



Isle of Man
Government
Reillys Ellan Vannin



Draft Area Plan for the East

PIP 2

Cabinet Office Response Table - Part 1

Cabinet Office

June 2019

Comment No.	Respondent	Paragraph / Site / Map	Summary of Representation/Comment	Recommended Cabinet Office (CO) Response If specific change is suggested it shown in italics	List in CO Schedule of Changes?
101.1	Department of Infrastructure	1	General - some proposals are Island-wide in scope and there may be difficulties moving forward in looking to apply different approaches to common Island issues in the various Area Plan regions e.g. where the proposal relates to a facet of infrastructure which cuts across Area Plan boundaries.	This comment is noted and each section will be reviewed accordingly.	N
101.2	Department of Infrastructure	4 Landscape Proposal 10	Additional text required: <i>DOI should be engaged in early discussions with any prospective applicants wishing to develop along these routes, and formal engagement should be undertaken for each application to which this proposal relates.</i> DOI would also welcome early engagement for any future developments which are to be located adjacent to the boundary of the railway line or within close proximity to the transport corridors.	The Cabinet Office supports the addition of the supplementary text at the end of Landscape Proposal 10. Proposed text: <i>Prospective applicants wishing to develop along these routes (which includes sites located adjacent to the boundary of the railway line or within close proximity to the transport corridors) should engage with the Department of Infrastructure for advice ahead of the submission of any planning application.</i> <i>Prior to any decision on a planning application for which Landscape Proposal 10 is relevant, advice will normally be sought from the Department of Infrastructure.</i> Proposed text change Landscape Proposal 10: Change "view paths" where used to the word <i>views</i> .	Y
101.3	Department of Infrastructure	5 Natural Environment Proposal 1	Not supported. In exercising the functions of DOI it may be necessary to pursue development on some of these sites/ for future Highways work to relieve traffic congestion particularly at the Mountain Road/Governors Road junction. Suggest addition to proposal: <i>...or as required for the exercise of functions and requirements of a Government Cabinet Office if it is demonstrated that an alternative site is not suitable for the proposed development.</i>	In light of the points raised, the Cabinet Office suggests an amendment to the last two sentences of paragraph 5.15.4. Proposed text: <i>It is, however, recognised that part of this area has been mooted as being potentially suitable for key social infrastructure and is possibly needed to improve highway infrastructure at the Mountain Road/Governors Road junction. Any future applications will be considered on their merits taking into account the proposals set out in this plan and the Isle of Man Strategic Plan.</i> Proposed text at end of Natural Environment Proposal 2 and Natural Environment Proposal 3: <i>Applications may be considered favourably if reason for an exception can be demonstrated in line with General Policy 3(g) set out in the Isle of Man Strategic Plan.</i>	Y
101.4	Department of Infrastructure	5 Natural Environment Rec 3	Needs a reference in supporting text to ongoing work undertaken by Flooding Advisory Group.	An additional reference to the FAG is supported. Proposed new text after "social receptors": <i>The ongoing work of the Flooding Advisory Group is recognised as part of this.</i>	Y
101.5	Department of Infrastructure	6	DOI/DFE should work with Cabinet Office to produce an additional proposal.	The Cabinet Office would be happy to consider any new proposals put to it - the best option now is to consider any new proposals through the Public Inquiry process - there will be the opportunity to submit 'proofs of evidence' for exchange and discussion at Inquiry (at the discretion of the planning Inspector).	N

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101.6	Department of Infrastructure	6 Urban Environment Proposal 2	In the Douglas Promenade redevelopment scheme aesthetic considerations and aspirations need to be balanced against what is practical and affordable.	The Cabinet Office accepts that there is always a balance when it comes to design/materials versus cost. UEP 2 will ensure that all schemes, whether lead by Government or the private sector, recognise the need to take account of the public realm at the start of any design schemes.	N
101.7	Department of Infrastructure	6 Urban Environment Proposal 9	Amendment required to make it clear that what is being protected is the appearance of such structures rather than the form. Some reservations as to how this proposal will work in practice - some elements are not in public ownership.	Cabinet Office recommends an amended Proposal 9: <i>Where possible and practical to do so, station buildings, gate-keepers' huts, and other line-side structures in the East should be retained and sensitively renovated to respect their original appearance. It is recognised however that financial and modern operating requirements, as well as ownership complexities, may mean that this is not always feasible and opportunities may not always exist.</i>	Y
101.8	Department of Infrastructure	7	Electric vehicles - development briefs should make reference to electric vehicle charging points. DOI prepared to assist with drafting a proposal for electric vehicles within the Plan.	The Cabinet Office would be happy to consider any new proposals put to it. The best option now is to consider any new proposals through the Public Inquiry process - there will be the opportunity to submit 'proofs of evidence' for exchange and discussion at Inquiry (at the discretion of the planning Inspector). In this instance, the Cabinet Office is conscious that this issue affects the Island as a whole and not just developments in the East. Any briefs will however seek to anticipate the need for EVCPs.	N
101.9	Department of Infrastructure	7	A site/sites need to be identified for the storage of HGVs should planning permission not be granted for their current operating centres (DOI happy to discuss further).	The Cabinet Office is keen to monitor the situation regarding the DOI's current operating centres. Cabinet Office understands that since this comment was drafted, that DOI is content that no new site needs to be identified for Government. Again, CO advises that DOI is able to update on the issue (if necessary) at the Public Inquiry, at the discretion of the Planning Inspector.	N
101.10	Department of Infrastructure	8	Waste management- Reference to BE024 as a site proposed but not included within the Draft Plan is confusing and should be removed. It is not adjacent to the Energy from Waste plant. Middle Park Recycling site is a private depot and there are other commercial facilities for waste reprocessing that have not be mentioned.	All of the sites submitted to the area plan process, including those not taken forward by the DEpartment, retain their original site references. The accompanying papers to the draft plan included: a. The All Sites List - DP EP1; and b. The Map showing 'All Sites Proposed'. The intention was to ensure that areas of land, whether they were included in the draft plan or not, could be easily identified throughout the entire process. It is accepted that references in the Written Statement to sites which are "not proposed" could be confusing and assurances are hereby given that prior to the final plan being Adopted' that all site numbers will be updated. All other references to site descriptions will be checked and any that are no longer relevant will be removed.	N
101.11	Department of Infrastructure	8	Further consideration needed of the statement that sets out that waste is acceptable on general employment land (para 8.13.1).	If possible, further advice on the wording of paragraph 8.13.1 should be provided by DOI (Waste Unit). In the meantime, CO recommends a change to the 3rd sentence: Delete "acceptable on general employment land." Replace with: proposals will be judged on their merits. Delete 4th sentence.	Y

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101.12	Department of Infrastructure	8	Waste Management Unit can supply information on the location of small scale facilities for the collection of household materials for recycling e.g. Bring Bank Recycling facilities.	This information would be welcome.	N
101.13	Department of Infrastructure	8	Land should be identified and zones adjacent to the Energy from Waste plant for future development and incompatible adjacent land uses avoided. There should be an adequate safety buffer zone included in the Plan.	Further details on the land requirements for the Energy from Waste plant in the future would be welcome, as well specifics on the form and nature of any required safety buffer. The Plan does not currently identify any additional land for the EFW plant; long term plans for the plant could be dealt with as part of the next Area Plan although it is sensible to look to avoid hindering long term essential plans for the plant by looking ahead now and protecting land around the plant for the future.	N
101.14	Department of Infrastructure	7 Transport Proposal 1	Some active travel routes will be ready for inclusion in the final plan. DOI is prepared to produce a spatial diagram setting out the proposed vision for Active Travel in the East.	The Cabinet Office understands that the document titled "The Isle of Man Active Travel Investment Plan" is in its final draft as at March 2019. Active Travel is accepted by CO as a policy focus to achieve a sustainable transport shift in and around Douglas. It is has been critical to the re evaluation of the sites recommended for release as general allocations going forward. DOI has committed to provide the necessary policy background (spatial diagrams/additional narrative) on what it generally known as a sustainable transport shift as part of wider mitigation measures to ease congestion on the highway network around Douglas and Onchan.	N
101.15	Department of Infrastructure	7 Utilities Proposal 2	Sequencing of Development - DOI would welcome further dialogue on how best to accommodate public transport in forthcoming development briefs. Ports - DOI can provide further details regarding more detailed proposals relating to Douglas Harbour. A development brief for DM007 needs to be designed in such a way that it enables the space to be utilised for future operational needs of the marshalling yard.	CO welcomes the offer to provide information for the development/planning briefs relating to: a. The accommodation of public transport in new developments b. The development of Douglas Harbour c. The future development of sites DM007 which needs to be designed in such a way that it enables the space to be utilised for future operational needs of the marshalling yard. It is recommended that the Development (or Planning Briefs as more often referred to in planning documents) are dealt with as part of the Inquiry Process. Potentially this could be dealt with at a series of 'round table' discussions with agreement by the Inspector. This would be CO's recommendation in the absence of it being able to ensure the final drafting, publication of proofs, time for comment and review, before the opening of the Inquiry.	N
101.16	Department of Infrastructure	9 Town Centre Mixed Use Proposal 7	Town Centre Mixed Use Proposal 7- DOI can provide information on Projects E & F (part of Harbours Strategy) which require inclusion in the Plan. There should be no non-industrial development east of the lifting bridge due to the petrochemical storage sites at Battery Pier. Douglas Harbour is a key infrastructure asset and residential development (of any height) is not appropriate.	CO welcomes the offer to provide additional information in terms of the Harbours Strategy. In the absence of a defined area that can be easily recognised as "east of the lifting bridge", the DoI's concerns are possibly better expressed through the inposition of a consultation zone around the petrochemical storage sites at Battery Pier. This could be linked to the "major hazard zones" shown on the Infrastructure Constraints Map 1b. There are existing residential properties in the general vicinity of the Harbour but CO understands the need to avoid the intensification of existing residential development and/or additional residential development in the area close to Battery Pier. It is recommended that the outer boundary of the circular features depicting Major Hazard Sites shall be taken to be the "Consultation Zone" requiring consultation with the DoI (Harbours Division) and Health and Safety at Work Inspectorate in DEFA. This would be in line with Environment Policy 29 of the Isle of Man Strategic Plan.	N

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101.17	Department of Infrastructure	Chapter 9 and 13	CTA Proposal 1 (The Villiers) CTA Proposal 2 (Market Street) CTA Proposal 3 (Riverside and Peel Road East) Town Centre Mixed Use Proposal 7 all are strategic freight corridors and need to be protected which may limit the options available.	The identification of the Comprehensive Treatment Areas in the Draft Plan is the first step in encouraging and enabling development/redevelopment and positive change in key areas. CO would welcome the input of DOI during any work-up of feasibility studies after the approval of the Plan. CO recommends additional text in Chapter 13 to highlight the CTAs which are strategic freight corridors. 13.6.1: Insert The Villiers site CTA is also a strategic freight corridor and maintaining access for commercial vehicles, including HGVs, must be considered in any proposed development. 13.6.2: Insert The Market Street CTA is also a strategic freight corridor and maintaining access for commercial vehicles, including HGVs, must be considered in any proposed development. 13.6.3: Insert The Riverside and Peel Road (East) CTA is also a strategic freight corridor and maintaining access for commercial vehicles, including HGVs, must be considered in any proposed development. 9.8.7: Insert The Quays are also strategic freight corridors and maintaining access for commercial vehicles, including HGVs, must be considered in any proposed development.	Y
101.18	Department of Infrastructure	10 Tourism Proposal 4	Amend wording: The use of the Sea Terminal Building is recognised as primarily being a gateway to the Island but it also an important area for multiuse leisure and office accommodation. The continued use of this building for these purposes will be generally be supported.	Agree change suggested by DOI with minor amendment: <i>The use of the Sea Terminal Building is recognised as primarily being a gateway to the Island but it is also an important area for a variety of different uses including leisure and office accommodation. The continued use of this building for these purposes will generally be supported.</i>	Y
101.19	Department of Infrastructure	10 Tourism Proposal 6	Not required as overly prescriptive and adequate protection is already afforded through the Strategic Plan.	CO agrees to remove TP6 as it is superfluous given Transport Policy 3 in the Strategic Plan.	Y
101.20	Department of Infrastructure	11 Open Space and Community Proposal 3	Open Space and Community Proposal 3 - a new or improved TT access road should be considered as a beneficiary of the Community Infrastructure Levy.	At the time of writing, the Town and Country Planning Amendment Bill 2019 has finished its progression through the Branches and is heading for Royal Assent. There is still much work to do in order to bring CIL into effect, starting with the Regulations. It may be appropriate to set out particular areas/projects/infrastructure needs which would be subject to CIL in the development plans as they are prepared/updated but it is far too early to say if this would be an appropriate approach for the East Plan. On this point the Regulations (as yet undrafted) are vital to the understanding of the meaning of CIL. In terms of any new or improved/extended/re-routed TT Access Road, plans are not yet advanced sufficiently well enough to comment on this. So on both counts - the Regulations and the works on the TT Access Road - are not ready to be referenced in the East Plan. DOI may be able to update on the latter ahead of the Public Inquiry.	N
101.21	Department of Infrastructure	12 Public Estates and Housing	52% of the Island's total public housing stock is located in the East and sufficient land must be identified so that this stock can be replaced over time. There should be mixed tenure developments utilising existing brownfield sites within the townships areas, ahead of any new greenfield developments.	CO suggests the addition of a sentence to Para 12.18.3 to reflect that 52% of the Island's total public housing stock is located in the East. The existing public sector housing areas are identified as "predominantly residential". This would allow redevelopment in principle for public sector housing. The Department agrees that it is vital to encourage and support the development of brownfield sites and make the best use of our resources. The quantity and phasing of the release of new sites for residential development has been carefully considered as part of the draft plan but also in the proposed amendments to the sites going forward to Inquiry taking into account the Strategic Plan, population projections, highways infrastructure and the need to provide a choice and variety of housing. If the DoI has 'new' sites in mind that it hasn't already mentioned, or has information which would be helpful to the Inquiry, it is encouraged to provide such information.	Y

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101.22	Department of Infrastructure	12 Residential Recommendation 1	This should be relocated to the Urban Environment section of the Plan due to its wide scope.	The Department supports the relocation of Residential Recommendation 1 to Chapter 6 on the Urban Environment.	Y
102.1	Department of Environment, Food and Agriculture	1	It is noted that the plan makes a number of commitments and suggestions for further work streams (some within a specific/short-term timescale) and that these would be in addition to existing commitments (most notably including those set out in the Council of Minister's Planning Action Plan). It would be helpful to discuss these in more detail to clarify the resources and priority for these proposals.	The completion of the Area Plan for the East is one of the priorities in the Programme for Government. Inevitably, the Plan will set out work commitments which have not been previously identified specifically and are yet to appear in any update to the Planning Action Plan. It is agreed that the Plan has been drafted to make clear what should be done and proposals and recommendations are not caveated by the statement "if resources allow". Cabinet Office and other Departments will have a responsibility to find the resources and prioritise the follow on work in terms of the East alongside other Action Plan projects and timeframes. CO is happy to continue working with DEFA which has a number of representatives on the Planning Action Plan Working Group.	N
102.2	Department of Environment, Food and Agriculture	1	We understand that Development Briefs will be established for each site and assume that the previously identified environmental considerations will be taken account of within those briefs.	This is the intention (see also response to Comment No. 101.15).	N
102.3	Department of Environment, Food and Agriculture	4	The approach to landscape policies appears to follow that taken in the Area Plan for the South, however, detailed discussion with officers would be welcomed to ensure that any lessons are captured in relation to how this approach may be refined.	It is sensible to take account of the most recent document on landscape character which is that available at the time of the Area Plan for the South - namely the Landscape Character Assessment Report. The Department would welcome any specific suggestions to refine the proposals or the supporting text ahead of the Public Inquiry.	N
102.4	Department of Environment, Food and Agriculture	4	It would be helpful to consider how the unique views from the Snaefell Mountain Railway can be protected.	Landscape Proposal 10 attempts to reflect this. Suggestions to amend this text in addition to that agreed to in response to comment 101.2 (DOI) are welcome ahead of the Inquiry.	N

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102.5	Department of Environment, Food and Agriculture	5	In DEFA's response to the Preliminary Publicity, we raised the scope for a Green Infrastructure approach to be embedded in the Plan and would welcome the opportunity to work with you to develop this aspect further.	<p>Whilst not explicit in the Strategic Plan, the Strategic Objectives, Strategic Policies, Policies on General Development Considerations as well as Environment Policies are not at odds with a 'green infrastructure approach'.</p> <p>CO understands green infrastructure to be a network of multifunctional green space which has had a variety of benefits for individuals, society, the economy and the environment. A green infrastructure strategy is generally the starting point for early planning, design and enhancement of green space and CO understands the importance of reflecting this in the Area Plan which can be taken forward, as appropriate, into planning briefs and consequently site development. The draft Area Plan for the East makes reference to green infrastructure in Chapter 5 "The Natural Environment", specifically at 5.3 Objective iii, and 5.4 Desired Outcome iii and 5.15.2 (in relation to Green Gaps).</p> <p>CO understands that DEFA is continuing work on such a Green Infrastructure Strategy (GIS) for the Island?? Given the clear policy direction in the Strategic Plan including GP2 it would be entirely appropriate for the Area Plan to identify know gaps in the GI network and components and opportunities for improvement. CO welcomes advice from DEFA in the indentification of existing and proposed green infrastructure networks. This would help deliver any GIS. This would allow an additional section on green infrastructure in Chapter 5, a refinement of the text at section 12.15, better cross referencing with section 5.14 'Registered Trees and Woodland' and Open Space and Comm Rec 1 and a new proposal to be included in the Plan along the lines of:</p> <p><i>The Department supports the protection, creation and improvement of green infrastructure in the East and in particular in those locations as identified on Map ? /spatial diagram ? shown to be or have the potential to be part of a 'network'. Applications for development in these 'zones' must take into account any approved Government Green Infrastructure Strategies, but in any case, must design in to any schemes green space in a manner which contributes to the long term provision of a network of connected green spaces.'</i></p> <p>Also see response to Comment 404.5 (MNH)</p>	Y
102.6	Department of Environment, Food and Agriculture	5	DEFA's Landscape and Amenity Strategy identifies the wellbeing benefits of access to nature and amenity activities. There is potential for developments to facilitate a healthy lifestyle and we would welcome the opportunity to work with you to develop this aspect further.	CO would welcome such cross departmental working in the drafting and refinement of specific planning briefs for proposed development sites.	N
102.7	Department of Environment, Food and Agriculture	5	DEFA believe there is scope to further enhance and enjoy the natural features which still exist or can be created within the urban environment and we would welcome the opportunity to explore this further.	As above (Response to Comment 102.6)	N
102.8	Department of Environment, Food and Agriculture	5	Acknowledging DEFA's role as a landowner, it may be helpful to identify the ability of the sites that we own to contribute to the recreation, amenity and wellbeing agendas.	This would be helpful and information could be added to Chapter 11 on Open Space and Recreation, Education, Health and other Community Facilities if agreed as part of the Inquiry process.	Potential

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102.9	Department of Environment, Food and Agriculture	5	The Department's Climate Challenge Strategy & Action Plan identifies the potential for measures in relation to minimising emissions (e.g. installation of electric charging points) and adaption (e.g. tree planting to regulate temperature) which could be facilitated or implemented through the Area Plan (and may have implications in terms of S.13 agreements and/or the proposed Community Infrastructure Levy) and the need to be mindful of the impact on emissions of land use practices.	<p>The Strategic Plan recognises the need to promote greater awareness and recognition of the benefits, both to the environment and the consumer of energy efficiency in its widest sense. Whilst electric charging points were not part of our world back when, subsequent strategies have seen the acceptance of and express need for such facilities.</p> <p>It is noteworthy that the more specific strategies of government set out in the Programme for Government today, remain in line with the broad direction of approach set out in the Strategic Plan's Strategic Objectives set out in Chapter 3.</p> <p>There is clearly a need to address the issues raised Island wide. It is not just the East that will see a rise in the demand/need for electric charging points for example and such can be encouraged as part of planning briefs for sites in the East which will support other Island wide requirements set out in other primary/secondary legislation.</p>	N
102.10	Department of Environment, Food and Agriculture	5 Natural Environment Rec 3	Natural Environment Recommendation 3 is noted, as is the supporting text which references the National Strategy on Sea Defences, Flooding and Coastal Erosion. It could further strengthen the proposals to ensure this information has been used to shape the Area Plan.	If a specific change to Section 5.20 or NER 3 is recommended CO would welcome any revisions to be put forward as part of the Inquiry process. See also CO response to Comment 101.4.	Potential
102.11	Department of Environment, Food and Agriculture	5 Natural Environment Rec 1	<p>Recommendation 1 from the the National Strategy on Sea Defences, Flooding and Coastal Erosion stated:</p> <p>"The Strategy will be of relevance to various departments in the Isle of Man Government and Manx Utilities as well as interested economic, environmental and social stakeholders and should be used to inform future investment and planning decisions at all scales. Recommendations are provided for planning policy in relation to requiring sustainable drainage measures in all developments over a certain size, ensuring that flood risk is not increased elsewhere as a result of drainage and ensuring that areas subject to coastal erosion are not developed."</p>	CO notes this reference which is taken from the National Strategy on Sea Defences, Flooding and Coastal Erosion.	N
102.12	Department of Environment, Food and Agriculture	5	<p>Recommendation 5 from the the National Strategy on Sea Defences, Flooding and Coastal Erosion stated:</p> <p>"The Action Plan and responses developed to manage the evident risks should be undertaken through a catchment management approach avoiding piecemeal intervention and ensuring that the management of risk in one location does not increase risk elsewhere."</p>	CO notes this reference which is taken from the National Strategy on Sea Defences, Flooding and Coastal Erosion.	N
102.13	Department of Environment, Food and Agriculture	5	<p>Recommendation 6 from the the National Strategy on Sea Defences, Flooding and Coastal Erosion stated:</p> <p>"Low cost solutions working with nature through natural flood management measures should be adopted wherever possible as these have the potential to reduce flood risk elsewhere and can achieve biodiversity and carbon benefits as well as helping to adapt to climate change."</p>	CO notes this reference which is taken from the National Strategy on Sea Defences, Flooding and Coastal Erosion.	N

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	Department of Environment, Food and Agriculture	5	The draft Area Plan also considers the Biodiversity Strategy and concludes that no proposals are necessary. However, the Biodiversity Strategy ("Managing our Natural Wealth") sets out a series of actions, and the Area Plan has the potential to contribute to delivery of these (e.g. 6, 7, 8, 17, 19, 20, 21, 32 and 35). We would welcome the opportunity to discuss this in more detail.	Additional text can be added to section 5.5.2 regarding the Biodiversity Strategy and this can be agreed ahead of the Inquiry for consideration at the Inquiry if necessary. In terms of the actions identified the BS these are: 6. By 2020 review all of government's relevant legislation, regulations, schemes, incentives and codes of practice for consistency with biodiversity conservation, especially international obligations. 7. By 2022 embed proper consideration of biodiversity and ecosystem services in all relevant policy and decision-making to facilitate Government's commitment to biodiversity. 8. From 2018, where government offers incentives it will need to show that the activities it supports are not detrimental to biodiversity and wherever possible it will provide positive incentives to conserve it. 17. By 2025 we will appropriately conserve and manage 20% of land and inland water through statutory designations and other effective conservation management schemes. 19. From 2016, when assessing developments on or adjacent to protected sites, there will be increased consideration of biodiversity and environmental sustainability. 20. Continue to investigate and pilot landscape-scale initiatives to restore and conserve scarce or vulnerable habitats and their rare species and by 2025 improve ecosystem resilience to climate change. 21. DEFA will continue to promote a policy of 'no net loss' for semi-natural Manx habitats and species and ensure that unavoidable loss is replaced or effectively compensated for. 32. By 2025 bring pollution, including diffuse pollution, to levels which support healthy ecosystems and biodiversity. 35. By 2025 ensure that no human activities contribute additional stress to vulnerable Island ecosystems already impacted by climate change or ocean acidification.	Potential
102.15	Department of Environment, Food and Agriculture	5	It would be helpful to understand and further discuss Natural Environment Recommendation 1 to further improve the methodology and outcome.	CO notes that some of the comments received during the consultation have sought clarification on the Wildlife Sites, both designated and in draft, and have questioned their status. An update from DEFA/Manx Wildlife Trust which can better explain the Wildlife Site project (including their purpose, how they are identified and how landowners are involved throughout the process could help to reassure/respond to those who have submitted comments). It would also enable improved drafting of section 5.11 whether in the form of refined narrative - a policy statement or a proposal - or a recommendation on the matter of Wildlife Sites.	Potential
102.16	Department of Environment, Food and Agriculture	5	Natural Environment Proposals in relation to Dark Skies is welcomed, however light pollution can have an ecological impact and so is relevant in other areas (e.g. woodland edges) - hence this proposal could potentially be expanded.	The suggestion may be better dealt with through specific development briefs.	N
102.17	Department of Environment, Food and Agriculture	5	The Area Plan could acknowledge the potential for development which supports strategies such as Food Matters and Future Fisheries. Find a copy please	This is an Island wide strategy and acknowledgement of such could be made. DEFA is invited to provide a form of words to be added to Chapter 5. CO is also happy to work with DEFA in the drafting of any text which is relevant to the East, and consequently, the East Plan. Food Matters http://www.tynwald.org.im/business/opqp/sittings/Tynwald%2020142016/2014-GD-0076.pdf (won't hyperlink). Future Fisheries https://www.gov.im/media/1349731/sea-fisheries-strategy.pdf (won't hyperlink).	Potential
102.18	Department of Environment, Food and Agriculture	5 and 7	In response to the Preliminary Publicity, DEFA made comments in relation to fisheries and it is noted that some of these points are responded to within section 5.18, Natural Environment Proposal 6, and Natural Environment Recommendation 2 and also Utilities Proposals. As the plan develops (including the potential for changes during/resulting from the inquiry) further detailed discussions with DEFA Fisheries Officers on the detail of this wording may be appropriate.	DEFA is encouraged to draft changes as it thinks fit for further consideration. It is recommended that this is done ahead of the Public Inquiry. CO can provide a 'pre-inquiry view' through proofs of evidence, if necessary on this point, for the benefit of the Inspector and the Inquiry process.	Potential
102.19	Department of Environment	5.5	The acknowledgement of the Biosphere is welcomed (5.5).	Noted.	N

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102.20	Department of Environment, Food and Agriculture	5.14.1	Acknowledging that Tree Registrations may vary over time, for example due to changing conditions or threats, it would be helpful to expand the wording of 5.14.1 to clarify this.	Additional text can be added below 5.14.1 to reflect this suggestion. Again this can be provisionally agreed ahead of the Inquiry for consideration at the Inquiry if necessary.	Potential
102.21	Department of Environment, Food and Agriculture	5 Natural Environment Policy 4	Natural Environment Policy 4 could perhaps be expanded to more clearly consider the Report on the future of the Manx Uplands (potential to support delivery of recommendations 7 - 10, 12, 15, 16).	The Report on the Future of the Manx Uplands - recommendations referred to - are: 7. An island-wide land use strategy should be developed, particularly to enable forestry strategy to exploit the opportunity to expand the tree area in the lowlands or marginal uplands with more imaginative tree cover options. 8. Any further coniferous planting in the uplands should be approached on a balanced ecosystems services basis. Plantations which will clearly never come into profit should be cleared where possible and regeneration prevented with an aim of increasing the area of upland heath and retaining the flood-controlling capacity of riparian plantings. 9. Active vegetation management (either by controlled burning and/or maintenance of a sustainable grazing regime) should be an enforced condition of any farm tenancy. 10. Carry out a pilot project on remediation of peatland by a range of measures (e.g. revegetation, grip filling, ditch bank re-sculpturing) as a mitigation /sequestration measure which could be paid for on the basis of 'Carbon capture'. 12. Improve signage provision across the uplands generally and review the need for a fully integrated signage programme which would reflect the multi-functionality and integrity of the uplands as a unique entity. This would make the general public clearly aware of where recreational activities are permitted. This should be included on all tourism information. Incorporate into local Educational programmes. 15. From the perspective of the uplands, Government should consider a funding package which could include the delivery of both the Biodiversity strategy and wider Uplands ecosystems services delivery strategy. 16. Carry out a full analysis of the likely environmental, economic and other impacts of any of the potential renewable options identified by the AEA report deemed suitable for the uplands, these renewable generation options being set within the wider context of this strategy for the Manx uplands. CO would welcome specific wording suggestion from DEFA.	Potential
102.21	Department of Environment, Food and Agriculture	cont...		Care needs to be taken not to add in proposals which are already dealt with by strategic policy. It is accepted that it can at times be tempting to do so and may in fact do no harm to the all round policy framework. CO agrees to re-evaluate (Natural) Environmental Proposal 4 if value from an Eastern perspective can be drawn out. A Recommendation regarding all DEFA strategies mentioned in its submission may be helpful and provide valuable context when assessing planning applications and the further identification of vulnerable habitats/hill land and management and use thereof.	Potential
102.22	Department of Environment, Food and Agriculture	6	There is a wide range of heritage assets in rural areas and it could be helpful to recognise these alongside those already acknowledged in urban areas.	CO would be content to strengthen references to heritage assets in rural areas. DEFA is invited to provide an indication of additional words for Chapter 6.	Potential
102.23	Department of Environment, Food and Agriculture	6.16	In relation to Waste, Section 6.16 could usefully be expanded by considering the issue of historic and operational landfill sites. DEFA Officers would welcome the opportunity to discuss this and the information we may be able to supply.	CO agrees that an additional section would be helpful, particularly as the EFW plant is in the East as well as other landfill sites/facilities, which is a mix of historic and operational sites. Amended text at section 8.13.1 on 'Waste' is already proposed. It may be better to add a new paragraph/section at section 8.13 and identify here any consequential proposals. Additional spatial information from DEFA/DOI would also allow the relevant Maps to be updated/checked for accuracy and annotated correctly.	Potential

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102.24	Department of Environment, Food and Agriculture	7 and 8	It is noted that the plan appears to be largely silent on future waste management and energy options. The recent National Infrastructure Plan and Waste Strategy are noted and DEFA Officers would welcome the opportunity to discuss this further.	It is agreed that this area needs to be expanded on in relation to the East. CO would welcome cross-government working to draft suitable narrative ahead of the Inquiry.	Potential
102.25	Department of Environment, Food and Agriculture	7	Strategic Plan Transport Policy 5 clarifies, "In the preparation of the Area Plans consideration will be given to the identification of suitable sites for commercial vehicle parking". It could improve the plan to consider the provision of suitably located and authorised HGV parking within the East. This is likely to become an increasing concern as the new Road Transport Regulations 2018 take effect.	There has not been any assessment undertaken to identify such sites so far in the plan process. As this issue has also been touched on by DOI, for openness and transparency, there should be cross government working to identify what, if any, the needs are in the East as part of the Inquiry process. It is important that the Inquiry itself allocated inquiry time on key issues and sites and allows proper scrutiny. At the moment, CO does not have sufficient evidence to support identification through the Area Plan of a site for commercial vehicle parking. Government should ahead of the Inquiry agree if inquiry time is needed to consider need, opportunities in the East and implications or having a site/not having a site of this nature.	N
102.26	Department of Environment, Food and Agriculture	7 Utilities Proposal 1	It is noted that detail is provided in relation to the high pressure pipeline (Utilities Proposal 7), however, we would welcome an opportunity to discuss this further with a view to inclusion in site briefs where appropriate.	This is a sensible suggestion and CO agrees.	N
102.27	Department of Environment, Food and Agriculture	8	Snugborough Industrial Estate and surrounding housing appears to be identified as countryside, which does not seem to be a realistic reflection of the existing situation and perhaps the approach could be considered further.	As in the South, there are areas which fall outside of the identified settlements but which are sufficiently large to warrant being recognised as a use other than countryside. CO agrees there is merit in showing such areas in colour to reflect the dominant and acceptable predominant land uses. <i>The meaning of such colourisation outside of the settlement boundaries (defined by a purple (industrial or pink - residential) should be set out in a paragraph in the plan and shown on the relevant Maps.</i> <i>Proposed for:</i> <i>Snugborough Industrial Estate, Braddan</i> <i>Mount Murray, Braddan/Santon</i> <i>River Walk area, Braddan</i>	Y
102.28	Department of Environment, Food and Agriculture	9	In relation to town centres, the plan provides an opportunity to clarify the delivery of the Strategic Plan approach in relation to out-of-town retail and office development plus in relation to urban parking.	In defining the town centre boundary for Douglas, this is helpful in the broad delivery of the Strategic Plan Policies in relation to retail. The Mixed Use Area Proposals and the CTAs also attempt to provide clarity. There is no intention to try and change the broad policy direction set out on out of town retail and office development through the Area Plan process. In terms of parking, the DOI is in the midst of undertaking a number of studies including a 'review of on and off street parking' and a 'Car Parking Study'. The latter is due to be completed in the summer 2019.	N
102.29	Department of Environment, Food and Agriculture	12	In relation to Groups of Houses in the Countryside (12.23), it is understood that further work is being considered and would welcome the opportunity to further discuss how this will be reflected in the final version of the plan.	This section is proposed to be removed. Work will be undertaken separately as part of a wider all Island project/plan. <i>Para 12.23.2 to 12.23.4 - text to be amended</i> <i>Res Proposal 3 to be removed.</i>	Y

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102.30	Department of Environment, Food and Agriculture	12	In relation to Lower Density Housing in Parkland, the plan suggested that this is subsumed within generic residential areas. We would welcome the opportunity to further discuss this to understand how, for example, the potential redevelopment of these areas at a higher density would be considered.	It is agreed to consider this further. LDHP Sites in rural areas to remain. Only sites in settlements may be affected.	Potential
102.31	Department of Environment, Food and Agriculture	13	The inclusion of Comprehensive Treatment Areas is welcomed as it allows for transformational projects. We look forward to more detailed discussion, to clarify how they will be finalised and implemented.	Noted.	N
103.1	Department of Education, Sport and Culture	11	We support the comments made by IOM Sport within their Preliminary Publicity Response Form submission in 2017. It is as they note important that sport and leisure provision is properly provided for within the East Plan, to deal with the increased demand that the additional housing and employment development would bring in the localities identified.	Section 11.2 sets out the relevant Strategic Plan Policies (although it does not repeat them in this section). CO considers these to be sufficient.	N
103.2	Department of Education, Sport and Culture	11	We understand that it is highly unlikely that any sports pitches will be identified for removal under the draft plan. If any pitches are to be lost, then a suitable replacement needs to be provided which is as good or better than the existing site, with suitable levelling, drainage, pitch establishment and change provision, and in place prior to the loss proposed, fully funded by the developer.	This is covered sufficiently by Strategic Plan Recreation Policy 2.	N
103.3	Department of Education, Sport and Culture	11	Retaining and maintaining adequate open space for sport and recreation is critical to the Department in achieving its strategic aims. The IOM Strategy for Sport recognises the importance that engagement in sport and physical activity plays in delivering improved health and well-being as well as providing both young and older people with local community provision (structured and unstructured) in leisure and exercise. Without sufficient open space to participate in, provision and opportunity will decrease and have a detrimental impact on other Government Departments and budgets in the longer term. As such any housing and employment development of new sites proposed under the East Plan, needs to include good provision for open space, and for sport and recreation.	CO supports this view and the proposals of the Plan do not conflict with the aims of the Strategy.	N

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103.4	Department of Education, Sport and Culture	11	We already have significant Primary capacity pressures in the <u>North Douglas / Onchan area</u> . We have a current Primary permanent capacity of 1900, compared to a 17/18 academic year roll of 1976. The permanent capacity is supplemented by mobile classroom provision. This pressure exists particularly at Scoill yn Jubilee, Onchan, Willaston and Cronk-y-Berry schools. The potential significant development that you have outlined in this region would we consider require the redevelopment and increase in capacity of Onchan school from 2-form entry to 3-form entry, and the extension of Willaston school, to increase capacity from 1-form entry to 2-form entry. It is not possible to enlarge Cronk-y-Berry beyond its current 2-form entry capacity. It is not possible to increase the capacity of Scoill-y-Jubilee, at the two split and constrained existing sites (see 6. below). We consider that an extended Willaston school would be able to cope with the additional roll which could come from the suggested development to the west of Johnny Watterson's Lane. However if expansion of the Douglas boundary is likely to continue further west in the future, consideration should be given now to the establishment of a new school site in this area, with good access.	To summarise the comments made, CO understands that: There is existing pressure at the following primary schools: Scoill yn Jubilee Onchan Ashley Hill Cronk y Berry DESC considers that the delivery of the Draft Plan would: - Require change from 2 form to 3 form entry at Onchan. CO would like DESC to clarify if this is possible on the current Onchan site? And what would be the implications for Ashely Hill? - Require a change to 2 form entry at Williston, which is possible and could take children from any new development at Johnny Wattersons Lane. - Despite demand, additional children could not be accommodated at Cronk y Berry and Scoill y Jubilee - Any further development into the Strategic Reserve site west of Johnny Wattersons, would require a new primary school with good access.	N
103.5	Department of Education, Sport and Culture	11	In general across <u>South Douglas</u> , where we have been proactive in developing new Primary schools over recent years we do have capacity - a permanent capacity of 1900, compared to a 17/18 academic year roll of 1569. In terms of local pressure points we understand the potential new residential development would be to the West of Vicarage Road, and at the Strang. This area is currently served by Braddan school, which has some capacity, as does Scoill Vallajeelt, which serves the neighbouring catchment East of Vicarage Road. It would be prudent to identify a site for a new 2-form entry school to serve future development demand at this side of Douglas / Braddan, possibly located at the Strang, which could replace and enlarge the capacity of the site constrained Braddan school at some future point.	To summarise the comments made, CO understands that: - Braddan School has some capacity - Scoill Vallajeelt has some capacity A new site for a 2 form primary school needs to be identified for the long term in the area - possibly at the Strang which would in time replace Braddan School.	N
103.6	Department of Education, Sport and Culture	11	Of the other possible increase in settlements out-with Douglas / Onchan the following issues are noted regarding our Primary provision. We cannot expand the capacity of the existing Laxey school, which is on a constrained site -it does have some capacity, and through managing admissions in conjunction with the adjacent Dhoon school, we should be able to deal with the potential roll growth in this region. The suggested development at Glen Vine and Crosby could require the enlargement of Marown school. Of great concern regarding development in this central corridor is the location of the school, which is remote from Crosby and away from the main residential area in Glen Vine, on the other side of the busy main highway. This leads to a large number of parents bringing their children to school by car. There is already significant congestion at drop-off / collection time, and any further residential development will lead to more, which should be considered seriously prior to zoning additional residential land in this region.	To summarise the comments made, CO understands that: - Laxey School cannot be expanded - Admissions are managed between Dhoon Schhol and Laxey School - Marown School may need to be enlarged (CO would DESC's views on whether this is possible?) From CO point of view, the location of Marown School is an issue which will need to be resolved ahead of any further general land releases for residential development. It is distant from the existing residential area in Glen Vine and separated by the A? Main Road. It is accepted that there is already vehicular congestion at drop off/pick up times which would be compounded by additional development.	N

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103.7	Department of Education, Sport and Culture	11	With regard to our <u>Secondary capacity</u> in the Eastern region, we have some existing capacity across Ballakermeen and St Ninian's - a permanent capacity of 2880, compared to a 17/18 academic year roll of 2569. Ballakermeen is currently operating beyond its permanent capacity, with the provision of six mobile classrooms, while there is good capacity at the split-site St Ninian's, created through the lower school development at Bemahague which opened in 2012. Significant residential development, particularly in Douglas North and Onchan as the indicated settlement targets, would necessitate our moving forward with a major extension at the lower school site, where we do have a development area set aside for enlargement of the school.	To summarise the comments made, CO understands that in terms of secondary school provision: - There is some capacity at Ballakermeen and St Ninian's - BUT Ballakermeen is operating beyond its permanent capacity - Residential development in north Douglas and Onchan would require plans to be brought forward to extend Bemahague (St Ninian's Lower) which is possible.	Potential
103.8	Department of Education, Sport and Culture	11	As noted above the scale of new housing suggested would necessitate an increase in <u>Primary capacity in Onchan</u> , where we already have capacity pressures. We support your proposal to identify this area as a Comprehensive Development Area, since we believe that our need for a new and enlarged Onchan school is best met in this area, given the otherwise built-up nature of the catchment and the challenging natural topography further North and East. Options to be explored should also include the future redevelopment / location of Ashley Hill school. The existing school is of Vic Hallam timber frame construction - it has exceeded by many decades its design life through re-glazing and refurbishment but at some point in the future will require replacement.	To summarise the comments made, CO understands that: - The CTA around the Onchan Schools is welcome - Ashley Hill is nearing the end of its design life and requires redevelopment/replacement as part of the overall scheme for Onchan Schools.	N
103.9	Department of Education, Sport and Culture	11	As noted above the existing <u>Scoil yn Jubilee</u> is located on split sites - Ballaquayle Infants and Murray's Road Junior, and are lacking in modern 21C facilities. We are particularly interested in the potential to develop a new 2-form entry school on our former Park Road school site, which is now owned by DoI. As such we believe that the zonings in the forthcoming East Plan should not hinder such a consideration (the Park Road site will be currently zoned for education), including the potential redevelopment of the existing school sites for residential.	To summarise the comments made, CO understands that: - The preferred option is to replace Scoill yn Jubilee (currently on 2 sites) with 1 school at Park Road which was previously used as a school site and which is now vacant (owned by DoI). - Flexibility should be afforded in the Plan to allow school use at Park Road and redevelopment for housing on the existing Scoill yn Jubilee sites. CO considers that the Park Road site would be suitable as a school subject to Scoill yn Jubilee remaining for educational/school use until such time as it can be demonstrated that the educational needs of this area can be adequately accommodated on the Park Road site.	N
103.10	Department of Education, Sport and Culture	11	We note significant proposed residential zoning to the west of Johnny Watterson's lane, but do not see any specific reference to the establishment of a new primary school site as we sought.	CO understands that if and when the Strategic Reserve were brought forward this would necessitate the school being brought forward. The best way to accommodate this would be to require a master planned approach as part of a phased release of the entire site. This would ensure it would not be an afterthought but an area designed in readiness.	N
103.11	Department of Education, Sport and Culture	11	Significant proposed residential zoning proposed near Braddan school and at the Strang / Union Mills, but do not see any specific reference to the establishment of a new primary school site as we sought.	As above in 103.10; considered best through a master planned approach to ensure best siting.	N
103.12	Department of Education, Sport and Culture	11	Significant area of strategic reserve lands noted in Crosby – our concerns noted regarding access to Marown school / Primary provision in this area must be considered.	Noted. See also response to Comment 103.6.	N
103.13	Department of Education, Sport and Culture	13	Your inclusion of Comprehensive Treatment Area (CTA) 5 is recognised and welcomed - as previously noted it will assist in our considering primary education development options in this area.	Noted.	N

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103.14	Department of Education, Sport and Culture	13	Your proposed zoning of the former Park Road school site (DH039) as residential in lieu of the existing educational zoning is noted – as noted in our previous correspondence we wish to retain the option to develop this site for Primary (Scoil Jubilee) in lieu of our existing split site provision at the Ballaquayle and Murray's Road sites; the option for educational use of the Park Road site must be preserved – perhaps it would be appropriate to identify these 3 sites as a CTA, to allow future development flexibility.	Flexibility can be assured through the plan proposals rather than a CTA. Additional Open Space and Community Proposal <i>The Park Road site (add final site number) would be acceptable as a replacement school site for Scoil Yn Jubilee. This is however, subject to the two Scoil yn Jubilee sites remaining for educational/school use until such time as it can be demonstrated that the educational needs of this area can be adequately accommodated on the Park Road site over the lifetime of the Plan.</i>	Y
104.1	Department for Enterprise	1 & 2	The Department welcomes the Area Plan for the East, covering as it does the Island's capital and its main economic heartland. The new Plan represents a real opportunity to address the Planning context within the East enabling the creation of the best economic outlook for the lifetime of the Plan. The Department is mindful that the proposals set out within the Draft Plan cannot countermand the policies set out within the Strategic Plan and has taken this into consideration in making its response to the Cabinet Office. Whilst recognising that the quality of our natural and built environment is an important aspect of the Island's offer to those wishing to do business, live or relocate here; the Department has restricted its detailed responses to Employment, Town Centres, Tourism, Residential and Retail.	The Department welcomes this overview and approach.	N
104.2	Department for Enterprise	3	The Department considers that the spatial vision as set out within the Plan creates the Planning framework for the future development of Douglas and the east and in particular, the reinforcement of the capital as a centre for commerce, retail and leisure is vital to the economic vitality of the Island.	Comment noted.	N
104.3	Department for Enterprise	4	The Department accepts the proposals as set out within the Chapter and makes no further comment.	Comment noted.	N
104.4	Department for Enterprise	5	The Department recognises the vitally important part the Natural Environment plays in the Island's "offer" to residents, visitors and those wishing to re-locate. The Department welcomes the opportunities provided by the Urban Environment Proposals as set out within Chapter 5.	Comment noted.	N
104.5	Department for Enterprise	6	Douglas and its surroundings create a vibrant urban environment offering greater flexibility within the Planning Environment in which commerce can thrive, which recognises the best of the Victorian character, but allows for the interlacing of modern, high quality, flexible workplaces, vibrant retail and residential.	Comment noted.	N

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104.6	Department for Enterprise	7	<p>Whilst the Department supports the proposals, it does query the lack of reference in respect of car parking, electric vehicle charging and the potential impact of driverless vehicles on the road infrastructure and car parking.</p> <p>The Department understands that the Department of Infrastructure is due to commence a new Car Parking Study in September this year. The data derived from this Study should be incorporated into the Plan for the East.</p> <p>The Department notes that no designation is afforded to the current telecommunications site at Carnane on Douglas Head. The site has recently seen substantial investment with the potential for further investment in the near future. Given the global expansion of telecommunications, the Department respectfully requests that the current designation is expanded to allow for future telecommunications requirements.</p>	<p>The Department has reviewed the content and format of Chapter 7 in regard to electric vehicles and repeats here comments made elsewhere in this document that this is an Island wide issue and not one unique to the East. There is no harm in making reference to electric vehicle parking generally however as part of the general context of Chapter 7 and even as a desired outcome at paragraph 7.5.1 iv.</p> <p>All development briefs should include a requirement to scope out and plan for the provision of EVC points as part of the scheme as a whole and as part of individual properties.</p> <p>The Department understands that the Car Parking Study (DoI) will be completed in the summer 2019.</p> <p>In light of this comment, and that provided by Carnane Estates, <i>CO proposes to clearly identify this telecommunications area on the relevant Maps.</i></p>	Y
104.7	Department for Enterprise	8	<p>The Department has previously commented on the allocation of employment land via the 2017 Preliminary Publicity Consultation for the East and is content with the land allocation.</p> <p>In respect of the take up process of land and in particular the release of the Strategic Reserves, the Department considers that this needs closer monitoring and the Employment Land Review regularly updating to ensure that when such time as the Strategic Reserve land is considered ready to be released, the information is there to corroborate it.</p> <p>The Department's discussions with the Island's Commercial Agents suggest that flexibility is the key for the Commercial sector, particularly in Douglas and the East. The agents suggest that Douglas' Commercial offer has not kept abreast with the direction of Commercial elsewhere with our contemporaries. The Department supports the drive to reintroduce residential above an active ground floor use.</p>	<p>Comment noted regarding the employment land proposals and allocations.</p> <p>The Department agrees that the methodology for the release of the Strategic Reserves needs careful thought. There are no proposals to add to section 8.16 at this point but CO will review ahead of final submissions to the Public Inquiry.</p> <p>In recent years there has been cross Government working on the Employment Land Review. The Department agrees that the evidence base needs to be up to date and relevant and recommends Departments work together to achieve this.</p> <p>The Department is keen to understand how the DFE thinks the commercial offer needs to change and what if any specific changes should be considered for the Draft Area Plan.</p> <p>Regarding the reintroduction of residential above an active ground floor use the draft Area Plan builds on 8.13.4 of the Strategic Plan which states: "In recent years, interest has grown in the development of residential dwellings from redundant commercial space, primarily above shops. In the United Kingdom, inspiration for such development came from the LOTS initiative (Living Over The Shop) started in 1989 and the FOS programme (Flats Over the Shop), set up in 1991. The Department generally supports the conversion of redundant storage space above shops (which are often outside of residential areas), into residential development unless the occupants would suffer adverse noise, general disturbance or loss of residential amenity from other land uses."</p> <p>A consultation on Permitted Development has just been launched it is intended to make some conversions easier, particularly in some urban areas.</p>	N

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104.8	Department for Enterprise	9	<p>The Department supports the proposals set out within this section in particular, the complete inclusion of the Central Douglas Masterplan, the drive to reintroduce residential into our Town Centres and the promotion of entertainment and leisure facilities as a means of creating a destination and the reinforcement of the night time economy.</p> <p>In respect of retail, the Isle of Man Retail Sector Strategy was launched in December 2013. The strategy sets out a clear vision of the future: to promote competitive and accessible retail and leisure environments in our town centres, which offer choice and convenience for consumers, improve the economy and enhance residents' quality of life.</p> <p>Four overarching objectives have been identified:</p> <ul style="list-style-type: none"> •Supporting variety and competition •Maximising on Island expenditure •Developing the indigenous retail sector; and •Creating high quality town centre retail environments <p>Whilst the figures may need updating, the basis of the vision etc remain relevant. The town centre first policy also supports the renewed emphasis on the development of brown field sites which The Plan for the East should give strong emphasis to encouraging the development of those brownfield sites and to significant further improvements to the fabric of Douglas.</p> <p>With the exception of our comments in the Section 16 on Comprehensive Treatment Areas, the Department fully endorses the Town Centre first approach to retail.</p>	The comments are noted.	N
104.9	Department for Enterprise	10	<p>The Department welcomes the Plan's support to the general goal of improving both the Island's tourism offering and its image as an enjoyable and attractive place to visit whilst also underpinning that the quality of a destination is intrinsically linked to the quality of life for residents. The emphasis of the Department's tourism drive is toward quality, whilst recognising the importance of diversification within the tourism sector.</p> <p>The Department is concerned that the inference of Tourism Proposal 1 is that a building owner may consider allowing the building to fall into disrepair in order to redevelop it for some other use. There is an acceptance that some buildings will cease their tourism use and the Department is keen that this process should not result in unsightly buildings.</p> <p>As stated in the Isle of Man Hotel Futures Study 2016 it highlighted a hotel industry that has been in decline for some time and that the Island had fallen behind competitor island and resort destinations in terms of quality. With strategies in place for economic, population and leisure tourism growth over a longer season there is a clear need and potential for the renewal of the island's hotel offer through investment in existing stock and some new hotel provision.</p> <p>Tourism Proposals 2 – 6 the Department are in general support of. Tourism Proposal 7 the Department is currently investigating the redevelopment of the TT Grandstand and the paddock site to broaden the attraction of the area and to improve the amenities on the site.</p>	<p>CO agrees to re-examine the drafting of Tourism Proposal 1 in light of the comments:</p> <p>There is a recognised need for the renewal of the Island's hotel offer through investment in existing stock and some new hotel provision. Planning applications for the conversion of hotels in the eastern area to other uses will not normally be permitted unless it can be demonstrated that the premises do not provide a sufficient standard of accommodation and upgrading the facility would not be feasible.</p> <p>Support for TP 2-6 noted. TP 6 is now proposed to be removed (see response to comment 101.19) as is TP 4.</p> <p>Comments on TP 7 are noted.</p>	Y

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104.9	Department for Enterprise	cont.	Tourism Proposal 8 the non-serviced accommodation sector ranges from self-catering properties to Glamping and Camping and is a diverse sector within the accommodation offering of the Destination. Glamping is an area of growth that the Department is looking to advance. The Isle of Man Non-Serviced Accommodation Futures Study showed clear potential and need for high quality, distinctive, family-friendly and weather-proofed non-serviced accommodation, in order to attract the family and short break markets, extend the season, and compete with UK and Irish rural, coastal and island destinations that are much further ahead than the Isle of Man in providing these types of visitor accommodation.	TP 8 - CO acknowledges that the provision of non-serviced accommodation covers a wide range of accommodation and scales. The intention of TP 8 is to focus on and provide clarification on the small scale developments in woodland areas which are becoming popular and often subject to development proposals. It is not proposed to amend TP 8 at this time. In terms of the recommendation in the Isle of Man Non-Serviced Accommodation Futures Study 'high quality, distinctive, family-friendly and weather-proofed non-serviced accommodation', there is no intention to look to establish a site(s) in the East. This is an issue which affects the Island as a whole at a strategic level and should be dealt with as such.	
104.10	Department for Enterprise	11	The Department recognises the importance of the quality of these facilities in creating a healthy and vibrant environment for residents and those looking to re-locate to the Island and supports the proposals set out this section.	Noted.	N
104.11	Department for Enterprise	12	The Department considers that quality and choice of residential offer is an important facet of the East's offer and ties in with its status as the Island's main focus of commerce, retail and leisure. The Department supports the encouragement of residential within our town centres above an active ground floor. The Department considered the potential implications of additional residents and the knock on effects for schooling in the area but considered that the location will likely appeal to young professionals or older, retired people and that schooling would not be a significant issue. In respect of the 25% Affordable Housing provision; the Department, whilst mindful of the Department of Infrastructure's targets, would request that some consideration is given to the relaxation of this provision in new residential provision, particularly in the Douglas Town Centre. The Department would suggest that further research be carried out in respect of this to better understand the implications of this action. With regard to residential development; whilst recognising the constraints of the Plan making process i.e. that the Plan cannot override the Strategic Plan policies, the Department considers that the current policies on the conversion or replacement of existing dwellings are too constraining, particularly in respect of the 50% rule for extension. The Department considers that the emphasis should be placed instead on the quality and appropriateness of the design in its particular location. The Department does accept that this might have to wait until the next review of the Strategic Plan.	CO does not consider it necessary to lower the 25% affordable housing provision in the town centres as this is where additional effort should be maintained. The matter of the Housing Policy 14 in the Strategic Plan and the issue of the 50% rule is one which is being considered outwith the Area Plan process.	N

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104.12	Department for Enterprise	13	<p>In making the following comments, the Department is mindful that the current retail policies set out in the Strategic Plan seek to protect the town centre, whilst allowing 'bulky goods' out of town and that the creation of the Draft Plan for the East cannot countermine the policies within the Strategic Plan.</p> <p>Whilst the Department fully supports the protection of our Town Centres, it is considered that the current policies do not offer sufficient flexibility in the location of supermarkets in particular, with their need for plentiful parking and good road network access in order to allow for the 'weekly shop'. Whilst the Town centre sites contain supermarkets, there is little or no choice for new supermarkets or the meaningful expansion or relocation of those existing facilities within the town centre.</p> <p>The Department therefore recognises the potential flexibility that the extension to the Town Centre boundary out along Peel Road and the use of the Comprehensive Treatment Area provides in offering an</p>	<p>CO acknowledges the understanding expressed in the DFE's comments. Retail is a complex issue.</p> <p>The Draft Plan attempts to add some flexibility without undermining the Strategic Plan. The town centre boundary needed careful thought and the asking of questions such like: in the policy framework of a 'town centre first approach' in a climate of general demand for quality and choice in terms of convenience shopping, which could be provided by more supermarket provision, how does Douglas as the main centre respond when faced with limited, challenging or undeliverable sites, including those sites sites which have potential but are occupied by industrial uses?</p> <p>A town centre boundary which takes in the Peel Road area, it is an attempt to identify a wider area where retail development could be provided. The plan has not been explicit in stating that a supermarket would be acceptable within the town centre as defined but it would be realistic to assume that Strategic Policy 9 of the Strategic Plan would be relevant. Of course, there has to be the recognition that in order to strive towards having supermarket choice within the 'town centre' there is not currently a defined space to accomodate as a supermarket site; the characteristics of which are commonly recognised as being self-service stores selling mainly food, with a trading floorspace less than 2500 square metres, often with car parking (in the absence of a IOM definition, this definition is set out in the National Planning Policy Framework, 2012).</p>	N
104.12	Department for Enterprise		<p>104.12 cont...</p> <p>The Department tempers this support with concern for the potential policy control mechanisms as its support is purely in relation to the provision of supermarkets in this location. If in supporting the extension of the Town Boundary in such a manner it allows the functions of the town centre retail to extend along Peel Road, thereby diluting the Town Centre, the Department could not support such a proposal. If it is considered by the Cabinet Office, that the current Strategic Plan retail policies are not sufficiently specific to allow for this clarification, then the Department could not support these proposals.</p> <p>In respect of additional CTA's identified in the plan; the Department, again supports the principle of CTA's in providing flexibility in respect of strategically important sites. However, it does not wish to comment directly on other sites identified in the Consultation and feels the identification of such sites best sits with qualified, experienced planning officials.</p>	<p>Retail provision is an Island wide issue but particularly important in the East as Douglas is the Main Centre. Douglas and Onchan currently provide 9199 sq metres of convenience shopping space over 8 premises. Two are close in size to the NPPF definition of supermarket; Tesco and Marks and Spencer.</p> <ul style="list-style-type: none"> - Tesco, Lake Road, Douglas (2473sqm)* - Shoprite, Village Walk, Onchan (787sqm) - Shoprite, Little Switzerland, Douglas (1684km) - Marks and Spencer, Drumgold Street, Douglas (2894sqm) - Co-op Food, Duke Street, Douglas (182sqm) - Co-op Food, Main Road, Onchan (171sqm) - Robinson's World Food Market, Prospect Terrace, Douglas (136sqm) - Robinson's World Food Market at Ballapaddag, Cooil Road, Braddan (872sqm) Subject to enforcement action; outcome unknown as at June 2019 - Chester Street - closed - previously used as supermarket (1606sqm). Car park above remains in use. <p>*(All figures are approximate)</p> <p>However, until such time as there is an update to the retail evidence already in existence which can demonstrate that there is a need for additional supermarket space in the East that cannot be accommodated within Douglas town centre, retail provision shall be provided in accordance with the Strategic Plan.</p> <p>Only up to date evidence will determine whether or not action needs to be taken to satisfy a demand which cannot be met within existing town and village 'centres' which would lead to options for meeting this need being considered.</p>	N

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104.13	Department for Enterprise	Evidence Papers	<p>The Department is mindful that the impact upon the residential provision figures of the reintroduction of residential into the Town Centre does not appear to be factored in.</p> <p>The Department is also mindful of the Car Parking Study to be carried out by the Department of Infrastructure in September and requests that the impact of its findings is factored into the Plan.</p>	<p>CO monitors the approval rate and delivery through its RLAS Updates. Account is taken of projected conversion rates. Any change to the permitted development in town centres such as change of use of unused space on upper floors to residential will possibly require data collection by a different method.</p> <p>Car Parking Study is not yet available as at June 2019 but is due to be completed over the summer 2019.</p>	N
104.14	Department for Enterprise	1	The Department refers to the previous submission made at the Preliminary Stage in respect of the specific sites	Noted.	N
104.15	Department for Enterprise	1	<p>The Department recognises the inclusion of its comments made in the Preliminary Consultation in 2017 and expresses its gratitude to the Cabinet Office for this and the further opportunity to comment on the Draft Plan.</p> <p>The Department supports and welcomes the approach set out within this Plan; particularly the drive to reinforce Town Centre first retail, the reintroduction of residential (above an active ground floor use) and the renewed emphasis on brownfield sites, i.e. that a strong emphasis should be placed on encouraging the redevelopment of these sites. Recent discussions with the commercial property agents suggest that they are keen that as much flexibility should be built into the conversion of buildings within the Town Centre, in order that the empty office space can be brought back into meaningful use.</p> <p>The Department also recognises the importance of the impact of car parking within Douglas Town Centre and recommends that the findings of the Department of Infrastructure's car parking study are used to inform the policy making in and around the Town Centre.</p>	<p>Comments on the redevelopment of brownfield sites and conversion of empty office space are noted. CO understands that the Car Parking Study (DoI) will be completed over the summer 2019.</p>	N
105.1	Department of Health and Social Care	1 & 2	From the DHSC perspective our main concern is the need for infrastructure to support further housing developments. Early discussions would be much appreciated to enable longer term plans to be agreed.	Noted.	N
105.2	Department of Health and Social Care	11	There needs to be consideration of the infrastructure to support more housing developments, such as GP surgeries, community centres etc.	<p>Noted.</p> <p>The need to master plan the larger sites in the plan area ahead of release will allow these needs to be taken into account. Development Briefs will assist in this regard.</p>	Potential

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105.3	Department of Health and Social Care	11	New Ambulance Station needed for Douglas to replace current station on old Noble's site. Sites difficult to locate, we are interested in the field in DOI ownership off Johnny Watterson Lane - Currently no access, houses planned for adjacent sites, developer does not wish to discuss land swap at present. Leece Lodge fields in DHSC ownership, however, road access to main routes is limited. Further work is needed to establish site needed and traffic challenges.	CO understands that: The Headquarters of the Isle of Man Ambulance Service is based at Cronk Coar on the Noble's Hospital site in Braddan. Douglas Ambulance Station is on the old Noble's Hospital site at Ballakermeen Road and has 10 parking bays for vehicles, as well as the usual rest and refreshment requirements for the staff. CO understands that there remain possible options: - DoI land off Johnny Watterson's Lane but whilst access is physically possible, it can only be through adjacent land and the land owners and not open to negotiation at this time. - Leece Lodge (DHSC ownership). - Until such time as the issue can be resolved CO recommends ensuring flexibility in the Plan regarding land at Leece Lodge and a refinement of the text as necessary regarding the difficulties in terms of specific site allocations for both ambulance and fire station provision in the East Area. Proposed changes:	Potential
105.4	Department of Health and Social Care	Village walk, Onchan	Village walk, Onchan currently houses the GP practice, the rent is high and we need to build a new surgery or buy new premises within the population area.	Additional text is recommended to highlight the issue in Chapter 9: New text to be drafted:	Y
105.5	Department of Health and Social Care	Old Glenside Site	Summerhill planning permission granted, awaiting appeal arranged for the 13th September. It is essential we provide care for the elderly and the site and development have been carefully planned to meet the island's needs.	It is understood that PA 18/00144/B was approved at appeal on 13th February 2019 subject to a number of conditions.	N
105.6	Department of Health and Social Care	Current Radcliffe Villas site, Glencrutchery Road.	The site will need re developing in conjunction with the review for Learning Disabilities, the plan is to use the same site using the Greenfield Garden Centre etc.	CO understands that the current strategy for Learning Disabilities expires in 2019 but is being reviewed.	N
106.1	Department of Home Affairs	11	The Fire and Rescue Service- The only issue relates to future sites for a replacement fire station in Douglas and it is noted they are included in the documentation which is most appreciated.	CO notes that discussions are ongoing as to the most suitable location for either a replacement fire station or a new combined scheme for a replacement fire station/ambulance control centre.	N

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106.2	Department of Home Affairs	DH001	<p>Communications Division- I would refer to the proposal for development for site DH001 - this is the area around Westmoreland Road that includes Crookall House. The concern is that we have a TETRA site located on the roof of Crookall House. This site was created in 2001 and its purpose was to provide coverage into parts of central and southern Douglas. Whilst this is not now a critical site to the TETRA network it does provide additional resilience into both the central and southern areas of Douglas should there be a TETRA failure at either Carnane or Douglas Head sites. Currently if we had a failure of TETRA at either of those sites there would be no major impact as TETRA coverage would continue through Crookall House. However if Crookall House was no longer operational and we lost either of the aforementioned sites then there would be a serious degradation of TETRA communications in the area until such time as the site was restored. I would stress however that the likelihood of such a catastrophic failure of TETRA is extremely low. Obviously if this building/area was to be sold then we would need to move the TETRA site. However, the choice of alternative locations in the area is extremely limited.</p>	<p>The comments are noted. It is recommended that additional text is added in the form of a new Proposal to ensure the consideration of the TETRA site at Crookall House in the event of any redevelopment.</p> <p>New Proposal to be drafted:</p>	Y
106.3	Department of Home Affairs	1	<p>Isle of Man Constabulary- The Chief Constable and command team are content with the document as long as there continues to be dialogue at a senior level with the planners.</p>	<p>The comments are noted and the CO welcomes the offer of continued input.</p>	N

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201.1	Douglas Borough Council	DP	The Council supports these two Chapters. The Council seeks to be engaged and involved in devising Development Briefs, at both a political and officer level.	Opportunity will be given to Douglas Borough Council, and others, to consider and make comment on any draft development briefs.	N
201.2	Douglas Borough Council	3	The Council supports this Chapter.	Support noted.	N
201.3	Douglas Borough Council	4	The Council is supportive of all ten landscape proposals.	Support noted.	N
201.4	Douglas Borough Council	5	The Council supports the draft policies, the six proposals and three recommendations. The Council seeks to have its policy in relation to the ceasing of discharge of whey into Douglas Bay reinforced in the Written Statement, that is, for this practice to cease in 2021.	Support noted. The discharge of whey into Douglas Bay is covered by an agreement between IoM Creamery and MUA to use its pipe for discharge. It is understood that approval has been given for a fixed two-year extension of the pipeline agreement to allow a sustainable solution to be developed and implemented.	N
201.5	Douglas Borough Council	6	The Council supports the draft policies, eleven proposals and one recommendation, and welcomes paragraph 6.8.3. The Council particularly welcomes Urban Environment Proposals Two and Three which require enhanced and innovative design in Douglas Town Centre. The Council would seek to have Urban Environment Recommendation One included within Development Briefs. The Council seeks to have Urban Environment Proposal Five clarified as to whether, once works had been identified, whether prosecution would follow if the works were not undertaken and a building was subsequently demolished that could otherwise have been saved if the owner/developer had acted in a timely manner. The Council is particularly interested in how this proposal will be achieved in reality.	Support noted. Support noted. Having considered the views expressed about section 6.15 re 'Urban Gulls', the Cabinet Office accepts that tackling any problems associated with particular bird species requires a multi agency response and may not be appropriate to set out a recommendation on design in the form set out in Urban Environment Recommendation 1. Where appropriate the development briefs should set out when specific attention should be paid to the matter. On reviewing Urban Environment Proposals 4, 5 and 6, Cabinet Office recognises the intent behind their inclusion in the draft plan which was to help protect and conserve important heritage assets. However, the result should not be the addition of another layer of guidance which is duplication of protection measures and opportunities for assessment which exists elsewhere. It is proposed to remove Urban Environment Proposals 4, 5 and 6 and replacement with: <i>Urban Environment 4</i> <i>Proposals which help to secure a future for built heritage assets, especially those considered to be at greatest risk of loss or decay, will be supported.</i>	Y
201.6	Douglas Borough Council	7	The Council supports the draft policies, two transport proposals, seven utilities proposals and one telecommunications proposal. The Council would wish to see Utility Proposal Five include urban storm water drainage systems to take account of flood mitigation and climate change as this is mentioned elsewhere within the document but not included within the proposal.	Support noted. CO has no objection to this suggestions on how improve the wording of this Proposal. The preference would be for MUA to review any change to include this text at bullet point 3 UP 5.	Potential

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201.7	Douglas Borough Council	8	<p>The Council supports the draft policies, the seven proposals and three recommendations.</p> <p>The Council considers that Strategic Plan Business Policy 7(a) should be applied more strictly on the grounds that the draft plan objectives for the provision of employment land should also include maintaining and enhancing the viability and vitality of the business areas and the day time economy of the Town Centre of Douglas by restricting office developments in out-of-town locations.</p> <p>The Council also formally requests planning guidance to clarify Strategic Plan Business Policy 5(a) specifically to help interpretation of what items cannot reasonably be sold from a town centre location because of their size or nature, and the proportion and frequency of sale of such goods in order to qualify for an exemption under Strategic Plan Business Policy 5(a).</p>	<p>Support noted.</p> <p>The Cabinet Office believes the Area Plan strengthens Strategic Business Policy 7 appropriately.</p> <p>Interpretation of the policy from a Development Management (planning application assessment) point of view is made by DEFA on a case by case basis taking into account the merits of the application as measured against the legislative and policy context. The request for further guidance will be passed to DEFA and there will be the opportunity to seek to have BP5 amended/replaced when the full review of the Strategic Plan takes place.</p>	Referred on
201.8	Douglas Borough Council	9	<p>The Council supports the draft policies and the eight mixed use proposals.</p> <p>In relation to Mixed Use Proposal Five, the Council recommends that a bus station or transport interchange should be included as this is mentioned elsewhere within the Chapter but not specifically included within the proposal.</p> <p>The Council particularly welcomes Objective 4 in paragraph 9.4.4. of the Written Statement, specifically in relation to Finch Hill (DH001/Westmoreland), that is, that there would be a presumption to retain any existing open space and sports and recreation facilities which served as assets for the Community.</p> <p>As previously mentioned, the Council formally requests planning guidance to clarify Strategic Plan Business Policy 5(a) specifically to help interpretation of what items cannot reasonably be sold from a town centre location because of their size or nature, and the proportion and frequency of sale of such goods in order to qualify for an exemption under Strategic Plan Business Policy 5(a).</p>	<p>Support noted.</p> <p>The Cabinet Office agrees that the Plan is an opportunity to ensure any requirement for a bus station, transport interchange/hub is earmarked if necessary so that other schemes in Douglas Town Centre can take it into account in early design schemes and Department of Infrastructure in terms of infrastructure planning. It would be an opportunity missed if the final plan had no regard to the possibilities and needs even if uncertainty still exists.</p> <p>It is recommended that a General Proposal is included in Chapter 9 along with supporting text (to reflect the importance of factoring in early a 'transport hub') which is cross referenced with paragraph 7.8.1. This should appear before MU Proposal 1 and after section 9.7.</p> <p>New Proposal before Mixed Use Proposal 1 and after section 9.7 <i>To be completed</i></p> <p>It is noteworthy that the DOI is currently working on a broader integrated Island Strategy which will include preliminary work (internal) undertaken on an Island bus and rail strategy to date.</p> <p>Support noted for Objective 4 para 9.4.4</p>	Y

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201.9	Douglas Borough Council	10	<p>The Council is supportive of the draft policies and nine tourism proposals.</p> <p>With regard to Tourism Proposal Seven, the Council seeks to have this paragraph expanded to read "The use of Noble's Park to support TT and Manx Grand Prix related uses will normally be supported, while applying appropriate protection to open space and associated leisure and recreational facilities".</p>	<p>Support noted.</p> <p>The Department supports the proposed amendment to TP 7.</p> <p><i>The use of Noble's Park to support TT and Manx Grand Prix related uses will normally be supported, while applying the appropriate protection measures to open space and associated leisure and recreational facilities.</i></p>	Y
201.10	Douglas Borough Council	11	<p>The Council supports the draft policies, the three open space and community proposals and one recommendation.</p>	Support noted.	N
201.11	Douglas Borough Council	12	<p>The Council supports the draft policies, the one strategic reserve proposal, three residential proposals and one residential recommendation.</p> <p>The Council suggests consideration be given to relaxing the requirement for 25% of new housing on a development be affordable homes in a defined brownfield area in order to stimulate development of brownfield sites, some of which may be in town centre locations.</p> <p>As previously commented, the Council would seek to be engaged and involved in devising Development Briefs, at both a political and officer level.</p>	<p>Support noted.</p> <p>The Select Committee's Report and recommendations on Unoccupied Urban Sites was approved by Tynwald in July 2018. An update report is due for consideration by Tynwald in June 2019. It would be premature to instigate proposals in the Area Plan for the East specifically ahead of this Report which will address a number of factors regarding the the development of 'brownfield sites'.</p> <p>There will be the opportunity to comment on draft development briefs.</p>	N

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201.12	Douglas Borough Council	13	<p>The Council supports the draft policies and the six comprehensive treatment area proposals.</p> <p>The Council seeks engagement and involvement in deriving the Development Briefs for the Comprehensive Treatment Areas at both a political and officer level, and to this end a workshop style discussion would be welcomed.</p> <p>As previously mentioned, the Council formally requests planning guidance to clarify Strategic Plan Business Policy 5(a) specifically to help interpretation of what items cannot reasonably be sold from a town centre location because of their size or nature, and the proportion and frequency of sale of such goods in order to qualify for an exemption under Strategic Plan Business Policy 5(a).</p> <p>The Council particularly welcomes Comprehensive Treatment Area Proposal One relating to the Villiers site.</p> <p>The Council particularly welcomes Comprehensive Treatment Area Proposal Two relating to Market Street.</p> <p>The Council seeks to have the last sentence of Comprehensive Treatment Area Proposal Three changed to "Provision for a cycle route that could eventually link to the Millennium Cycleway shall be included" to provide synergy with Comprehensive Treatment Area Proposal Four.</p>	<p>Support noted.</p> <p>The Department through its officers, commits to hold a workshop with the Borough Council and Onchan Commissioners if so desired to discuss views on the draft Comprehensive Treatment Areas proposals ahead of publication. This is likely to be after the approval of the Area Plan by Tynwald. Until then the approach on Comprehensive Treatment Areas may continue to be refined.</p> <p>See response to comment 201.7.</p> <p>Support for CTA Proposal 1 and 2 is noted.</p> <p>CTA Proposals 3 and 4. It is recommended that there is a consistency in the use of names to ensure the linkages sought are clear. Ahead of this clarification, the same outcome could be achieved by referring to <i>links to existing and future cycle networks</i> as the Active Travel work has drafted a number of cycle routes.</p>	y
201.13	Douglas Borough Council	Evidence Papers	The Council has no comment to make in relation to the Evidence Papers.	Noted.	N
201.14	Douglas Borough Council	No site reference	The Council will object to the proposed land designation of residential to the Council owned land at Homefield/School Road. During both the Call for Sites and the Preliminary Publicity stages of this draft plan, the Council has suggested that the land be re-zoned to Mixed Use to facilitate development for education purposes, given the proximity of the land to existing educational provision. The Council reiterates the possibility of a suitable land swap to enable this area to improve the Educational provision.	<p>Cabinet Office agrees to making changes to the draft plan where these would allow flexibility and facilitate optimum use of land. The more information available, ensures there is a full understanding of the suggestions.</p> <p>New OSC Proposal in Chapter 11:</p> <p><i>The row of residential properties (which will need to be clearly identified/named by this proposal) shall remain as predominantly residential use until such time as plans have been approved to redevelop this area for educational purposes as part of the continued development of the Isle of Man College campus site on Greenfield Road. Any planning application will need to set out whether or not the existing public sector properties are to be replaced elsewhere within the town or there will be a net loss to the overall public sector provision as a result of the development scheme to expand the College campus.</i></p>	y
201.15	Douglas Borough Council	DH001	The Council does not object to the partly Council owned land at Westmoreland (DH001) being designated as Mixed Use provided that the Finch Hill bowling ground and tennis courts remain as Open Space in accordance with Objective Four in paragraph 9.4.4 of the Written Statement.	<p>The Department proposes to amend this section to make objective 4 a Proposal.</p> <p>Proposed Change Paragraph 9.4.4: <i>Change Objective 4 to a Proposal and re-number</i></p>	y

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201.16	Douglas Borough Council	No site reference number	The Council through the aegis of the draft plan seeks a re-designation of land in the area of the Willaston social housing development and specifically the area adjacent to Barrule Road, Douglas, currently used as a children's playground from Recreation to Residential to facilitate the current plans for the Willaston General Apartments social housing development. It is the Council's view that such a re-designation would not be to the detriment of open space provision generally and the playground will be re-located in the immediate vicinity as part of the development.	The Public Inquiry may benefit from additional information on the Willaston General Apartments Social Housing Development Scheme from DBC. CO would not be averse to the insertion at 12.19 to additional text on public sector housing and a re-jig of 12.18 accordingly to refer to public sector housing as well as 'affordable housing'. The general view is that in principle and if there is to be no net loss in the public open space/children's playground provision, regeneration to improve quality/layout/overall social housing provision in Willaston will be supported subject to all of the normal assessment methods undertaken at the planning application stage. It is not therefore necessary to change the allocation of play space as it is there as a protective measure until such time as a new development scheme is approved.	Potential
201.17	Douglas Borough Council	No site reference number	The Council through the aegis of the draft plan seeks a re-designation of land immediately adjacent to the Pinewood public house, at the junction of Pulrose Road and Laburnum Avenue, from Open Space to Residential to facilitate future social housing developments.	Cabinet Office has not seen either this suggestion or that in 201.16 set out in map form. However, the situation is the same as that summed up for 201.16. The principle of social housing redevelopment in this area is acceptable subject to compliance with the strategic policies regarding loss of open space. A clearer understanding of the proposed schemes would need to be understood before there could be support to change the open space allocations in the Area Plan. This is a protective measure until such time as a new scheme has been approved.	N
201.18	Douglas Borough Council	DP	The Council does not wish to make any further comments on the Draft Plan.	Noted.	N
202.1	Ramsey Commissioners	CTA 1	Supports development of the Villiers site.	Noted.	N
202.2	Ramsey Commissioners	3	Spreading the population around the island will benefit other facilities which may be underused.	The spatial strategy is set out in the Strategic Plan but may be re-evaluated in the future.	N
202.3	Ramsey Commissioners	5	Maintaining an aesthetic countryside is essential for attracting visitors and those relocating. Developments in any natural space can have long-term and irreversible effects.	The countryside is protected for its own sake and the strategic policies cover this.	N
202.4	Ramsey Commissioners	6	Gulls are outside the scope of the plan.	See response to comment 201.5	N

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202.5	Ramsey Commissioners	7	Road network planning should look beyond 2026. Expansion onto trunk roads is misguided due to traffic pressures. As multiple carriageways are not viable, other forms of transport should be encouraged.	<p>Cabinet Office agrees that it is sensible and worthwhile from an infrastructure point of view to consider life after the formal plan period of 2026.</p> <p>Cabinet Office recognises the challenges that go along with this such as weighing up the impact of the Government general policy changes, demographic changes, changing demands on the highway network because of lifestyle changes, junction improvements, traffic management; all have an impact on the network in the short, medium and long term. It is important to monitor such changes and have plans that are flexible enough to react if circumstances dictate. It is agreed that there is sense in planning, monitoring and managing through the development plan framework.</p> <p>The Draft Area Plan was informed by the National Infrastructure Strategy which aims to ensure there is an integrated, reliable, secure and resilient provision of Island wide infrastructure that meets the social and economic needs of the Island up to 2050.</p> <p>Further consultation with the Department of Infrastructure helped Cabinet Office produce an additional evidence paper (PIP 3 Highways). This provides further information regarding the highways network and traffic modelling which has informed the recommended changes to the Draft Plan. The Active Travel Strategy 2018-2021 which seeks to enable more active travel by creating a safe, convenient and effective active travel network for people to use has also informed the recommended changes to the Draft.</p> <p>Chapter 2 - Recommended insertion of paragraph to explain how the draft plan changed throughout the process and the supporting reasons/influences for this.</p>	Potential
202.6	Ramsey Commissioners	7	Utilities should be provided by shared branching.	Further information on this point would be helpful to allow a fuller response.	N
202.7	Ramsey Commissioners	7	Correction- Ramsey processes more freight than Douglas.	No correction required as this is not stated anywhere in Chapter 7. Chapter states Douglas is a focus for freight.	N
202.8	Ramsey Commissioners	8	Secondary commercial hubs are being developed around Braddan and Ballasalla which will damage Ramsey and the North. Out-of-town office locations require town-centre style services. New businesses should be sited within towns and villages.	The Area Plan makes no change to Strategic Plan policies relating to offices and retail. Business Policy 7 remains valid.	N
202.9	Ramsey Commissioners	9	Douglas' businesses centre is desolate while greenfield sites in Braddan are burgeoning. Town centre focus is essential to protect the greenbelt.	Comment noted.	N
202.10	Ramsey Commissioners	11	There should be regional plans for amenities, recreational facilities and businesses and an all-island plan for housing, social care, schools and health care. More recreational facilities should be introduced into communities.	Until such time as the area plans are combined into a singular development plan, there will be an element of looking at the sustainable development of the Island in separate parts. The strategic plan will always be an Island wide document for all departments to develop their strategies and the aim is for Government to keep all such documents as up to date as possible.	N
202.11	Ramsey Commissioners	12	New housing should be banked until required. Current provision is mass-produced and identikit. Local people will be more interested in homes within a 30 minute commute of Douglas than in living in the capital.	The Area Plan has been prepared in line with the spatial strategy as set out in the Strategic Plan. Cabinet Office understands the points being made and accepts challenges exist in attempting to focus development in our existing settlements and the pressure on green, grey and social infrastructure.	N
202.12	Ramsey Commissioners	12	Homes should be 'Euro-proofed' and feature solar panels and ground source heat pumps.	An interesting point and one which can be tackled through other legislation that is Island wide.	N

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204.1	Onchan District Commissioners	OH004	Object. It is felt that the current Onchan Local Plan 2000 items 4.36, 4.37, 4.41, 4.42, 4.43, 4.44 and 4.67 are still valid and must be adhered to.	From time to time plans need to be reviewed and updated. This is not done without consultation and evidence review. Some elements of the development plan for an area may well stay the same; others will naturally change but only after thorough debate. Cabinet Office does not agree with the Commissioners view that the Proposals in the Onchan Plan 2000 must be adhered to.	N
204.2	Onchan District Commissioners	OH011	Object. It is felt that the current Onchan Local Plan 2000 items 4.36, 4.37, 4.41, 4.42, 4.43, 4.44 and 4.67 are still valid and must be adhered to.	Please see response to Comment 204.1.	N
204.3	Onchan District Commissioners	OH017	Object. It is felt that the current Onchan Local Plan 2000 items 4.36, 4.37, 4.41, 4.42, 4.43, 4.44 and 4.67 are still valid and must be adhered to.	Please see response to Comment 204.1.	N
204.4	Onchan District Commissioners	CTA 5-OE001/OM002	Object. It is felt that the current Onchan Local Plan 2000 items 4.36, 4.37, 4.41, 4.42, 4.43, 4.44 and 4.67 are still valid and must be adhered to.	Please see response to Comment 204.1.	N
204.5	Onchan District Commissioners	DM001	Object. It is felt that the current Onchan Local Plan 2000 items 4.36, 4.37, 4.41, 4.42, 4.43, 4.44 and 4.67 are still valid and must be adhered to.	Please see response to Comment 204.1.	N
204.6	Onchan District Commissioners	3	It is felt that detrimental impact would be experienced by the residents of the district in relation to: over population.	The issue of population is dealt with in paper DP EP 5 - Household Size and Population Projections (Update June 2019).	N
204.7	Onchan District Commissioners	7	It is felt that detrimental impact would be experienced by the residents of the district in relation to: failure of existing infrastructure.	The Draft Area Plan was informed by the National Infrastructure Strategy which aims to ensure there is an integrated, reliable, secure and resilient provision of Island wide infrastructure that meets the social and economic needs of the Island up to 2050. Further working with the Department of Infrastructure helped in the production of an additional evidence paper (PIP 3 Highways) to be drafted. This provides further information regarding the highways network and traffic modelling.	N
204.8	Onchan District Commissioners	9	It is felt that detrimental impact would be experienced by the residents of the district in relation to: dilapidation of existing properties.	Local authorities can take action under the Building Control Act or the Local Government (Miscellaneous Provisions) Act to tackle detrimental impacts of buildings.	N
206.1	Marown Parish Commissioners	1	1.1 If landscape protection is considered important, MH021 and MH001 should be excluded.	The Draft Plan recognises the aesthetic value of the landscape of the East and has provided sufficient proposals to protect and enhance these within Chapter 4. Site MH021 is partly under construction and is recommended to remain in the Plan. MH001 is recommended to remain as a Strategic Reserve.	N
206.2	Marown Parish Commissioners	2 and 3	Douglas should be considered separately to the rest of the East (supported by paragraphs 2.4.1 and 3.2.3 of the plan). No development should be contemplated outwith Douglas until all possibilities within the Borough have been exhausted. Douglas has two options: regenerate to increase employment/ designate unused offices as residential in order to increase the town's population travelling by foot/bus.	It is judged that Douglas should remain as part of the development planning for the East as a whole. Part of the process in allocating new land for development is to look at the urban capacity in our existing settlements which has been done through looking at land supply work. Douglas is the main centre but has limited land supply in terms of development land for housing and employment. Work is running alongside this Area Plan with a focus on brownfield sites to ensure that carrots and sticks are in place to make such sites more attractive to develop and to remove obstacles. This work is complemented by the area plan particularly when it comes to the town centre Mixed Use Proposals, the CTA areas and the definition of the town centre. Douglas is bounded by Onchan District and Braddan Parish and close to Santon, Marown and Garff. Responsible planning is about optimising our available land and making informed decisions about where development may go next taking many factors into account.	N
206.3	Marown Parish Commissioners	4	4.1.2 Concerned about replacement of Areas of High Landscape or Coastal Value and Scenic Significance.	The intention is to replace the system currently in place in the East, North and West (AHLCVSS) with a more refined Landscape Character Assessment which provides more detail in terms of Character Areas and types.	N

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206.4	Marown Parish Commissioners	4	4.7 Oppose there being no particular designation for land in Crosby and Glen Vine areas. Omission of West Baldwin and the Baldwin Valley, Central Valley and Plain of Heaven.	This Plan replaces this designation taking account of the Landscape Character Assessment Report which was commissioned in 2005 to examine and assess the countryside of the Isle of Man with a view to classifying the various types of landscape. Glen Vine and Crosby were identified as C3 Broad Lowland Valley character area and has been accordingly stated in the Draft Plan. It may help the Inquiry if a spatial representation of what the Commissioners think of as the Plains of Heaven may be helpful in further discussions.	N
206.5	Marown Parish Commissioners	5	Importance of Biosphere status.	Noted.	N
206.6	Marown Parish Commissioners	5	5.1.4 The sites recommended in Marown do not reflect the intention to soften the divide between urban and rural.	Concern is noted.	N
206.7	Marown Parish Commissioners	5	5.5 Oppose sites MH003 and MH001: these border the River Dhoo and a RAMSAR site.	CO questions the point that the sites border a RAMSAR site.	N
206.8	Marown Parish Commissioners	5	5.15 Support the green gap between Crosby and Glen Vine.	Support noted.	N
206.9	Marown Parish Commissioners	5	5.18 Support Natural Environment Recommendation 2.	Support noted.	N
206.10	Marown Parish Commissioners	6	6.5 Support Urban Environment Proposal 1. This (alongside brownfield areas) should be explored before building more in villages.	Support for Urban Environment Proposal 1 noted.	N
206.11	Marown Parish Commissioners	6	6.6 Support principles of good design. Housing planned MH021 is lacking in features which should not depend on owners for improvement.	Views on MH021 noted.	N
206.12	Marown Parish Commissioners	7	7.3.3 Development in Marown would lead to traffic problems on the A1 which would negate any benefit from additional employment opportunities in the greater Douglas area.	Additional highway modelling has been undertaken and continues to be a factor in site development and timing of release. See Evidence Paper on Highways PIP 3.	N
206.13	Marown Parish Commissioners	7	7.5.1 The Plan should include solutions to address congestion issues.	See response to comment 206.12 - See Evidence Paper on Highways PIP 3.	N
206.14	Marown Parish Commissioners	7	7.9.2 Full highway assessment required for effect Quarterbridge of proposed development to the East of the junction. Junction already under pressure by development to the West of Peel/ future development in Western Plan.	See response to comment 206.12 - See Evidence Paper on Highways PIP 3.	N
206.15	Marown Parish Commissioners	7	7.13 Support Utilities Proposal 1 (Serviceability)	Support noted.	N
206.16	Marown Parish Commissioners	8	8.2.3 Observation is supported. New residential development should be as close as possible to employment centres.	Comment noted.	N
206.17	Marown Parish Commissioners	8	8.2.4 Supported providing any new building is limited and sympathetic to its surroundings.	Comment noted.	N
206.18	Marown Parish Commissioners	8	8.6 If Eilerslie Depot closes this should be used for a technology park.	Such a use would not be ruled out by the land use allocation (industrial) shown in the plan.	N
206.19	Marown Parish Commissioners	8	8.9 Employment Proposal 1 is too limited.	Cabinet Office does not share this view.	N
206.20	Marown Parish Commissioners	12	12.3 The housing requirement is too high given the current static/falling population and number of empty properties (this should be 5%). Prioritise brownfield in Douglas.	This issue is addressed in Evidence Paper DP EP 5 (Update June 2019)	N
206.21	Marown Parish Commissioners	12	12.4 (ii) Development risks upsetting vibrant communities. (iii) Urban extensions to villages are not welcome or sustainable. Village infill has no foundation in good planning policy.	Cabinet Office notes the strong views on the spatial distribution of new residential development.	N
206.22	Marown Parish Commissioners	12	12.9.2 (ii) Assertion is flawed and not supported by evidence in the Plan.	This issue is addressed in Evidence Paper DP EP 5 (Update June 2019)	N
206.23	Marown Parish Commissioners	12	12.12 Scenario 1 is not reflected by the allocation of areas outside Douglas (especially in Crosby).	Cabinet Office notes the strong views on the spatial distribution of new residential development.	N
206.24	Marown Parish Commissioners	12	12.13 Jubilee Oak roundabout. More focus on Quarterbridge required. No capacity at Ballagarey and Crosby treatment plants for 30 additional dwellings at Glen Vine.	See Evidence Paper DP EP 5 (Update June 2019)	N
206.25	Marown Parish Commissioners	12	12.14.1 No capacity at Marown School and traffic will become an issue at peak times. Expansion/a new primary school would be required.	Cabinet Office is aware of the school capacity and the challenges posed by the location of Marown School. The Department continues to work with the Department for Education, Sport and Culture.	N

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206.26	Marown Parish Commissioners	12	12.14.2 Marown has no medical facilities therefore expansion not viable.	Any further expansion in Marown and nearby settlements would need to take into account the need for community facilities and the Department is taking into account the views of DHSC.	N
206.27	Marown Parish Commissioners	12	12.16 Support Residential Recommendation 1.	Support noted.	N
206.28	Marown Parish Commissioners	Evidence Paper 2 Site Identification Report	Decisions on the Lower Douglas Masterplan must be made and implemented before other land in the East is contemplated.	The Department takes this reference to mean the 'Central Douglas Masterplan'. Sites within this area are likely to deliver a number of town centre uses including residential. Whilst some sites will deliver more residential units than others, there remains the need to properly assess the suitability of sites in and around other settlements to ensure there is sufficient housing supply even if these are held back as strategic reserves or phased in other ways. The evidence which supported the Draft Plan concluded that Douglas could not supply all of the housing required until 2026 and there needed to be deliverable sites identified at its 'edges' and in other settlements. The Central Douglas Masterplan has been used to inform the Draft Area Plan and in particular helped shape the Town Centre and Comprehensive Treatment Area information and proposals.	N
206.29	Marown Parish Commissioners	Evidence Paper 3 Land Supply	Approved, un-built should be included in housing calculations. Non-commencement is evidence that need is being met by existing supply.	The RLAS Reports work to keep up to date planning approval data for residential units and the take-up of those planning approvals. 'Housing calculations' are very much a part of identifying the need for additional housing land.	N
206.30	Marown Parish Commissioners	Evidence Paper 4	GHIC- Oppose expansion of Glen Vine, Union Mills, Crosby, West Baldwin, Braaid, Eairy, Ballavitchel and Glen Darragh. Only sympathetic infill should be supported.	Glen Vine, Union Mills, Crosby are not Groups of Houses in the Countryside as set out in the Spatial Strategy but are identified settlements in their own right. A specific project/plan for Groups of Houses in the Countryside is intended to be scoped out separately for the whole Island in due course.	N
206.31	Marown Parish Commissioners	Evidence Paper 6 Audit of Community Facilities	Those facilities identified as being controlled by Marown Parish Commissioners are owned and operated by an independent charity.	Such references have been checked.	N
206.32	Marown Parish Commissioners	MH018	Existing planning approval.	Noted.	N
206.33	Marown Parish Commissioners	MH019	Existing planning approval.	Noted.	N
206.34	Marown Parish Commissioners	MH020	Existing planning approval.	Noted.	N
206.35	Marown Parish Commissioners	ME001	Existing planning approval.	Noted.	N
206.36	Marown Parish Commissioners	MH021	MH021 has provision for a retail unit. The approved dwelling designs for this site have no redeeming features.	Comments are noted.	N
206.37	Marown Parish Commissioners	MH003	MH003 was refused for appeal in 2015 (settlement character and removal of trees) and the reasons for refusal remain relevant.	Site has been changed to a Strategic Reserve. <i>Update tables in Chapter 12 to reflect Strategic Reserve status.</i>	Y
206.38	Marown Parish Commissioners	MH023	MH023 is supported as sustainable infill development.	Comment noted.	N
206.39	Marown Parish Commissioners	BH031	BH031 is opposed as it would affect the Trollaby Lane Area of Union Mills (Marown) and capacity at the Jubilee Oak and Quarterbridge junctions.	The close proximity of the site to the boundary with Marown is noted but the Commissioners do not expand on what the impact might be. Additional highway modelling has been undertaken and this is summed up in DP EP 5 (Update June 2019).	N
206.40	Marown Parish Commissioners	Strategic Reserves	The Strategic Reserve sites are not supported due to unsold properties and unconstructed approvals.	The Strategic Reserves are about looking ahead. There may be needed for uses other than residential and their identification can help in the planning for development towards the end of one plan period and the start of the next.	N
206.41	Marown Parish Commissioners	MH001	MH001 is opposed due to the too-small exit onto Ballavitchel Road and effect on rural character.	Objection is noted. Please see final Site Assessment Report for this site.	N
206.42	Marown Parish Commissioners	MM001	MM001 is opposed as it would ruin Crosby forever. This is an area of High Landscape Value and Scenic Significance.	Objection is noted. Please see final Site Assessment Report for this site.	N

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207.1	Braddan Parish Commissioners	BH031 and BH032	Object to BH031 and BH032: Development in Union Mills and Strang should meet local needs and not lead to the coalescence of the villages. Infill plots/small extension of up to 15 dwellings would be in-keeping, proportionate to the settlement hierarchy, meet local housing needs and integrate new development into the community. Oppose as sufficient housing can be accommodated on the edge of Douglas and Onchan without using these greenfield sites.	Objection is noted. Please see final Site Assessment Report for this site. Proposed Map Change: Site BH031 <i>Map 8 change to add in part of site excluded at Draft Plan stage.</i>	Y
207.2	Braddan Parish Commissioners	DBH002 and BH030	Object to DBH002 and BH030: would cause coalescence of Douglas and Union Mills. Oppose as sufficient housing can be accommodated on the edge of Douglas and Onchan without using these greenfield sites.	The Commissioners have not provided details of those greenfield sites on the edge of Douglas and Onchan which is finds preferable to BH031, BH032, DBH002 and BH030. The Department does not agree that the latter 2 mentioned sites would result in the coalescence of Douglas and Union Mills. See also the final SAF Reports for these sites.	N
207.3	Braddan Parish Commissioners	BM006	BM006 is a suitable extension of employment land (including BE004) and would provide alternative premises for relocated Snugborough businesses.	The Department accepts that there are sometimes competing land use options for any particular piece of land. Given that finding suitable housing land have proved challenging in the East in line with the spatial strategy and as the Braddan Commissioners is arguing to reduce the number of identified sites in surrounding settlements, then deliverable residential sites such as BM006 must remain as potential sites in the Plan.	N
207.4	Braddan Parish Commissioners	8	Support change of Snugborough Trading Estate to Residential.	Snugborough Trading Estate is an established, busy, occupied estate. It is on the main freight route but it is admittedly a cramped estate with limited customer parking and loading areas. The Plan to date has not examined closely any proposals to relocate this elsewhere and redevelop as housing and the Department questions the practicality of achieving this within the plan period.	N
207.5	Braddan Parish Commissioners	8	Support relocation of 'bad neighbour' land uses which frees up brownfield land for housing.	Consideration always has to be given to the alternative locations for such 'bad neighbour' uses as in many cases they serve a purpose or provide a service and have specific land needs of their own. CO simply agrees it can be a complex issue.	N
207.6	Braddan Parish Commissioners	5	Green gap should be established between Union Mills and Strang.	CO does not share this view. Whilst it agrees that Union Mills and Strang are separate settlements they are close and a separation can still be ensured through careful design and landout and landuse decisions rather than a green gap.	N
207.7	Braddan Parish Commissioners	5	Green gap should be established between Douglas and Braddan.	From a settlement point of view, Douglas is bordered by a number of smaller centres. Protection is afforded by the general policy to protect the countryside. Merging is of course an issue but so too is ensuring land is available when there is evidence to support expansion. Redevelopment of brownfield sites and optimum use of land within our settlements is clearly a key goal but there may be need to have additional land identified to provide sustainable urban extensions. The extra layer of protection afforded by further green gaps is not needed and may in fact inhibit options looking forward.	N
207.8	Braddan Parish Commissioners	5	Green gap should be established between Union Mills and Douglas (between Vicarage Road and Peel Road).	See response to comment 207.7.	N
207.9	Braddan Parish Commissioners	6	The following should be considered as Conservation Areas: Mount Rule, The Baldwins and Oakhill, Port Soderick.	There are no plans to identify proposed conservation areas as part of this draft plan. The plan cannot in any case approve new conservation areas through the development plan process. This is addressed under a separate process.	N
207.10	Braddan Parish Commissioners	7	Underinvestment in Active Travel- encourage greater uptake of cycle-to-work schemes.	The Area Plan can and does strive to complement and provide a supportive context for the Active Travel Strategy being led by the DoI. Proposed changes to the draft plan by CO are heavily influenced by the Active Travel Plan.	N
207.11	Braddan Parish Commissioners	7	A Park & Ride facility should be build either on the A1 (Ballahutchin Hill) or A5 to reduce congestion within Douglas.	Any need for a Park and Ride facility will be worked up in conjunction with the DoI but only after there is evidence in place to support such a facility.	potential

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207.12	Braddan Parish Commissioners	7 Utilities Proposal 3/Telecommunications Proposals 1	Mobile phone masts should not be installed near schools, hospitals and nurseries.	Evidence of harm on health grounds remains unfounded and the Plan is not the right tool to restrict development of this nature in a sweeping sense as put forward.	N
207.13	Braddan Parish Commissioners	7 Utilities Proposal 6	Support. Sustainable development should avoid unnecessary concreting of the countryside. SUDS should be used to minimise flooding.	Support noted.	N
207.14	Braddan Parish Commissioners	8	Investment in employment generating opportunities should be proportionate to the scale of the existing villages and supporting infrastructure. New employment opportunities in Union Mills and Strang should provide jobs for local people and not require large scale residential growth.	This comment seems at odds with the comment put forward in 207.4 which seeks to have Snugborough changed to residential. The use of the term 'local' is interesting. CO accepts that this is often tricky to define and has in the past been acknowledged in an Island context as larger than a particular village or town i.e. the eastern area is 'local'. It might be helpful for CO to know more about the Commissioners understand to mean 'local' in the context of the comment.	N
207.15	Braddan Parish Commissioners	9	Regeneration of the Town Centre for mixed use development (including employment) should remain a priority.	Comment noted.	N
207.16	Braddan Parish Commissioners	10	General support for tourism chapter. The Plan should do more to promote Archibald Knox and the Arts and Crafts movement on the Island.	This is possibly better suited to the Strategic Plan i.e. an Island wide goal and indeed developed in line with other cross government strategies.	N
207.17	Braddan Parish Commissioners	12	Proposed residential development is completely disproportionate to actual housing need. It is distributed to unsustainable locations within Braddan. The actual total number of homes required on the IOM to keep up with demand is 2,384 (less than half of what is proposed). Paragraphs 12.20.3-11. The government plans to deliver 3,780, far in excess of even the Strategic Plan target of 2,440. Including Strategic Reserves this jumps to 4,985.	Housing need is addressed in Update paper DP EP 5 (Update June 2019).	N
208.1	Daphne Caine MHK	1	Strategic Plan should be revised before future Area Plans are finalised.	CO understands the broad concept here but it also recognises the fact that development plans take time to review even if only focusing on a limited number of policies. The approach to the Area Plan for the East and the papers prepared ahead of Inquiry will hopefully explain how issues are to be dealt with the approach to how government should react to new statistics which are often worthy of being challenged.	N
208.2	Daphne Caine MHK	1	Time consuming Area Plans do not assist the island to plan sustainable development. A regularly update Strategic Plan would set out the overarching principles for the whole island.	The Strategic Plan does attempt to do this. The intention is to have a strategic plan and for the next few years 3 area plans. Long term, an Island Development Plan consisting of a Strategic Plan and a single Area Plan could well be the preferred approach.	N
208.3	Daphne Caine MHK	3	Zoning of fields for development could lead to the erosion of green gaps or spectacular views being lost forever.	CO agrees that there is a balance to strike. The Strategic plan is part of the planning framework and the area plans are prepared with it very much in mind. Assessment of sites is very detailed and the development plan procedure helps to ensure there is opportunity to consider all of the implications of additional development.	N
208.4	Daphne Caine MHK	3	Difficult to realise desired outcome: 'to ensure that all new development avoids adverse environmental impact and is resource efficient to maintain sustainable growth in the east'.	There is a need to have such a desired outcome. Debate along the way is part of the process of getting it right. There needs to be a vision and a direction of travel to shape the 'proposals.' The proposals deliver the vision and consequently having clear goals such as those set out in this plan are in themselves worthy.	N
208.5	Daphne Caine MHK	3	Wider policy of how land is zoned and when it should be released for development requires a rethink. A prioritisation system should prevent sites being designated for development until such a time as there is a proven need and a demonstrable lack of alternative available development land.	CO agrees that it is sensible and worthwhile from an infrastructure point of view to consider life after the formal plan period of 2026.	N

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208.6	Daphne Caine MHK	5	Hill and coast land represents the island's biggest national asset and should be developed only when absolutely necessary.	The strategic plan policies protect the countryside for its own sake and additional development is to be focused in and around existing settlements. Sites and the need for them are thoroughly assessed.	N
208.7	Daphne Caine MHK	5	Biosphere status must be taken into account when reviewing what land is allocated for development.	Agreed.	N
208.8	Daphne Caine MHK	6	Draft Plan should incorporate the outcome of the will of Tynwald on unoccupied urban sites. Notes Recommendations 1 and 2 of the Tynwald Select Committee.	A report is due to be considered by Tynwald in June 2019. CO is involved with this and is providing ongoing contributions to the work going forward along with Treasury, DFE, DEFA and DOI.	N
208.9	Daphne Caine MHK	6	Minimum eco standards for new builds and incentives for using passive technology.	Technical aspects such as this are better provided in the Building Regulations. The general policy background does support good quality design for new builds.	N
208.10	Daphne Caine MHK	7	Impact of out of town developments on congestion should be mapped.	Highways modelling has been undertaken which involves an assessment of the highway network and the impact on junctions, some of which are already known to be congested at peak times. Changes proposed to the Draft plan have taken into account this modelling (See PIP 3Highways).	N
208.11	Daphne Caine MHK	7	There should be a requirement to reduce traffic congestion in permitting new developments.	See response to comment 208.10.	N
208.12	Daphne Caine MHK	9	More detailed strategic planning needed for Douglas promenade. Opportunity for a student campus on the Summerland Site/and ageing hotel blocks and conversion of boarding houses to student accommodation.	That is an interesting suggestion for a site (Summerland) which has remained vacant for a number of years. There are certainly constraints on the site but also opportunities for the right use. The need for such a campus is not founded at this point and would need cross Government support and agreement that this is the best site.	N
208.13	Daphne Caine MHK	12	Understandable lack of public confidence in the plan when the need for more houses is based on overstated population figures.	Housing need is addressed in Update paper DP EP 5 (Update June 2019).	N
208.14	Daphne Caine MHK	Evidence Paper 1- All Sites List	Land at Government House, Onchan would be preferable development site to below Scollag Road.	Comments are noted.	N
208.15	Daphne Caine MHK	Site west of the A2 at Baldrine	No justification for 'urban creep' that would result from this development.	Please see final site assessment reports for particular sites in Baldrine.	N
208.16	Daphne Caine MHK	GM001	Would contravene stated aim to preserve views from the Manx Electric Railway.	Please see final assessment report for Site GM001. <i>Update tables in Chapter 12 to reflect Strategic Reserve status.</i> Proposed change to Strategic Reserve.	Y
208.17	Daphne Caine MHK	Evidence Paper 1- All Sites List	All greenfield sites, including at the Plains of Heaven, need review and to be removed from the Plan.	Comments are noted. Please see changes to the All-Sites List - DP EP All Sites List (Update June 2019).	N
209.1	Bill Shimmins MHK	1	I question whether planning by region remains appropriate in this context. It does not take into account the daily movement of people across the Island. Arguably, this piecemeal approach has contributed to the sub-optimal situation we now find ourselves in. A continuation of the current trend will constitute failure. It will carry on benefitting a small number of landowners and developers at the expense of the wider social and economic welfare of the rest of the Island population.	The production of one Area Plan was an option considered and a single plan could still be achieved given the provisions in the TCPA 1999. However, a decision was made to prepare a small number of Area Plans first. Each Area Plan can still be viewed in the context of the Island as a whole given the approved policies in the strategic plan. Rather than constitute failure in the way so described, CO views the approach worthy of continuation. Once the East Plan is approved, over 70% of the population will have a development plan relevant to their area which is less than 9 years and the remainder of the Island - Plan for the North and West - will be being prepared. It is not agreed that the regional approach for now benefits only a small number of landowners and developers and in any case wonders how this argument would be solved by having one Plan.	N

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209.2	Bill Shimmins MHK	3	Whilst I am broadly supportive of the settlement hierarchy approach and Island spatial strategy, it requires more effective implementation. The hierarchy and strategy should enable better utilisation of existing resources.	There is a duty to make the optimum use of resources. The settlement hierarchy can be used to break down into numbers what each settlement type should be providing i.e. number of new housing units. This can prove difficult in reality for a number of reasons but the availability of resources and opportunities to ensure the right supporting infrastructure are at the forefront of looking at the settlements and their capacity.	N
209.3	Bill Shimmins MHK	3	The draft plan often refers to appropriate scale; this is judgemental, one person's view on what is appropriate will differ from many others.	It is agreed that in planning, judgements often have to be made. This skill lies in weighing up all of the evidence and making recommendations for the best outcome.	N
209.4	Bill Shimmins MHK	3	The nagging concern is that these green fields will continue to be developed with inappropriate large scale estates whilst brownfield sites, on which there is real consensus that they are appropriate for development, will be a low priority for developers.	No additional development is released without proper and thorough assessment and the development plan they form part of examined as part of a Public Inquiry.	N
209.5	Bill Shimmins MHK	3	The plan proposes corridors through Peel Road, the Nunnery and the Cooil Road. It is hoped that safe active travel routes are on the agenda for these corridors to link homes, workplaces, schools and other amenities.	The Department continues to work with DOI in monitoring the Active Travel routes and associated literature.	N
209.6	Bill Shimmins MHK	3	The railways are also by their nature constrained by the tracks laid. As such they are unable to service the growing employment areas like Spring Valley. Buses provide a much more cost-effective public transport solution covering more of the population.	It is agreed that the buses offer part of the solution and work continues on ensuring new sites are supported by the right infrastructure such as public transport.	N
209.7	Bill Shimmins MHK	3.4.8	Highlights that integrated public transport will support growth. The suggestion that better inter connections between the electric railway, steam railway and horse trams are key components is fanciful. The heritage railways are leisure and tourist attractions. They only run for 6 months or so over the main holiday periods so cannot be an effective public transport system.	Paragraph 3.4.8 sets out the Vision for the East. CO does not agree it is fanciful and would point out the merits in thinking about where we are headed. The Promenade is undergoing major redevelopment which retains the tracks. There are opportunities here which are set out in a broad vision even if the heritage railways are, as yet, only available for part of the year.	N
209.8	Bill Shimmins MHK	3.6.6	It is good that the spatial vision recognises the need to safeguard and reinforce the distinctive character of the various settlements.	Support noted.	N
209.10	Bill Shimmins MHK	4	The importance of the Island's landscape cannot be underestimated. • It is a key differentiator which attracts many people to visit our Island. • The landscape was recognised by UNESCO when they awarded biosphere status to the Island.	Comments on landscape and Biosphere are noted.	N
209.11	Bill Shimmins MHK	4	The Isle of Man is unique in the crown dependencies in having a breadth of landscapes and open countryside. Other international business centres e.g. Singapore and Monaco also do not enjoy our natural surroundings. The Isle of Man continues to compete for international investment to generate income. One of our unique selling points is the unspoilt landscape. Conversely, one of our weaker aspects is the quality of the urban centres.	Comments on landscape are noted. This Plan seeks to improve the quality of our town centres.	N
209.12	Bill Shimmins MHK	4	The plan recognises this in some areas and makes provision to safeguard the Laxey Wheel, Laxey Glen, West Baldwin and the heritage railways.	Noted.	N

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209.13	Bill Shimmins MHK	4	It does not recognise the significance of the landscape of the central valley. This is one of the most important routes across the Island and which is highly visible to visitors and residents.	Consideration will be given to the need to draft any additional proposals for the Greeba Valley (C1) - para 4.7.6	Potential
209.14	Bill Shimmins MHK	5	The draft plan proposals recognise the importance of the natural environment.	Comments noted on the natural environment.	N
209.15	Bill Shimmins MHK	5	I welcome the identification of green gaps (ref 5.15) between settlements.	Support noted on the Green Gap Proposals.	N
209.16	Bill Shimmins MHK	5	I also concur with the concepts of Marine Protected Areas and Marine Conservation Zones but note that there are no proposals in this regard.	Comments noted on the MPAs and MCZ.	N
209.17	Bill Shimmins MHK	5	Many areas of the East have suffered severe flooding in recent times. As such proposed development should not take place in flood plains.	Site assessments have taken into account the latest flood risk data.	N
209.18	Bill Shimmins MHK	6	Douglas has lost much of its vitality and this is not helped by the large number of empty sites and buildings.	CO recognises that the development plans can set the scene and done well, this can help and not hinder sites coming forward for development or developers having the confidence to move forward with schemes. There is an argument for using planning measures to focus on the implementation and delivery of the vision/proposals set out in plans. The mechanism of identifying Comprehensive Treatment Areas is setting the scene for this and the plan dedicates a Chapter (9) to Town Centres and Chapter 13 on CTA's. Government is reporting back to Tynwald in June 2019 on the Secelct Committee's recommendations on Unoccupied Urban Sites.	N
209.19	Bill Shimmins MHK	6	The proliferation of gravel car parks is an eyesore. Whilst they are described as temporary, many have operated unchanged for decades.	This is being partly tackled by the Tynwald resolution on 'temporary car parks.' The Plan does try and set out Mixed Use Proposals to set out what sort of uses would be acceptable on such sites.	N
209.20	Bill Shimmins MHK	6	In recent years, other areas of the U.K., Ireland and Europe have enjoyed an urban renaissance. These places have prospered due to thoughtful planning and incisive decision making. It is through this lens that the draft Area Plan should be viewed. The objective must be to regenerate Douglas for the benefit of the whole Island. Whilst the current plan does acknowledge that regeneration of Douglas is important, the proposals support the continuation of the development of outlying areas. I am concerned that these sites which are, by their nature, easier to develop profitably, will be built out. It is also likely that the more challenging brownfield sites will continue to languish undeveloped, holding the town back.	CO agrees that 'urban renaissance' is taking place in some areas. Reasons are typically not down to one particular policy stance but many and involve a number of policy drivers and stakeholders over time. It is interesting to note the activity, development, planning approvals granted in Douglas in recent years which may act as a catalyst for further activity and confidence.	N
209.21	Bill Shimmins MHK	6	The draft plan makes many good points on the importance of the urban environment.	Support welcomed.	N
209.22	Bill Shimmins MHK	6	We need, however, to be wary of trying to preserve every old building, regardless of quality. There is a balance to be struck between the benefits that new architecture will bring and also conserving quality historical structures. It should be possible to enhance the urban space with a blend of high quality new and old buildings.	This is agreed.	N
209.23	Bill Shimmins MHK	6	The select committee to investigate the options available to encourage and prioritise the development of unoccupied or previously developed urban sites ahead of building on green fields in the Manx countryside laid its report before Tynwald in July 2018.	CO notes the paper to be put to Tynwald in June 2019.	N

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209.24	Bill Shimmins MHK	6	It concluded that there is a lack of a register of brownfield sites and a lack of readily accessible data on the number of planning approvals given and taken up in brownfield and greenfield sites respectively.	CO is now producing this data.	N
209.25	Bill Shimmins MHK	6	It concluded that there is significant support in principle for the encouragement and prioritisation of the development of unoccupied or previously developed urban sites ahead of building on greenfield sites in the Manx countryside.	Noted.	N
209.26	Bill Shimmins MHK	6	It concluded that despite that support, the committee had seen a considerable amount of development on greenfield sites in recent years and that the pace of development in our towns – Douglas in particular – has been disappointing.	Noted.	N
209.27	Bill Shimmins MHK	6	It concluded that Tynwald has at its disposal a range of policy levers which have the potential to reverse the trend and breathe new life back into the Island's towns.	Yes, a number of policy levers are available.	N
209.28	Bill Shimmins MHK	6	Recommendation 1 That the Cabinet Office should publish at regular intervals data on planning approvals given and taken up in brownfield and greenfield sites respectively.	Noted and statistics are now available and the methodology will be refined going forward.	N
209.29	Bill Shimmins MHK	6	Recommendation 2 That Tynwald calls upon the Council of Ministers and all Departments to use every means at their disposal to encourage and prioritise the development of unoccupied or previously developed urban sites ahead of building on greenfield sites in the Manx countryside; and in particular that Tynwald is of the opinion that urgent action should be taken – (i) to set up flexible Development Zones in Douglas; (ii) to transfer control of all Government land and buildings to a single strategic body; (iii) to set up a Development Agency in partnership with local government and the private sector; (iv) to use the planning system, taxation and other potential incentives to discourage greenfield development; (v) to use the planning system, taxation and other potential incentives to encourage brownfield development in Development Zones in Douglas and in other urban areas.	The June 2019 Report will be available for consideration as part of the Inquiry.	N
209.30	Bill Shimmins MHK	6	Recommendation 3 That the Department of Infrastructure in consultation with the Treasury and local authorities should review the legislative framework for compulsory purchase and options for funding thereof.	See response to Comment 209.29.	N
209.31	Bill Shimmins MHK	6	These will be debated at either the October or November sitting of Tynwald. It is normal practice for Tynwald reports to be debated two sittings after they are laid. Due to the summer recess the Committee has requested that the report is debated at the next sitting to avoid delay. A response is awaited from Government departments in this regard. The outcome of this debate should be considered as part of the Eastern area plan deliberations.	The June 2019 Report will be available for consideration as part of the Inquiry.	N
209.32	Bill Shimmins MHK	7	Large scale residential green field development on the outskirts of Douglas and across the Island has created major commuter flows each working day. Traffic congestion is causing frustration, inefficiency and pollution.	CO is working with the Highways Division on highway modelling and notes the concerns about congestion.	N

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209.33	Bill Shimmins MHK	7	The draft plan advises that traffic modelling has informed the preparation of the plan. It states that the strategic links can cope with the increased vehicles accruing from the proposed new development but it identifies junctions which at present experience regular congestion. The peak flows will only increase with out of town development creating further congestion. This will create additional pollution and negatively impact air quality and the health of these commuters and the residents of Douglas. Further modelling should be undertaken to fully assess all impacts prior to the approval of large out of town developments.	Further modelling is taking place (See PIP 3).	N
209.34	Bill Shimmins MHK	7	The Active Travel Strategy was unanimously approved by Tynwald Court in July 2017. This strategy should be incorporated in all aspects of the Eastern Area plan.	The Active Travel Strategy has been integrated into recommendations going forward on how to change the draft plan.	N
209.35	Bill Shimmins MHK	8	The draft plan makes provision for employment land but it is recognised that this is an example of where a national plan would be more beneficial. This resulted in the Employment Land review and subsequent activity.	The ELR and Update concluded that the demand for employment land is mainly in the East and the South. The available evidence is sufficient to allow sensible and practical allocations for employment land in the East.	N
209.36	Bill Shimmins MHK	8	Offices and other workplaces have moved to the outskirts of Douglas. Modern business parks provide an attractive option for employers and employees. The combined effect has been to hollow out Douglas.	Certain types of office development are now at Cooil Road. Town centres are changing but there remains in the form of Business Policies in the Strategic Plan to allow certain offices only.	N
209.37	Bill Shimmins MHK	8.2.5	The proposal that offices will normally be within town centres ignores the reality that Spring Valley and other business parks on the outskirts of Douglas already contain many large modern offices. It is widely thought that other firms are currently looking to move to the business parks. Most large offices on the Island are headquarter type buildings.	Concerns are noted.	N
209.38	Bill Shimmins MHK	8.6.2	The technology park proposal (ref 8.6.2) has some high-level attractions and it would appear that this has garnered support in some areas of government. The Island is fortunate to have a number of large employers in the technology sector. It is unclear whether the existing technology companies want to move to a new technology park. They have expended considerable resources on their current establishments and moving causes enormous upheaval and expense. Others have indicated a preference for a location closer to the airport. Recently, four new business incubator sites have been opened in Douglas, Castletown and Ramsey. Is there sufficient demand for more? These factors are constantly evolving and a flexible approach is required.	Monitoring and flexibility is important as well as the development of the idea of a 'technology park'.	N
209.39	Bill Shimmins MHK	9	The plan presents an opportunity to regenerate Douglas. Our Island's capital must be the highest priority. Douglas is declining due the trends seen over the last few decades.	Comment noted.	N

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209.40	Bill Shimmins MHK	9	The draft plan acknowledges the changing retailing trends but it does not fully recognise the profound change that the internet is bringing. Those town centres which have not adapted are declining. The Strategic Plan retail policy already looks outdated. It is likely that current trends will continue and there will be less demand for retail premises. Imposing restrictions and ground floor requirements are well intentioned but I would prefer to see a more pragmatic approach. The mixed use proposals should be more flexible than presented. Trying to maintain designated areas for retail or leisure at specified ground floor levels may create ongoing voids which will detract from the desire for regeneration and occupancy. We should welcome increased leisure, tourism/hotel, entertainment and food and drink development across the town centre mixed use areas. We should also welcome increased office and residential development in these mixed use areas.	The comments suggests that the Mixed Use Proposals should be more flexible. The draft MU Proposals are considered flexible whilst protecting the vitality and quality of the town centre.	N
209.41	Bill Shimmins MHK	9	I welcome the recommendation in favour of a multi storey car park in mixed use area.	Support noted.	N
209.42	Bill Shimmins MHK	9	I would suggest more than one new additional multi storey car park would be beneficial for the town centre. This would free up space occupied by the gravel car parks. It could also facilitate the reduction of car parking on the promenade to enable this to become a leisure asset. Adoption of a fully considered Douglas car parking strategy would be a major step forward.	An integrated strategy which includes car parking is being prepared by the DOI. It can provide an update to the Public Inquiry.	N
209.43	Bill Shimmins MHK	9 Town Centre Mixed Use Proposal 8c	It is good that mixed use proposal 8c recommends improved pedestrian and cycle links. This should be replicated in all the mixed use proposals. Improvements in provision elsewhere have been shown to deliver wide ranging benefits in health, social and economic wellbeing.	Additional text re the Active Travel Strategy and action plan should be noted in the other Mixed Use Proposals. Comment welcome.	Potential
209.44	Bill Shimmins MHK	10	Many towns and cities elsewhere have permitted short term stay apartment accommodation for tourism and also hostels. Douglas should also embrace this trend to attract and accommodate more tourists. The draft plan appears silent on this aspect.	Chapter 10 addresses Tourism and includes a number of proposals. New hotel accommodation will increase the type and number of rooms available in Douglas. It is not necessary to add anything further.	N
209.45	Bill Shimmins MHK	10 Tourism Proposal 1	The Tourism proposals recognise that many visitors now expect a high standard of accommodation. Upgrading dated tourism stock is in many cases impractical to meet expectations. Room sizes, ensuite facilities etc. have moved on since the Victorian boarding house era. In this context, more flexibility is required in Proposal 1. In many cases it will be better to start afresh.	It is thought that these comments are more relevant to Tourism Proposal 2. CO recommends TP1 and TP2 remain as drafted subject to review of the word 'active' in TP2. See response to comment 209.46.	Potential
209.46	Bill Shimmins MHK	10 Tourism Proposal 2	The active ground floor frontage in Tourism Proposal 2 may be overly restrictive. Successful tourist accommodation does not always have an active ground floor frontage. It may have retail or offices on the ground floor.	The main hope by using the word 'active' is to seek to have a sense of openness, people movement, retail, bar/restaurant - The move to hotels having limited or no reception on the ground floor can inhibit such movement and activity. The plan seeks to get the right balance.	Potential

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209.47	Bill Shimmins MHK	11	It is good that these aspects are recognised as a key requirement in the draft plan. In the past, developers have built large out of town residential estates without making any contribution for the cost of additional services. This has placed schools and other services under pressure. Douglas is generally well provided with government services. It makes sense that development takes place in town ahead of remoter areas where existing provision is less adjacent.	Existing and future opportunities for facilities and supporting services for any new housing schemes which may improve the situation for existing communities forms part of the overall assessment for sites. As too the availability of suitable sites in existing settlement boundaries.	N
209.48	Bill Shimmins MHK	12	The assessment of the additional dwellings needed in the Strategic Plan is flawed. The original strategic plan calculations were based on population growth projections which were proven to be overstated by the 2016 census which showed a slight decline. Subsequently, the Cabinet Office submitted an additional evidence paper in May 2018. Surprisingly, this arrived at a higher figure than the original requirement - 5,311 versus 5,100. The Cabinet Office premise is that whilst the population has not increased from 2011 to 2018, it will now do so, based on a net annual inward migration of 500. The new Cabinet Office projections envisage a higher number of housing units will be required due to reducing household sizes.	Please see DP EP 5 (Update June 2019)	N
209.49	Bill Shimmins MHK	12	The projection also assumes an increase of space for households. It states larger houses require more space. This is fuzzy logic; smaller households should not require larger houses.	Please see DP EP 5 (Update June 2019)	N
209.50	Bill Shimmins MHK	12	There is an urgent need to reassess the requirement. This work should be completed ahead of any formalisation of the Area Plan.	Please see DP EP 5 (Update June 2019)	N
209.51	Bill Shimmins MHK	12	A high number of new residential units have already been built in the West and South with more in the pipeline in these areas and in the North. An updated tally should reduce the overall requirement for the East.	Please see DP EP 5 (Update June 2019)	N
209.52	Bill Shimmins MHK	12	As confirmed by the Cabinet Office, household sizes are getting smaller. The birth rate has declined markedly and more people are living on their own. This is the key evidence submitted to justify the same number of housing units. This size of household decline needs to be modelled in more detail than the simple spreadsheet used. It may mean that more apartments are required rather than detached houses, which would counteract the impact of household size reduction.	Please see DP EP 5 (Update June 2019)	N
209.53	Bill Shimmins MHK	12	The Cabinet Office figure of 658 available brownfield units feels on the low side. This has been reviewed by others who have arrived at a figure in excess of 1300. This could be increased further depending on density and height of development.	Cabinet Office is continuing to update the data.	N

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209.54	Bill Shimmins MHK	12	The Isle of Man has a very high rate of empty housing stock. This was revealed to be circa 15% in the 2016 census and is higher than elsewhere: England is 2.5%, Scotland is 4%, Jersey is 7%. It should be possible to accommodate some of the planned growth utilising empty stock. The Cabinet Office projection has been carried out with a vacancy rate of 4%. This is much lower than the census statistics and inflates the housing units needed.	<p>A 4% Vacancy Factor accepted in the Strategic Plan 2016 does not mean that 4% of the existing housing stock is empty. This issue was debated at the Inquiry for the Strategic Plan and the 4% Vacancy Factor was accepted.</p> <p>Research is ongoing in so far as establishing why properties that could be occupied are 'empty', what is meant by empty and also reasons for such under occupation. There are a number of policy levers to bringing such truly empty properties back into use.</p> <p>A healthy housing market expects a level of vacancy: properties may be undergoing works, they may be in the process of being sold/purchased, they may be tied up in the distribution of estates, some may even have been abandoned - in effect losing their residential status.</p> <p>The comments seem to suggest that the overall number of units for the island should be reduced because of the findings of the Census 2016. The findings which are currently being examined further will be helpful in understanding the true situation but it would not be helpful to abandon the East Plan and review the Strategic Plan.</p> <p>Evidence Paper EP DP 5 (Update 2019) explains this issue further and how any controversy regarding empty properties, housing need and land release is to be dealt with as part of the East Plan.</p>	N
209.55	Bill Shimmins MHK	12	Empty office space in the centre of Douglas is at record levels as firms have moved out to business parks. Elsewhere these have been converted to residential units. This trend "departments to apartments" has reused empty blocks and regenerated towns. It is an attractive option for Douglas, which will also help meet the housing requirement.	<p>Business Parks are not suitable for all types of office development. In some locations and for some buildings residential may be perfectly acceptable. The trend of allowing office to residential is not without its critics and this has been reported in England.</p> <p>Part of the approved Action Plan for Planning is to update the Permitted Development Order and the Use Classes Order. This may have some impact on making office conversion somewhat easier in particular circumstances.</p> <p>Housing on upper floors is generally supported but apartments don't suit everyone and there is a need to ensure opportunities for a mix of housing types.</p> <p>The answer to the question 'how best can we achieve thriving regenerated town centres?' is not answered entirely by the conversion of empty space at all floor levels to residential - 'departments to apartments' - as it is suggested.</p>	N
209.56	Bill Shimmins MHK	12.17	The ageing population creates additional requirements. The strategy for meeting this need may also require fewer detached houses and more closely joined residential communities. This will reduce the overall land requirements.	The ageing population is a real issue. And how to ensure sufficient accommodation with the right level/mix of support and specialist care provision is very topical. We're all ageing but not all of us will want or need supported housing or high levels of care. There is a reliance on specific evidence being available and DHSC and the Housing Division of DOI can help with this. Often it is sufficient to ensure that any development briefs take into account housing needs at any one time unless a site lends itself particularly to being reserved for a residential home, a nursing home, dementia home or sheltered housing and there is a clear need to do so.	N
209.57	Bill Shimmins MHK	13	These represent a very helpful set of tools which are already in statute and are available as part of an agreed area plan. If used wisely, they will positively stimulate the development of Douglas.	Support for CTA Chapter noted.	N
209.58	Bill Shimmins MHK	13	I fully support these concepts but challenge why they are restricted to the five areas. I would prefer that a wider CTA is created for the entirety of Douglas town centre.	It is considered that these are where effort should be focused and where Treatment Plans are likely to have the greatest impact. It may be difficult to define a purpose for a significantly larger CTA and resources risk being spread too thinly without focus or clear objectives.	N

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209.59	Bill Shimmins MHK	13	I would also encourage the use of the widest range of powers to include tax incentives, rate relief, fast track planning and grants. Each site will have different dynamics. A comprehensive menu of available options will enable regeneration to take place in a timely manner.	Such suggestions are noted in relation to CTAs and development briefs.	N
210.1	Jane Poole-Wilson MLC	1.2	The draft APE acknowledges it must be produced in general conformity with the Strategic Plan. This would mean that the draft APE should: take account of the requirement that development make best use of resources by optimising use of previously developed land, redundant buildings, unused and under-used land and buildingsand being located so as to utilise existing and planned infrastructure, facilities and services (Strategic Policy 1).	Agreed.	N
210.2	Jane Poole-Wilson MLC	1.2	The draft APE acknowledges it must be produced in general conformity with the Strategic Plan. This would mean that the draft APE should take account of the fact that proposals for development must ensure that the individual character of our towns and villages is protected or enhanced by avoiding coalescence and maintaining adequate physical separation between settlements (Strategic Policy 3).	Agreed. Where settlements are physically close, land allocations that would threaten the 'separation' would be thoroughly considered. There may be merit in some development in such loations but this would need to be carefully planned, taking into account all other material issues and challenges presented in the Plan area. There are no easy sites to develop and sometimes it is worth considering the practicality of suitable mitigation.	N
210.3	Jane Poole-Wilson MLC	1.2	The draft APE acknowledges it must be produced in general conformity with the Strategic Plan. This would mean that the draft APE should take account of the fact that new development should be located and designedwith the aim to minimise journeys, especially by private car, make best use of public transport, not adversely affect highway safety for all users, and encourage pedestrian movement (Strategic Policy 10).	Agreed.	N
210.4	Jane Poole-Wilson MLC	1.2	The draft APE acknowledges it must be produced in general conformity with the Strategic Plan. This would mean that the draft APE should take account of the strategic policy to give favourable consideration to proposals for improving the quality and condition of the existing housing stock and for the creation of flats by conversion of redundant boarding houses and vacant or under-used space above commercial premises,(Strategic Policy 12)	Agreed.	N
210.5	Jane Poole-Wilson MLC	1.2	The draft APE acknowledges it must be produced in general conformity with the Strategic Plan. This would mean that the draft APE should be in line with the Island Spatial Strategy and associated policies -in particular that the Douglas urban area will remain the main employment and services centre for the Island (Spatial Policy 1); that outside Douglas development will be concentrated on the ...Service Centres (Spatial Policy 2) and that in the non-Service Villages, development should maintain the existing settlement character and should be of an appropriate scale to meet local needs for housing and limited employment opportunities. Also that Area Plans will define the development boundaries of such settlements so as to maintain their existing character (Spatial Policy 4).	Agreed.	N

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210.6	Jane Poole-Wilson MLC	1.2.3	In light of the various Strategic and other policy and approach statements quoted above, relying on statements of intent and encouragement does not seem sufficient. The opportunity must be grasped through the development of the APE to introduce measures and polices that will incentivise both Government Departments and others to ensure that brownfield/vacant or underused sites are prioritised for development, including appropriate residential development. Therefore, taking account of the recommendations of the Tynwald Select Committee on the development of unoccupied or previously developed urban sites, there is further scope for concrete policies and measures to be brought forward as part of the APE to support this.	<p>As stated, the Recommendations are being acted on it that there is a cross Government response being prepared and due to be considered by Tynwald in June. This is clearly just the beginning in taking initiatives forward and need policy guidance at a national level not just through a single area plan.</p> <p>In the meantime, the East Plan is being prepared in conformity with the Strategic Plan and assumptions have been taken into account for sites which may deliver some residential development. Care needs to be taken not to overestimate the figures. This risks a situation where there is simply not enough housing land which is deliverable and opportunities have been missed in the planning for such including infrastructure provision which often has a lead in time - such as schools, utilities, highway improvements and healthcare provision etc.</p>	N
210.7	Jane Poole-Wilson MLC	2.4.1	Current proposals to zone a number of greenfield sites to meet housing needs seem out of step with the Island Spatial Strategy for Douglas and the East. For example, some proposed greenfield sites (including some Strategic Reserve Sites) are outside existing settlement boundaries and are of such a scale that were residential development to go ahead on them, it would definitely change the character of the relevant settlement, particularly the smaller non-Service villages in the East. Also, if the policy of "constraining further greenfield development" has aided the process of regeneration within the existing urban area, the question must be asked as to why that policy should not be central to proposals for the future development of the East, and, to incentivise developers to focus on our urban centres, what further policies aimed at prioritising urban regeneration are being considered and could be introduced.	<p>Strategic Policy 2 in the Strategic Plan proposes the use of appropriate 'sustainable urban extensions' to meet development needs.</p> <p>The Island Spatial Strategy makes a sensible and approved policy stance regarding the development of the Island. This is based around the main centre - Douglas - and a series of lower order settlements. The debate concerning the distribution of development was dealt with at length during the Strategic Plan Review.</p> <p>It was agreed that additional development was needed. In terms of housing this was just over 5000 over a period of 15 years. Where to build? The spatial strategy guides development to existing settlements and sustainable extensions thereof. Douglas has been allocated the greatest proportion of the housing need. This is in line with the Spatial Strategy and to do otherwise would inevitably mean greater allocations to the lower order settlements some of which are relatively close to Douglas.</p> <p>Land supply (allocated housing land) is extremely limited and whilst there is potential for some further development, it can be argued that there is still a need to look for additional development land for housing. Wherever that housing goes, there are implications for grey, green and social infrastructure and the risk is if the goal is residential at all costs, there is pressure to have all of the supporting infrastructure in that general area. There is always a balance of arguments and history reminds us to be mindful of the consequences of releasing what appears to be vacant land for housing but 20 years down the line its realised that that land, now lost, would have served as excellent expansion land for the adjacent school which is now stretched and over capacity.</p>	N

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210.8	Jane Poole-Wilson MLC	3	There are overwhelming positive justifications for prioritising urban centres and brownfield sites including: improve and enhance the visual appeal and vitality of urban centres (particularly Douglas) providing a boost to the economy, including the tourist and night time economy; use previously developed sites to provide suitably designed and appropriately sized dwellings (reflecting the trend towards smaller households) that are designed to meet our demographic needs in particular appropriate housing for our ageing population and units that appeal to a younger demographic; more of whom we wish to attract to locate here; in this way enable improved access to more amenities (such as medical and dental services), and retail and entertainment/leisure opportunities, which should be more easily accessible by means of active transport or public transport; and by siting residential development nearer to work, services and retail/leisure activities, support a reduction in the number of journeys made by private car and thus reduce traffic flows and congestion, providing safety and environmental benefits; reduce the need to zone greenfield sites in and around our villages for residential development thus protecting and conserving our landscape and environment, preserving the character of current settlements and reducing the potential for increased journeys by private car with associated congestion, safety and environmental adverse impacts.	<p>Optimising available land is vital and for our town centres a mix of uses is necessary to keep them vibrant places to live, work and spend time. All of the benefits referred to in this comment are acknowledged and laudable and many can be achieved within the plan period which will be a great basis for the next plan period.</p> <p>Questions have to be asked and some have already been answered through evidence gathering at the draft plan stage.</p> <p>In Douglas, a settlement boundary has been defined to reflect the current settlement. A town centre boundary has been defined and mixed use proposals drafted and expressed spatially to help support from a policy perspective redevelopment, regeneration, confidence and commitment to invest.</p> <p>The capacity of Douglas has been examined along with a realistic assessment of the sites likely to come forward. It is known that there are a small number of brownfield sites that are reasonably sized. These are in some ways easier to monitor. Some have active planning applications, some have approvals, some have constraints. It is possible to assess the likely units to come forward from these sites. There are a number of underused sites, smaller in size. These have also been examined in terms of their potential for housing/employment land. It is accepted that the most difficult development type to monitor or predict from is the upper floors of buildings and giving an indication of units that may be possible given constraints such as access, parking, amenity etc. What the Department does do is estimate the likely number of conversions coming forward and taking this number away from the overall housing need figure. Other policy levers such as grants, tax breaks tax penalties may increase the desirability to convert premises to residential but to rely of this development type - being most likely apartments - could risk underestimating the housing need for the East and it is safer not to rely on this to satisfy housing supply.</p> <p>Of course, statistically, the conversion and windfall projection figures could be inflated to see the difference but it is unlikely to satisfy all of the East's housing requirements.</p>	N
210.9	Jane Poole-Wilson MLC	4.1.1	This is welcome as are the particular Landscape Proposals in the draft APE.	Support noted.	N
210.10	Jane Poole-Wilson MLC	5	The Natural Environment Proposals regarding the maintenance of 'Green Gaps' are therefore welcome as a concrete proposal to help deliver protection for the natural environment in practice.	Support noted.	N
210.11	Jane Poole-Wilson MLC	5.3-5.4	Taking into account the Island's UNESCO Biosphere status and the Objectives (paragraph 5.3) and Desired Outcomes (paragraph 5.4) set out in the draft APE regarding protection of the natural environment, the inclusion of robust proposals elsewhere in the APE that prioritise brownfield and urban development ahead of greenfield development is central to ensuring that we can in practice best protect our natural environment and biodiversity.	<p>The key phrase here and in the other comments above is to 'prioritise brownfield and urban development ahead of greenfield development.'</p> <p>Decision making on the plan will have to weigh up the question 'does the draft plan and any amendments thereto satisfy sufficiently such a goal? Could the right phrasing be part of the solution? Could more sites be held back a Strategic Reserves?</p> <p>CO has given more thought to this given this comment and other comments submitted to the draft plan.</p>	N
210.12	Jane Poole-Wilson MLC	7	In addition, as regards proposed residential development on the larger potential development sites, particularly in the Villages, it would be helpful to see analysis of the impact in terms of: likely increase in traffic flows and congestion; safety of road users (in particular pedestrians and cyclists); and how increased volumes of private car journeys would affect likelihood of people undertaking active travel.	<p>The additional traffic modelling undertaken is available and is published as part of the papers to support the recommendations going forward. See PIP 3 Highways.</p> <p>In terms of active travel, the Active Travel Strategy 2018-2020 has informed the plan and monitoring will be able to demonstrate in the future the impact of the scheme's implementation.</p>	N

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210.13	Jane Poole-Wilson MLC	7.2.1, 7.8.1 and 7.9	Prioritising more residential development in urban centres, particularly Douglas, so people can live nearer to work and other amenities, facilities and services, is key to enabling more people to make active transport journeys and reducing the number of journeys made by private car and the associated problem of congestion, it is encouraging to see that Transport Proposal 1 requires any development proposals to take into account the Active Travel Strategy.	Comments are noted.	N
210.14	Jane Poole-Wilson MLC	7 Transport Proposal 2	Supported.	Support noted.	N
210.15	Jane Poole-Wilson MLC	8 Employment Proposal 4 and 12.20.1	The development of Employment Strategic Reserve sites is not envisaged in the APE's period to 2026 and that future development of such sites will only be supported for certain specified uses and subject to certain criteria being demonstrated, one of which is: "the proposal is informed by a coherent masterplanned approach" The future development of Residential SRS is not subject to all of the equivalent requirements. In particular, it seems a serious omission not to make the future potential development of Residential SRS subject to a coherent and detailed masterplanned approach that takes account of wider housing needs as defined not just by numbers, but also by types of dwelling, volume of particular types and their location so development of housing units can be appropriately permitted to best meet the then current and projected social and economic need. Masterplanning should also incorporate detailed assessment against wider policies and objectives (including but not limited to strategic, spatial, housing, transport (including supporting active transport), safety, environment, community and infrastructure). As the Residential SRS provide capacity well in excess of projected housing need, a highly strict and rigorous approach to determining any proposal to bring forward any Residential SRS for development is vital, to safeguard against inappropriate and needless development on greenfield sites.	The Department welcomes the analysis undertaken here and accepts that there were elements in the draft plan which needed to be expanded. It was never the intention to treat the Strategic Reserves differently. The need for masterplanning is implicit but perhaps needed to be more explicit in the draft plan. The situation should be addressed by additional explanatory text and in the form of development briefs.	potential
210.16	Jane Poole-Wilson MLC	9.4.1	The Objectives and Desired Outcomes are by and large welcome.	Comments are noted.	N
210.17	Jane Poole-Wilson MLC	9 Mixed Use Proposals	They seem unduly restrictive particularly as regards the scope for residential development and so as presently written seem to be at risk of undermining the Objectives and Desired Outcomes for urban centres, particularly maximising development and regeneration in Douglas Town Centre. More flexibility in line with Strategic Policies 1, 10, and 12 would be helpful.	CO has re-examined the Proposals and recommends that they are sufficiently flexible.	N
210.18	Jane Poole-Wilson MLC	12	The draft APE should also be in line with the Housing Policy in the Island's Strategic Plan, and housing need.	Agreed.	N
210.19	Jane Poole-Wilson MLC	12	Chapter 12 states that the number of housing units for the East already completed or commenced is 196 up to the end of June 2017. Given consultation on the draft APE is taking place more than a year later this figure should be updated and should include numbers and types of dwellings already built and those not yet completed but where there is sufficient certainty that development is likely to go ahead.	Please see R-LAS 11.	N

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210.20	Jane Poole-Wilson MLC	12.1.1, 12.2.1, 12.2.2, 12.2.6	To what extent do the current draft APE proposals align with the above policy, strategy and approach statements? What further information and assessment would assist in answering that?	CO would like more time to respond to this valid question.	N
210.21	Jane Poole-Wilson MLC	12.5.1	There does not seem to be an assessment of how the evidence of the trend towards smaller households should be factored into what types of housing may be required. Nor does there seem to be an assessment of what types of housing might be needed to support other initiatives including to attract more Millennials to live and work here.	See DP EP 5 (Update June 2019)	N
210.22	Jane Poole-Wilson MLC	12.7.1	Having looked at some of the Site Assessment Reports previously and highlighted in my response to the Preliminary Publicity stage some inconsistencies in information contained in them and some conclusions that seemed either out of step with other evidence or not justifiable in the light of other information, what steps will be taken to thoroughly review the Site Assessment Reports and assess them in light of available evidence, before they are finalised, to ensure they are a sound basis for making policy decisions about the future potential development of relevant sites?	This is a valid point. The Site Assessment Reports have now been finalised and are available to read.	N
210.23	Jane Poole-Wilson MLC	12.9.2	Figures related to both the drop in household size and to potential net inward migration are discussed purely in terms of the impact on the total number of dwellings needed. Analysing what sorts of dwellings and in what volume would be most apt given the demographic and other drivers is key to provide a more robust evidential basis for housing proposals.	See Evidence Paper EP DP 5 (Update June 2019) Development briefs will set out the guidance but steer away from being too restrictive in terms of stating precise numbers and tenure, size etc. Occasionally however, this is sensible to do so.	N
210.24	Jane Poole-Wilson MLC	12.20.1	Whilst there may be valid reasons as to why the draft APE may seek to include some SRS for housing development, there are a number of questions which should be addressed in relation to the current proposals regarding such sites.	CO has addressed this through the changes it recommends to the draft plan.	N
210.25	Jane Poole-Wilson MLC	12.20.1	Without very strict criteria for release, there is a potential risk that SRS become regarded as zoned for residential development and these sites then become subject to a much greater risk of being developed, even though there may be brownfield or other already designated sites still available and/or the need for dwellings does not justify taking forward the development of SRS. It is notable that several of the largest SRS have previous designations of agricultural land (DH057) or open space (OH004 and BH032) or areas of high landscape or coastal value and scenic significance (MM001).	CO has addressed this through the changes it recommends to the draft plan.	N
210.26	Jane Poole-Wilson MLC	12 Residential Recommendation 1	Residential Recommendation 1 is welcome.	Support noted.	N
210.27	Jane Poole-Wilson MLC	12 Housing Policy 3	Whilst clearly aimed at managing spatial distribution across different parts of the Island, in line with the 'Plan, Monitor, Manage' approach, it would seem a missed opportunity to stick rigidly to pursuing development of the specified numbers of dwellings in one part of the Island without taking into account development which has taken place or is planned to take place elsewhere and thus contributes to meeting the overall number of dwellings required.	It is important to note that although the Island has for the time being been split for development plan purposes the distribution for the four plan areas was worked out based on the settlement hierarchy. At the time of the Strategic Plan it was broadly accepted that the areas could accommodate the number of dwellings needed although the sites were not identified. The RLAS work monitors development island wide as well as allocated sites that remain undeveloped. The take up rate of approvals is also known and combined with other evidence allows the plan to be set in the context of the Island as a whole.	N

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210.28	Jane Poole-Wilson MLC	Evidence Paper No DP EP3	The Isle of Man Strategic Plan notes that each new RLAS update records the types, locations and numbers of homes being approved and delivered. Table 1 in the Land Supply Report sets out Potential Development Site Yield Calculation Assumptions, including, in relation to housing, the percentage of a site developed for housing and the housing density of different sites. However, there does not seem to be an assessment of what the Island's future housing needs look like other than in terms of numbers of dwellings. As the draft APE clearly recognises the need for any proposed housing sites and policy statements made in support of them to be underpinned by sound evidence, it would seem crucial to understand not only likely numbers of dwellings, but also what types of housing units are needed to meet the Island's social and economic needs and in what volume. Such information is critical to help determine what types of housing development should be prioritised and encouraged, and where such housing should be located.	The comment is noted and a response is expanded on in EP DP 5 (Update 2019).	N
210.29	Jane Poole-Wilson MLC	Evidence Paper No DP EP3 3.7	Acknowledging that all of the potential development may not be able to be accommodated on brownfield sites, and that for good reason some brownfield sites will contain a significant element of non-residential development, 658 still seems a low number. So what additional measures and policies can be brought forward (whether to address deliverability concerns or otherwise) to maximise the redevelopment of our brownfield and previously developed sites to help meet the future housing need?	In terms of the development plan - the area plan - what can it do to optimise brownfield site development? It can be supported by evidence regarding key and identified urban sites which can be monitored It can have proposals and masterplanning requirements It can use CTAs as a method to potentially unlock sites and remove constraints and remove barriers It can encourage confidence in the private sector It can encourage Government to develop its own sites It can work alongside other policy levers which may be of a financial nature It can restrict town centre uses which would be inappropriate It can provide a clear background and context for planning application decisions	N
210.30	Jane Poole-Wilson MLC	Evidence Paper No. DP EP3 3.5 Table 3	It is also notable that the potential impact for the Villages in the East of, in the future, allowing residential development on SRS that are outside the Existing Settlement Boundary (ESB) would be significant. It is difficult to see how development that includes the capacity of SRS would align to the Island Spatial Strategy for the East (particularly the idea of sustainability and that development should be at "an appropriate scale") or Spatial Policies 1, 2 and 4.	It is agreed that the purpose, need for and methodology for the Strategic Reserves needs to be reviewed in the Written Statement.	potential
210.31	Jane Poole-Wilson MLC	Evidence Paper No. DP EP3 3.5	Table 3 in the Land Supply Report shows that even if this need is accepted, it can be more than met by the total supply of housing units available within Category 1 and Category 2 Sites, without reference to the SRS. Total Supply adjusted to exclude capacity of SRS is 2,408. Supply including SRS capacity is 4,726 -more than double the residual housing need.	The land supply report has been updated and further explanation of the figures provided. DP EP 3 (Update June 2019)	N
210.32	Jane Poole-Wilson MLC	DH057	Previous designation as agricultural land.	Noted.	N
210.33	Jane Poole-Wilson MLC	OH004	Previous designation as open space.	Noted.	N
210.34	Jane Poole-Wilson MLC	BH032	Previous designation as open space.	Noted.	N
210.35	Jane Poole-Wilson MLC	MM001	Previous designation as an area of high landscape or coastal value and scenic significance.	The areas of AHLVCSS are gradually being replaced by a series of landscape Areas and Types. Landscape Proposals are now more detailed than under the system of AHLVCSS.	N

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211.1	Children's Champion- Tim Baker MHK	12	TAPE needs to make provision for the development of suitable supported accommodation for young people leaving care, similar in form to halfway houses and sheltered accommodation for the elderly.	The Plan can be prescriptive where necessary and appropriate. The need for such accommodation could be expressed clearly by the DHSC and DOI. The Plan should not restrict general housing allocations to specific types unless there is evidence of need.	N
211.2	Children's Champion- Tim Baker MHK	12	This provision needs to be in the East as this is where around 50% of the population resides. A location in Douglas would provide good access to town centre facilities and public transport.	Noted.	N
211.3	Children's Champion- Tim Baker MHK	12	Potential locations could be the former Park Road School site or the former prison on Victoria Road.	Both of these sites have been the subject of additional internal assessment given they are in Government ownership. Please see the final site assessment reports for Site DH039 Park Rd School & Bowling Green PH and Site DH046 Victoria Road Prison and Edale (including Eastcliffe)	N
212.1	Julie Edge MHK	2	Plan lacks fully projected financial impact studies for infrastructure, service delivery, protection of our environment, green space, countryside and proper use of brownfield sites.	Financial Impact Studies have not been produced. However, this is not to say that the infrastructure, service delivery, the environment etc. do not form part of the site assessment process and plan production. The strategic plan sets out the development needs of the Island and even though numbers are hotly debated, there is a general acceptance that additional development needs to be planned for. The Plan is not at odds with Government's general programme 2015 -2021 but releasing new sites for development is not done so without careful consideration. At 'what cost' additional development results in is much wider than 'financial' and there are checking mechanisms in place whether that means mitigation, legal agreements which include financial contributions, and both carrot and stick incentives and legislation.	N
212.2	Julie Edge MHK	11	Current schools infrastructure in Onchan is poor and requires a strategic proposal.	This is being achieved by the identification of the area as a Comprehensive Treatment Area.	N
212.3	Julie Edge MHK	5	Support for Green Gap between Onchan and Douglas.	Support noted.	N
212.4	Julie Edge MHK	OH004	Site is contrary of Strategic Plan policy 'to protect the countryside for its own sake.	Please see final assessment report for Site OH004	N
212.5	Julie Edge MHK	OH011	Site is contrary of Strategic Plan policy 'to protect the countryside for its own sake.	Please see final assessment report for Site OH011	N
213.1	Rob Callister MHK	12	Questions lack of work relating to future population figures and what facilities and infrastructure the island will need over the next 8 years. Believes a genuine debate on population is required. Questions the need for additional 5100 homes between 2011 and 2026 on the island when looking at the average population growth increase on the island with 2400 in the East and how these figures were established. Uncertainty of Brexit and how that may affect the strategic objectives with regards to future needs, infrastructure and resources etc.	See DP EP 5 (Update June 2019)	N
	Rob Callister MHK	OH004	Traffic concerns a full traffic management review is needed. Parking concerns nears the school.	See final SAF Report for this site.	N
	Rob Callister MHK	OH011	Cannot accommodate 250-500 cars without major infrastructure and traffic management review. Site Assessment outlines the site is zoned "open space" on the adopted Onchan Local Plan therefore any proposed development would be contrary to the Local Plan and that development would represent an intensification of the existing built fabric resulting in an undesirable visual impact.	See final SAF Report for this site.	N

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	Rob Callister MHK	12	The plan also needs to reflect the housing need, the island does not need further million-pound development. We need good quality and affordable housing for young professionals and families. Policy 5 of the Isle of Man Strategic Plan policy for 25% affordable housing on development of 8 or more is too low and needs to be reviewed as part of the Area Plan for the East. There is also growing demand for more Local Authority/Social Housing across the island. Eastern plan needs to take account people coming to the island on a temporary basis and it should support and encourage a high quality rental market especially in Douglas. Updated legislation that protects the rights of the tenant and the landlord is needed.	The plan seeks to encourage a range of different housing choices and acknowledges the need for affordable and social housing. The plan identifies the need for appropriately drafted development briefs to be carried out in which matters such as this can be discussed and requirements for affordable and social housing can be set out through the briefs. Legislation relating to landlord and tenant regulations is not part of the Area Plans remit.	N
	Rob Callister MHK	3, 8	Support the statement in the Preliminary Publicity Main Consultation Document (February 2017) describing Onchan as a Service Centre where development will be concentrated to provide regeneration and choice of location for housing, employment and services. Key stakeholders should work together to deliver more employment and service opportunities in Onchan.	Noted.	N
	Rob Callister MHK	12	If an additional 400-600 houses were actually built in and around Onchan over the next 8 years then Ashley Hill and Onchan School will require significant investment or possibly relocation to new purpose-built site, which combines both primary schools.	Comments noted.	N
	Rob Callister MHK	11, 12	Historical issue with traffic management of St Ninian's Lower School opening. Questions whether the DoI will review the traffic management in Onchan as the road leading to Hillberry Road from Signpost Corner continually backs up during peak periods and can go beyond the roundabout on Signpost Corner, which is a serious traffic concern. Concern over exiting and entering Highfield Crescent and Birch Hill Crescent and Heywood Avenue during peak periods. Onchan requires a full traffic management system review before further development is undertaken in this area.	Cabinet Office has produced a further evidence paper relating to transport and highway matters (Evidence Paper PIP 3)	N
	Rob Callister MHK	7	Major concern with the removal of sewage and rainwater in Onchan, particularly higher parts of Onchan, a full review of the Onchan's sewerage and drainage system is required and is a matter of urgency before any further large development should be undertaken.	Importance of drainage infrastructure noted.	N
	Rob Callister MHK	7	Welcomes review of Onchan bus timetable as part of the plan.	Support noted.	N

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301.1	GB Investments	MH009/MH010	Oppose decision to exclude these sites from the Draft Plan.	Objection noted. Please see final SAF Reports for these sites.	N
301.2	GB Investments	1	No direct notification from Cabinet Office that these sites were excluded and for what reasons.	CO relied on the Draft Plan, the draft Site assessment reports and the supporting evidence papers. Please see the final SAF Reports for these sites.	N
301.3	GB Investments	1	Preliminary Publicity comments/objections were not published before 31st August 2018.	Concerns about this are noted.	N
303.1	Gilbey Farms Ltd	MH004/MH005	These two sites are intended to play a strategic role in the establishment of a proposed Social Enterprise Housing Company (The Community Housing Trust).	This is not sufficient justification to set aside the policies in place to protect the countryside from development.	N
303.2	Gilbey Farms Ltd	MH004	Currently unclear as to why the Braaid has not been identified as a Group of Houses in the Countryside suitable for sensitive infill development.	Braaid was recognised in the draft plan as a group of houses in the countryside. However, no groups were recognised as being suitable for sensitive infill development. Res Proposal 3 was clear in that feasibility studies still needed to be undertaken for West Baldwin and Quine's Hill. In any case, the recommendations in terms of this project have been changed following the consultation. Proposed Change - recorded in the Y column here only <i>Residential Proposal 3 is to be removed</i>	Y
303.3	Gilbey Farms Ltd	MH004/MH005	These sites meets the criteria for a single Group of Houses in the Countryside as the historic boundaries of the Braaid were defined at Braaid and Stuggadhoo crossroads.	See response to Comment 303.2	N
303.4	Gilbey Farms Ltd	MH005	Potential to host a small group of single storey cottages around a shared garden/ green space which would reset the expected standard for rural development and provide more affordable homes in a rural environment.	See response to Comment 303.2	N
317.1	Wilson Consulting	9	Town centre first approach should be key, edge/out of town retail should not be allowed. Suggests incentives for existing retailers on high street.	At a strategic level, the Business Policies remain operational. The plan defines a town centre boundary for Douglas to allow greater flexibility and encouragement for town centre type uses and schemes. The plan does not in itself offer incentives but plays its part in the mix of policy incentives.	N
318.1	Wilson Consulting	BH013, GHIC Site 11 West Baldwin Village	Fields 324507 & 524324 should be included within the GHIC designation. The current boundary is too restrictive for new development. The southern boundary of the designation should extend to the West Baldwin sign. This would not affect the answers to the Identification Survey/the outcome of the SAF/Critical Constraints. A house on the north end of the site would not effect scale, landform or pattern of the landscape. Strong demand for houses in this type of location.	West Baldwin was one of two areas identified for further work in Res Prop 3. However the recommendations in terms of this project have been changed following the consultation. CO no longer intends to release additional land in the form of additional development in identified groups of houses in the countryside, through the Area Plan for the East. This issue needs to be dealt with at a strategic level and the work undertaken on groups as part of this plan reveals why this would be advantageous. Proposed Change: <i>Residential Proposal 3 is to be removed (see response to comment 303.2)</i>	N
319.1	Carnane Estates Limited	BH004, BH005, Carnane Hill	Future planning applications within this particular 30 acre enclosed hill top should be excluded from Landscape Proposal 6 due to the telecoms facilities' strategic need.	Comment is valid. CO agrees to make this explicit through the mapping and mentioned in Landscape Proposal 6. Proposed Change - Landscape Proposal 6 and Map change Include reference to telecoms	Y
322.1	Savage & Chadwick Architects	BH007	Objects to non-designation of site as residential. Natural infill site between Ballamillaghyn housing estate and cluster of houses on the A23 to the NW. Houses and agricultural buildings to the North of the site. Access to A23 is existing and requisite visibility splays were established by Hyder Consulting Engineers in 2000. Site should be considered as a GHIC. New houses would be an integrated part of the settlement of Mount Rule. Site is available now, not an isolated site in the countryside, could provide 25% affordable housing. BH007 is within the extent of the settlement envelope. The site has former residential status (mansion house grounds and gatehouse) though now designated Agricultural. Planning application PA94/1252: Inspector identified potential of the site for development of multiple houses. Braddan Plan review 2003- identified BH007 as suitable for residential development.	See final site assessment report for BH007. The work put in to the review of the Braddan Plan early in 2000s has no relevance. Previous planning history can often be relevant and material in decision making. However, the decision referred to was prior to the approval of the Strategic Plan. The Braddan Plan was abandoned and has not been integral to the development of the draft plan nor should it given it has no material weight. The recommendations in terms of the GHIC project have been changed following the consultation. CO no longer intends to release additional land in the form of additional development in identified groups of houses in the countryside, through the Area Plan for the East. This issue needs to be dealt with at a strategic level and the work undertaken on groups as part of this plan reveals why this would be advantageous. Mount Rule did not meet the criteria for a GHIC and Ballamillaghyn housing estate is just that. An area of housing, urban in nature which is somewhat isolated from the Strang which is the nearest settlement and which would be difficult to see as part of the roadside houses known as Mount Rule even if extended. <i>Residential Proposal 3 is to be removed (see response to comment 303.2)</i>	N

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323.1	Savage & Chadwick Architects o.b.o. Baccarat Ltd	BH031	Supports development of BH031, but plan has omitted parcel of land within overall site ownership west of Trollaby Lane, request it be included as offers highway connections- map included	Comments noted. Please see final site assessment report for BH031. Any agreed proposals to include BH001 should give consideration to the inclusion of this parcel as part of the wider allocation. <i>Proposed Change Map 8</i> <i>Insert original part of site alongside Trollaby Lane</i>	Y
324.1	Savage & Chadwick Architects o.b.o Mr D Moore	BH042	Representing site owner. Object that site has not been included in the Draft Plan. Do not believe housing on site should be classed as housing in the countryside as site is surrounded by developed land, has existing access and is screened by trees.	Please see final site assessment report for BH042.	N
329.1	Kaz Ryzner Associates	DH002	Provides a draft development brief for this site.	See final site assessment report for DH002. Development Briefs need to be discussed as part of the Inquiry Process.	N
331.1	Kaz Ryzner Associates o.b.o Hampton Court Settlement	BH014	Request to extend Group of Houses in the Countryside (Site 13) to included client's land. Client previously represented by Construction Design Limited.	The recommendations in terms of the GHIC project have been changed following the consultation. CO no longer intends to release additional land in the form of additional development in identified groups of houses in the countryside. This issue needs to be dealt with at a strategic level and the work undertaken on groups as part of this plan reveals why this would be advantageous. Residential Proposal 3 is to be removed (see response to comment 303.2)	N
338.1	Modus Architects	BH021	We refer to our previous submissions in respect of this site ie the Call for Sites Response Form (July 2016), and the attendant written statement dated 21/09/2016, as well as our subsequent submission in the form of the Preliminary Publicity Response Form (February 2017) and our comments in respect of Question 3 therein. Our position with regard to the site in question remains unchanged since these submissions were made, and we request that we be allocated time on the schedule for the Public Inquiry, so that we may make further representations in respect of this site.	Please see final site assessment report for BH021.	N
340.1	Dandara Group Holdings	1 & 2	It is indicated in the Draft Plan that Development Briefs will be prepared for proposed development sites where appropriate. It would have been helpful if these had been included within the Draft Plan for comment.	It is agreed that this was the intention and would have been helpful to all. However, this was not what occurred and the the Department has said publicly that it is the intention to ensure briefs are available for comment before the Inquiry and can be discussed at the Inquiry as necessary.	N
340.2	Dandara Group Holdings	12	A separate Residential Overview statement has been submitted as part of this response.	Noted.	N
340.3	Dandara Group Holdings	Evidence Papers	The table of Site Yield Calculation Assumptions provided by the Land Supply paper is helpful, but it would be more helpful still if the yield assumptions in respect of individual sites were to be provided.	The comments are noted and the Land Supply Paper has been updated to be as helpful as possible going into Inquiry.	N
340.4	Dandara Group Holdings	BH031	Site BH031 is partly owned by Dandara and would be available for development immediately. The site was originally allocated for Predominately Residential use in the 1982 Development Plan and the 2003 inquiry into the Modified Draft of the Braddan Local Plan recommended the site for designation as a residential Strategic Reserve as it would not cause serious visual impact. Large scale employment use at Nobles Hospital creates local demand for housing. New housing here will broaden the choice of housing within Union Mills and form a suitable extension to existing residential areas in Union Mills and Strang. There is also suitable provision for a new primary school on the site. Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. A new masterplan will address prevision issues such as landscape impact, coalescence of settlements and highway arrangements. There are no overriding highway constraints on the construction of 200 dwellings and development would be in accordance with the access policies of the Strategic Plan. The site boundary should be updated to include an extra parcel of land adjoining Peel Road on the western side of Trollaby Lane. This would enable anew highway connection between Peel and Mount Rule Road (and potentially to Strang Road via site BH032). A new connection would reduce vehicle use on Strang Road.	Please see final site assessment report for BH031. Any agreed proposals to include BH001 should give consideration to the inclusion of this parcel as part of the wider allocation. See response to comment 324.1.	N

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340.5	Dandara Group Holdings	BH032	<p>Site BH032 is owned by Dandara and would be available for development immediately. The 2003 inquiry into the Modified Draft of the Braddan Local Plan recommended the site for residential development and a school. The estimate yield of 100 given at the time of the inquiry was as a guide only and a high number of dwellings could be produced by a mix of densities. Large scale employment use at Nobles Hospital creates local demand for housing. It would represent a sustainable extension to and existing residential area. There is opportunity to provide significant open space onsite or on Dandara-owned adjacent land. Development of this site would allow for a new highway connection between Strang Road and Mount Rule Road and potentially to Peel Road via site BH031. This would improve access to Nobles hospital and reduce vehicle use on Strang Road.</p> <p>Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. A comprehensive masterplan would address previous issues such as landscape impact, coalescence of settlements and highway arrangements. There are no overriding highway constraints on the construction of 250 dwellings and development would be in accordance with the access policies of the Strategic Plan. Access and drainage is satisfactory. The Draft Area Plan has allocated this site as a Strategic Reserve (Residential). The site should be designated as Predominately Residential 'with immediate effect', including community facilities and a primary school if required. This is of greater significance given the issues identified at sites DBH002 and BH030 (outlined below).</p>	<p>The Department notes the availability of the site and the references to the previous development plan inquiry in 2003. The plan wasn't adopted or approved and therefore in planning terms carries no weight. The operational development plan is the 1991 Braddan Local Plan.</p> <p>The location of Nobles Hospital and references to it being a major employer are pertinent. The Hospital, which was approved by Order is in Braddan but adjoins the settlement boundary for Douglas (Main Centre) at its south eastern boundary and the settlement boundary for Strang (Village) at its western boundary. Both Strang and Union Mills straddle Strang Road although there is a wedge of green between them.</p> <p>The Draft Plan allocated this site as a Strategic Reserve. The Department acknowledges the suggestion that the site could include community facilities and a primary school if required alongside residential.</p> <p>Until such time as the full community infrastructure needs are fully known, CO considers that the site should remain as a Strategic Reserve but factored in in an master plan for BH031. Technically the release of a Strategic Reserve would not need to be approved by Tynwald but follow the procedure set out in the plan. Further information is set out in the final SAR for Site BH032 which should be read in conjunction with final SAR for BH031.</p>	N
340.6	Dandara Group Holdings	DBH002/BH030	<p>The Draft Area Plan allocates Sites DBH002 and BH030 for Residential Use. The Site Assessment Report for DBH002 highlights a number of areas of serious concern (which also have some relevance for site BH030). Bryan G Hall Consulting Civil and Transportation Planning Engineers' report (attached) considered that satisfactory access to the site is unlikely to be achievable without resulting in significant environmental impact (particularly in respect of the Registered Trees). Development of the site would not fit the scale, landform and pattern of the landscape, resulting in the partial loss of one or more key features. The landscape and visual appraisal report by Chantelle Shulz Landscape Planning and Design (attached) highlights that development of the site will result in the coalescence of the existing settlements of Tromode Woods and Braddan Hills as viewed from the South. The same report concludes that given the elevation of the northern aspects of the site, the Registered Trees will not screen views from the surrounding area and the impact upon visual amenity could not be easily mitigated through design and layout. Though the Site Assessment Report makes the assumption that the Registered Trees at the site boundary will be retained and provide screening, elsewhere in that Report it states that there is likely to be conflict between access proposals and the need to retain Registered Trees.</p>	<p>The Department notes the reports submitted on these 2 sites.</p> <p>Please see the final SAR reports for DBH002 and BH030. The Development Briefs for these sites will be critical in terms of how and when they are to be released for the level of development proposed. In terms of Active Travel there is a key link between Camlork and these sites in improving the public transport route into Douglas but it is accepted that it is important to get it any release done properly by looking at all the possible options which may not be immediately obvious.</p>	Potential
340.7	Dandara Group Holdings	BE010	<p>BE010 is owned by Dandara and would be available for development immediately. Previous development on the site has included a construction storage compound, industrial units and a recycling compound for construction waste. Part of the proposed site was considered for industrial allocation the 2003 Braddan Parish Plan process. The inspector for the Cooil Road Development Order in 2010 advised that no weight be applied to the Modified Draft Braddan Parish Plan on employment land requirements as no evidence suggested that these were properly investigated and considered. Fields 522517 and 552519 were considered during the Cooil Road Development Order process, but the inspector concluded that the isolated nature of the site would be unsuitable. As the site in question has now expanded this is no longer a concern. The Middle Farm site was put forward for released by Development Order in 2015 but was not selected. Development of this site would represent a sustainable extension to the existing employment area adjacent to the existing Douglas settlement boundary. The site is suitable for mixed employment development including business or technology park use and is close to the A5 corridor. There are no overriding highway constraints and development would be in accordance with the access policies of the Strategic Plan. Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. <i>As employment need in the lifetime of the Area Plan may not justify the allocation of the entire 38.65ha site, an area of 6.88ha on the western side should be allocated for Special Employment uses (specifically Waste Treatment and Recycling) and the remainder identified as a Strategic Reserve for employment uses.</i></p>	<p>The Department notes the availability of the site and the references to the previous development plan inquiry in 2003. The plan wasn't adopted or approved and therefore in planning terms carries no weight. The operational development plan is the 1991 Braddan Local Plan.</p> <p>The site was discussed as part of the Cooil Road Development Order 2010 Inquiry and noted in the Inspector's Report as being unsuitable because of its isolation. Dandara suggest that the comments of the Inspector are no longer a concern.</p> <p>CO notes that the difference between the BE010 site now and that promoted as part of the CRDO 2010 is....</p> <p>The Employment Land Development Order work 2016 ranked the site as out ofin the East. Sites taken forward from that project work werewhich were ranked.....</p> <p>CO notes the site's location between the EFW plant and the settlement boundary for Douglas and the fact that the site is in effect split into two byroad.....</p> <p>Given the employment land needs it is not deemed necessary to look for additional land given the general allocation at Cooil Road and the Strategic Reserve BE002 and BE006.</p> <p>See also the final SARs for these sites.</p>	N

Comment No.	Respondent	Paragraph / Site / Map	Representation/Comment	Recommended Cabinet Office (CO) response If specific change is suggested it is shown in <i>italics</i>	List in CO Schedule of Changes?
340.8	Dandara Group Holdings	BH033	The site is wholly owned by Dandara and meets the criteria set in Section 8.8 of the Strategic Plan regarding Groups of Houses in the Countryside. During the 2003 inquiry into the Modified Draft Braddan Parish Plan it was suggested that this site 'would consolidate development in the hamlet, not extending the hamlet any further northwards than is the existing built environment' and could accommodate 'up to around 20 dwellings'. During the inquiry this site was combined with two others to create a potential yield of 55 houses and this was considered unacceptable as Mount Rule had not been identified as a settlement. A lower number of dwellings (as few as 2) would address this concern. The site is enclosed by existing residential property on three sides and its development would be sensitively related to the existing settlement pattern and landscape. <i>Mount Rule should be identified as a suitable area for development and BH033 allocated for residential use.</i>	The Department notes the references to the previous development plan inquiry in 2003. The plan wasn't adopted or approved and therefore in planning terms carries no weight. The operational development plan is the 1991 Braddan Local Plan. In the preparation of the Draft Plan work was undertaken to look at potential Groups of Houses in the Countryside. Mount Rule did not make the final list of six which was measured on a set of criteria. In any case, CO now recommends that this is no longer dealt with as part of the Draft Plan but rather is dealt with at an Island-wide level. <i>Residential Proposal 3 is to be removed (see response to comment 303.2)</i>	N
340.9	Dandara Group Holdings	OH011	Site OH011 is owned by Dandara and would be available for development immediately. Development would represent a sustainable extension to an existing residential area and would be adjacent to the existing settlement boundary of Onchan. The site would provide a range of housing in Onchan at a scale appropriate to the settlement. Significant open space could be provided either within the defined site or on adjacent Dandara-owned land. During the Onchan Local Plan inquiry DLGE concluded that this site should be within a wider area of Open Space to prevent the future spread of development beyond the site and towards Ballacottier Road. Part of the site had previously been recommended for a Predominantly Residential zoning by the Onchan Local Plan inspector. In 2004 135 dwellings were refused at appeal on the same site due to the Open Space designation and not because development would result in significant harm towards landscape, highway or amenity interests. Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. A Master Plan will address issues such as landscape impact, drainage and highway arrangements, making use of at least one existing plot at Birch Hill Crescent. There are no overriding highway constraints and development would be in accordance with the access policies of the Strategic Plan.	Site OH011 was proposed for development as part of the Draft Plan. CO supports the need for a masterplan to properly think through all of the issues associated with developing the site. See also final SAR for this site.	N
340.10	Dandara Group Holdings	SH013	Site SH013 is owned by Dandara and would be available for development immediately. The site is within an area of white land on the 1982 Development Plan and within an Area of High Landscape or Coastal Value and Scenic Significance. Planning Circular 7/91 (no longer a material consideration) showed the site as within an area of Proposed Residential Use. Planning approval for 42 dwellings was refused in 2001 due to its designation, the suitability of the Clannagh Road/A5 junction and so as not to pre-empt an upcoming comprehensive assessment of area. The site is the only appropriate opportunity to meet local housing need in Newtown. Open Space would be provided within the defined site or on adjacent Dandara-owned land to the North. Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. There are no overriding highway constraints and development would be in accordance with the access policies of the Strategic Plan. The area is served by the public foul drainage system and surface water would be taken to a local watercourse. <i>Field 510455 should be included within the allocated development site in order to enable access improvements. A development brief could restrict use of this field for access improvements and Open Space.</i>	Site SH013 was proposed for development as part of the Draft Plan. In order that access can be secured, it is agreed that Field 510455 should be shown as land for future road improvements and landscaped open space only. Proposed Change: <i>Site SH013 are to be held back as Strategic Reserve.</i>	Y
340.11	Dandara Group Holdings	MH002	The Draft Area Plan proposes that this site remain as Open Space. The site is within an area of white land on the 1982 Development Plan and within an Area of High Landscape or Coastal Value and Scenic Significance. Dandara owns Site MH002 and it would be available for development immediately, in contrast to the other sites identified for residential development in Glen Vine which have not been the subject of Call for Sites response forms, resulting in uncertainty over ownership and deliverability. These sites are also limited in size and constrained by surrounding development. This site has the ability to be assessed and developed in isolation from surrounding land. A moderate scale of development on this site would provide a choice of housing in Glen Vine (including affordable and elderly) without having an undue impact upon existing infrastructure. This site is close to Marown Primary School which has scope to be extended if required. Development on the site will fit the scale, landform and pattern of the landscape with no significant adverse visual impact. Unlike surrounding land promoted by others and Strategic Reserve sites in Colby, this site can be accessed from the existing highway network without new connections to the TT course. Access to the site can be provided from King Orry Road and be maintained when the TT course is closed. The site is well located in relation to A1 bus services. Unlike developments in Crosby which have required temporary onsite treatment, dwellings on this site would be connected to the public foul sewer network and not require new or upgraded public treatment works. Part of the site was included within a site put forward by others (MH002 and MH015) MM002 who stated erroneously that they controlled the site.	The Draft Plan did not contain any specific sites for development. Sites were however identified in Crosby as it was felt that Crosby could more easily achieve a stronger sense of place and could be developed more as a village given the existing formal and informal play space, the pub and potential for further community facilities in the future. MH001 and MM001 in Crosby were both identified as Strategic Reserves. Marown School falls within the settlement boundary of Glen Vine but is separated from the significant area of housing to the north east of the school and over the A1 Primary Distributor Road and TT Course. Other than the school and the Church alongside the road, there are no other community facilities. The housing north of the A1, much of which is known as Ballagarey, is essentially a housing estate with a central area of open space which was designed as a retention pool for drainage purposes. In terms of Marown School's capacity, there are still issues about the capacity going forward and congestion around the school and further educational needs in this area generally. See also final SAR for these sites.	N

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340.12	Dandara Group Holdings	DM002/DH021/ DH022/DH019	<p>Previously developed sites at Lake Road (DM002) and Bridge Road (DH021) are wholly owned by Dandara. The 1998 Douglas Local Plan designated DM002 within an area of Predominantly Residential Use. DH021 was designated as Light Industrial Use in the Douglas Local Plan. Both sites are shown in the Draft Area Plan to be within Mixed Use Area 8a (MUA 8a) and Comprehensive Treatment Area 3. <i>Development briefs should be prepared for these sites which reflect their town centre location and allow for greater flexibility of use than currently proposed under Mixed Use Proposal 8a or the wording changed to reflect the expanded range of uses. Specific development briefs for these two sites would ensure that other parts of MUA 8a could retain the currently prescribed range of uses. Office uses should be identified as acceptable as MUA 8a is well located in relation to existing offices. In fact Mixed Use Proposal 8b suggests that office use may be appropriate in MUA 8b, despite the fact that this area is further from the town centre than MUA 8a. In addition, there is an extant consent in place to redevelop site DH021 with a new office building. A town centre site such as DM002 is suitable for a supermarket development, with the extent of comparison good floorspace controlled at the planning application stage following a Retail Impact Assessment. Peel Road/Circular Road (DH022) and South Quay (DH019) are partly owned by Dandara.</i></p> <p>DH022 is located in Mixed Use Area 4 and it is noted that residential uses will be considered acceptable outside of Athol Street. DH019 is located in Mixed Use Area 7 where residential uses will be acceptable. <i>In respect of this site DH019 it is over-prescriptive to restrict such use to first-floor level and above.</i></p>	<p>DM002 and DH021 are shown on the Draft Plan to be:</p> <ul style="list-style-type: none"> - within the town centre boundary - within a Comprehensive Treatment Area - within Mixed Use Area 8 a <p><i>The points raised in relation to the wording of the Mixed Use Proposals are helpful and these, as well as Map 5, have been re-examined with the comments in mind.</i></p> <p>Comments noted re Site DH022.</p> <p>In terms of DH019, and the comment that the residential uses at first floor only are too restrictive, the recommendation is to leave this bullet point as it is set out. The intention is to retain activity on the ground floor of premises on South Quay as much as possible.</p> <p>Any application to propose otherwise would have to be considered on its merits in the context of what is trying to be achieved by Chapter 9.</p>	Potential
340.13	Dandara Group Holdings	DH011	<p>Site DH011 is wholly owned by Dandara and capable of accommodating increased residential development to meet identified housing need. The site is within the settlement boundary of Douglas and located in Residential and Low Density Housing in Parkland (LDHP) designations. Of the four LDHP properties constructed as part of a 21 dwelling scheme on the site (PA/07/01917/) only 2 have been sold. As the site is largely enclosed by existing development, there is no justification that very low density housing is required to soften the boundary between the built environment and countryside. Development at low to medium density would be in keeping with adjacent residential areas. Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. There are no overriding highway constraints that would prevent the development of the site to provide some 50 dwellings and development would be in accordance with the access policies of the Strategic Plan. <i>This site should be allocated for development with low to medium density housing to address a broader element of housing demand and use the land more efficiently.</i></p>	<p>Site DH011 was proposed for residential development in the Draft Plan. It has not been shown as LDHP.</p> <p>The number of dwellings that might be appropriate needs to be assessed as part of a detailed planning application. It is accepted that there needs to be an optimum use of land.</p> <p>See also the final SAR for DH011; there will be the opportunity to discuss the development brief as part of the Inquiry process.</p>	N
340.14	Dandara Group Holdings	IOM Business Park	<p>The site is owned by Dandara would be available for development immediately. The site is currently zoned as Open Space (Agricultural) in the 1991 Braddan Local Plan. Part of the proposed site was considered for industrial allocation the 2003 Draft Modified Braddan Parish Plan process. The inspector for the Cooil Road Development Order in 2010 advised that no weight be applied to the Modified Draft Braddan Parish Plan on employment land requirements as no evidence suggested that these were properly investigated and considered.</p> <p>In 2015 the majority of the site was out forward as a potential site for release through a Development Order but was not selected. DED's Employment Land Review report identified that there is a need for additional employment land in the East. Other sites within Douglas and the East are largely unsuitable for business park type uses due to size, location and general environment. By providing location choice, this sight will help ensure that issues of commercial incompatibility are less likely to arise. The site would be capable of accommodating employment development to meet identified economic need and would represent a sustainable extension to the existing Isle of Man Business Park adjacent to the settlement boundary. It would make use of the existing infrastructure (including the adjacent service centre with its shop, pub, takeaway and children's nursery). Development on the site will fit the scale, landform and pattern of the landscape and impact on visual amenity would be mitigated by design and layout. The visual impact of development within field 524194 would be less easy to mitigate, but a successful relationship between business park and residential uses has already been established and this would be no different. There are no overriding highway constraints that would prevent the development of the site and development would be in accordance with the access policies of the Strategic Plan.</p>	<p>Is this referring to BE009? If so...</p> <p>The Department notes the availability of the site and the references to the previous development plan inquiry in 2003. The plan wasn't adopted or approved and therefore in planning terms carries no weight. The operational development plan is the 1991 Braddan Local Plan.</p> <p>The site was discussed as part of the Cooil Road Development Order 2010 Inquiry and did form part of the Employment Land Development Order work 2016 and the site was ranked at that time.</p> <p>CO notes the site's location adjacent to the settlement boundary for Douglas at its north western edge.</p> <p>Given the employment land needs it is not deemed necessary to look for additional land given the general allocation at Cooil Road and the Strategic Reserve BE002 and BE006.</p> <p>See also the final SAF Report for this site.</p>	N

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340.15	Dandara Group Holdings	BH017	Supports the designation of Quine's Hill as a Group of Houses in the Countryside with potential for development. The current boundary is too restrictive and it is proposed that the subject site (or at least a portion thereof) be included. The landowners request to be kept informed of further feasibility studies on the site.	In the preparation of the Draft Plan work was undertaken to look at potential Groups of Houses in the Countryside. Quine's Hill did make the final list of six which was measured on a set of criteria and went on to be referred to in Res Proposal 3 as being identified for a further feasibility work. However, CO now recommends that this is no longer dealt with as part of the Draft Plan but rather is dealt with at an Island-wide level. <i>Residential Proposal 3 is to be removed (see response to comment 303.2)</i>	N
342.1	Forest Homes	SH002	The site has been turned down during the initial enquiry, due to it being not within an existing settlement as defined during the course of the Preliminary Public Consultation. We would request that consideration be given to putting the site through for residential use due to: (1) Its positioning within an existing residual location with numerous other dwellings (2) On an arterial route, with frequent public transport (3) The availability of existing services in the area (4) The lack of an alternative use of the site which would be of economic benefit to the Isle of Man. The last point is of relevance, as it strikes the core of the purpose of the plan. Without the benefit of residential planning permission the site will simply not be used for anything, and the option to purchase the site cancelled.	The site would represent residential development in the countryside and the Department stands by its original assessment.	N
342.2	Forest Homes	BH015/BH019	The two sites are directly adjacent to one another on the northern side of Vicarage Road in Braddan. Given the striking similarities between the approved BM006 and the above two sites, one would request that BH015 and BH019 also be put forward as approved in the eastern plan. The two areas are less than half a mile apart in distance. There does not appear to be a material difference between the approved and unapproved sites, except for the existing residential use of BH015.	BH015 and BH019 already have some development and so the points raised seem to suggest that the sites could accommodate additional development? They are beyond the settlement boundary for Douglas and so simply remain as countryside. There is a separation between these and the site BM006 it is recommended that the sites remain as countryside. <i>See also final SAR for Sites BH015 and BH019.</i>	N
343.1	Delta Planning o.b.o Eden Park Developments	3- 3.4.3	Support the Draft Plan objective to support existing established employment areas and provide for a mix of additional employment land.	Support noted.	N
343.2	Delta Planning o.b.o Eden Park Developments	7 Transport Proposal 1/ Transport Proposal 2	Support delivery of the Active Travel strategy and integrated transport network which have informed the masterplan proposal for land south of Cooil Road (BE002)	Support noted.	N
343.3	Delta Planning o.b.o Eden Park Developments	7 Utilities Proposal 1-7 Telecommunications Proposal 1	Support. Proposals have informed proposal, with specific regard to the high pressure gas pipeline south of Cooil Road and associated public safety issues. Eden Park Developments has previously worked around this constraint when constructing the new roundabout and Jacksons Car Showroom.	Support noted.	N
343.4	Delta Planning o.b.o Eden Park Developments	8.3	General support. Plan should make clear that land adjoining existing settlements can also provide a sustainable option for growth, as recognised by current allocation of land. Reword criterion (ii) to state that development will be directed towards existing settlements or sustainable locations adjacent to the existing settlement boundary as identified in the Draft Plan. This would align with the Strategic Plan.	Noted but no change proposed at this time.	N
343.5	Delta Planning o.b.o Eden Park Developments	8.5	Eden Park Developments has received firm market enquiries for a variety of employment uses for its land at Cooil Road sufficient to accommodate some 9 ha (gross) of development. Concerned that the Employment Land Review (2015 and updated 2017) does not fully take into account employment land requirements. The GL Hearn Assessment (March 2018) and Addendum Report (April 2018) concluded that the ELR significantly underestimates the future demand for employment land on the island. The Assessment calculates that 16.56 ha minimum is needed for 2014-2026 (as compared to 8.43 ha in the ELR). Supply margin of five years (10.6 ha) recommended in order to provide market competition and flexibility. Total recommended employment land target of approximately 27 ha to 2026 (12.56 in para 8.5.9 of Draft Plan). Figure excludes land for supporting infrastructure and any zoning of land should take account of this. 40% of future employment demand is for offices and Draft Plan should make land available for offices in addition to industrial uses and logistics/distribution facilities. Considerable proportion of available office accommodation in Douglas is of poor quality and would be unviable to redevelop and there is little available elsewhere in the East.	Noted but no change proposed at this time.	N
344.1	GVA HOW Planning o.b.o Peel Energy	3	Agrees with economic vision Paragraph 3.4.3	Support noted.	N
344.2	GVA HOW Planning o.b.o Peel Energy	7	Supports Transport Proposals 1 and 2. Believe BE002 meets these proposals. Supports Utilities Proposals 1-7 and Telecommunications Proposal 1. Believe BE002 meets these proposals and has given specific regards to the high pressure gas pipeline south of Cooil Road.	Support noted.	N

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344.3	GVA HOW Planning o.b.o Peel Energy	8	<p>Support objectives for Employment land (Paragraph 8.3). Suggest that the wording of Paragraph 8.3 be reworded to make clear that land adjoining the existing settlements can also provide a sustainable option for growth- "development will be directed towards existing settlements or sustainable locations adjacent to the existing settlement boundary"</p> <p>Believes that the Employment Land Review undertaken by PBA on behalf of the Government in 2015 (updated 2017) significantly underestimates the future demand for employment land on the island.</p> <p>Eden Park commissioned GL Hearn to undertake further assessment the key results are as follows:</p> <p>There is a requirement of 16.56 ha of employment land for the East between the period of 2014-2026. A supply margin of 5 years (10.6 ha) is recommended in order to provide market competitions and flexibility. Total recommended employment land is approx. 27 ha to 2026. This excludes land required for supporting infrastructure etc.</p> <p>A considerable proportion of available accommodation in the town centre is of poor quality and there is a limited choice of accommodation elsewhere and a poor supply of available good quality industrial land in the East. The Plan should make land available for offices, industrial uses, logistics/distribution facilities.</p> <p>8.1- Supports zoning of land under Employment Proposal 3 and Strategic Reserve sites under Employment Proposal 4. But suggests zoning more land at Cooil Road (to the immediate south) and lists existing firm enquiries for the site.</p> <p>8.16- Additional criteria to release of Strategic Reserve sites (only released following review of ELR published by gov.) is contradictory to Employment Proposal 4 and is unreasonable and unnecessary. 8.16 should be removed from the plan.</p>	<p>Para 8.3 to remain as it is in the draft at this present time.</p> <p>No additional land to be allocated at the present time.</p> <p><i>It is agreed to review the wording of EP 4 and 8.16 given the comment.</i></p>	potential
344.4	GVA HOW Planning o.b.o Peel Energy	8	<p>Employment Proposal 1- welcomes this policy but should include uses falling within Class 5 (Light Industry and R&D).</p> <p>Employment Proposal 3- supports but requests additional 7.6ha gross added to zoning. Wording of proposal should include uses falling within Class 5 (Light Industry and R&D) and medical clinics included in list of acceptable uses. Delete requirement that development proposals would have to demonstrate that they could not reasonably and acceptably be accommodated on the sites set out under Employment Proposal 2 as this is too restricting.</p> <p>Employment Proposal 4- Error site sizes (BE002 part and BE006) Strategic Reserve= 28.9ha. Acceptable uses should also include Class 5 (Light Industrial and R&D). Supports the approach to the restriction on release of Strategic Reserve land.</p>	<p>It is agreed to review the wording of EP 1, 3 and 4 in terms of the merits of including Class 5.</p> <p>No other change to EP 3 at this time.</p> <p>EP 4 - Agree to review accuracy of site size and amend if necessary.</p>	potential
344.5	GVA HOW Planning o.b.o Peel Energy	9	Generally supports Town Centre Proposals 1-8 but concerned the policies do not sufficiently reflect the challenges retail and office sectors face in Douglas, the presumption in favour of residential redevelopment should also be included.	See 9.5.1 vii. Current consultation on Draft permitted development order on allowing greater flexibility in some areas for conversion to residential.	N
344.6	GVA HOW Planning o.b.o Peel Energy	Evidence Papers	Employment Land Review significantly underestimates the future demand for employment land on the island.	Noted.	N
344.7	GVA HOW Planning o.b.o Peel Energy	BE002	Supports BE002 zoning within Employment Proposal 3 and reserve land status Employment Proposal 4 but considers additional 7.6ha gross be included. It has early phases of built development and key infrastructure, single ownership, fully funded, and deliverable.	Noted but no change proposed at this time.	N
348.1	Ballafayle Management Ltd	6	Keen to see Brownfield development ahead of final plan publication.	Comments noted. The Report on the development of unoccupied urban sites is due to be submitted to Tynwald in June 2019. Where appropriate the plan will take the Report into account.	N
348.2	Ballafayle Management Ltd	12	Supports size of family plots at Willaston	This comment seems to be supporting the general development of more housing in Willaston for families.	N
349.1	Public comment - initials H.C.	9	Douglas is dying: stores closing, empty derelict bank sites, relocating and closing businesses on Athol Street, boarded up hotels, Castle Mona, Imperial Hotel etc. Regeneration before buildings outwards.	Comments noted. The Report on the development of unoccupied urban sites is due to be submitted to Tynwald in June 2019. Where appropriate the plan will take the Report into account.	N
349.2	Public comment - initials H.C.	11	School playing fields are being replaced with housing.	The Strategic Plan Policy on the protection of recreational space remains in operation. The draft plan does not propose to build on any school playing fields.	N
349.3	Public comment - initials H.C.	DM001	Objection. Represents a creeping invasion of the greenbelt by home developers.	Objection noted. Please see final SAF Report for this site.	N
349.4	Public comment - initials H.C.	OH011	Objection. Access will require demolition of 60 and 64 Birch Hill Crescent. By law access should be from an A road, not a B road such as Birch Hill Crescent. Existing issue with rush hour traffic Hilberry Road/ Signpost Corner, Main Road. Increase of traffic on a residential 'B' road. Buses cannot run on Birchill Crescent during bad weather due to incline. Two storey dwellings will domination skyline in predominately one storey area. Low water pressure an issue at top of Birch Hill Crescent- investment of installing water, gas, sewage and electric services up a hill. New school in Onchan would be needed to cater for this and other Draft Plan developments.	Objection noted. Please see final SAF Report for this site.	N

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349.5	Public comment - initials H.C.	CTAs	Plan does not adequately explain what these are.	Comments noted and some minor changes have been made to this section.	N
350.1	Monarch Estates Ltd	12	Registration of interest in Draft Plan, specifically land at Stuggadoo	Noted. Details have been added to the correspondence list.	N
351.1	Pegasus Group/McGarrigle Architects o.b.o. Clucas	BE025	<p>Object to the exclusions of land to the west of Tromode Industrial Estate for employment. The site is a brownfield land previously used for employment with a historical planning application with approval in principle to develop for industrial use.</p> <p>The Site Assessment concluded "Development of this site, where this did not result in the loss or damage of any existing trees may result in the proper management of the trees and also may present the opportunity for the creation of part of a much longer footpath link from Cronkbourne Village through the Castleward land to Sir George's Bridge and to East Baldwin" This is still relevant and is supported.</p> <p>There is a strong demand for new and high quality employment premises projected. The site represents a logical extension to the adjacent industrial estate which can be successfully incorporated into the local landscape.</p> <p>Disagree with the Site Assessment Report (November 2016) findings and therefore objects to the decision to exclude the site.</p> <p>A lack of employment land identified (Economic Benefits Report provided). Opportunities to allocate and develop 'new' previously developed brownfield locations such as this should not be overlooked. The site would provide substantial economic benefits.</p> <p>The proposed development (subject to suitable floor risk mitigation measures) will be safe for its lifetime without increasing risk of flooding elsewhere, and where possible, will reduce flood risk overall. (Flood Risk Assessment provided).</p> <p>The proposed development has appropriate mitigation measures to account for Trees on the site (Tree Feasibility Assessment provided), confining proposed development to the vacant/cleared area, offering replanting along the river edge, and formal management of retained woodland.</p> <p>BE025 site size is 2.5ha, proposes contribution to employment supply as 0.8ha leaving 1.7ha retained/managed woodland.</p>	<p>Cabinet office changes no change to the allocation of the site at this present time.</p> <p>However, CO would like more time to consider the evidence submitted and to seek advice from other Government Departments.</p> <p>CO recommends that the most appropriate place to discuss the merits of the evidence is via the public inquiry stage.</p>	Potential
352.1	Bramhall Park Investments Ltd	BH001	Objects to site not being included in plan. Proposed development is small scale . A planning application directly opposite this site was approved. Developers prepared to provide aesthetically pleasing housing that meets social and affordable requirements.	Objection noted. Please see final SAF Report for this site.	N
354.1	Isle of Man Enterprises	2	A lot of us have found keeping track of site codes, lists and differing maps quite convoluted. It has taken a lot of time and reviewing detail to build an adequate picture of what is proposed. The format as a whole would benefit from simplification, or at least the inclusion of a detailed summary. The summary should come first and outline the total numbers of each site type, the total physical areas of these and how many proposals have been knocked back since the previous stage. This would better give an overview of the scale without having the delve into detailed lists and scour multiple plans every time.	<p>The comments are helpful. The explanations and supporting information have been re-examined. Original site numbers are being retained throughout the stages until the Final Plan. This was in order to find 'tracking back' easier.</p> <p>An expanded 'All Sites List' has been produced.</p>	N
354.2	Isle of Man Enterprises	CTA 4 – Peel Road	IOME own and operate a Warehouse and light industrial facility on Pulrose Road, adjacent to the proposed CTA on Peel Road, opposite the Power Station. We feel given the proposed future designation of this area, our site and those adjacent would also benefit from inclusion within CTA 4 as a location of established Warehousing, light industrial and bulk goods retail.	<p>It is not clear whether the comment is seeking the area referred to on Pulrose Road to be included in CTA 4 or Mixed Use Proposal 8 a or b? Or indeed to be included within the town centre boundary?</p> <p>The Department accepts that it is sometimes difficult to decide the line of a boundary but for the time is content that the town centre boundary should remain as in the draft plan.</p>	N
354.3	Isle of Man Enterprises	DM013	IOME is largely in agreement with the latest site assessment and conclusions drawn in relation to DM013. We would reiterate our previous comments relating to point DC9. We are unaware of any evidence put forward to suggest that any adjacent sites are of potential conservation interest, and therefore suggest the green category would be more applicable in this instance.	<p>CO does not fully appreciate the context of this comment at this stage.</p> <p>See the final SAF report for Site DM013 on Victoria Road, Douglas.</p>	N

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354.4	Isle of Man Enterprises	DH048	In particular the surface drainage in this area is already over capacity. Since the construction of the housing on Linden grove, the issues of aging under specified drains has only been compounded. It is essential further development in this area needs to account for this, both in terms of site design i.e. permeable surfaces and water recycling, but also the costs of any improved drainage should be passed onto the developer in question.	The planning application on the former Glenside site (site DH048 in this plan) has now been approved.	N
354.5	Isle of Man Enterprises	DH009	This includes DH011 and DH057. There is extensive zoning proposed for housing in this area, and the first main concern is the lack of current drainage and the capacity of the drainage where it does exist. The site is on a reasonable gradient and covers a substantial area. Suitable drainage to include soakaways and attenuation should be considered. We are aware of previous plans for drainage for the sites DH009 and DH011 to run through the existing Castleward Green housing site. Drainage from these site should preferably run west down the gradient and not interfere with the existing housing.	Of course, all aspects of drainage will need to be addressed. Comments of the MUA will be taken into account in the allocation of sites and any development briefs.	N
354.6	Isle of Man Enterprises	DH003	There is an area to be included adjacent to DH003. Looking at site DH003 on Ballanard Road, there is a white strip of Land adjacent, between the existing settlement boundary and this site. This Land is linked with the adjacent house named Antillas and should either be included within the existing settlement boundary or the Strategic Reserve.	The Department agrees to review the strip of land referred to and update the position through any proposed map amendments.	Potential
354.7	Isle of Man Enterprises	Site Rear of Victoria Road Shoprite	The Land to the rear of Victoria road Shoprite has been represented as a combination of predominantly residential and open space. The open space designation is inaccurate and the predominantly residential designation should be extended to include the north and western boundaries of the site.	The Department agrees to review the land area to the rear of Shoprite, Victoria Road and update the position through any proposed map amendments.	Potential
355.1	Peter Brett Associates o.b.o Allprop Ltd	1	'Draft existing settlement boundaries' as a tool for evaluation of land use allocations is seriously flawed, this prevents further consideration of the planning merits of a proposals. <ul style="list-style-type: none"> • They have not been subject to public consultation. • They have no basis in the Strategic Plan which states that settlement boundaries will be defined in the Area Plans • They have not been adopted by COMIN or Onchan Commissioners and should have no material weight in the planning making process • There are significant inconsistencies regarding inclusion or exclusion of particular sites with reference to draft settlement boundaries (highlighted in preliminary publicity response). Settlement boundaries should only manifest at the point of the Draft Plan publication after proposals have been assessed using more appropriate planning considerations, then an appropriate settlement boundary can be established encapsulating the planned and appraised extent of the settlement. The draft settlement boundaries should have been disregarded earlier in the process and suggest they are reconsidered now. Concerns regarding site assessments, sites should be assessed on basis of potential environmental effects and alterations to adopted policy. The sequential approach to the site assessments is flawed.	CO does not agree that the method for identifying the draft existing settlement boundaries is seriously flawed. There has consistently been an openness about this and the background explained whether this basis was an extant plan, site visits or both.	N
355.2	Peter Brett Associates o.b.o Allprop Ltd	OH009	Site specific- Howstrake (OH009)- does not agree with the failure of Critical Constraint 2 (CCQ2) in site assessment regarding scale of development. Rationale behind failure does not correctly assess the detail of the proposal and resulted in failure of correct further assessment. The site is on previously developed land with the potential to improve the landscape setting but was not given full assessment. A full assessment of the merits of all site proposals should have occurred and believe the Department should do so before the Public Inquiry and that Howstrake should be included in the proposed housing allocation for the area plan.	CO does not agree with this view.	N

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356.1	WYG o.b.o. Isle of Man Development Company	5	<p>We support Environmental Policy 1 and its aim to protect the countryside and its ecology. We agree that development which would adversely affect the countryside should not be permitted unless there is an overriding national need in land use planning terms which outweighs the requirement to protect the countryside and for which there is no reasonable and acceptable alternative.</p> <p>In accordance with the aims of Environmental Policy 1, we consider that the Draft Area Plan for the East should only allocate land for employment development which is currently in the open countryside in exceptional circumstances (i.e. where there is an overriding national need and no reasonable and acceptable alternatives). We consider that land should only be released from the open countryside for employment development to meet a clear and objectively assessed need which has been identified for the plan period. We consider that it would go against the objective of Environment Policy 1 for any more land to be released from the open countryside (via the allocation of employment land) than is required to meet the employment land needs of the East Area during the plan period. We do have concerns that more land is allocated in the Draft Area Plan for the East than is required to meet the employment needs of the plan area. We provide further detail in this regards in relation to Sites BE002 and BE006. In addition, in order for land to be released from the open countryside for employment development it must be ensured that there are no sequentially preferable alternative sites within the development boundary, urban areas or existing allocated sites which could accommodate the required need.</p>	<p>The Department is also aware of the Business Policies in the Strategic Plan:</p> <p>Business Policy 1: The growth of employment opportunities throughout the Island will be encouraged provided that development proposals accord with the policies of this Plan.</p> <p>Business Policy 2: Land for industrial development should be designated in all parts of the Island, having regard to:</p> <ul style="list-style-type: none"> (a) scale, which should be appropriate to the area; (b) the availability of public transport links; (c) the proximity of labour; and (d) the availability of water, sewerage and other utilities <p>A number of studies have been undertaken in recent years to establish employment land needs across the Island.</p> <p>Pertinent to mention are the Employment Land Review and the Update 2017 which was prepared alongside work to establish the merits of preparing a Development Order to release new employment land in the East. A draft Development Order was never prepared at the end of this work as the background work was subsumed within the Area Plan for the East.</p>	N
356.1	cont...	5	<p>In order to assist applicants in the submission of planning applications and the local planning authority in the determination of planning applications, we recommend that a definition of 'overriding national need' should be provided in the Area Plan for the East. The Strategic Plan does not provide a definition of overriding national need, and accordingly, the term is open to interpretation. We consider that by providing a definition in the Area Plan for the East of overriding national need, the term and its application will be less ambiguous, and it can be applied in a consistent manner. We consider that it would be beneficial for the Area Plan for the East to provide examples of scenarios where a development would meet the test of 'overriding national need'. This would assist applicants in understanding the tests that would need to be satisfied for a planning application to be approved which would adversely affect the countryside on the basis that there is an overriding national need in land use planning terms which outweighs the requirement to protect the countryside.</p>	<p>In terms of overriding national need, CO does not support introducing a definition through this Area Plan. If it considered appropriate then it should be done at an Island-wide scale.</p> <p>The term can be interpreted using the knowledge of previous decisions and proper assessment, using this knowledge and taking account of the merits of the proposal/scheme within the existing policy framework.</p>	N
356.2	WYG o.b.o. Isle of Man Development Company	8	<p>Draft Employment Proposal 1</p> <p>In relation to Draft Employment Proposal 1, we support the inclusion of 'retail' as a use that will be supported where industrial land is to be redeveloped, subject to compliance with Strategic Plan Business Policy 5.</p> <p>Over the last 30 years at Spring Valley Trading Estate, which is owned and managed by the Isle of Man Development Company (IoMDC), there has been a decrease in demand for general industrial and manufacturing uses, and an increase in demand for trade and bulky goods retail uses. This demonstrates that it is necessary for retail uses to be supported (in certain circumstances) within industrial areas in order to provide adequate flexibility to respond to the market. There is currently a mix of operators present at the Spring Valley Estate with approximately half of units comprising employment uses and half trade/bulky goods retail units. The inclusion of 'retail' as a use which will be supported where industrial land is to be redeveloped, subject to Strategic Plan Business Policy 5, provides adequate flexibility to meet the likely future demand within the estate, and to facilitate the reuse and redevelopment of redundant and outdated land and properties. These trade and bulky goods retail uses, which often require large floorplates which are unlikely to be available in town centre locations, act to complement the town centre offer, rather than compete with it.</p> <p>Draft Employment Proposal 3 Draft Employment Proposal 3 clearly states in relation to the site South of Cooil Road/Kewaigue (Site ID BE002) that:</p> <p>'Notwithstanding Strategic Plan Business Policy 5, retail development (including bulky goods) will not be supported.' We agree that the policy should clearly prescribe that retail development will not be accepted at this location.</p>	<p>Support for Employment Proposal 1 is noted.</p> <p>In terms of Spring Valley, it is recognised that this area falls between the settlement boundaries of Douglas and Union Mills. The comments on the characteristics of the estate are noted and understood.</p> <p><i>It would be helpful from a general mapping point of view to consider showing this area as purple to represent industrial land.</i></p> <p>Comments noted on Employment Proposal 3.</p> <p>The commentator suggests additional text at EP3:</p> <p>Given the work undertaken on employment land and the availability of sites, the Department is content that the Proposal is adequate as drafted and proposes no changes at this time.</p>	Potential

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356.3	WYG o.b.o. Isle of Man Development Company	8	We would recommend in addition to this that the policy states 'or elsewhere within the settlement boundary, existing urban areas and previously developed land'. The Strategic Plan clearly directs new development to locations within the settlement boundary, existing urban areas and previously developed land in the first instance. Accordingly, we consider that Draft Employment Proposal 3 should be clear in stating that the development of this site for Manufacturing, Warehousing and Distribution and Office uses will only be permitted where no sequentially preferable sites i.e. within the settlement boundary, are available and suitable for the proposed use, and the other criteria of this policy are met.	CO makes no change to EP 3 to reflect this comment at the present time but will review given the text in 8.10.3.	Potential
356.4	WYG o.b.o. Isle of Man Development Company	8	Paragraph 8.10.3 of the Draft Area Plan for the East states that: 'In light of the Strategic Plan policies on protecting the countryside, the proposals seek to promote the development of those sites within Existing Settlement Boundaries first. The reason being, as a potential intrusion into the countryside in the form of an urban extension, it is only justified because of the need identified in the Employment Land Review (which does not include Retail). The use of land in the urban extension for employment land is therefore restricted to 'core' uses.' We agree with the text provided at paragraph 8.10.3 that the development of the site South of Cooil Road/Kewaigue (Site ID BE002) for retail use would be wholly unjustified. The Strategic Plan clearly seeks to protect the open countryside and specifies that development will only be permitted in the open countryside in exceptional circumstances, with these circumstances being where there is an overriding national need in land use planning terms and for which there is no reasonable and acceptable alternative. There is absolutely no evidence to justify the release of open countryside for retail uses, and there are reasonable and acceptable alternative locations within the settlement boundary where retail uses could be accommodated. Accordingly, we are in strong agreement that Employment Proposal 3 should clearly set out that retail uses will not be permitted on the site South of Cooil Road/Kewaigue (Site ID BE002). Draft Employment Proposal 3 sets out four criteria which proposals for manufacturing, warehousing and distribution and office developments must adhere to if they are to be supported on Site BE002. We note that the third bullet point states: 'that the development could not reasonably and acceptably be accommodated on the sites set out under Employment Proposal 2.'	Comments are noted.	N
356.5	WYG o.b.o. Isle of Man Development Company	8	Draft Employment Proposal 4 The introductory text to Draft Employment Proposal 4 states at paragraph 8.11.1 in relation to the identified Strategic Reserve Site for Industrial Use (Site ID BE002 part/BE006) that: 'It is not envisaged that these sites will be required during the plan period and proposals are set out which would restrict their development ahead of other sites. However, they provide flexibility and the potential to accommodate development beyond the plan period.' As we set out in further detail in relation to Site ID BE002 part/BE006, we have concerns with regards to the allocation of a site for employment use which is not required to meet identified needs during the plan period. Indeed, we consider that The Cabinet Office may have overestimated the amount of employment land required to meet the needs of the East Area. We consider in accordance with the ethos of the Strategic Plan that land should only be released from the open countryside where there is an overriding national need and no reasonable and acceptable alternatives. It is clearly stated within the Draft Area Plan for the East at paragraph 8.11.1 that it is not envisaged that the site will be required during the plan period. On this basis, there cannot be an overriding national need for this site in the open countryside to be allocated as an industrial site, even if this is on a 'reserve' basis. In addition, we consider that the use of the term 'flexibility' at paragraph 8.11.1 could be misleading, as this implies that these reserve sites provide a choice or wider range of industrial site options for developers. It suggests that the Strategic Reserve Site could potentially be developed as an alternative to sites within the settlement boundary or sites allocated for industrial purposes. We would therefore recommend the word 'flexibility' is removed from this paragraph.	The commentor suggests additional text at EP 4 and confirmation that retail will not be acceptable. CO considers the latter comment is already included in the Proposal. The comments suggests generally that the Strategic Reserve at BE002 and BE006 is not required. That the need for employment land has been overestimated, that the term 'flexibility' is inappropriate and that developers will, as a result, believe the SR is a simply an alternative to bring forward at any time. Given the work undertaken on employment land and the availability of sites, the Department is content that the Proposal is adequate as drafted and proposes no changes at this time in addition to those already committed to in this document.	N

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356.6	WYG o.b.o. Isle of Man Development Company	8	<p>In accordance with our views relating to Draft Employment Proposal 3, we support the inclusion of wording within the policy to make it clear that retail development on the Strategic Reserve Site will not be supported. The Strategic Plan clearly seeks to protect the open countryside and specifies that development will only be permitted in the open countryside in exceptional circumstances, with these circumstances being where there is an overriding national need in land use planning terms and for which there is no reasonable and acceptable alternative. There is absolutely no evidence to justify the release of open countryside for retail uses, and there are reasonable and acceptable alternative locations where retail uses could be accommodated. Accordingly, we are in strong agreement that Employment Proposal 4 should clearly set out that retail uses will not be permitted on the Strategic Reserve Site (Site ID BE002 part/BE006).</p> <p>The policy also sets out four criteria which proposals for manufacturing, warehousing and distribution and office developments must adhere to if they are to be supported on Site BE002 part/BE006. We note that the third bullet point states: 'that the development could not reasonably and acceptably be accommodated on the sites set out under Employment Proposal 2 or 3.'</p> <p>We would recommend in addition to this that the policy states 'or elsewhere within the settlement boundary, existing urban areas and previously developed land'. The Strategic Plan clearly directs new development to locations within the settlement boundary, existing urban areas and previously developed land in the first instance. Accordingly, we consider that Draft Employment Proposal 4 should be clear in stating that the development of this site for Manufacturing, Warehousing and Distribution and Office uses will only be permitted where no sequentially preferable sites i.e. within the settlement boundary, are available and suitable for the proposed use, and the other criteria of this policy are met.</p>	Noted. No changes proposed.	N
356.7	WYG o.b.o. Isle of Man Development Company	9	<p>Draft Business Policy 5</p> <p>We support Draft Business Policy 5 in relation to its aim to set out the exceptions where retail development will be permitted on land zoned for industrial use. The policy recognises that certain retail uses, in particular bulky goods retail warehousing, provides an offer which complements rather than competes with town centre locations. Such operators typically require large plate floorspace at a low cost, which is unlikely to be available in town centres. The situation at Spring Valley Trading Estate, where there is a mix of industrial uses and trade and bulky goods retailing uses, demonstrates that certain retailing uses can work well on land zoned for industrial use and can complement not compete with the town centre offer.</p> <p>For the avoidance of doubt, we recommend that Draft Business Policy 5 makes clear that land zoned for industrial use does not include those sites identified by Draft Employment Proposal 3 and 4.</p>	<p>CO is uncertain which Proposal is being referred to. However, it is content that Employment Proposals 3 and 4 are specific enough and no changes are necessary.</p> <p>Business Policy 5 is in the Strategic Plan.</p>	N

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356.8	WYG o.b.o. Isle of Man Development Company	BE002	<p>Site BE002 (Land South of Cooil Road) is located outside the settlement boundary for Douglas. However, the Strategic Plan is clear that new development should be directed to locations within the settlement boundary, existing urban areas and previously developed land in the first instance. Therefore, to justify the release of open countryside for employment development (which would essentially be the case if Site BE002 is to be allocated for industrial use), the Strategic Plan is clear that there will be a requirement to demonstrate an overriding national need for employment land together with a thorough assessment of potential alternative sites. Only if an overriding national need for employment land exists, and no reasonable and acceptable alternative to development in the open countryside is found, does this then constitute the exceptional circumstances required by Strategic Policy 2 for the release of open countryside for development.</p> <p>Section 8.5 of the Draft Area Plan for the East sets out the broad employment land requirements for the plan period. These requirements are based on the evidence provided by the Employment Land Review (ELR) which was published in 2015 (with a corrected version published in 2017). The ELR sets out three scenarios as to how the national employment land requirement could be distributed across the four Area Plan areas. The Draft Area Plan for the East proposes to use Scenario 1 for the Area Plan, which assumes that 75% of trend take up is within the geographical area covered by the Area Plan for the East. Using Distribution Scenario 1, applying the central growth rates, adding a 50% choice and churn factor and discounting sites which have been developed since 2014, the Area Plan seeks to allocate sufficient land to meet a residual target of 9.77 hectares. When considering potential sites to meet this need, the Cabinet Office has applied a discount to the gross area of sites to take account of areas which would be required for green infrastructure. A further discount is applied on the basis that not all allocated sites will be taken up and as sites may not be fully built out during the plan period.</p> <p>Taking into account the above assumptions, the Draft Area Plan for the East allocates a total of 13.42 hectares of land for industrial use via the sites identified by Employment Proposal 2.</p>	<p>The need for employment land - i.e. the figure presented in previous studies excluded the technology park element so this was always going to be extra. Given the difficulties in the past of having land available which has undergone proper assessment, it is sensible to look at the evidence available now and plan for the future release of sites which may of course be on a phased basis.</p> <p>This provides the opportunity to masterplan, design in necessary infrastructure and provide confidence that there is a defined focus for new land in the East.</p>	N
356.9	WYG o.b.o. Isle of Man Development Company	BE002	<p>We consider the approach taken by the Cabinet Office within the Draft Plan exaggerates the amount of employment land required for allocation. The multiple discounts which are applied to allow for choice and churn, site infrastructure and sites not coming forward, and the exclusion of the technology park and strategic reserve site, has resulted in a larger number of sites being identified than we consider necessary to meet the identified need.</p> <p>Indeed, as we set out in our representation to the Area Plan for the East – Preliminary Publicity Consultation, experience at Spring Valley Trading Estate does not reflect the forecast employment land requirements identified in the ELR. Spring Valley Trading Estate is a large and well established trading estate located off Cooil Road, which provides one of the Island's premier locations for manufacturing and industrial uses. However, voids within the estate have increased substantially in recent years, despite the IoMDC continuing to actively manage and invest in the estate. These vacancies reflect a wider dilution of demand for industrial premises on the Island due to further industrial and mixed use estates opening. The IoMDC would expect Spring Valley Trading Estate to be full if significant pressure for new industrial premises existed on the Island. As we set out in our previous response to the Preliminary Publicity Consultation, given the disparity between the forecast employment land requirements identified by the ELR and the current situation at Spring Valley Trading Estate, we recommend that a commercial agency based assessment of future employment land requirements in undertaken based on current and future demand.</p>	<p>The Department does not believe it has over exaggerated the amount of land required for employment purposes.</p> <p>There is always a balance to be made in terms of establishing what land is available. Questions asked are often: How is it used? Is it suitable to meet demand? What problems are being experienced? How can these be tackled? Is there a need beyond that available, taking into account the size and distribution of those vacant or underused sites?</p> <p>If additional data is available for Spring Valley now, it may be helpful to provide this to the Inquiry ahead of any further independent assessments being undertaken.</p> <p>In any case, being clear about the acceptable uses on BE002 and 6 in the future may help in the resurgence of interest in established sites and there is no restriction on land owners to look again at what business needs are and how can the current estates improve and provide facilities in line with demand.</p>	N
356.10	WYG o.b.o. Isle of Man Development Company	BE002	<p>We are particularly concerned that the release of an excessive amount of land in the open countryside for employment use could undermine existing employment areas which are located in more sustainable locations within the development boundary and urban areas. Released sites will compete with established employment locations to attract investment from the pool of operators wishing to invest in the Island. A surplus employment land supply would therefore dilute and potentially displace town centre investment, or investment in established employment areas and in allocated sites within the settlement boundary, 'cannibalising' employment uses from these more sustainable locations to released open countryside.</p> <p>In addition, the release of more land for employment use than is required could lead to pressure for alternatives to be developed on this land (e.g. retail, residential or food and drink). Once sites in the open countryside are released, if the intended employment use is not forthcoming there will be pressure for the sites to come forward for other purposes. This has already occurred at Eden Business Park where land was released from the open countryside on the basis of an overriding national need for high tech light industrial uses, only for the development to ultimately be occupied by retail and other uses.</p>	Comments noted.	N

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356.10	cont...		In summary, we have concerns with regard to the release of Site BE002 (Land South of Cooil Road) from the open countryside and its allocation for employment uses, as we have reservations with regards to the method which has been used to establish the employment land requirement for the East Area and the method used to establish the size of sites required to meet this need. As we have explained, at Spring Valley Trading Estate a decline in demand for industrial and manufacturing uses has been witnessed in recent years, with increasing voids occurring at the estate despite active management and investment. We are concerned that by over-estimating the amount of employment land that is required during that plan period that further land will be released from the open countryside than is required (which is against the policies of the Strategic Plan), investment could be displaced from town centres and established employment areas within the settlement boundary to sites in the open countryside and if the intended employment development is not forthcoming on the released sites (which is likely if there is an oversupply) there will be pressure for sites to come forward for other purposes e.g. retail and food and drink.	Comments noted.	N
356.11	WYG o.b.o. Isle of Man Development Company	BE002/BE006	In relation to Site BE002/BE006 (Land South of Cooil Road and North of New Castletown Road, Douglas), the Draft Area Plan for the East clearly states at paragraph 8.11.1 that: 'Some sites have been identified as Strategic Sites. It is not envisaged that these sites will be required during the plan period and proposals are set out which would restrict their development ahead of other sites. However, they provide flexibility and the potential to accommodate development beyond the plan period. As a result, 100% of the available capacity has been discounted in meeting the demand identified previously in this chapter.' We do not consider it to be appropriate to include sites within the Area Plan for the East, particularly sites which would result in the release of open countryside, which are not required to meet an identified need and which are not envisaged to be developed during the plan period. The plan period for the Area Plan for the East extends to 2026. We assume that monitoring will take place throughout the plan period to establish the take up of land and that the employment land requirements will also be reviewed and updated. Accordingly, we consider it would be more appropriate for a review of the Area Plan for the East to take place should any further employment land be required during the plan period, and at that time the most suitable site, and scale of site, could be selected to meet that requirement. A substantial amount of change may occur in the next eight years leading to 2026, and therefore it seems more appropriate for an assessment of further potential employment sites to be undertaken when (and if) required in the future, rather than identifying a site on a speculative basis at this stage.	Comments are similar to those raised above. No changes proposed.	N
356.12	WYG o.b.o. Isle of Man Development Company	BE002/BE006	As we have explained in relation to Site BE002 (Land South of Cooil Road), to justify the release of open countryside for employment development (which would essentially be the case if Site BE002/BE006 is to be allocated as a strategic reserve site for industrial use), the Strategic Plan is clear that there will be a requirement to demonstrate an overriding national need for employment land together with a thorough assessment of potential alternative sites. Only if an overriding national need for employment land exists, and no reasonable and acceptable alternative to development in the open countryside is found, does this then constitute the exceptional circumstances required by Strategic Policy 2 for the release of open countryside for development. As the Cabinet Office have set out at paragraph 8.11.1 of the Draft Area Plan for the East, there is no requirement for the land identified at Site BE002/BE006 to come forward for employment development during the plan period, therefore, there cannot be an overriding national need. Accordingly, the land should not be allocated for industrial use, even if on a reserve basis. As set out in relation to Site BE002, Section 8.5 of the Draft Area Plan for the East identifies the broad employment land requirements for the plan period. These requirements are based on the evidence provided by the Employment Land Review (ELR) which was published in 2015 (with a corrected version published in 2017). The ELR sets out three scenarios as to how the national employment land requirement could be distributed across the four Area Plan areas. The Draft Area Plan for the East proposes to use Scenario 1 for the Area Plan, which assumes that 75% of trend take up is within the geographical area covered by the Area Plan for the East. Using Distribution Scenario 1, applying the central growth rates, adding a 50% choice and churn factor and discounting sites which have been developed since 2014, the Area Plan seeks to allocate sufficient land to meet a residual target of 9.77 hectares. When considering potential sites to meet this need, the Cabinet Office has applied a discount to the gross area of sites to take account of areas which would be required for green infrastructure. A further discount is applied on the basis that not all allocated sites will be taken up and as sites may not be fully built out during the plan period.	Comments noted.	N

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356.13	WYG o.b.o. Isle of Man Development Company	BE002/BE006	<p>Taking into account the above assumptions, the Draft Area Plan for the East allocates a total of 13.42 hectares of land for industrial use via the sites identified by Employment Proposal 2 and 3, as well as Table 9 which includes existing employment sites with potential capacity. This figure of 13.42 hectares of allocated industrial land does not include the 29.12 hectares of land identified as a Strategic Reserve – Industrial Land (Site ID BE002 part/BE006), or the 4.25 hectares of land identified for the delivery of a technology park at Sangster's Field. If these two sites are also taken into account, 46.79 hectares of employment land is identified by the Draft Plan.</p> <p>We consider the approach taken by the Cabinet Office within the Draft Plan exaggerates the amount of employment land required for allocation. The multiple discounts which are applied to allow for choice and churn, site infrastructure and sites not coming forward and the exclusion of the technology park and strategic reserve site, has resulted in a larger number of sites being identified than we consider necessary to meet the identified need.</p> <p>Indeed, we consider the allocation of a 29.12 hectare site as a strategic reserve site for industrial use to be excessive. The site provides nearly three times the site area of the employment land residual target for the east of 9.77 hectares identified in the East Area Plan. It seems illogical that if 9.77 hectares of employment land is required during the plan period (up to 2026), that 29.12 hectares of land needs to be available in reserve for further employment development. This is particularly pertinent given the emphasis of the Strategic Plan in ensuring that land is not released from the open countryside unless there is an overriding national need, and no reasonable and acceptable alternative sites. It is clear that there is no overriding national need to release (even if on a reserve basis) approximately three times the Area Plan employment land requirement for further employment development.</p>	Comments are noted and if CO has anything else to add it will issue an update on the points raised in the entire submission.	N
356.14	WYG o.b.o. Isle of Man Development Company	BE002/BE006	<p>Indeed, as we set out in our representation to the Area Plan for the East – Preliminary Publicity Consultation, experience at Spring Valley Trading Estate does not reflect the forecast employment land requirements identified in the ELR. Spring Valley Trading Estate is a large and well established trading estate located off Cooil Road, which provides one of the Island's premier locations for manufacturing and industrial uses. However, voids within the estate have increased substantially in recent years, despite the IoMDC continuing to actively manage and invest in the estate. These vacancies reflect a wider dilution of demand for industrial premises on the Island due to further industrial and mixed use estates opening. The IoMDC would expect Spring Valley Trading Estate to be full if significant pressure for new industrial premises existed on the Island. As we set out in our previous response, given the disparity between the forecast employment land requirements identified by the ELR and the current situation at Spring Valley Trading Estate, we recommend that an agency based assessment of future employment land requirements in undertaken.</p> <p>Given our concerns with regards to the forecasted employment land requirements identified by the ELR and contained within the Draft Area Plan for the East, it is even more concerning that a further 29.12 hectares of open countryside is earmarked for release by the draft plan.</p> <p>We are particularly concerned that the release of an excessive amount of land in the open countryside for employment use could undermine existing employment areas which are located in more sustainable locations within the development boundary and urban areas. Released sites will compete with established employment locations to attract investment from the pool of operators wishing to invest in the Island. A surplus employment land supply would therefore dilute and potentially displace town centre investment, or investment in established employment areas and in allocated sites within the settlement boundary, cannibalising employment uses from these more sustainable locations to released open countryside.</p> <p><i>In addition, the release of more land for employment use than is required could lead to the</i></p>	See above	N

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356.15	WYG o.b.o. Isle of Man Development Company	BE002/BE006	In summary, we have concerns with regards to the release of Site BE002/BE006 (Land South of Cooil Road and North of New Castletown Road, Douglas) from the open countryside and its allocation as a strategic reserve industrial site. The Cabinet Office acknowledge in the Draft Area Plan for the East that the site is not envisaged to be required during the plan period, and in addition the land encompassed by the strategic reserve allocation extends to 29.12 hectares, which is approximately three times the amount of employment land identified as being required during the plan period. Notwithstanding this, we also have reservations with regards to the method which has been used to establish the employment land requirement for the East Area and the method used to establish the size of sites required to meet this need. As we have explained, at Spring Valley Trading Estate a decline in demand for industrial and manufacturing uses has been witnessed in recent years, with increasing voids occurring at the estate despite active management and investment. We are concerned that by over-estimating the amount of employment land that is required during that plan period that further land will be released from the open countryside than is required (which is against the policies of the Strategic Plan), investment could be displaced from town centres and established employment areas within the settlement boundary to sites in the open countryside and if the intended employment development is not forthcoming on the released sites (which is likely if there is an oversupply) there will be pressure for sites to come forward for other purposes e.g. retail and food and drink. In light of our concerns that the employment land requirement for the East Area has likely been overestimated by the ELR and Draft Area Plan, it is furthermore concerning that an additional 29.12 hectares of employment land is earmarked for release from the open countryside through the allocation of Site BE002/BE006. This clearly does not comply with the aims of the Strategic Plan for land to only be released from the open countryside where there is an overriding national need, and no reasonable and acceptable alternatives are available.	See above. Comments noted.	N
356.16	WYG o.b.o. Isle of Man Development Company	BM004	Site BM004 (Spring Valley Trading Estate, Cooil Road, Braddan) is allocated as industrial land in the Draft Area Plan for the East. As we set out in our previous representations to the Preliminary Publicity Consultation, we consider that a mixed use allocation would be more appropriate for the Spring Valley Trading Estate in recognition of the existing uses present at the site and to provide adequate flexibility to respond to the market. The estate is owned and managed by the Isle of Man Development Company (IoMDC) and encompasses a mix of employment and retail uses, including storage and distribution, industrial uses, offices, manufacturing, trade and bulky goods retailing. Over the last 30 years a shift in occupiers has been witnessed on the estate, with the demand from industrial and manufacturing uses declining, and the demand from trade and bulky goods retailers increasing. In addition, in recent years voids within the estate have increased. The Isle of Man Employment Land Review (ELR), published in June 2015, identified 24,800 sq.ft of vacant floorspace across five units. By May 2017, 65,100 sq.ft of vacant floorspace was identified, comprising 21,300 sq.ft of floorspace available to let and 43,800 sq.ft proposed for redevelopment. The vacancies on the estate reflect the wider dilution of demand for industrial premises on the Island as a result of a number of new industrial and mixed use estates having opened on the Island.	The employment land data has not been independently updated since 2017. It may be helpful to the Inquiry for the commentator to provide a further update on the availability of premises/land on the Spring Valley Trading Estate. It may also be helpful to expand on the new and mixed use estates opening which are being referred to as being a direct influence on the occupation of Spring Valley. Spring Valley itself is on the main freight route and close to Douglas. It is accepted that types of use have changed over the years but that doesn't mean that there is justification to change to Mixed Use. Even if it did, uses would most likely be restricted. An industrial zoning and the different uses it would allow are considered the best zoning for this area. <i>Consideration is being given to relevant maps showing this area as purple in colour to reflect 'industrial'.</i>	Potential
356.17	WYG o.b.o. Isle of Man Development Company	BM004	In its current form the estate is home to a broad mix of employment uses, including bulky and trade retail uses. The mix of uses is recognized in the Cabinet Office draft site assessment for site BM004 which supported the Area Plan for the East: Preliminary Publicity Main Consultation Document, which identified that the site is in use for retail and employment uses, with around half the total floorspace occupied by retail uses. Trade and retail operators present on the estate include B&Q, Pets at Home, Currys/PC World, MotaWorld, Agrimark and Howdens Joinery. The grant of planning permission for these types of bulky and trade retail uses on the estate recognises the operational requirements of these types of businesses as well as the complementary nature of bulky goods retail warehousing to town centre retail offer. Bulky goods retail warehousing requires large floorplates which are not typically found in town centres and provides a complementary offer to, rather than competing with the town centre offer. In accordance with the existing mixed use offer which is available at the Spring Valley Estate, we consider that there is no reasonable prospect of the site returning to wholly industrial use, indeed there is not the demand from such uses. Accordingly, we consider that a mixed use allocation at the site would be reasonable and justified. Such an allocation would provide the flexibility needed to ensure the continued use and successful management of the estate.	The area to the north east of Cooil Road which contains B & Q and Pets at Home, Currys etc. is allocated for Industrial. If and when applications are made for bulky good retailers these can be assessed on their merits at the time of application. A Mixed Use designation is not appropriate here or at Spring Valley. Even if it was, any development briefs are likely to be restrictive and allow no more than an industrial allocation anyway.	N

Comment No.	Respondent	Paragraph / Site / Map	Representation/Comment	Recommended Cabinet Office (CO) response If specific change is suggested it is shown in <i>italics</i>	List in CO Schedule of Changes?
357.1	International Centre for Technology	8.12	In conflict with the covenants and rights contained in the Deed of Conveyances of the Nunnery and the Centre's portion of Sangster's Field. Requires rewording.	The Department agrees to review this section in light of the comments.	Potential
357.2	International Centre for Technology	8 Employment Proposal 5	In conflict with the covenants and rights contained in the Deed of Conveyances of the Nunnery and the Centre's portion of Sangster's Field. Requires rewording.	The Department agrees to review this section in light of the comments.	Potential
358.1	Bastion Investments Ltd	OH004	Site should changed from Strategic Reserve and be designated for residential (150 properties). Congestion could be eased by introducing a one-way system onto School Road. Opportunities exist for improved access: widening road at the entrance to Little Mill up to Ashley Road or redevelopment of land behind the Triumph Factory (Government-owned). Also allow Onchan and Ashley Hill schools to amalgamate. Site benefits from open location, secluded position, shielding by mature trees, natural drainage. Ashley Hill School currently undersubscribed and would benefit from housing on this site. Supported by Rob Callister MHK.	The Department notes the comments but also the issues at hand such as the future plans for Ashley Hill School and Onchan School, the future of the factory site and the access to all 3 as well as the surrounding properties. This area needs to be looked at as a whole, otherwise opportunities will be missed. It would be premature to bring additional housing land forward ahead of anything else.	N
359.1	McGarrigle Architects o.b.o Craig Ross Ltd	MH027 (previously MH001)	Site meets criteria outlined in Evidence Paper 4 and should be reconsidered as a Group of Houses in the Countryside. Site suitable for Low Density Housing in Parkland type or a mixture of affordable and larger family homes.	The draft plan recognised Braaid as a Group of Houses in the Countryside but did not recommend further study. The recommendations on the development of such groups has changed in that it is no longer proposed to be undertaken as part of this Area Plan but on an Island wide basis as a separate project outside of the Area Plan for the East process. <i>Proposed change to Res Prop 3 captured elsewhere. It is proposed to be removed.</i>	potential
360.1	SES Satellite Leasing Ltd	4.7.12	Yes, on 4.7.12 Douglas Head (D12): The current "Carnane" site with the visible towers of Arqiva and the DHA also comprises the SES Isle of Man teleport. Today the area is EXCLUSIVELY ZONED FOR RADIO TRANSMISSION. This area is strategic for the Island's telecommunication and broadband services and is subject to further investment plans from the private sector, making it become a 'telecommunications hub'. The topography of the elevated hill top position above Douglas makes the site being without alternative for several 'tower based' telecommunication services. Similar SES has invested several millions into the Carnane teleport. In order to reach a globally competitive scale of the operation, our company needs to be able to expand the teleport site and we need planning certainty for our telecommunication infrastructure investments. The unobstructed views from the satellite earth stations (parabolic antenna dishes) at Carnane make the site physically ideal. Also, in our island wide site assessment, Carnane turned out to be ideal to hide the teleport facility as much as possible - unlike the visually intrusive Carnane towers (or the other large telecom sites of Creg-ny-Baa and Foxdale which are visually very exposed) - from views of the most scenic nearby sites: Douglas Promenade, Douglas Marina, Marine Drive.	Proposed Change agreed to reflection of the Carnane site on the relevant maps and inclusion of appropriate supporting text if needed. See response to comment 360.2.	N
360.2	SES Satellite Leasing Ltd		SES fully supports the principles of the draft area plan to conserve the Island's landscape. But we also need to secure strategic sites for telecommunications. Rightly larger telecommunications infrastructures had been pooled in a few specific areas exclusively zoned for 'radio transmission'. Those industrial areas with their antennas and towers have already created visual impacts, like the massive structures of the Carnane towers disturbing the hill skyline. Hence the addition of a few, smaller antennas, towers or buildings doesn't matter and should not be subject those restrictions as laid out, creating a climate of planning and investment uncertainty. -> SES recommends to keep the exclusive zoning for 'radio transmission' of the Carnane site to the Carnane site -> SES rejects the draft text in 4.7.12 for Douglas Head in its overly restrictive application to the Carnane site -> SES suggests to explicitly create a section for the industrially used Carnane site (and other exclusively zoned radio transmission sites) with only minor planning and building restrictions.	<i>The Constraints Map (1c) identifies the site as a community service site. It is accepted that the mapping reference could be improved for this site and potentially others.</i> <i>Additional text to be added at section 7.13 with reference to Carnane in the first instance.</i> Section 4.7.12 in terms of the Landscape Character Area D12 is taken from the Landscape Character Assessment Report. The Strategies and Key Views information for all of the 'Areas' are extracts from this Report. <i>The Department agrees to review Landscape Proposal 6 in terms of appropriate reference to the radio transmission site at Carnane.</i> A draft Permitted Development Order on Telecommunications has recently been published via the consultation hub.	Y
361.1	Powerwheels	10	Biosphere principles to be maintained	Comments noted	N

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362.1	Island Road Transport Association	1 & 2	With the introduction of the Road Transport Regulations 2018 and the requirement for Certificates of Lawfulness or planning consent for HGV operators centres and the impact this will have on current hauliers who have been in the haulage industry for many years if not generations and who do not have these requirements there does not appear to be any provisions for areas which will allow for HGV operators centres.	It seems that a key matter is to ensure such facilities are in the right location and quite possibly have very specific requirements for each Haulier firm. It would not be appropriate for the plan to set aside land for such uses particularly as CO does not know the precise details of what is required and where. It may be better to reassure the Association and businesses that such uses will generally be acceptable on land zoned for industrial purposes or at existing businesses on their merits. CO would be interested to know what the specific requirements in the East are so the matter can be further considered.	N
362.2	Island Road Transport Association	1 & 2	There seems to be no provision for garages or storage for Haulage Operations other than Warehouse Operations.	It would help the Inquiry if further details could be provided on 'Haulage Operations'.	N
362.3	Island Road Transport Association	7	again there seems to no provision for the Haulage Industry other than Warehouse/Distribution operations	It would help the Inquiry if further details could be provided on what the Haulage Industry requires.	N
362.4	Island Road Transport Association	8	No provision for Haulage Operations other than Warehouse/Distribution could see the closing down of operations thereby putting people out of work	It would help the Inquiry if further details could be provided on what the Haulage Industry requires.	N
362.5	Island Road Transport Association	Evidence Papers	Not comprehensive enough	Update Papers and additional Evidence Papers have been prepared.	N
362.6	Island Road Transport Association	DP	Since Government has introduced the Road Transport Regulations 2018, there is now a requirement for Haulage Contractors to have an approved Operating Centre. If the current site used does not carry the correct Planning Approval, or Certificate of Lawful Use, other sites are not available within these Plans, How can these Business 's continue without the required sites from which to operate?? What is there proposed to mitigate the probable loss of earnings/jobs???	See response to Comment 366.1.	N
363.1	Premier HGV	1 & 2	There seems to be a lack of industrial land for parking which is ideal for growing smaller businesses until they can afford premises. This would surely benefit new businesses and family run businesses in particular	CO is unsure what is being asked for in this comment.	N
363.2	Premier HGV	4	Why does we need to build on green areas like camlork when there are other sites available... Can the infrastructure cope around TT and MGP in particular?	The draft plan did carry out research and evidence gathering before its publication. The supporting evidence papers summarise the work that was undertaken. The draft plan was prepared in line with the Strategic Plan and the proposals and land release reflect that. Put simply, there was evidence that insufficient land was available on existing sites and that some greenfield land was required. The recommended changes to the draft plan going forward by CO followed by the Inquiry process will determine the balance between brownfield and greenfield development is about right or that more or less land needs to be identified and the manner in which it is identified.	N
363.3	Premier HGV	7	You need to make more land available for affordable parking of HGV vehicles for rental as well as purchase of land. Remember that no trucks=no goods on shelves!	It would help the Inquiry if this was further explained.	N
363.4	Premier HGV	8	As a company that teaches people to drive HGVs , i feel that we will be strangled out of existence by new legislation re the operators licence especially as there does not appear to be any areas zoned AND available for affordable parking. There are lot of people running small businesses in the same boat as us who are blissfully unaware of the operators licence and its implications and if the planning isn't in place in time there will be mayhem and the IOM govt will be putting people of out business.	CO accepts this is a serious and complicated issue and welcomes comments highlighting the new legislation and the issues as seen by the operators. Is the issue Island wide? Is it mainly an issue in the East? Details of any specific requirements would help in debate going forward.	N
363.5	Premier HGV	12	Again, develop what you have already zoned... The plan for the future	Comments noted.	N
363.6	Premier HGV	DP	There needs to be HGV parking available for small businesses	Noted - addressed in above comments.	N
364.1	AQL/Bluewave	7	Cannot support anything which impinges on the build out of existing telecoms land at Carnane.	See response to Comment 364.1	N
366.1	Ellis Brown Architects	12	Proposed sites within Union Mills, Strang and Tromode/Douglas as indicated on Draft Proposals Maps 4 and 8 do not accord with Strategic Policy 3 of the Strategic Plan RE maintaining village character. The green gap should be maintained and the entire sites of BH031 and DBH002 should not be included in the Final Plan.	Please see final SAF Reports for these sites.	N
366.2	Ellis Brown Architects	Development briefs	Absence of development briefs has made it difficult to comment on site zoning proposals.	Criticism acknowledged. The best place for discussion is now part of the Inquiry process and CO believes there is merit in doing this in any case but experience of the Area Plan for the South.	N

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366.3	Ellis Brown Architects	12	The general allocation sites approach with no differentiation gives no guidance on how residential choice of location, type and size is to be met. This does not correspond with 3.4.4: "A broader choice of homes will provide the flexibility needed for individuals and families to remain on or be attracted to the Island".	No changes are proposed at this point.	N
366.4	Ellis Brown Architects	12.1.1	No guidance is given on how the needs of an ageing population are to be met or on preferred locations within the identified residential zoning sites. Nursing Homes, Residential Care Homes and sheltered housing should be segregated from the general residential zoning ("general allocation sites") to ensure that this policy is given due attention and consideration.	CO recognises the importance of this issue but considers that there is no need to segregate land at this time but saying that, evidence from DHSC is always important in making judgements on this matter of likelihood of specific needs such as extra-care nursing homes etc.	N
366.5	Ellis Brown Architects	12	Little opportunity for individual development of one-off houses which may be larger houses on larger plots.	Noted.	N
366.6	Ellis Brown Architects	12	The LDHP designation should be reconsidered- either have it or do not. If it is retained there should be a form of addendum/policy statement/planning guidance note for clarity. Alternatively, remove the designation, consider the sites for housing are attach a development brief defining acceptable density.	The comments are valid and indeed there is an absence in the Strategic Plan of guidance on this allocation. The situation, as it was in the South Plan is to retain the designations in rural areas but consider changing to predominately res where appropriate in urban areas/inside the settlement boundaries.	N
366.7	Ellis Brown Architects	12	The Groups of Houses in the Countryside are too restrictive. Quines Hill and West Baldwin are more akin to villages or hamlets.	The recommendations in terms of the GHIC project have been changed following the consultation. CO no longer intends to release additional land in the form of additional development in identified groups of houses in the countryside. Res Prop 3 is to be removed as set out in the Schedule of Proposed Changes.	N
366.8	Ellis Brown Architects	Maps	Apparent gaps in the zoning of land e.g. Map 11 (Newtown)- apparent sites on the roadside frontage between two zoned residential areas. These sites should be included in the logical zoning to avoid future planning conflicts should the circumstances of the landowner or ownership of the land change. The Final Plan should consider forming logical boundaries and should not leave unidentified areas within boundaries, for zoning for development purposes.	CO agrees to review all of the Maps and will report back relevant inconsistencies to the public inquiry.	Potential
366.9	Ellis Brown Architects	Maps	There appears to be a disconnect between Draft Proposals Map 11 and the Environmental Constraints Map. SH013 is lies within an Area of Ecological Importance. Any areas lying inside the Draft AEI should be excluded in line with a precautionary approach.	SH013 is now proposed as a Strategic Reserve but comments are noted. See response to comment 366.8.	N
366.10	Ellis Brown Architects	Scenario Testing	A further scenario coming 2 and 3 would provide an integrated approach to providing sites for employment and housing provision. This could be achieved by development to the west and south of Douglas, creating sustainable communities in the settlements in these locations and avoiding the need for travel through the already congested Jubilee Oak and Quarterbridge Roundabouts, making more of the Cooil Road roundabout to the South Quay route into Douglas.	This is an interesting point and merit for development as an idea in any future plans.	N
366.11	Ellis Brown Architects	DH008	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.12	Ellis Brown Architects	SH003	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.13	Ellis Brown Architects	SH015	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.14	Ellis Brown Architects	SH010	This site could be considered for residential zoning.	Please see final SAF Report for this site.	N
366.15	Ellis Brown Architects	GH039	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.16	Ellis Brown Architects	SH003	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.17	Ellis Brown Architects	DH008	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.18	Ellis Brown Architects	BH022	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.19	Ellis Brown Architects	GH032	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N
366.20	Ellis Brown Architects	MM002	This site should be included in the Plan a further representation has been included.	Please see final SAF Report for this site.	N

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366.21	Ellis Brown Architects	MM001	Part site should be included in the Plan with the remainder as a Strategic Reserve site and a further representation has been included.	Please see final SAF Report for this site.	N
368.1	Chapman & Co Chartered Surveyors	9	The vitality of the town centre is crucial to the economy, attracting new business and growing the working population. Government should do everything possible to maintain footfall in Strand Street. Rejecting out of town retail planning applications and encouraging town centre residential, office and car parking development are key.	Comments are noted.	N

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401.1	Building Conservation Forum	3	Recent census and other indicators suggest that there is less actual growth in demand than suggested. Long term trends suggest a more complex range of demands for different housing types.	An update to EP DP 5 has been produced which addresses the issues raised by the 2016 Census. CO notes that demographic and other changes will affect the range of housing types required in the future but judges that sufficient flexibility has been built into the Plan to deliver this.	N
401.2	Building Conservation Forum	6	Substantial amount of existing housing stock available but underused. More emphasis on sustainability, maintenance, refurbishment and reuse of existing housing. Imaginative conversion of other types of building stock to housing where appropriate.	CO recognises that there are vacant residential properties in the East and around the Island as a whole. There are a number of reasons for units being vacant including homes that are in the process of being sold. The housing market relies on this type of vacancy. There is a renewed policy drive to identify and encourage bringing back into use empty properties which have been unoccupied for some time and this includes greater flexibility in urban centres to develop residential units on upper floors through new permitted development legislation (work ongoing on this legislation).	N
401.3	Building Conservation Forum	6	Baldrine, Agneash and particularly Douglas Head are worthy of designation of Conservation Areas	Comment noted. Further work is intended on Conservation Areas outwith the Area Plan for the East programme.	N
401.4	Building Conservation Forum	6	Welcomes sensible approach to 'sense of place' and carefully managed infill to encourage sustainable communities. Requires careful characterisation study to take account of heritage assets in established settlements. Current registration system does not recognise 'group' significance in a townscape.	Comment noted. CO is committed to working closely with our colleagues at DEFA and members of the Island's various heritage bodies to ensure that assets and their setting are fully recognised.	N
401.5	Building Conservation Forum	4	Key views and skylining. How does the Plan identify and protect views of landscape which might fall outside the boundary of development areas?	The Draft Plan utilises the framework provided by the Landscape Character Assessment Report to convey how key views and skylines factor into development planning. In the course of identifying sites for development, CO has taken into account the cumulative impact of development on landscape views, which includes areas falling outside development boundaries.	N
401.6	Building Conservation Forum	4	Concerns re. general appearance of prime gateways to the Island: industrial zone, gas and fuel storage at Douglas harbour in contrast with Douglas Head.	Concerns are noted. It is important to ensure that design aspirations for Douglas harbour are balanced against safety measures and the functionality of the industrial zone and gas and fuel storage. The draft Plan recognises the Harbours Strategy (DOI) as a key strategic document for this area.	N
401.7	Building Conservation Forum	6	Registered building records in the Plan area should be refreshed so that these are at a standard for proper assessment.	Comment noted. DEFA has responsibility for maintaining and updating the registered building record for the Island and CO will work closely with DEFA to ensure that up to date information is included in the final Plan and relevant development briefs.	N

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401.8	Building Conservation Forum	6	Concern that level of resources available within government for assessment and consideration for registration may not be sufficient to provide the information the Plan needs now or further in the process. Significant backlog needs to be addressed.	Concern noted. Building registration is a statutory duty of DEFA but there are close links between CO and DEFA on the matters of conservation.	N
401.9	Building Conservation Forum	6	As demolition does not currently need planning consent we are concerned that some important structures may be at risk.	This issue is outside the scope of the Plan but CO recognises that all policy approaches that affect 'at-risk' heritage assets must be carefully considered.	N
401.10	Building Conservation Forum	12	Clarification needed on policies for Low Density Housing in Parkland.	The comments are valid and indeed there is an absence in the Strategic Plan of guidance on this allocation. The situation, as it was in the South Plan is to retain the designations in rural areas but consider changing to predominately res where appropriate in urban areas/inside the settlement boundaries.	N
401.11	Building Conservation Forum	11	Plan should encourage groups and individuals to submit 'non-development' proposals for new amenity or open space.	CO has launched the Call for Sites for the North and West but will take this comment into account going forward, ahead of the Preliminary Publicity Stage.	N
401.12	Building Conservation Forum	6	Issue of curtilage needs to be urgently addressed either within the Plan or as part of the Town and Country Planning Act review.	As it seems that this comment relates to the issue of the curtilages for Registered Buildings, this responsibility falls within the remit of DEFA.	N
401.13	Building Conservation Forum	2	Further work is needed on landscapes, buildings and sites (such as Ballakilmartin) which are not included in the plan. This is a statutory function and more emphasis should fall onto the voluntary sector.	CO would welcome further working with the Building Conservation Forum. Care needs to be taken to ensuring the East Plan is the most appropriate document to discuss specific properties in detail. Registered Buildings fall under the remit of DEFA but the Plan can make appropriate references if there is reason to do so.	N
401.14	Building Conservation Forum	6	Some of the public criticism of development in the towns and countryside is because of poor standards of design and a lack of imagination. The Forum is concerned that the Island is vulnerable to the construction of low quality suburban housing. Many new developments have used inappropriate materials in ways "foreign" to the Island vernacular. We would welcome initiatives to raise public and professional awareness further.	CO agrees fully with the assertion that more professional and public awareness is needed on what constitutes "good design" in the Island context. The draft Plan highlights the need for a general uplift in design standards across the Island (paragraph 6.4). <i>What else is gov doing? DEFA</i>	N
404.1	Manx National Heritage	2.4.1	The policy to constrain greenfield development is a commendable aspiration, but its achievement may come at a cost. The recent political focus on brownfield and gap-site development is not a total panacea for the preservation of green fields, and runs the risk of creating an urban wasteland devoid of character, rhythm, variety, greenery and wildlife, with inevitably poor consequences for quality of life for residents. Indeed there is a risk of negative impacts in terms of the conservation of historic urban areas. We believe it is vital that this new focus on urban development is undertaken hand in hand with: high quality and imaginative design; varied density; opportunities for soft green open space; habitat preservation – and creation – to encourage urban wildlife.	An update paper on 'Unoccupied Urban Sites' is on the Tynwald agenda for June 2019. CO believes that the Draft Plan contains proposals designed to counteract these potential issues, in particular 5.3 Objective ii (on Green Infrastructure) 6.64 (on housing development), Urban Environment Proposal 2 (on public realm) and 6.4 Desired Outcome ii (on uplift in design quality).	N

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404.2	Manx National Heritage	2.8.1	We suggest that "when decision makers make a decision" could be simplified to "when a decision is made".	This section will be reworded to reflect the suggestion. Proposed change 2.8.1 <i>when a decision is made</i>	Y
404.3	Manx National Heritage	2.9.1	We note that parts of the Plan are written as if development briefs have already been prepared, whereas in reality they have yet to be finalised and published. There are currently several specific statements of issues that will be considered (e.g. 4.4.1 landscape assessment; 5.14.2 tree surveys and landscaping proposals; 7.11.1 traffic modelling), and a more general outline of the criteria which may be assessed in drawing up an application. We had expected that environmental constraints would be more precisely listed and tailored to individual sites. Instead, none of the Employment Proposals and none of the Residential Proposals make any reference to a process of environmental evaluation in arriving at a position "that the proposal will not have any unacceptable environmental impacts (including any significant landscape impacts)". Only within the narrative subsequent to the Residential Proposals – and not in the Proposals themselves – are some of the criteria listed that might be considered, in paragraph 12.20.2 (the first sentence of which is missing at least one word). It is therefore difficult to have confidence that a robust assessment process is intended for evaluating, quantifying, reducing and mitigating the environmental impacts of individual development proposals.	CO notes MNH's concerns regarding the process of environmental evaluation. It is recommended that the Development (or Planning Briefs as sometimes referred to in planning documents) are dealt with as part of the Inquiry Process. Potentially this could be dealt with at a series of 'round table' discussions with agreement by the Inspector. This would be CO's recommendation in the absence of it being able to ensure the final drafting, publication of proofs, time for comment and review, before the opening of the Inquiry. CO will proceed with the intention on working up such draft Development Briefs ahead of the Inquiry.	Potential
404.4	Manx National Heritage	3.4.5	Development in areas within which archaeological remains survive may result in those remains being preserved as open space: by this means, cultural assets will become every bit as much part of the 'green infrastructure' as wildlife habitats. We would wish to see the diversity of cultural heritage acknowledged in planning policy, particularly those assets which do not sit comfortably within the current definition of 'built heritage' which is more narrowly identified within planning legislation and policies as buildings.	CO recognises that there is a need to broaden the definitions of cultural heritage assets within the planning process in order to encompass buildings lying outside urban settings and archaeological remains to ensure that these features receive adequate protection. While these features may be situated within areas of green infrastructure they cannot be securely included within in this definition.	N

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404.5	Manx National Heritage	3.4.7	Further to our previous remark, the explanation of the vision for 'green infrastructure' as here defined persists in being narrowly focussed on ecology and the natural environment (in effect as the opposite of the built urban environment). Biosphere IOM, by contrast, reflects our cultural heritage, as do aspects of agricultural policy (eg the Agricultural Development Scheme), so it would seem appropriate for planning policy to take a more informed view of cultural heritage and include it within the narrative relating to the green environment.	<p>See also response to Comment 102.5 (DEFA) which identifies what CO understands GI to mean.</p> <p>Of interest is the definition of Green Infrastructure from the European Commission (2013 - full ref): "a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services. It incorporates green spaces (or blue if aquatic ecosystems are concerned) and other physical features in terrestrial (including coastal) and marine areas. On land, GI is present in rural and urban settings."</p> <p>While the central focus is on ecology and the natural environment CO is also concerned with the interactions of GI with cultural heritage and the built environment.</p>	N
404.6	Manx National Heritage	4.1.1	We must insist that 'landscape', by most internationally-accepted definitions, is not simply a synonym for 'scenery'. Landscape is the product of thousands of years of past human activities, and by its nature reflects, and often represents, an area's distinctive cultural heritage. The Isle of Man is recognised as having an unusually well-preserved and distinctive landscape, and in seeking to preserve, enhance, and value it, we should be acknowledging its cultural value at every opportunity, and particularly within planning policy.	<p>CO supports the following change:</p> <p><i>4.1.1 - first sentence.</i></p> <p><i>...landscape; their value, measured both in terms of scenic value and cultural heritage, is enjoyed by both residents...</i></p>	Y
404.7	Manx National Heritage	4.7.21	Within the Plan a large number landscape character areas are 'nominated' (an interesting choice of word which we do not entirely understand). A number of Landscape Proposals are put forward which are obviously meant to relate to specific character areas, but there are several others which are not specific. It should be clarified whether these are meant to relate to all character areas, or only to those which they follow within the narrative. We remain unclear over what Proposals are in place to protect Landscape Character Areas not specifically identified; is LP1 the only Proposal that covers all character areas, or all Areas not otherwise specifically covered by other Proposals? This is confusing.	<p><i>Use of the word 'nominated' is admittedly confusing. Where this occurs in this Chapter 4 in this context - replace with the word included</i></p> <p><i>4.2.1 states "Where there are no specific Landscape Proposals for an Area, the Landscape Strategies and Key Views shall be taken to be the policy approach for the area i.e. the Landscape Proposal."</i></p> <p><i>To avoid confusion this will be changed to:</i></p> <p><i>Where there are no specific Landscape Proposals for an Area, the Landscape Strategies and Key Views shall be taken to be the policy approach for the area i.e. Landscape Proposal 1.</i></p> <p><i>The following Landscape Proposals will be renamed:</i></p> <p><i>"Landscape Proposal 2" to "Landscape Proposal 2 (Laxey Glen)";</i></p> <p><i>"Landscape Proposal 3" to "Landscape Proposal 3 (West Baldwin)";</i></p> <p><i>"Landscape Proposal 4" to "Landscape Proposal 4 (West Baldwin)";</i></p> <p><i>"Landscape Proposal 5" to "Landscape Proposal 5 (Laxey)";</i></p> <p><i>"Landscape Proposal 6" to "Landscape Proposal 6 (Douglas Head)";</i></p> <p><i>"Landscape Proposal 7" to "Landscape Proposal 7 (Santon)";</i></p> <p><i>"Landscape Proposal 8" to "Landscape Proposal 8 (Douglas Bay)"; and</i></p> <p><i>"Landscape Proposal 9" to "Landscape Proposal 9 (Clay Head)".</i></p>	Y

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404.8	Manx National Heritage	5.1	Throughout this introductory section it is evident that terms for landscape, countryside, environment and nature/natural are used almost interchangeably. This potentially creates inaccuracy and misunderstanding and has unfortunate consequences for the formulation of planning policies which accurately protect the landscape. In our view this can be rectified by some limited redrafting.	This comment is noted and CO commits to review the language/terms used in this section.	Potential
404.9	Manx National Heritage	5.2.3/5.2.5	It is pleasing to see references to 'cultural environment' and UNESCO Biosphere status within these paragraphs, but we see little follow-up in terms of Natural Environment Proposals within the chapter as a whole. Indeed, this 13-page chapter is disappointingly long on narrative and relatively short Proposals (six in total) and Recommendations (three).	It is unnecessary to repeat the Strategic Plan Policies. There is considerable narrative in this Chapter, included to be helpful. CO recommends that where current designations are referred to, consideration is given to the transfer of this to an Appendix.	Potential
404.10	Manx National Heritage	5.4	Further to our previous comments, we suggest that protection of cultural landscape and heritage assets in the rural environment should be one of the core outcomes of the Plan in the context of this chapter.	Comment noted.	N
404.11	Manx National Heritage	5.8	We note that these Manx Wildlife Trust reserves (and the independent, private reserves which have also been gathered under this heading) are not statutorily designated. This is confusing and misleading, and is exacerbated by inconsistencies on the draft maps, which do not, for instance, show all Manx Museum and National Trust lands, which by their nature are protected by statute. Such a guarantee of protection does not extend to privately-held reserves.	CO would welcome further advice from MNH regarding Manx Museum and National Trust lands which do not feature currently on Map 1A Environmental Constraints. It is recommended that MNH ensures the Mapping Service (DOI) which is a shared service, has all of the up to date data files so that the Constraint Maps are accurate when printed. We need to confirm the status of the listed sites with the Wildlife Trust. Is it the case that sites do not have to be MWT-owned in order to be designated as Wildlife Sites?	Potential
404.12	Manx National Heritage	5.12.1	This is a confused conflation of a selection of Ancient Monuments (some of which are in our guardianship, but not ownership) and some of our MM&NT landholdings. It would benefit from redrafting.	CO would appreciate MNH's assistance in ensuring that CO has an up to date list of Ancient Monuments and MM&NT landholdings. There is a reliance on Departments and Statutory Boards to provide certain information as part of the plan process.	Potential
404.13	Manx National Heritage	5.16	We are disappointed that this section, which has a narrative extending to just over a page, contains no mention of the high cultural heritage value of the uplands. As a consequence, users of the Plan have no inkling that enforcement of EP4 (presumably this should be NEP4?) – for instance should there be a planning application for a development on hill-land – would probably require the undertaking of an archaeological evaluation.	CO would support the inclusion of text within 5.16 on the cultural heritage value of the uplands. MNH may want to suggest a reference for inclusion as part of any further evidence submitted to the Inquiry. No development is proposed on hill-land. Any applications will be dealt with on their merits in line with the Strategic Plan. "Environment Proposal 4" will be changed to Natural Environment Proposal 4.	Potential
404.14	Manx National Heritage	5.17.1	Having been an instrumental party in promoting the Dark Skies concept on the IoM, we welcome recognition of its significance within planning policy.	Comment noted.	N

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404.15	Manx National Heritage	5.20.2	This section makes no reference to the consequences of development and hard surfaces on the potential for flooding. We would suggest that, despite avowals of "flood resilience", there should surely be specific reference in Proposals which promotes the incorporation of flood attenuation into drainage schemes for new development. We would also suggest that there should be cross-reference to Sustainable Urban Drainage Systems (SuDS) in paragraphs 7.5 and UP6.	This section is designed to implement rather than repeat the policies of the Strategic Plan detailed in 7.12 Areas Subject to Flooding and Erosion. Crucially it states in 7.12.2 that 'The Strategic Plan seeks to prevent the loss of natural flood plain and to guide development away from areas at risk of flooding'. Environment Policy 10 in the SP states that where there is a potential risk of flooding, a flood risk assessment and details of proposed mitigation methods must accompany any application for planning permission. SuDS is mentioned in 7.5 and the document will be checked to see if cross referencing is further required.	Potential
404.16	Manx National Heritage	6.5.4 Urban Environment Proposal 1	We are very pleased to see our longstanding comments in this regard finally reflected in policy encouraging residential use of the town centre.	Support noted.	N
404.17	Manx National Heritage	6.8.2	We strongly urge that this paragraph be reworded to make it clear that the reference to 'heritage assets' specifically relates to the built environment and not to other archaeological remains and Ancient Monuments.	Insert the words ' <i>in the built environment</i> ' after 'heritage assets' into the first sentence of 6.8.2.	Y
404.18	Manx National Heritage	6.9.2	Similarly, it would be helpful if the reference to 'heritage' in the first line of this paragraph be altered to 'built heritage'.	Agreed. Insert the words <i>built heritage</i> instead of heritage into the first sentence of 6.9.2.	Y
404.19	Manx National Heritage	6 Urban Environment Proposal 4	Again similarly, it would be helpful if the reference to 'heritage' in the first line of this proposal be altered to 'built heritage'.	Insert the word ' <i>built</i> ' before 'heritage assets' in the first sentence of Urban Environment Proposal 4.	Y
404.20	Manx National Heritage	6.10.2	We note that Urban Environment Proposals from this proposal onwards are mis-numbered.	Renumber 'Urban Environment Proposal 6' on page 55 as ' <i>Urban Environment Proposal 7</i> '. Renumber 'Urban Environment Proposal 7' as ' <i>Urban Environment Proposal 8</i> '. Renumber 'Urban Environment Proposal 8' as ' <i>Urban Environment Proposal 9</i> '. Renumber 'Urban Environment Proposal 8 (2)' as ' <i>Urban Environment Proposal 10</i> '. Renumber 'Urban Environment Proposal 10' as ' <i>Urban Environment Proposal 11</i> '.	Y

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404.21	Manx National Heritage	6.12	This section, located within the chapter 'The Urban Environment', narrates the potential for archaeological remains in the rural landscape without then providing Proposals for its protection in the face of development, thereby creating the inference that whilst archaeological remains may be present, they are not sufficiently significant to merit protection through Proposals. In contrast, paragraph 6.12.3 and UEP8 draw attention to the issue of urban archaeology and provide specific policy for the area focussed around Lord Street, and are to be welcomed insofar as they relate to a very limited area of Douglas. The archaeological potential of land, of currently rural character and agricultural use but zoned for residential, employment and industrial development, is nowhere addressed within the Plan, and as we have commented elsewhere (2.9.1 above) is reliant on the preparation of Development Briefs which are yet to be published. We feel that this issue has been inadequately addressed in the Plan.	6.12.1 and 6.12.2 will be relocated to "Chapter 5: The Natural Environment". Strategic Policy 4 in the SP requires that proposals for development "Protect or enhance the fabric and setting of Ancient Monuments, Registered Buildings(1), Conservation Areas(2), buildings and structures within National Heritage Areas and sites of archaeological interest". CO would welcome MNH's suggestion of any proposal specific to archaeological remains in the rural landscape of the East which would compliment the Strategic Plan policy. The archaeological potential of all sites included in the plan will be addressed in the upcoming development briefs.	Y
404.22	Manx National Heritage	6 Urban Environment Proposal 8 (1)	We warmly welcome the intent of this proposal, but would suggest that a definition of the extent of the area covered by the 'Town Centre' is required – is this the same as the area described as 'Draft Douglas Town Centre Boundary' shown on Map 5?	Insert " <i>on Map 5</i> " after "as defined" in second second sentence of "Urban Environment Proposal 8".	Y
404.23	Manx National Heritage	6.13.1	We suggest that this paragraph requires rewording to explain and differentiate between 'monuments' protected because of national significance, and several hundred other heritage assets.	Reword paragraph: 6.13.1 <i>There is a diverse collection of ancient and historic monuments heritage assets in the East, ranging from the Neolithic to the modern period. While some Most of the monuments themselves are protected by being under the care of the Manx Museum and National Trust (Manx National Heritage), but the immediate setting and, in some instances, the landscape context may also need protection or enhancement. Many monuments heritage assets are located on comparatively remote or isolated sites which are unlikely to be subject to change arising from development, but others are within or close to our settlements or may be close to potential mineral workings or sites for public infrastructure.</i>	Y

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404.24	Manx National Heritage	6 Urban Environment Proposal 8 (2)	We strongly suggest that it would be preferable if this proposal were reworded to reflect more clearly the requirements of Strategic Plan Environment Policy Nos 40 and 41, particularly the need to evaluate the effect of a proposed development scheme on a monument or archaeological site and the mitigation proposed.	CO does not consider it necessary to elaborate further on this proposal. The effect of proposed development schemes on monuments or archaeological sites will be evaluated at the development brief stage. As a general point, the Plan will be reviewed as a whole to ensure that where any proposals which are not specific to the East and there is no reasonable reason for inclusion (such as Urban Environment Proposal 8) these should be removed from the Plan and looked at again during any strategic plan review. CO commits to keep this under review up to the Inquiry.	Potential
404.25	Manx National Heritage	6.16.1	We suggest that a former brickworks site is of less significance in terms of its contamination risk than, for instance, a former gasworks. Other former industries which may be of concern include metalworking and tanning.	Comment noted.	N
404.26	Manx National Heritage	7.2.4	This paragraph appears twice.	<i>Delete repeated paragraph.</i>	Y
404.27	Manx National Heritage	7.9.2	We question the relevance of discussing Parliament Square and Ballacraigne crossroads in the context of the Area Plan for the East.	Roads in the East form part of the Island's highway network and CO remains aware of the knock on effects of congestion across area plan boundaries.	N
404.28	Manx National Heritage	7.9.3	We similarly question the relevance of any part of this paragraph.	See response to 404.27.	N
404.29	Manx National Heritage	7 Utilities Proposal 6	We feel that this Proposal seems rather tentative in form, with fewer definite outcomes and less certainty than other transport and utilities Proposals in this chapter. It is not clear which parts of this Proposal should be in bold (all of it?)	CO will revisit the content and presentation of Utilities Proposal 6	Potential
404.30	Manx National Heritage	7.16.1	The "a" before "modern" should be deleted.	<i>Delete "a" before "modern" in this sentence.</i>	Y
404.31	Manx National Heritage	7.16.2	The word "communications" is redundant.	<i>Delete "communications" in first sentence.</i>	Y
404.32	Manx National Heritage	7.16.5/ Telecommunications Proposal 1	We believe that this paragraph and Proposal need to be more robust, as neither the background narrative nor the policy proposal acknowledges the significant visual intrusion caused by the proliferation of telecoms infrastructure: the Island's landscape and its scenic quality are unique points of difference and must be safeguarded. Telecoms policy must reflect this and Proposals should articulate principles requiring the removal of infrastructure as soon as it becomes redundant and encourage the reduction of visual impact as new and improved technologies for miniaturised antennae and booster equipment are developed. Operators should be required to demonstrate that options appraisals have been undertaken to establish the most suitable locations for infrastructure providing best possible coverage and least possible visual intrusion.	CO recognises that scenic and environmental considerations need to be taken into account in the siting of telecommunications infrastructure. Infrastructure Policy 3 in the Strategic Plan addresses the issues redundancy and the sequential approach to siting infrastructure. CO does not consider additional information to be required within the Plan.	N
404.33	Manx National Heritage	8.5.4	Bearing in mind the ever-increasing onscreen/online use of policy documents such as this, we believe it would be a great help if references to other documents could be footnoted and hyperlinks provided. These should of course be updated as and when additional relevant material becomes available throughout the lifetime of the Plan.	Comment noted. CO is giving serious consideration to how the digital version of the Plan, its appendices and maps can be optimised to promote ease of access.	Potential

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404.34	Manx National Heritage	8 Employment Proposal 3	The SAF process identified possible archaeological implications which have not been reflected in the content of EP3: for the avoidance of doubt it would be appropriate if this comment in brackets were revised to read "landscape, ecological and archaeological impacts".	"that the proposal not have any unacceptable environmental impacts (including any significant landscape impacts)" will be reworded as "that the proposal not have any unacceptable landscape, ecological or archaeological impacts".	Y
404.35	Manx National Heritage	8 Employment Proposal 4	The SAF process identified possible archaeological implications which have not been reflected in the content of EP4: for the avoidance of doubt it would be appropriate if this comment in brackets were revised to read "landscape, ecological and archaeological impacts".	"that the proposal not have any unacceptable environmental impacts (including any significant landscape impacts)" will be reworded as <i>"that the proposal not have any unacceptable landscape, ecological or archaeological impacts"</i> .	Y
404.36	Manx National Heritage	8 Employment Proposal 5	The SAF process identified possible archaeological implications which have not been reflected in the content of EP5: this must be rectified.	Additional bullet point required: "considers the archaeological implications of the development of the site".	Y
404.37	Manx National Heritage	ER1	It would appear that a noun is missing after "Cross Government".	Replace "Cross-government" with <i>"A cross-government study"</i> .	Y
404.38	Manx National Heritage	9.8.1	We suggest inserting "cultural," before entertainment, and correcting "Villa Gaiety" to "Gaiety Theatre".	Replace "entertainment and visitor attractions notably the Villa Marina, the Manx Museum and the Villa Gaiety" with <i>"cultural entertainment and visitor attractions notably the Villa Marina, the Manx Museum and the Gaiety Theatre"</i> .	Y
404.39	Manx National Heritage	9 Town Centre Mixed Use Proposal 1	It is likely that operational requirements will outgrow the capacity of the present Manx Museum complex within the lifetime of the plan, and require a certain amount of refocussing of activities and uses. It may therefore be more appropriate to re-word the proposal and we would suggest "the retention of cultural and entertainment venues" and omit "Museum".	Replace "the retention of entertainment venues and the Museum" with <i>"the retention of cultural and entertainment venues"</i> .	Y
404.40	Manx National Heritage	9.8.7/ Mixed Use Proposal 7	We suggest that in both narrative and MUP7 there should be acknowledgement that the former industrial uses may pose environmental problems that will require resolution.	9.8.7- Insert text after paragraph: <i>"Due to the former industrial uses of South Quay, significant site preparation including decontamination may be required."</i>	Y
404.41	Manx National Heritage	10.3.3	The word "need" is redundant and should be deleted from final sentence.	Delete "need" in 4th sentence.	Y
404.42	Manx National Heritage	12.19.2	We suggest that "All...will not" should be "None...will". In our view, given the subject-matter of the rest of the paragraph, the final sentence is a complete non-sequitur.	5th sentence: replace "all" with <i>"none"</i> . Delete "not".	Y
404.43	Manx National Heritage	12 Residential Strategic Reserve Proposal 1	The SAF process identified possible archaeological implications which have not been reflected in the content of RSRP1: for the avoidance of doubt it would be appropriate if this comment in brackets were revised to read "landscape, ecological and archaeological impacts".	Residential Strategic Reserve Proposal 1 (iii). Replace "that the proposals will not have any unacceptable environmental impacts (including any significant landscape impacts)" with <i>"that the proposals will not have any unacceptable landscape, ecological and archaeological impacts"</i> .	Y
404.44	Manx National Heritage	12.20	Para 12.20 introduces the subject of Strategic Reserve 'Predominantly Residential' Sites, from which RSRP1 and RP1 & RP2 both appear to flow. Paragraph 12.20.2 proceeds to list the criteria under which residential sites will be evaluated, but it is not clear if these criteria relate to reserve sites, proposal sites, or both: this needs to be clarified. Perhaps it would also help if 'Residential - Strategic Reserve – Sites' and 'Residential Sites' were considered under separately numbered paragraph sections: RSRS under 12.20 as now, and RS under 12.21, with subsequent sections renumbered to accommodate this. Should RP1 and RP2 also be moved into this newly numbered section 12.21?	Replace "Residential- Strategic Reserve- Proposal 1" with <i>"Strategic Reserve Proposal 1"</i> . Renumber 12.20 "Strategic Reserve Sites" as 12.21. Renumber 12.20.1 as <i>12.21.1</i> , to be followed by "Strategic Reserve Proposal 1". Renumber 12.20.2 as <i>12.20</i> , to be followed by "Residential Proposal 1" and "Residential Proposal 2". Strategic Reserve Sites will then follow in from Residential Proposal Sites as suggested.	Y

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404.45	Manx National Heritage	13.6.2	The outcome of this proposal potentially involves the loss of properties between TK Maxx and the Strand Centre, which together comprise a large proportion of the surviving 150+ year-old buildings on this side of Strand Street. If approved, we suggest that some historic building recording is likely to be necessitated.	CO agrees with the suggestion that historic buildings are recorded in advance of any development taking place within the Market Street CTA. This would likely form part of the development brief.	Y
404.46	Manx National Heritage	13.6.4	We would comment that the presence of buried river channels and 19th-century water-management channels - mill leats etc - may require carefully engineered groundworks.	Insert text in CTA Proposal 3 (Treatment Plan): " <i>The presence of buried river channels and 19th century water management channels such as mill leats may require carefully engineered groundworks.</i> "	Y
405.1	Save Camlork Committee	BH031	Opposed to the residential designation of site BH031- "Camlork". Land is a mixture of Class 2 and Class 3 agricultural land; Class 2 land is not supposed to be built on and the site should retain its Open Space and Agricultural designation. Camlork Farm is a well-run, productive business and part of an outstanding rural view. Camlork is visible from Lhergy Cripperty and forms part of an extremely attractive view. Housing should be focused on brownfield land within Douglas and not on productive greenfield land. In 2011 the manifesto of the now Chief Minister promised the electors of Middle that he "would support Braddan residents in their opposition to development at Camlork. Union Mills and Strang are threatened with coalescence. An additional 650 residents would require additional public services and infrastructure. This site has been refused planning permission on several occasions and it is unclear what material change has taken place to recommend this land for development. Development of Camlork would be in direct contravention of a number of Strategic Plan policies.	Please see Part 2 of Response Table.	N
405.2	Save Camlork Committee	12	The Strategic Plan 2016 is a flawed document and its projected population figure of 87,598 has proved to be way off the mark. The Isle of Man has no need for an additional 5,000 plus dwellings by 2026.	Please see Part 2 of Response Table.	N
408.1	Finch Hill Bowling Club and Snooker Club	DH011	Objection to development. Facility has 120 members and growing.	Comment noted. CO has tried to respond to the concerns on this site but have been raised by a number of parties.	N
412.1	Isle of Man Sport	11	All open space should be retained as a minimum.	Comment noted.	N

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412.2	Isle of Man Sport	11	Missing from Community Facilities Audit: Douglas High School Old Boys AFC- Blackberry Lane; Douglas Royal AFC- Ballafletcher Sports Pitches; Corinthians AFC- Ballafletcher. Incorrect location information: Braddan AFC plus home fixtures at the Glencrutchery Road sports pitches; Douglas Rugby Club plays home fixtures at Port-e-Chee Meadow, Peel Road; Vagabonds RUFC play home fixtures at Ballafletcher Sports Pitches.	This information has been added to the Community Facilities Audit.	Potential
413.1	Isle of Man Natural History & Antiquarian Society	4.2.1	Important long distance views missing: from Douglas Head over Douglas, from above Creg Ny Baa on Mountain Road, from Creg Ny Baa Back Road to Ochan's western edge and Douglas Bay, from Everlasting Bend southwards along the coastline, from Lhergy Cripperty Road over the Central Valley.	CO notes the comments but does not propose to supplement the Evidence Report on Landscape Character at this time.	N
413.2	Isle of Man Natural History & Antiquarian Society	4.5.1	Needs extending to describe the Baldwins area down from Beinn y Phot and Caldon otherwise seem to be just covering the coast. Landscape proposal 1, suggested addition: 'Skyline development or development that breaches the skyline will not be supported'.	See response to 413.1.	N
413.3	Isle of Man Natural History & Antiquarian Society	4.7.1	Needs proposal to protect setting of Braaid archaeological site and assessment of applications for substantial development on views from Lhergy Cripperty Road.	See response to 413.1.	N
413.4	Isle of Man Natural History & Antiquarian Society	4.7.12	Policy needed to cover views of new development with base height criteria: Douglas Head for Lower Douglas and St George's for Upper Douglas.	See response to 413.1.	N
413.5	Isle of Man Natural History & Antiquarian Society	4.17.1	Proposal 8 needs to be about the view of the town centre and the Promenades and control on height of development not view of the Headlands so new development is not significantly higher than existing buildings.	See response to 413.1.	N
413.6	Isle of Man Natural History & Antiquarian Society	6	All development sites should be checked for archaeological remains.	At present, Environment Policy 41 in the Strategic Plan states: "The Department will require that archaeological evaluations be submitted prior to the determination of proposals affecting sites of known or potential archaeological significance. In cases where remains are affected but preservation in-situ is not merited, the Department will expect to secure excavations and/or recording in advance of construction work either by the imposition of suitable conditions attached to a planning permission or through a formal agreement entered into with the developer." There is an argument that this policy should apply to all development sites. As this is an Island-wide issue as opposed to one concerning the eastern area specifically, it will be examined during the next review of the Strategic Plan.	N
413.7	Isle of Man Natural History & Antiquarian Society	6.6.5	Conversion of terraced housing to office blocks should be discouraged.	Cabinet Office agrees that maintaining high quality terraced housing as part of a diverse residential offer is to be encouraged.	N
413.8	Isle of Man Natural History & Antiquarian Society	6.8.2	2 nd sentence should be removed as prejudicial and unproven.	This sentence has been designed to make all stakeholders in the planning system aware that the Manx built environment is unique and contains heritage assets which are not directly comparable with those on the adjacent isle.	N

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413.9	Isle of Man Natural History & Antiquarian Society	6 Urban Environment Proposal 3	Needs qualifying and balancing against what is being lost in terms of architecture and use.	CO believes that the wording of this proposal gives adequate support to the need for new development to respect and compliment the existing built environment. It is not seeking to dictate new and existing uses should be balanced.	N
413.10	Isle of Man Natural History & Antiquarian Society	6.9.2	There is a difference between historical and architectural value.	<i>For clarity, the word "historical" in the 4th sentence of this paragraph will be replaced with "heritage".</i>	Y
413.11	Isle of Man Natural History & Antiquarian Society	6 Urban Environment Proposal 4	Should be merged with Proposal 5.	CO agrees to review the drafting and structure of UE Proposals 4 and 5.	Potential
413.12	Isle of Man Natural History & Antiquarian Society	6 Urban Environment Proposal 6	Needs to be cross-referenced with the list in 6.10.1. There are 20 Conservation Areas, not 19- Douglas North Quay has been omitted.	CO is satisfied that the structure of this section indicates that Urban Environment Proposal 6 (which will be renumbered as 7) refers to the list in 6.10.1. The list of Conservation Areas in 6.11.1 will be updated to include Douglas North Quay.	Y
413.13	Isle of Man Natural History & Antiquarian Society	6.11.3	Archaeological and built environment does not receive same coverage as natural environment. Proposed conservation areas not covered and coverage of existing is minimal.	Please see other CO responses for details on how archaeological and built environment coverage will be expanded within this plan. CO is highly aware of the need to revisit the Island's list of Conservation Areas. This workstream will take place outside of the scope of the Plan.	N
413.14	Isle of Man Natural History & Antiquarian Society	6 Urban Environment Proposal 8	Should refer to list of known Ancient Monuments.	CO is satisfied that the structure of this section indicates that Urban Environment Proposal 8 (which will be renumbered as 10) refers to 6.13.1.	Potential
413.15	Isle of Man Natural History & Antiquarian Society	6 Urban Environment Proposal 9	Remove 2 nd sentence.	While every effort should be made to preserve the appearance of line-side structures, there must be flexibility within the Plan to allow the DOI to maintain safe and modern operating systems. See response to comment 101.7.	N
413.16	Isle of Man Natural History & Antiquarian Society	9 Mixed Use Proposals 4, 5 and 6	Should make reference to fact that existing sites are partly in existing Conservation Areas.	Insert text in: Town Centre- Mixed Use Proposal 4: <i>"As this area lies partly within a Conservation Area, development plans should pay regard to the Conservation Area Character Appraisal for Athol Street and Victoria Street."</i> Insert text in Town Centre- Mixed Use Proposal 5: <i>"As this area lies partly within the Douglas North Quay Conservation Area, development plans should pay special regard to this location."</i> Insert text in Town Centre- Mixed Use Proposal 6: <i>"As this area lies partly within the Douglas North Quay Conservation Area, development plans should pay regard to the Conservation Area Character Appraisal for Douglas Promenades."</i>	Y
413.17	Isle of Man Natural History & Antiquarian Society	13.4.1	Important buildings such as the former Drill Hall need to be kept.	Feasibility studies for the proposed CTAs will include a site context and existing conditions plan, including details of all architecturally and historically important buildings within the CTAs. See 6.9 for further proposals regarding creative reuse of historic buildings.	N

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413.18	Isle of Man Natural History & Antiquarian Society	10.2.1	Mention of Horse Tramway needed.	<i>Insert "the Horse Tramway" after "Snaefell Mountain Railway".</i>	Y
413.19	Isle of Man Natural History & Antiquarian Society	DH001	Former nurses home should be promoted for redevelopment.	Work is underway on a register of Brownfield buildings and it is likely that the Former Nurses' Home will be considered for inclusion. Any development brief for DH001 will consider the future use of the Former Nurses' Home.	N
413.20	Isle of Man Natural History & Antiquarian Society	DH001/DH057	Retain open view over to Central Valley and Central Hills from John Watterson's Lane. Requires substantial structural landscaping.	These comments will be considered during the drafting of the development brief for this site.	N
413.21	Isle of Man Natural History & Antiquarian Society	DM001/DH057	Undesirable in landscape and access terms and need is questionable.	Comment noted.	N
413.22	Isle of Man Natural History & Antiquarian Society	DH019	Prominent views of site as part of Maritime Gateway (Fort William Terrace to the South East).	Comment noted.	N
413.23	Isle of Man Natural History & Antiquarian Society	DH022	Drill Hall should be registered and not converted.	Proposed registration of the Drill Hall will be considered by the Registered Buildings Officer at DEFA.	N
413.24	Isle of Man Natural History & Antiquarian Society	DH039	Bowling Green Pub is a valuable community facility and should not be redeveloped.	Comment noted.	N
413.25	Isle of Man Natural History & Antiquarian Society	DH046	Eastcliffe (site of WW1 riot) should be retained and not redeveloped.	Comment noted.	N
413.26	Isle of Man Natural History & Antiquarian Society	DM003	New built development on Promenade frontage will form part of Conservation Area.	Comment noted. As stated in 6.11.4, CO is fully aware that contemporary development must be designed with current and future Conservation Areas in mind.	N
413.27	Isle of Man Natural History & Antiquarian Society	DM004	Must take into account archaeological assessment.	Comment noted.	N
413.28	Isle of Man Natural History & Antiquarian Society	DM008	Western half must take into account adjacent Conservation Area.	Adjacent Conservation Area reference will feature in any Development Brief for drafted for this site.	N
413.29	Isle of Man Natural History & Antiquarian Society	OH011	Avoid skyline development, take account of longer distance views from Mountain Road, landscaping to mitigate effect of existing Western edge of Ballachrink, no new access over greenfields.	These comments will be considered during the drafting of any development brief for this site.	N
413.30	Isle of Man Natural History & Antiquarian Society	Evidence Paper 6 Audit of Community Facilities	Places of Worship- list should include: Old Lonan Church, Lonan; Baldrine Methodist Chapel; Agneash Methodist Chapel; Santon Church; St Luke's Church, Baldwin; Union Mills Methodist Chapel; Old St Runius, Marown; All Saints Lonan.	List will be update to included these Places of Worship.	Y
413.31	Isle of Man Natural History & Antiquarian Society	12.22	Low Density Housing in Parkland- LDHP must not be subsumed into Predominantly Residential designations.	See response to 401.10.	N
416.1	Manx Wildlife Trust	1	We consider the draft Area Plan to include many positive strategic aspects such as vision, some of the outcomes sought, and inclusion of such features as Wildlife Sites and the suggestion for further Green Infrastructure network development. That said, it seem to be weak and confused in areas on the natural environment, and to be fit for purpose it will require more up to date information on relevant ecological features in the plan area upon which to base decision making. We do not find it clear that the baseline information is adequate. The application of critical constraints assessment does seem to have worked well in the main.	The criticism is noted. Some changes are now recommended as a result of all of the representations made on this Chapter 5. Please see Schedule of Proposed Changes.	N

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416.2	Manx Wildlife Trust	1.2.1	It does little to elaborate on the IoM Strategic Plan Environment Policy 4, with little new investigation to support adequate baseline information to base decision making on.	See above response.	N
416.3	Manx Wildlife Trust	1.2.3	It should be clear what weight recommendations have, as it may be that other departments negate important action in the Area Plan. A small foot note may be possible. Once accepted through Tynwald, is there any duty to act on a recommendation?	Recommendations have the meaning as set out in paragraph 1.2.3. The Plan is a statutory process and once approved has the weight of Tynwald behind it.	N
416.4	Manx Wildlife Trust	1.5.1	Table 2 reveals the important place of baseline information in the process. By what assessment is it decided whether the baseline information is sufficient? We are not convinced that the natural environment is covered adequately.	The process itself is a checking mechanism given the level of public consultation and stages in the process. There is a requirement to produce a draft plan within 12 months of the preliminary publicity which helps to keep the evidence base relevant. The Public Inquiry is the forum for being able to highlight and question the evidence and baseline information and highlight any issues that are felt not to have been adequately covered. In turn the CO is able to explain, clarify and ask questions at the Inquiry.	N
416.5	Manx Wildlife Trust	1.7.1	The time line and impact is confusing, does this mean that the Strategic Plan will be updated as a result of review before 2021?	No.	N
416.6	Manx Wildlife Trust	1.9	No mention of the Governments Biodiversity Strategy being incorporated or considered as part of the process. Should Biosphere also be considered? There is a section later, but it is not used to form the Area Plan - a need for a Management Plan to deliver Biosphere objectives and so this would seem like a relevant vehicle as they both wish to deliver sustainable development. This is a weakness and an oversight.	This issue is an all-Island issue and not just relevant to the East. Paragraph 5.5.2 is sufficient in explaining the Biosphere status. Of course where development sites are allocated, biosphere will be taken account of through development briefs and requirement for master planning. There are sufficient protection measures in the Strategic Plan and other legislative vehicles are available to deliver the 'Strategy'.	N
416.7	Manx Wildlife Trust	2.6.1	We support the overall objective to the Area Plan, but do not think that the plan adequately ensures all environmental policies of the IOM Strategic Plan are incorporated, and therefore fails to meet its overall objective in its current state.	No changes are proposed by CO.	N
416.8	Manx Wildlife Trust	2.9.1	Development Briefs. Definition of development is very economic and construction focused, MWT would like to know if this could be broader in terms of development as positive change that could include nature conservation and green infrastructure opportunities?	This is a valid point. Development Briefs can be detailed and wide-ranging. It may be that the term 'development brief' is in itself a term which could be improved by simply changing to the term 'planning brief'. It is important to note that sites, ahead of allocation, have been through site assessment.	Potential
416.9	Manx Wildlife Trust	3.1.1	Very economic focused to the detriment of the following paragraph. While the economic will always be major in these plans, it should be along side the rest of sustainable development from the beginning.	No changes are proposed by CO.	N
416.10	Manx Wildlife Trust	3.1.2	Agree with its use to achieve sustainable development but this requires a balance for environmental and society alongside the economic development that is favoured in the document. What evidence is there are achieving and moving towards sustainable development? This should be measurable and it should be clear how the Area Plan contributes towards this aim.	Comments noted. No changes are proposed by CO.	N

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416.11	Manx Wildlife Trust	3.2.2	Very good vision, but how does this fit with the document? How are you proposing to enhance the Islands natural environment?? There is no detail in the Area Plan for the East of how this will contribute, thought some areas could also contribute if updates to the draft Area Plan are made.	No changes are proposed by CO.	N
416.12	Manx Wildlife Trust	3.4.1	States that the natural environment will be maintained and enhanced, but further in the document it is not clear how this will be delivered. It is however a supported and lofty aim.	No changes are proposed by CO.	N
416.13	Manx Wildlife Trust	3.4.2	It should include green infrastructure as part of what creates the setting for investment and quality of life.	CO notes there is mention of 'green infrastructure' in 3.4 - Spatial Vision.	N
416.14	Manx Wildlife Trust	3.4.4	Houses are not the only contribution to place and "home", and certainly not the only requirement to meet residents needs and attract new people to the Island.	Agreed.	N
416.15	Manx Wildlife Trust	3.4.5	MWT agree that good design will require green infrastructure to be at its heart.	Comment noted.	N
416.16	Manx Wildlife Trust	3.4.7	Very supportive of a green infrastructure network – it is needed now, rather than after the end of this plan. It requires definition. Wider benefits should be clearly stated e.g. health https://www.wildlifetrusts.org/sites/default/files/2018-05/r1_literature_review_wellbeing_benefits_of_wild_places_lres.pdf	All green infrastructure references have been reviewed following the consultation on the draft plan.	N
416.17	Manx Wildlife Trust	3.6	Desired outcomes will not meet the vision (3.4.7) v. ensuring avoidance of adverse environmental impact does not offer any enhancement. Viii. What assessment of this "excellent opportunity" to access good quality open space is there? The Biodiversity Strategy determines there is a policy of "no net loss" of biodiversity, which would be the minimum standard, but net gain of biodiversity should be used especially for major developments.	It is recommended to: Remove 3.4.7 v. Review wording of viii Response needs to be Island wide - requirement as part of development/planning briefs for biodiversity strategy for each site.	Potential
416.18	Manx Wildlife Trust	4.1.1	Requires a definition – European Landscape Convention: "Landscape" means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors; Character is a way of defining common units (usually by factors and features) it and usually has an element of quality assessment as well as formulation of objectives. Currently there is only minimal assessment of natural factors and features when taking Chapter 4 as whole. This is substantially different to how MWT have seen Landscape Character utilised by other nations.	Change proposed to 4.1.1. See response to other MNH comments.	Potential
416.19	Manx Wildlife Trust	4.4 (2)	We support this outcome, but it is not clear from the Area Plan how it will achieve this outcome. iii. what is the "natural landscape"? All our landscapes are cultural ones. Natural systems underpin this, and require consideration as part of the key features of a landscape. Fundamentally landscape is about more than view, and it is not exactly clear whether there is any further assessment. 2005 is not a fit assessment, or sufficient, on which to base landscape character requirements in the Area Plan. This assessment seems to be devoid in many areas of key features within the landscape, in many cases where the natural system is degraded but still a defining feature. To summarise, open hills, trees, coasts and views.	There is no replacement/follow up document to the 2005 Assessment. CO notes the criticism of this Report but is also aware that the countryside is protected for its own sake and there remain through the Strategic Plan limited opportunities to develop outside of those areas zoned for development. When proposing to alter/expand those areas, landscape impact in all of its meanings is taken into account and balanced against all other matters raised.	N

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416.20	Manx Wildlife Trust	4.7	Again, this section is based on views. Often natural systems are not really identified as important features. They are in E type landscapes, but this blends into the other landscape types also. Degradation of natural features should be included as part of the landscape assessment.	CO would be interested to have an example of how - taking the Northern Uplands as an example - the landscape could be better described? This may help to understand and consider the merits of making any changes to Landscape Proposal 1 and other Landscape Proposals. <i>No changes currently proposed by CO.</i>	N
416.21	Manx Wildlife Trust	4.7.1	Does this mean the removal of plantations? In some cases we would positively support this as an important action.	Not explicitly.	N
416.22	Manx Wildlife Trust	4.7.2	Woodland ecosystems are part of the landscape character	Noted. No changes proposed.	N
416.23	Manx Wildlife Trust	4.7.3	Glen Roy – nationally important woodland ecosystem that warrants its own mention as a landscape feature, linking into the continuous tree cover and wooded landscape with farmsteads.	Noted. No changes proposed.	N
416.24	Manx Wildlife Trust	4.7.7	This should mention the key feature of wetlands – central curraghs and surrounding garey which is now degraded. Much more than a “treed valley” which substantially misses the point	See below.	N
416.25	Manx Wildlife Trust	4.7.12/4.7.13	Misses the key and important point of coastal ecosystems and their connections moving inland that are significant e.g. Santon Gorge.	Given the comments raised in connection with Chapter 4, CO commits to review the merits of adding to the descriptions along the lines mentioned.	Potential
416.26	Manx Wildlife Trust	5.1.1	More about urban areas than the natural environment and reveals that there is a lack of understanding of what key ecosystems are present. Onchan does not hold the key wetlands does it?	No change to 5.1.1.	N
416.27	Manx Wildlife Trust	5.2.4	Is there not a requirement to use the Area Plan to implement the Strategic Plan?	No change.	N
416.28	Manx Wildlife Trust	5.3	iv. is about the agricultural environment, not the natural environment. Good objectives, but really there is not any scope to deliver them.	Noted.	N
416.29	Manx Wildlife Trust	5.4	i. is just landscape and aesthetic desired outcome. It should be bottom. ii. is good and must be kept. This should be the top outcome. iii. is also a good outcome. iv. very much needed. This needs to reach 20% of land area.	Agree to re-order as suggested.	Y
416.30	Manx Wildlife Trust	5.5.1	We welcome the clear use of UNESCO Biosphere and a clear statement of its three pillars. It should be clear that the CONSERVATION pillar is about conservation of biological diversity as defined under the Convention of Biological Diversity to which we signed up in 2012. Perhaps it should read CONSERVATION: contribute to the conservation of biological diversity at all scales from landscapes, ecosystems, species and all the way to genes.	Agree to change subject to review and comment from DEFA	Potential

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416.31	Manx Wildlife Trust	5.5.2	This is not demonstrated, and it cannot be said that protection is sufficient. The aim is to deliver the desired outcomes, which requires enhancement and to value biodiversity, which means it should be considered through the action of Government. The Area Plan should be the key location for highlighting the strategic conservation action that is possible as part of development – positive change. Where are areas to be identified for enhancement? How will this reflect on planning policy in the future? How will degraded areas be restored and where? We need considerably more designations to meet 20% target.	It would help if CO could understand the following before supporting the addition of any proposals as part of the East Plan. Its view on degraded areas? What does the 20% mean in terms of the East as opposed to the Island? Recommended wording for a planning brief on a development brief to ensure net biodiversity gain? Details may benefit the Inquiry and inform discussion on this matter.	Potential
416.32	Manx Wildlife Trust	5.10.1	There are much wider areas that should be mapped as AEI	Any details provided will be checked with DEFA.	Potential
416.33	Manx Wildlife Trust	5.12.1	Are there any habitats or key species here? There is not any mention of key features of the natural environment.	Section 5.12 is intended to be informative.	N
416.34	Manx Wildlife Trust	5.13	More information on how they contribute to the ecology and biodiversity of the area would be useful, and how they perhaps could contribute to enhancement?	Section 5.13 is intended to be informative. It is recommended (and has been set out elsewhere in this document) that some of this chapter is set out in an appendix rather than the main document.	Potential
416.35	Manx Wildlife Trust	5.15.2	Where are they natural/semi-natural green spaces? Not on your mapping. There may be a small section in Crosby, but this looks to be under development as well. Ineffectual.	No changes are proposed by CO.	N
416.36	Manx Wildlife Trust	5.16.2	MWT would challenge that food is an obvious product of the uplands – it is obvious of agricultural land.	Recommend removal of first sentence at 5.16.2.	Y
416.37	Manx Wildlife Trust	5.16.4	You have missed delivering international obligations.	Views are noted.	N
416.38	Manx Wildlife Trust	5.16.6	While MWT agree with much in this paragraph, there is a clear conflict between the burning and peat soils. These should be wet, dry peat is degraded peatland.	CO would be interested in how MWT would redraft this paragraph.	Potential
416.39	Manx Wildlife Trust	5.16.9	This paragraph misrepresents the uplands through omission and there are other very degraded areas of EU Annex 1 habitats (I think there is a miss represented "priority" term used). This is also a point that could be applied to other habitats in the Area Plan area.	CO would be interested in how MWT would redraft this paragraph.	Potential
416.40	Manx Wildlife Trust	5 Environment Proposal 4	Environment Proposal 4 is a little disingenuous . It needs to read "positive" management, and it should not feel that it is all about preservation. It is already failed as some areas of the land is "improved", abandoned, drained and/or degraded.	Either: Remove (Natural) Environment Proposal 4 or add new text: <i>positive</i> management and remove "and preservation".	Potential
416.41	Manx Wildlife Trust	5.18	No mention of important wetlands in the area – galey and Central Valley Curraghs stand out, along with peatlands esp upland peat.	CO supports the addition of text if supported by DEFA	Potential
416.42	Manx Wildlife Trust	5 Natural Environment Recommendation 2	Should also include impacts on hydrology for wetlands and mention catchment impacts.	Agree to addition of text	Potential
416.43	Manx Wildlife Trust	5 Natural Environment Recommendation 3	This should have multi use win-win scenarios as part of integrated natural flood risk management solutions such as wetland habitat washland sites. This should be identified as a key opportunity, as there are areas in the central valley and north of Tromode Dam areas that could have multi functional natural flood attenuation projects.	Agree to review wording of NER 3	Potential
416.44	Manx Wildlife Trust	7.4	v. the mention of catchments is important	Noted.	

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416.45	Manx Wildlife Trust	7.5.1	vi. SUDS are welcome and needed, but natural holistic solutions matching catchment needs are also required – e.g. multi functional washlands.	Agree to review wording of 7.5.1 vi with the support of DEFA	Potential
416.46	Manx Wildlife Trust	7 Utilities Proposal 6	Agree with SUDS and protecting and enhancing natural systems	Noted.	N
416.47	Manx Wildlife Trust	8.6	Technology Park – could it be a trailblazing green/sustainable development?	This is an interesting and valid point.	N
416.48	Manx Wildlife Trust	8.8.5	Why is this sentence relegated to the back?? "Good Planning is not achieved by separate projects but by a holistic and joined-up approach. "	Point noted.	N
416.49	Manx Wildlife Trust	11.7	Outdoor recreation is closer to Natural Environment. Or perhaps it should be Natural Environment and Outdoors.	CO recommends it remains as part of this Chapter but acknowledges the links to the natural environment. Agree to consider need for this link to be more explicit in Chapter 11.	Potential
416.50	Manx Wildlife Trust	11.7.2	There should be a GI standard relevant to the Isle of Man and similar to the English ANGSt standards http://webarchive.nationalarchives.gov.uk/20140605111422/http://www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx To reach the 20% target of land for nature conservation it would require 138ha per 1,000 people to have some level of priority for nature conservation. GI and Natural Environment masterplan is needed, like Open Space and Community Proposal 1.	This is not unique to the East but is of course worth consideration at a national level.	N
416.51	Manx Wildlife Trust	11 Open Space Community Recommendation 1	Supportive of the potential for an Active Travel Plan as part of green infrastructure and natural environment master planning. Not really green infrastructure. It should be noted the importance for wider natural environment for health. See report referenced early in our response.	No change proposed at this time.	N
416.52	Manx Wildlife Trust	13.1.3	Comprehensive Treatment Areas are defined well but not used for wider public benefit – but it clearly requires more work to integrate opportunities into the Area Plan.	Noted. It is recognised the CTAs need further work.	N
416.53	Manx Wildlife Trust	13.2.3	This is the only way to make sure there is a positive contribution to the environment. Requires definition.	Noted.	N
416.54	Manx Wildlife Trust	Evidence Papers	MWT feel that there should have been more evidence, and its own evidence paper, for the natural environment.	No additional paper is to be provided at this time.	N
417.1	Manx Utilities Authority	3	"The Cairns" in Laxey should be de-registered as an area for tourism. The site is marked for the development of Laxey Sewage Treatment Works and MUA now owns a substantial proportion of this area.	The map and designation will be reviewed.	Potential
418.1	Democracy Isle of Man	DP	The plan fundamentally and irreversibly alters the character of the Isle of Man and therefore should not be progressed without a referendum.	Tynwald makes the final decision on the Plan at which point there have been a number of public consultations and a public inquiry.	N
418.2	Democracy Isle of Man	3	This fundamentally and negatively alters the spatial vision of the Island.	Views are noted.	N
418.3	Democracy Isle of Man	4	This negatively impacts the landscape.	Views are noted.	N
418.4	Democracy Isle of Man	DP	This negatively impacts the environment and nature of the Isle of Man. This must be put to a referendum.	Views are noted.	N
419.1	Isle of Man Friends of the Earth I	DP	Chapter 2: The local authority of Douglas should be involved in devising Development Briefs, at both a political and officer level	Briefs are to be put to the Inquiry; there will be opportunity to comment.	N
419.2	Isle of Man Friends of the Earth I	3	The spatial vision is sound.	Comment/support noted.	N

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419.3	Isle of Man Friends of the Earth I	5	I support chapter 5 as it is written.	Support noted.	N
419.4	Isle of Man Friends of the Earth I	6	I support the nine proposals as it is written. The recommendation seems a bit far stretched as it is costly and hard to implement for all buildings in an area. Seagulls can most effectively controlled by the food available to them. For that and other reasons, the disposal of whey into Douglas Bay should be stopped.	CO agree to review of the usefulness of UER 1	Potential
419.5	Isle of Man Friends of the Earth I	7	I support the proposals in the chapter. One additional priority should be to create safe road crossing of the Heritage Trail straight across over the New Castletown Road at the quarterbridge junction to link into the path on the nsc grounds next to the river Glass.	This is being developed as a scheme as part of broader improvements.	N
419.6	Isle of Man Friends of the Earth I	8	I support the draft policies, the seven proposals and the three recommendations. The plan objectives should also include maintaining and enhancing the viability and vitality of the business areas of Douglas by restricting office developments in out-of-town locations.	This is supported by the Strategic Plan Policies.	N
419.7	Isle of Man Friends of the Earth I	9	I support the draft policies and the eight mixed use proposals. For Mixed Use Proposal 5, a bus station should be included.	CO agrees to reviewing the chapter to check for adequate reference to buses/public transport.	Potential
419.8	Isle of Man Friends of the Earth I	10	I support the draft policies and nine tourism proposals.	Support noted.	N
419.9	Isle of Man Friends of the Earth I	11	I support the points made in this chapter.	Support noted.	N
419.10	Isle of Man Friends of the Earth I	13	I support the draft policies and comprehensive treatment area proposals. Particularly proposal 1 relating to the Villiers Site and proposal 2 relating to Market Street.	Support noted.	N
419.11	Isle of Man Friends of the Earth I	Evidence Papers	One observation on the Supplementary evidence paper on statistics relating to 'brownfield sites' and 'greenfield sites' : Comparing the the numbers of dwellings alone does not give the full picture of the land use as developments of former greenfield sites tend to be lower in dwelling density than development on brownfield sites. If the acentage of greenfield vs brownfield sites developments during the same period would be included in the comparison, the picture would look very different.	The paper and how data is recorded will be refined going forward to ensure that the information is useful and accurate. Comment is noted.	N
419.12	Isle of Man Friends of the Earth I	BH031	The Isle of Man has enough development land already available to meet the projected population needs without building on even more green fields. There are more than enough brownfield sites that should be made available for redevelopment first. If we allow close-to-town, large housing developments this will stop the much needed re-development of Douglas back into a attractive place to live. Some of the site is class 2 agricultural land, attractive for food production and hence should not be built on at all.	Please see Evidence Paper DP EP 5 (Update June 2019).	N
419.13	Isle of Man Friends of the Earth I	BM006	Greenfield site, should have lower priority than brownfield site development and only permitted when there is a clear need, classed as strategic reserve site. The site is outside of the established settlement boundary of Douglas. If the site is developed, it should be part of the local authority of Douglas as most of the services used by the future residents will likely be supplied by DBC.	Please see Evidence Paper DP EP 5 (Update June 2019). Local Authority boundary changes are dealt with through a different process.	N

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419.14	Isle of Man Friends of the Earth I	OH011	Greenfield site outside settlement boundary, it is not an infill site to close any gaps or to make settlements more compact. Development should not be permitted for development or at least be classed as a strategic reserve site. The regeneration of Onchan village by renewing the housing stock and the regeneration of Douglas should be encouraged instead.	Please see the final Site Assessment Framework Report for Site OH011.	N
419.15	Isle of Man Friends of the Earth I	SH013	Greenfield site, development should not be permitted. Community infrastructure is very limited, retail and employment have to be accessed by motorised transport. The site is outside the settlement boundary and is not an infill site.	Please see the final Site Assessment Framework Report for Site SH013.	N
420.1	Isle of Man Friends of the Earth II	3	There is no compelling case for the proposed scale of new out of town estates based on crucial factors a) current and predicted population, particularly in the light of the most recent trends, b) status of unoccupied properties or c) already available brownfield sites, which must take precedence over greenfield development.	Please see Evidence Paper DP EP 5 (Update June 2019).	N
420.2	Isle of Man Friends of the Earth II	3	As the need for such large areas to be developed has not been demonstrated, it would be wrong also to designate additional 'reserve' areas for future designation, without further consultation at the time, which might not happen if already so designated.	Please see Evidence Paper DP EP 5 (Update June 2019).	N
420.3	Isle of Man Friends of the Earth II	3	The proposed greenfield developments run counter to the Island Spatial Strategy referenced at 2.4.1 stating a key element as a "continued policy of urban containment... maintaining the distinctive character of existing settlements".	Please see Evidence Paper DP EP 5 (Update June 2019).	N
420.4	Isle of Man Friends of the Earth II	3.1.2	At the head of the Vision 3.1.2 is the statement that it "provides a framework for sustainable development". The concept of sustainability is used so loosely in many contexts, that in this document it is meaningless unless further defined. This crucial aspect is casually referred to in many sections, so must be addressed by the Government.	Sustainability is a theme that runs throughout the plan and continues to be as shown in the response to the consultation on the draft plan.	N
420.5	Isle of Man Friends of the Earth II	3.4.5	Initial response from those precise communities shows that the proposed plan would achieve the opposite effect.	Noted.	N
420.6	Isle of Man Friends of the Earth II	3.4.7	In 3.4.7 "By 2026, the green infrastructure network will be well established". Without proper definition and an idea of how to achieve this goal, it is a dubious statement.	It remains important to have a vision which sets a future focused and attainable goal to work towards.	N
420.7	Isle of Man Friends of the Earth II	3.6	There is also a passing reference that "consideration will be given to climate change", devoid of any guidance on what this would actually require of a development plan. The same criticism applies to 'Desired Outcome' 3.6.v when stating "To ensure that all new development avoids adverse environmental impact and is resource efficient to maintain	Para 3.6 v is proposed to be altered (see Schedule of Proposed Changes).	N
420.8	Isle of Man Friends of the Earth II	4.2.1	The view westwards from upper Johnny Watterson's Lane would be one such view.	Noted.	N
420.9	Isle of Man Friends of the Earth II	4 Landscape Proposal 1	Landscape Proposal 1 states that "Applications for development must demonstrate consideration has been given to such landscape strategies	Noted. Unsure if respondent is suggesting a change.	N
420.10	Isle of Man Friends of the Earth II	4.7	The following section 4.7 requires that all proposals "Conserve and enhance", so the weak request that "consideration has been given" must be substantially strengthened.	Landscape Proposal 1 is in relation to any planning application. This does not prevent proper judgement through the normal processes.	N

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420.11	Isle of Man Friends of the Earth II	5.2.2 Environment Policy 1	Standing alone, this statement is to be welcomed. However, as referred to above, it is precisely this 'over-riding national need' which the plan fails to address or establish in terms of the need for out of town housing developments in the short medium or long term.	The purpose of the plan is to replace the current operational plans with an up to date development which covers one area. It is an opportunity to review all elements in terms of development needs within a sustainable approach.	N
420.12	Isle of Man Friends of the Earth II	6 Natural Environmental Recommendation 1	This is a very welcome statement.	Noted.	N
420.13	Isle of Man Friends of the Earth II	5.4 (ii)	As above, there will have to be a strongly worded statement to the effect that ecologically unsustainable developments will not be permitted, not just a weaker requirement that developers have 'had regard to' environmental issues.	No changes proposed as a result of this comment.	N
420.14	Isle of Man Friends of the Earth II	5	As above, regarding the reference to mitigating the effects of climate change, there is no clue in the plan about how this could be achieved. Surely this is where we need to address the need for zero or low carbon building regulations, coupled with sustainable heating and lighting (eg air source heat pumps, solar panels).	Some issues are being dealt with at an island-wide scale.	N
420.15	Isle of Man Friends of the Earth II	5	One of the glaring omissions in the whole approach is the lack of regard to the huge carbon footprint of new rural builds, including traffic movements both in construction and subsequently by residents.	The approach to site release and priority has been amended as a result of the consultation.	N
420.16	Isle of Man Friends of the Earth II	6	Most of the recommendations are to be welcomed.	Support noted.	N
420.17	Isle of Man Friends of the Earth II	6.2.5	What this fails also to address is the environmental impacts of large cruise ships, which burn dirty fuel and have massive emissions, both in terms of NO2 and particulates, as well as greenhouse gases, adding to our already unacceptably high carbon emissions. Furthermore there are concerns over discharge of grey water in port and immediately off shore, and black water once only three miles out.	CO recommends no changes as a result of this comment.	N
420.18	Isle of Man Friends of the Earth II	6	It is also stated that "Higher tourist numbers would help to support a distinctive local offer within core retail areas and contribute to a dynamic and vibrant town centres." This is a claim wholly without justification, research from existing cruise ports and passenger spend does not clearly establish such a pattern.	CO recommends no changes as a result of this comment.	N
420.19	Isle of Man Friends of the Earth II	6.15	Urban Gulls. The suggested hazards posed are over stated. Before making recommendations of widespread draconian prevention measures, it would be instructive for the Government to consult Manx Birdlife re the threats to seabirds and avian life in general.	Point noted. This section has been redrafted.	Potential
420.20	Isle of Man Friends of the Earth II	7	My general comment is that new greenfield developments are inimical to the core principles of environmentally sustainable transport, inevitably producing more business and personal car journeys.	Comment noted.	N
420.21	Isle of Man Friends of the Earth II	7	Nowhere can I find any regard to risks to human health already posed by traffic congestion in central Douglas from (principally) diesel exhaust fumes.	CO does not have any data on air pollution in Douglas attributable to traffic but will endeavour to update the Inquiry on the matter.	N

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420.22	Isle of Man Friends of the Earth II	7.3.4	In 7.3.4 there is another reference to a deep water berth for cruise ships, stating that "parking for buses and coaches will be possible on the pier". As noted above, there has to be regard to the increased harmful emissions associated with large cruise ships, not least the emissions from the fleets of vehicles necessary to ferry large numbers of passengers around.	The narrative is taken from the Harbours Strategy itself.	N
420.23	Isle of Man Friends of the Earth II	11	My general comment is that new greenfield estates as experienced in developments in the island over recent decades are absolutely not the best way to enhance these aspects of living. It would be much better to address the existing poor provision of play and recreation areas as described in Table 11.	Comment noted.	N
420.24	Isle of Man Friends of the Earth II	12.2.6/12.3 (ii)	I struggle to see how this backdrop justifies designation of so much greenfield land for housing development as the East Area Plan wishes to do at the present time.	The site allocations have been amended as a result of the consultation.	N
420.25	Isle of Man Friends of the Earth II	12.9	Under 12.9, "Projections based on the 2016 Census and implications for Housing Need", there are a number of 'findings', three of which are actually hypothetical possible future trends. They are speculative and do not appear to have much solid evidence to support them, but the Plan rather too easily states that "Based on these findings, the Department is prepared to rely on the housing need figures set out in the Strategic Plan 2016."	Please see Evidence Paper DP EP 5 (Update June 2019).	N
421.1	Marown Memorial Playing Fields	Close Jairst Beg/ Ballaglonney Farm	Sites are situated immediately adjacent to the Heritage Trail. Residential development here would be in contention with UNESCO Biosphere status. The Heritage Trail and River Dhoo host wetland habitats throughout the central region and attracts many hikers and cyclists. Development would likely exacerbate flooding issues downriver and into Douglas Harbour.	Comments noted. No changes are proposed by CO.	N
421.2	Marown Memorial Playing Fields	Close Jairst Beg	December 2016: planning approval refused for the Close Jairst Beg fields due to adverse impact on 'species or habitats of international, national or local importance'. What has changed to allow this policy to be ignored?	Please see the final Site Assessment Framework Report for the Site.	N
421.3	Marown Memorial Playing Fields	Ballaglonney Farm	Development on this site contradicts SP Environmental Policy 1 and would represent a 75% increase of the current number of houses in Crosby and is not in accordance with Strategic Policy 3.	Please see the final Site Assessment Framework Report for the Site.	N
421.4	Marown Memorial Playing Fields	6	Vacant brownfield sites should be considered and incentivised ahead of greenfield. Grants or loans should be considered to assist buyers to buy and improve older houses in need of renovation.	June Tynwald is considering a Report on Unoccupied Urban Sites. Work is continuing on this issue.	N
421.5	Marown Memorial Playing Fields	3	Proposed area of zoning would destroy Crosby's village character and be totally out of proportion to meet the housing demands of the area (SP Spatial Policy 4).	Please see the final Site Assessment Framework Reports for the Sites in Crosby.	N
422.1	Onchan AFC	5	3 fields on the left hand side of Blackberry Lane as you go up from Summerhill (designated as Green Gap in the Plan) should be designated for recreational use as both Old Boys Football Club and Onchan AFC have facilities on these fields.	No changes are proposed by CO as a result of this comment. The Proposal on the Green Gap is proposed to be amended slightly.	N

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426.1	Finch Hill Pavillion and Bowling Club	DH001	Company and 90 members object to redesignation as 'Mixed Use'. The site should retain the designation of 'Area of Buildings for Civic, Cultural & Other Special Use; Recreation and Leisure'. Owners are not in favour of a change of designation and have recently agreed new and extended leases to the Finch Hill Pavillion and Bowling Club and Douglas Lawn Tennis Club.	CO agrees to look at the designation of the pavillion and bowling club within the area identified as DH001.	Potential
427.1	Isle of Play	11.4 (i)	Isle of Play welcomes and supports this aim and desired outcome.	Comment noted.	N
427.2	Isle of Play	11	Chapter 11 is the relevant part of the Plan where evidence and information should be found on the provision (including the location relative to residential development and any road barriers) and quality of open space, children's play space and outdoor pitches in the Eastern Area. These should be set out against the minimum standards for sports pitches, children's play areas and amenity space per 1000 population as set in the Strategic Plan. The minimum standard is stated in Para 11.7.1 as the benchmark against which current provision is assessed.	Comment noted.	N
427.3	Isle of Play	Evidence Paper 6	The Evidence Paper 6 merely contains basic information on the provision of open space and community facilities. There is, for example, nothing about the location of children's play space relative to residential development or any barriers such as Main Roads to cross to access the play space or, most importantly, about the quality of the play space provided.	These are valid points and will be picked up during the planning brief stages and overall masterplans.	N
427.4	Isle of Play	11 Table 11	Table 11 summarises the figures. The Table is inadequate in that it does not state that the figures are per 1000 population, it does not give the Strategic Plan benchmark but compares the figures to Jersey. There is no explanation as to why Jersey is the chosen comparator rather than, for example, a rural UK Local Authority. When the figures in the Table are compared to the minimum Strategic Plan benchmark then it shows that there is a significant deficit in Children's play space in each Local Authority in the East. The overall provision is 0.06ha per 1000 population whereas the minimum benchmark is 0.6ha per 1000 population. The current provision is particularly poor in, for example, Marown where there is a high proportion of family type housing. Similarly, the figures in the Table for Outdoor Pitches show an overall provision of 0.61ha per 1000 population against the Strategic Plan benchmark of 1.8ha per 1000 population. Again there is a deficit in all the Local Authority areas contained within the Plan. Isle of Play notes the evidence presented on the significant deficit in children's play space and outdoor pitches and is alarmed to find that the three Open Space and Community Proposals do not address this evidence and do not meet the desired outcome. Indeed the three Proposals did not seem to be 'Land use Proposals' but appear to be statements of intent/policy rather than land use proposals.	CO agrees to review in more detail the points raised in this comment and the ones that follow.	Potential

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427.5	Isle of Play	11	An alternative child-focused approach for play provision and independent mobility Isle of Play would like to draw the Planning Office's attention to the report "Cities Alive – Designing for Urban Childhoods (2017) produced by Arup which can be found at https://www.arup.com/perspectives/cities-alive-urban-childhood . This report highlights the importance for planners in building cities which are better places for children to live. We acknowledge that the areas within the Eastern Plan are not cities but we would urge the same principles to be employed. There should be an emphasis on enabling children to get around independently, and providing play opportunities thereby increasing the amount of time they spend outdoors and in contact with green and diverse spaces and engaged in physical activity. The benefit of addressing these issues in the Plan with meaningful proposals will lead to a child-friendly outcome which adds value to all citizens' lives. Such an approach will attract inward migrants to our Island by encouraging them to see the Isle of Man a place for them to live, work and raise a family because the Isle of Man Government places a high value on the quality of life of its young people.	CO agrees to review in more detail the points raised in this comment	Potential
427.6	Isle of Play	11	A Plan in which both children's play and their independent mobility is prioritised will reap public health rewards in the physical and mental health of its future generations. The 2018 Isle of Man Public Health Report – Tackling Childhood Obesity by Dr Henrietta Ewart emphasised that the key to addressing this huge public health problem lay in sustained co-ordinated action across many agencies and partners. The Eastern Plan should be part of this co-ordinated action and the provision of play opportunities and children's independent mobility should be at its core – not its periphery.	CO agrees to review in more detail the points raised in this comment	Potential
427.7	Isle of Play	11	The Plan is not ambitious in its approach and does not stipulate as a key principle that there should be a network of accessible spaces, streets, open areas and public spaces, natural areas so children can move freely between these environments in a free and playful way. This will enable the children to build resilience, be creative and interact socially all leading to healthier and happier lives. Such an approach is so far away from a Plan which merely notes desirable outcomes but does not set out any clear proposals as to how they will be achieved. Such an approach means thinking beyond fenced off playgrounds and a quantitative reckoning of play areas. and towards planning for and building in playful interactions at many locations enabling spontaneous opportunities for play and physical activity. Green outdoor space and play areas in the East Areas cannot just be the spaces left over once the housing and commercial uses have been mapped out. Planners need to act strategically to achieve these aims as high priorities and to integrate child friendly thinking into all aspects of the Plan.	CO agrees to review in more detail the points raised in this comment and the ones that follow.	Potential

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427.8	Isle of Play	11	At a specific level, the Plan should include an objective of including wild spaces and freestyle playgrounds within the Eastern Plan Area so that even in the centre of Douglas or Onchan children and teenagers can play in engaging environments designed with consideration for their needs. Without such provision and consideration, children will be drawn towards unfavourable behaviours and a cycle of boredom, local vandalism, inconsiderate behaviour followed by negative reaction and intolerance from the local community will result.	CO agrees to review in more detail the points raised in this comment and the ones that follow.	Potential
427.9	Isle of Play	11	The Plan should also focus and make specific provision for children's independent mobility – allowing children to access schools, libraries, sports grounds etc by safe pedestrian routes, and addressing traffic and safety issues. If not, then the Eastern Plan will remain too focused on the car and its associated problems of pollution, congestion, anti-social behaviour and childhood obesity. This approach has a wider societal impact: if children can independently access facilities then so can the elderly, disabled and disadvantaged people who are also less likely to drive.	CO agrees to review in more detail the points raised in this comment and the ones that follow.	Potential
428.1	Braddan Football Club	DH049/DH050	Objects: Part of the DESC Glencrutchery Road Playing Fields are leased to Braddan AFC who have invested time and money in improving the pitch and facilities and running a TT campsite. DH049 and DH050 are contrary to objectives 11.3.ii and 11.3.vi and the sites should be protected as Open Space and Recreation. Correction to 'Douglas Sporting Pitches' table: DESC- Braddan AFC. Victoria Road, Douglas, Isle of Man. IM2 6AQ. Correction to All Sites List: DH049- Site name 'Old Rugby Pitch' is inaccurate as only 1/3 was previously leased to Vagabonds Rugby Club. DH050 and DH049 should feature as a single site.	CO would like more time to prepare a response and this will be updated in due course and ahead of the PIM on 18th July 2019.	
428.2	Braddan Football Club	Evidence Papers	In the draft area Plan for the East, and in particular the entries in the Audit of Community Facilities under Sports Pitches, the audit identifies Braddan Football Club as an organisation located at Nobles Park. This is incorrect, as only Douglas & District FC are located there. Braddan AFC are located on a plot adjoining the DESC land at Glencrutchery Road Playing Fields and our site is parallel to Victoria Road. Braddan Football Club has a significant interest in the proposals of the Draft Area Plan for the East and the Club requests that this error is corrected during the consultation period as it has a material effect on sites DH049 and DH050 in the All Sites List and Site Identification Report and the proposed uses as housing for those sites.	CO would like more time to prepare a response and this will be updated in due course and ahead of the PIM on 18th July 2019.	

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428.3	Braddan Football Club	DH049/DH050	My Club committee has considered the draft plan and the potential impact on the long term future of the Club, and given the level of commitment shown by my Club in developing and improving our site over many years for successive generations of our club and the service provided to the community, Braddan AFC respectfully concludes the following: That the proposed use for sites DH049 and DH050 is contrary to the Objectives of the draft plan which state:- "11.3.ii To protect existing open space and recreation facilities.." and "11.3.vi To protect existing community facilities" and recommends that the sites should be protected as Open Space and Recreation.	As above	
428.4	Braddan Football Club	DH050	It is unclear how site DH050 was separately identified in the draft area plan, at 0.36 hectares it would be only a very small part of the DESC land leased to IOM Sport and in our view should form part of DH049.	As above	
428.5	Braddan Football Club	Evidence Papers	In the draft area Plan for the East, and in particular the entries in the Audit of Community Facilities under Sports Pitches, the audit identifies Braddan Football Club as an organisation located at Nobles Park. This is incorrect, as only Douglas & District FC are located there. Braddan AFC are located on a plot adjoining the DESC land at Glencrutchery Road Playing Fields and our site is parallel to Victoria Road.	As above	
429.1	Hospice Isle of Man	1 & 2	Braddan Football Club has a significant interest in the proposals of the Draft Area Plan for the East and the Club requests that this error is corrected during the consultation period as it has a material effect on sites DH049 and DH050 in the All Sites List and Site Identification Report and the proposed uses as housing for those sites.	Check original submission re error.	
429.2	Hospice Isle of Man	4	I know it costs more to keep service supplies under ground, but it makes a tremendous positive difference to the look of the Island. I recently stopped for tea at the ManxSPCA Tea Rooms and the telegraph wires across the valley were very noticeable - such should be banned or, at the very least, seriously discouraged.	Comment noted. There is a general encouragement for all new development to have services underground where possible.	N
429.3	Hospice Isle of Man	5	Points already made earlier.	Comment noted.	N
429.4	Hospice Isle of Man	6	It must be well contained.	Comment noted.	N
429.5	Hospice Isle of Man	7	I believe the transport and utility services to Glen Vine & Crosby are good. However, the roads are regularly in heavy use. Any noticeable housing or office/industrial development would only worsen the problem.	Comment notedn	N
429.6	Hospice Isle of Man	8	I do not believe employment is a factor in Marown.	Comment noted.	N
429.7	Hospice Isle of Man	10	It should be encouraged. We have a beautiful Island, with wonderful	Comment noted.	N
429.8	Hospice Isle of Man	11	Already made my points	Comment noted.	N

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429.9	Hospice Isle of Man	12	Recent evidence is that the working population is still declining and that the Island has more unoccupied houses/apartments than anywhere else in the British Isles. I realise the detrimental impact on the construction industry, but I believe this means residential development should be seriously restricted and should concentrate entirely on providing housing for locals who are currently restricted to renting at high cost. Homes and facilities for the elderly, including nursing homes, are however increasingly essential as the Island is already at crisis point in this sector and the over 60s population is growing!	Please see Evidence Paper DP EP 5 (Update June 2019).	N
429.10	Hospice Isle of Man	MM001 & MH001	As stated earlier in my response, I am very concerned that BREXIT will, with or without an exit agreement, place a far greater burden on British agriculture, so I am absolutely against the development of good farming land.	Comment noted.	N