision in accordance with Recreation Policy 3 of the Isle of Man Strategic Plan 2007 or its replacement."</p>	<p>It has been suggested that the Development Brief simply states; "The development should provide open space in accordance with the provisions of the Isle of Man Strategic Plan."</p>	<p>In respect of the comments relating to paragraph 6.3(h), the suggested wording is broadly acceptable subject to further refinement. The paragraph will be amended as follow: "The development must provide open space in accordance with Recreation Policies 3 and 4 of the Isle of Man Strategic Plan 2007 or its replacement."</p>	<p>Paragraph amended:</p> <p>"The development must provide open space in accordance with Recreation Policies 3 and 4 of the Isle of Man Strategic Plan 2007 or its replacement."</p>
<p>para 6.3 g) ii) read</p> <p>"include an assessment to identify the key views into and go of the site."</p>	<p>para 6.3 g) ii) Mistyped. "into and go" not clear.</p>	<p>The comments in relation to paragraph 6.3 g) ii) are noted. The typographical error will be amended.</p>	<p>Paragraph 6.3 g) ii) now reads: "include an assessment to identify the key views into and out of the site".</p>

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<p>Para 6.4 a) iii) read: "show the main vehicular access for the site being off Victoria Road."</p>	<p>Whilst the principal access for any new scheme may be off Victoria Road, in a similar fashion to energy efficiency (above) access is only one of a number of important factors to be taken into account. It could be, for example, that an access from the highway to the north east would allow the creation of a more visually appropriate frontage to Victoria Road and enable the site to be used more efficiently. It would be more appropriate at this stage for 6.4(a)(iii) to require access to the site to be in accordance with Transport Policy 4 of the IoM Strategic Plan.</p> <p>A number of respondents have commented there may be other access positions into the site other than off the Victoria Road.</p>	<p>The one of the respondents acknowledges the principal access may be off Victoria Road; however, comments in relation to the access are noted. Therefore it would be appropriate at this stage indicate in the Development Brief that any access to the site must be in accordance with Transport Policy 4 of the Isle of Man Strategic Plan.</p>	<p>Para 6.4 a) iii) amended to: "show that any vehicular access for the site must be in accordance with Transport Policy 4 of the Isle of Man Strategic Plan 2007 or its replacement."</p>
	<p>A respondent has indicated that a main sewer runs across the site and whether this should be mentioned in the brief.</p>	<p>In respect of the comment relating to a main sewer running across the site, the Manx Utilities Authority has indicated that a surface water sewer runs down the south-western boundary of the former prison site. Furthermore, a foul sewer</p>	<p>A new paragraph has been inserted in section 1.0 of the Development Brief</p> <p>"1.3 A surface water sewer runs down the south-western boundary of the former prison site and a foul sewer partially</p>

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		partially crosses the south-western boundary of the 'Edale' site. These sewers will now be mentioned in the Development Brief.	crosses the south-western boundary of the 'Edale' site."
	It has been indicated that the surface water drainage is outdated and over capacity. Therefore the surface water must be directed to an appropriate alternative disposal route	It has been suggested that the surface water drainage and foul drainage must be directed to appropriate alternative disposal routes. However, this may not be necessary depending on how the development proposal is designed. This matter would be considered in greater detail at the application stage. The Development Brief has been amended to highlight that a drainage plan must be included as part of any application for development.	A new paragraph has been inserted: "There is a surface water sewer that runs down the south western boundary of the prison site. It is known that this sewer takes land drainage from Nobles Park along with surface water runoff from Upper Dukes Road/ Victoria Avenue & the Police station area. Any development within the area must take into account this sewer which may need to be diverted. Any proposal must include a drainage plan for the proposed development. Potential applicants are advised to discuss any proposals with the Manx Utilities Authority."

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	<p>No mention of Victoria House Nursery within the development brief within paragraph 6e). Also, the same consideration should be given as to that of 11 Poplar Terrace.</p>	<p>In relation to comments relating to 6e), it is assumed this is reference to 6.3e), the respondent is requesting that the same consideration be given as to that of No.11 Poplar Terrace. There is a difference between No.11 Poplar Terrace and the Nursery in that one property is a residential use and the other is in a commercial use, i.e. Nursery. However, issues of overlooking and loss of privacy from a child protection view can be a valid material consideration. Therefore, the Development Brief will be amended to ensure overlooking does not occur.</p>	<p>New paragraph inserted:</p> <p>"The siting of any building close to Victoria House Nursery will need to be carefully considered so as to ensure that the development does not result in overlooking and loss of privacy of the nursery. Proposals will need to demonstrate that these considerations have been taken into account."</p>
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