



Isle of Man
Government

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Draft Area Plan for the East Department Response to the Consultation

Public Inquiry Paper 1 (PIP 1) Consultation Covering Report

Cabinet Office

June 2019

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1 Overview of Area Plan for the East process 2015 to 2019

- 1.1 The preparation of the Area Plan for the East began with the Call for Sites exercise in 2015. This "Call for Sites" did not form part of the statutory process as set out in the Town and Country Planning Act 1999¹, but is an important starting point in terms of evidence gathering and scoping out of the plan and preparation for the next stage, namely the Preliminary Publicity.
- 1.2 The "Preliminary Publicity" for the Area Plan for the East was the first formal stage in the plan's development. Documents were published in February 2017; the consultation being open from the 24th February 2017 until the 26th May 2017. The main aim was to publicise and seek comments on the matters that the new plan proposed to deal with. The process for producing a new development plan is comprehensive and takes time, but importantly follows a set structure. This structure helps the Cabinet Office – the Department which has a duty to prepare such plans – to fulfil its remit to produce a series of up to date plans. Together, these form "the Island Development Plan". The Island Development Plan is made up of two parts as set out below:
- **A Strategic Plan** - This sets out a broad planning framework and spatial strategy and contains Island-wide written policies. It does not contain maps other than a spatial key diagram, and does not allocate land/sites for development.
 - **Area Plans** - These must be in general conformity with the Strategic Plan. They set out site specific proposals, allocate individual sites for development, show other land uses and areas to be protected from development and also include recommendations. They are typically made up of a Written Statement and a series of Maps.
- 1.3 At both the Call for Sites Stage and the Preliminary Publicity Stage, explanatory tables were used in supporting documentation to show the broad plan preparation process. The table below sets out these stages once again and the point which has been reached as at June 2019:

¹ The Area Plan for the East will be prepared in accordance with Schedule 1 'Development Plan Procedure' set out in the Town and Country Planning Act 1999

Table 1: Plan preparation procedure - Town and Country Planning Act 1999, Schedule 1

Stage	Progress
1. Call for Sites	Completed in 2016
2. Preliminary Publicity	Completed in 2017
3. Publication of Draft Plan	Completed in 2018
4. Public Inquiry	September 2019
5. Approval of the Plan by Tynwald	Programme for Government commitment is to complete by the end of 2019

1.4 All of the documents produced for the Call for Sites and the Preliminary Publicity are available for viewing and remain relevant in that they are part of the overall plan preparation process.

2 The Draft Area Plan for the East Consultation - May to August 2018

2.1 The end of the Preliminary Publicity stage marked the formal point in time whereby the Cabinet Office had 12 months to produce the draft area plan. The Draft Area Plan for the East was published within the statutory time limit, on 25th May 2018. The following documents were published:

- The Draft Area Plan for the East (Written Statement and 13 Maps)

Evidence Papers:

- DP EP 1 - All Sites List
- DP EP 2 - Site Identification Report
- DP EP 3 - Land Supply
- DP EP 4 - Groups of Houses in the Countryside
- DP EP 5 - Household Size and Population Projections
- DP EP 6 - Audit of Community Facilities
- DP EP 7 - Preliminary Publicity Consultation - Summary of responses received
- DP EP 8 - Supplementary Evidence Paper on Statistics Relating to "Brownfield Sites" and "Greenfield Sites" (published 21st June 2018)
- DP EP 9 - Supplementary Evidence Paper on Statistics relating to lapsed applications on "Brownfield Sites" and "Greenfield Sites" (published October 2018)

3 Summary of Consultation on the Draft Plan

- 3.1 There were over 300 individual responses to the Draft Plan, each setting out a number of detailed comments. Cabinet Office has examined all of the responses and undertaken additional work
- i. committed to in the Draft Plan Written Statement; and
 - ii. as a direct result of the representations made.
- 3.2 The Cabinet Office's response to many of the comments is set out in the main, in table form in a new Evidence Paper titled – **Cabinet Office Response Table - Paper for Inquiry 2 (PIP 2)**.
- 3.3 **PIP 2** is made up of Part 1 and Part 2; the latter being more in the form of a written report. This was considered to be the best way to organise and analyse the comments raised as many of them raised very similar points. The coding and order of respondents reflects the order in which the responses were received by Cabinet Office and does not reflect any order of priority.

4 Recommended proposed changes to the Draft Plan following the consultation, and how these have been shaped

- 4.1 Cabinet Office has spent the time since the publication of the Draft Area Plan in May 2018 on:
- Examining the population and household projections produced following the 2016 Interim Census and checking published documents;
 - Working to understand the implications of the detailed traffic modelling findings and giving further thought to how the published Draft Plan fits with the Strategic Plan and the broader government policy drivers;
 - Monitoring the data available on measures intended to result in a noticeable transport shift to more sustainable forms of transport; and
 - Reflecting on the points above whilst responding to comments submitted to the consultation, many of which made reference to population and highways.
- 4.2 Cabinet Office's response to the consultation includes a **Schedule of Proposed Changes (PIP 5)** which is linked closely to the Department's Response Table (PIP 2). There are two key areas which have shaped the proposed changes listed.

Key area 1: New population projections and implications for housing need

- 4.3 On 24th May 2018, Cabinet Office published (as supporting evidence to the Draft Area Plan for the East), an Evidence Paper titled **DP EP5 "Household Size and Population Projections Paper"**. This was one of 8 Evidence Papers published during the consultation phase of the Draft Area Plan which ended in August 2018. In respect of DP EP5, a number of representations brought into question the reliability of Housing Policy 1 and Housing Policy 3 in the Isle of Man Strategic Plan 2016 and consequently the housing need figures set out in the Draft Plan.
- 4.4 An updated Evidence Paper has been produced to address the issues raised and is titled **DP EP 5 - Household Size and Population Projections Paper (Update to review housing need, June 2019)**.

Key points and recommendations set out in DP EP 5 (Update June 2019)

- 4.5 Key points are as follows:
- i. The Area Plan for the East should continue to plan for a housing need in the East of 2,440 new homes to 2026.
 - ii. A system of phasing sites - through Strategic Reserves and approved methodologies for their release - is essential for when "need" is evident and supporting infrastructure is in place.
 - iii. Housing need in the East, using the new projection data available is 1,357 new residential units between 2011 and 2026.
 - iv. In simple terms, this suggests the East should be looking to provide 1,357 homes between 2011 and 2026 and not 2,440, but this shouldn't be taken in isolation as a "new target".
 - v. To accept that the Area Plan is in general conformity with the Strategic Plan but that the Area Plan needs to control the release of "which" sites and "when".
 - vi. Housing figures in the Strategic Plan should not be set aside so quickly. Whilst there isn't the need now, there could be in the future and sites need to be able to be brought forward with ease that have been through a rigorous assessment process which means being examined at public inquiry.

Key area 2: Traffic modelling, highways and related issues

- 4.6 Work undertaken after the publication of the Draft Plan fed into a new Cabinet Office Evidence Paper titled **PIP 3 - Impact of the Draft Area Plan for the East on the highway network**. This paper analyses and draws conclusions about the modelling work undertaken to strengthen the evidence base relating to highway matters in the East and makes a number of recommendations going forward. The paper takes into

account the findings of the consultants commissioned by Department of Infrastructure (DOI) to examine and model the impact of the Draft Plan on the highway network in the East as well as the periodic advice provided by the Highways Division of DOI.

Key points and recommendations set out in PIP 2 - Impact on the highway network of the Draft Area Plan for the East

4.7 Key points are as follows:

- i. Modelling the Draft Plan in terms of the impact on the highway network found significant effects were found in the weekday PM peak periods, both reducing the average travel speed and increasing the journey time, when compared to the 2016 input data (2016 Douglas Paramics Discovery Microsimulation Model).
- ii. The highway impact has been an important contributory factor in judging how, when and where sites are delivered in the East. Attention has been focused on the longer term mitigation policy measures that are being put in place which aim to influence people's behaviour when it comes to travelling on the road network and the efficiency of that network itself.
- iii. Bus lanes are not difficult to add in to the existing network but there may be opportunities to use some of the proposed development sites to explore how the approaches into Douglas and out can be improved; one example being the bus route into Douglas from Peel and from Douglas to Peel.
- iv. Making the existing network as efficient as possible is the preferred way forward.
- v. There is confidence in the ability of the "active travel" focus to deliver tangible changes in behaviours going forward, particularly as the Active Travel Investment Plan starts to take effect.
- vi. Areas of naturally slow moving vehicles in Douglas centre hot spots, can be improved by junction improvements and intelligent traffic lights.

5 What do the two key papers - highways and housing need - mean in terms of the recommended changes to the Draft plan?

5.1 Implications of the updated/additional evidence papers:

- i. Development sites for general release (as specific sites) should be within the Active Travel 2.5 mile radius which is where the active travel policy drive is most likely to have an impact².
- ii. There needs to be phased release of the sites, and all should have development/planning briefs and clear requirements that need to be satisfied before detailed approval and commencement of work on site.
- iii. Development impact should be thoroughly assessed prior to detailed approval and mitigation measures factored in from the start. Focus should be on reducing the need to travel by motorised transport especially by car, improving accessibility by all modes of travel and influencing active travel behaviours and maintaining mobility for highway users.
- iv. There is a clear need to monitor the outcome of Government's ongoing projects on car parking and integrated transport strategies.
- v. There is a need to encourage through development/planning briefs, the advantages and where appropriate, the need to include electric charging points in new development schemes as well as other spaces.

6 Improving the linkages between the Area Plan for the East, strategic planning policy and broader Government policy

Ensuring successful plan delivery

6.2 Cabinet Office is supportive of Government's broad aims of reducing car-use, encouraging active travel and supporting sustainable transport options and climate change mitigation. It continues to working closely with DOI and DEFA to see how the refinement of the East Plan can help to fulfil this. Much can be achieved by: the collation of evidence and the revisiting of that evidence, transparent and informed decision making in terms of which sites have priority regarding release, and the careful drafting of development briefs associated with any release. This is in essence an approach of "plan, monitor and manage" as advocated in the Isle of Man Strategic Plan.

6.3 The proposed changes put forward in PIP 5 now make up that informed decision making and demonstrate a process which is responsive and practical and typical of the "plan, monitor and manage approach". The relevance of this is as great if not

² see **PIP 4 - Proposals Map (Map 3) updated to show the Active Travel Investment Plan boundary**

greater than when it was first coined as a phrase in Manx planning legislation in 2007³, given the broad agenda of tackling Climate Change, delivering the Biodiversity Strategy and integrating green infrastructure. The Area Plan for the East is a tool to help achieve these broad Government goals and many more.

7 Proposed Site Changes

- 7.1 A number of site changes are proposed and these are listed in an updated evidence paper **DP EP 1 All-Sites List (Update June 2019)**. This identifies the sites as allocated in the Draft Plan and proposed changes recommended by Cabinet Office for consideration at the Public Inquiry.

8 Publication of new and updated Evidence Papers and other documents

- 8.1 The following documents are now being published which support the Cabinet Office's decision making following the public consultation on the Draft Plan. There may be further documents published ahead of or following the Pre-Inquiry Meeting and a full list will be regularly updated and available on the Government webpage.

9 Cabinet Office documents published June 2019

Updated Evidence Papers

- DP EP 1 All-Sites List (Update June 2019)
- DP EP 5 - Household Size and Population Projections Paper (Update to review housing need, June 2019)
- DP EP3 Land Supply (Update June 2019)

New Evidence Papers

- Public Inquiry Paper 1 (PIP 1) Consultation Covering Report
- Public Inquiry Paper 2 (PIP 2) Cabinet Office Response Table (Part 1 & Part 2)
- Public Inquiry Paper 3 (PIP 3) Impact of the Draft Area Plan on the highway network
- Public Inquiry Paper 4 (PIP 4) Proposals Map (Map 3) updated to show the Active Travel Investment Plan boundary

³ The Isle of Man Strategic Plan 2007

- Public Inquiry Paper 5 (PIP 5) Schedule of Proposed Changes
- Public Inquiry Paper 6 (PIP 6) Final Site Assessment Framework Reports

10 Next Steps – Pre-Inquiry Meeting and the Public Inquiry

10.1 The Pre-Inquiry Meeting is to be held on Thursday 18th July 2019 at 9.30am at the iMuseum, Kingswood Grove, Douglas. The intention of the pre-inquiry meeting is not to discuss the merits of the plan but to:

1. Outline the procedures to be followed at the Inquiry;
2. Discuss the programme for evidence, and how the evidence is to be presented at the Inquiry;
3. Facilitate the submission and exchange of any additional professional and technical evidence in advance of the Inquiry; and
4. To encourage those with common cause to consider working together to present their case.

10.2 Further guidance will be issued after this meeting in respect of how to express an interest in submitting additional documents to and/or giving evidence at the Inquiry sessions, how the Inquiry will be run and any remaining documents to be made available. The team handling the Public Inquiry administration is the Executive Office in Cabinet Office. Contact details are:

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- 10.3 All members of the public and interested parties are welcome to attend the Pre-Inquiry Meeting and the Public Inquiry. The Public Inquiry is intended to commence on Monday 9th September 2019. The venue and timetable will be confirmed after the Pre-Inquiry Meeting.