



Isle of Man
Government

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Draft Area Plan for the East
PIP 2
Cabinet Office Response Table - Part 2

Cabinet Office

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1 Chapter 1

1.1 *Plan process*

- 1.1.1** A number of concerns have been raised about the plan process, including the necessity of producing a Plan for the East at this stage. While the commitment to producing four separate area plans is not set in stone, it is felt that since the Area Plan for the South was published and is now in operation, it is appropriate that Plans for the East, North and West follow to ensure that up to date Area Plan cover the entire Island.
- 1.1.2** Some respondents felt that the Draft Area Plan did not respond fully to the concerns raised in during the Preliminary Publicity consultation. This document strives to provide detailed and specific policies, cannot respond directly to every piece of consultation feedback.

1.2 *Written statement and maps*

- 1.2.1** The style of the written document has been called into question, with some respondents reporting that the policies are over-prescriptive and the writing-style too wordy. This will be taken into account in the Final Draft and additional Evidence Papers.
- 1.2.2** Feedback regarding the online consultation has been noted and every effort will be made to ensure that future Plan consultations are as accessible and straight forward as possible. Some issues cannot be easily rectified, for example, the display of downloadable maps, therefore alternative means for accessing paper maps will continue to be provided.
- 1.2.3** While support for the “Desired Outcomes” set out for each chapter has been voluble, several respondents have referred to these sections “wish lists” and have questioned if such ideal outcomes can be delivered by this Plan. These outcomes do represent the best possible outcomes of planning policy, and it is vital that CO uses this vision-drafting process to establish a direction for growth and development. On publication for the Final Plan, a system of monitoring will begin to assess how far the Plan is delivering on its targets.

1.3 *General compliance with the Strategic Plan*

- 1.3.1** There was some concern that the Draft Plan did not reflect Strategic Plan policies. It is worth bearing in mind that the content of the Strategic Plan is not a static one; the duty to monitor and respond to market and economic conditions require some minor variation from these policies.

2 **Chapters 2 & 3**

2.1 *Spatial vision and site selection*

- 2.1.1** Some respondents have questioned whether the site selection included in the Draft Plan reflects the Island Spatial Strategy for Douglas and the East outlined in 2.4.1. The key elements of this strategy are “continued regeneration within Douglas” and a “continued policy of urban containment”. CO is of the opinion that this strategy has been reflected in the site selection, which has focused on areas within Douglas and on the edges of this settlement. While other sites have been selected in the service centre (Onchan) and service villages, where appropriate these have been designated as Strategic Reserves to build flexibility into the plan and to reflect changing demographic realities.
- 2.1.2** Other respondents expressed the opinion that the current spatial policy including the settlement hierarchy has led to over concentration of the population in Douglas and the East to the economic detriment of other settlements, in particular Ramsey and the North. CO is of the opinion that the location of future residential and employment land in the Draft Plan accurately reflects current societal trends and good planning practice, including a move towards a greater take up of Active Travel and more people living close to their places of work. By locating new development in existing settlements we can optimise the use of existing infrastructure and services and create vibrant neighbourhoods which combine a high standard of urban living with access to outstanding countryside.
- 2.1.3** The Draft Plan does not set out to prioritise Douglas over the Island’s other towns but does recognise its status as a major hub for population, employment and transport. The forthcoming Area Plan for the North and West will set out equally aspirational aims which will seek to build on the distinctive elements of these areas and provide opportunities for employment and housing and increased investment into community projects.

2.1.4 Some respondents have requested that a visual illustration of the proposed spatial vision be included in the Final Plan. This will be considered.

2.2 *Development briefs*

2.2.1 Development briefs are a useful tool for Planning Policy Officers and other stakeholders to assess and set out the development potential of a site. We take on board the criticism that the absence of development briefs from the Draft Plan has inhibited the evaluation of site selections. To ensure that these documents are fit for purpose moving forward, CO will be allotting sufficient time to the drafting Development Briefs in the run up to the Public Inquiry schedule for September 2019.

2.3 *Distinctive settlement character*

2.3.1 Concerns have been raised that the Draft Area Plan site selection does not deliver the priority to maintain the distinctive character of settlements. This has been raised particularly in reference to sites BH030 and BH031. While CO agrees that the character of settlements is of vital importance, it is worth bearing in mind that all settlements on the Island have developed over time and incremental change is essential to a growing population and diversifying economy. All new developments will be subject to intense scrutiny through the planning process and the contribution to settlement character will be an intrinsic part of this.

2.3.2 Some respondents have commented that in the Draft Plan Onchan and Braddan have been relegated to the position of suburbs existing only in relation to Douglas. This is not the impression which CO intends to give. In fact, the CO hopes to increase the status of Onchan as a service centre and Glen Vine, Crosby, Strang and Union Mills as service villages with distinct characters and a focus of local neighbourhood amenities. By supplying more facilities and amenities locally, unnecessary trips to Douglas can be reduced. Some respondents have expressed concern that Onchan is in danger of losing its "village" character and being subsumed into Douglas. CO believes that is possible to develop the service offer of Onchan while maintaining its distinct character and ensuring that the high quality of life of residents is maintained.

2.3.3 The undesirability of settlement coalescence has been raised by many respondents to the consultation, particularly as regards Union Mills and Strang and between Douglas and Braddan. The Island's villages are a major contributor to the charm and appeal of the Island and the Plan fully endorses the need to safeguard the character of the Island's villages of towns. However, physical distinctiveness is not the only element of "placemaking" and other elements, such as well-designed centres and walkability are extremely important to local character. The merging of specific settlements is not necessarily a bad outcome if it maximises the available road and utility, education and health assets currently in place. Rather than a zero-tolerance policy towards coalescence, efforts should be made that any merging of settlements is sensitively managed and landscaped to achieve an attractive result.

2.4 *Greenfield development*

2.4.1 The sustainability of building on greenfield sites has been questioned, raising the important point that, once developed, the future ecological value of this land could be diminished. While recognising the validity of this statement, CO believes that careful planning allows for the release of greenfield land only when absolutely necessary, with conditions which ensure that the impact on the environment is minimised as much as possible.

2.4.2 A number of respondents have referred to a "greenbelt" surrounding Douglas and Onchan. Unlike in the UK, no official greenbelt exists in the Isle of Man, allowing for a more flexible approach to spatial planning on the edges of settlements. However, green gaps have featured in the Draft Plan and these are likely to be explored further at Public Inquiry. CO is not proposing development on a scale that would constitute 'urban sprawl', but well-timed, high-quality developments that respond to changing housing requirements.

3 Chapter 4

3.1 *Landscape Character Areas*

3.1.1 There has been significant comment on the landscape chapter, reflecting the very important status of the Manx countryside. There is also some overlap with the discussion of Chapter 11 concerning Open Space. Contrary to the feelings of some respondents, the landscape areas discussed in this chapter are not selective, but reflect the complete range of landscape character areas discussed in the 2008 Landscape Character Assessment Report. Some respondents requested that protection for views and landscape elements be strengthened rather than merely offered protection, and this is an area worthy of further investigation in concert with the review of the Natural Environment chapter.

3.1.2 Some respondents have questioned how this chapter, which is largely descriptive in nature has been applied in practice to site selection. Every site included in the Draft Area Plan has been appraised on its own merits, with reference to its setting within Landscape Character Areas. Landscape character setting will be discussed in more detail at the Development Brief stage. CO does recognise that more explanation of how the considerations of this chapter are applied in practice may be required, particularly as regards the landscape impact of proposed developments in Union Mills, Strang, Glen Vine and Crosby.

3.1.3 Several respondents have voiced the opinion that there is significant variation in the quality of Manx landscape and this should be considered when siting new development. While some areas should remain totally unspoilt, others areas which are of less environmental value could accommodate some sensitive development.

3.2 *Planning application assessment*

3.2.1 Several important points were raised by respondents, including the fact that all views, not just those raised by planners in this chapter, must be considered at the planning application stage. This is an essential part of the planning process and one that can only be improved by applying the findings of the Landscape Character Assessment. Additionally, another respondent stated the importance of viewing the landscape as a living entity which must be maintained and nurtured rather than abandoned. Sensitive, well-located development can bring vitality back to degraded elements of the landscape.

3.2.2 It is also worth noting that the criteria set out in this chapter are not exhaustive: they refer to how new developments should respond to their landscape setting and are not required to make reference to other considerations such as traffic, drainage, light pollution or community facilities, all of which are covered in other chapters.

4 Chapter 5

4.1 *Sustainable development*

4.1.1 Some respondents have requested more detail on what is meant by “sustainable development” and how future developments can be made carbon neutral. This sits within wider government policies on Climate Change mitigation and the Final Plan will seek to incorporate the latest guidance and policy on sustainable development. It is the case that while not making specific reference to climate change, several sections of the plan will have direct impact on climate change mitigation strategies on the island, such as the delivery of energy-efficient homes, the eco-proofing of existing homes. Increasing tree and shrub covers can act as pollution buffers and siting new development away from areas of known flood risk. There was significant support from respondents for preserving existing trees in the East and promoting further planting.

4.2 *Landscaping*

4.2.1 Several respondents urged CO to put greater consideration into landscaping requirements for new developments. CO fully endorses these comments and landscaping requirements will be discussed in detail during the Development Brief stage.

4.3 *Flood mitigation*

4.3.1 Flooding, particularly in relation to specific sites, was mentioned by a number of respondents. CO is committed to recognising and protecting floodplains such as Port-e-Chee meadows and ensuring that overland flow from new developments is controlled. This risk of flooding associated with the increased frequency of intense weather events due to climate change is recognised and any new development will have to take drainage into account, including the effect on the downstream areas. The reuse of brownfield land is an important strategy in limiting the effects of future flood events.

4.4 *Conservation Areas*

4.4.1 Several respondents expressed concern at the current status of Conservation Areas and the efficacy of their management plans. This is an issue which deserves focused attention and a work stream is underway to examine and update the register of Conservation Areas on the Island. A detailed proposal for a new Conservation Area for the Douglas Head has been received and this will be explored outside of the Plan process.

4.5 *Green Infrastructure*

4.5.1 While the concept of “Green Infrastructure” does require further definition in the Plan, there was widespread support from respondents for green spaces to be incorporated into developments in both urban and rural settings. Several respondents supported the creation of green corridors and suggested potential routes for these to take. It is worth noting that the land ownership of these corridors is likely to be complex and will take time to consolidate as private land parcels come onto the market.

4.5.2 There was also support for smaller natural spaces which provide important wildlife havens within built up areas and require appropriate protection. Green gap policy has received considerable support and additional green gaps have been suggested, including between West Douglas and Braddan and between Laxey and Baldrine.

4.6 *Wildlife Sites*

4.6.1 A significant number of responses were received on the subject of Wildlife Sites and there was widespread support for the 14 potential Wildlife Sites to be formalised. Further work on these sites will take place outside of the Plan process. One respondent commented that it was essential for Plan policies to protect all species and habitats, not just those which are of international importance. While environmental protection extend beyond this single document, it is CO's belief that all species and habitats must be factored into development decision making. Some respondents were concerned that insufficient time had been spent investigating the wildlife and plant species prevalent in development sites. It is worth noting that any planning application on designated sites will be heavily scrutinised and ecological data will be gathered and assessed ahead of any approvals being made.

4.7 *Dark Skies*

4.7.1 There was support for Dark Skies policy, with the additional comments that excessive lighting should be avoided in all developments. This is an issue which may be revisited during the upcoming review of the Strategic Plan. Concerns were raised regarding the potential impact of development at Baldrine on the nearby Dark Sky sites of the Conrhrenny plantation car park and the Ballanette nature reserve. This is a situation when such policies would come into play and the cumulative effect of lighting from new and existing development would be carefully assessed.

4.8 *Agriculture*

4.8.1 Several respondents have raised concerns about the potential loss of farmland if the development of certain sites goes ahead. The anticipated need for increased local food production following Brexit and the potential loss of grassland and hedgerow habitats have been raised as areas of concern. The Agricultural Land Assessment is used to ascertain the productive quality of farmland and rate it accordingly, meaning that only lower quality land is released for development. Where there will be unavoidable impact on wildlife habitat, conditions will be applied to ensure that there is no net biodiversity loss.

4.9 *Biosphere*

4.9.1 Many respondents referred to the Island's status as a UNESCO Biosphere and questioned if the policies contained in the Draft Area Plan are concurrent with this status. Biosphere status requires commitment to conserving and developing the Island in a sustainable way. The role of planners is to deliver these obligations simultaneously, ensuring that environmental concerns are always factored into economic development strategies.

4.10 *National need*

4.10.1 Some concerns were raised regarding policies making reference to "national need" which has the potential to override environmental protection under a given set of circumstances. Any such "national need" would be subject to intense scrutiny and would only take precedence over environmental concerns if no other options were available.

5 Chapter 6

5.1 *Definition of "urban"*

5.1.1 A repeated criticism of this chapter was the use of the word "urban", as several respondents felt that this was not an appropriate descriptor of the Island's settlements. This term has been chosen to delineate towns and large villages from "rural" locations: smaller villages, hamlets and isolated farmsteads. "Urban" implies concentrations of population and services and is a useful descriptor for the purposes of the Draft Plan.

5.2 *Brownfield development*

- 5.2.1** There was significant support from respondents for the redevelopment of brownfield sites and refurbishment of existing properties. Many respondents were in favour of the conversion of the upper floors of retail establishments to residential, and the conversion of disused office space to residential in order to bring people back into Douglas Town Centre. Other suggestions for the reuse of brownfield sites in Douglas included a university campus on the Summerland Site and converting boarding houses to student accommodation. CO welcomes this support and will keep working to ensure that such developments are attractive to investors and deliverable in the short term. The Tynwald Select Committee on Unoccupied Urban Sites has investigated the issues surrounding the release and development of Brownfield sites as some length and has made its recommendations. These recommendations will feed directly into the final Area Plan for the East.
- 5.2.2** Regarding the use of upper floors, one respondent suggested a separate Call for Sites in order to capture the potential for such conversions. This suggestion will be considered in the design of future Area Plans. The same respondent also suggested the same process for identifying historic assets which would benefit from redevelopment. Again, this suggestion will be considered for inclusion on future Area Plans.
- 5.2.3** Some respondents called for Government to use its powers to incentivise brownfield sites and impose penalties for the development of greenfield sites. CO believes that the most appropriate way forward is to work to remove barriers to the development of brownfield land and to ensure that in those cases where greenfield development is unavoidable, developer contributions, either through Section 13 agreements or through the forthcoming Community Infrastructure Levy, are used for the benefit of local communities.

5.3 *Provision of car parking in urban developments*

- 5.3.1** A number of respondents have expressed concern that there will be an under provision of parking when brownfield sites are developed in Douglas and the reality is that most households do own at least one car. CO is of the opinion that, in many cases, providing limited onsite parking will be the only way to deliver these sites, and that such housing, particularly apartments, will be most attractive to young professionals or elderly people who do not own cars. The alternative is that these sites remain vacant and continue to have a negative effect on the amenity of the capital.

5.4 *Eco standards for new builds*

5.4.1 Some respondents suggested increasing minimum eco standards for new builds and introducing incentives for Passiv Hus technology. While an Area Plan can include such advances within a vision for progress, these are areas which need to be explored further through the Strategic Plan review and Building Regulations.

5.5 *Registered buildings*

5.5.1 Concerns were raised regarding the existing backlog of buildings being considered for registration. While building registration lies outside the scope of the Plan, it is an important consideration when looking holistically at the historic built environment in the East and identifying which buildings are most at risk of decay or inappropriate development.

5.5.2 One respondent suggested an amendment to Urban Environment Proposal 6 which CO is happy to take forward. The amendment concerns additional text to require the consideration of the immediate setting and, in some cases, the landscape context of an asset which is on the Register or being considered for inclusion.

5.6 *Historic urban setting*

5.6.1 Some respondents commented on the desirability of incorporating old and new structures in the urban landscape which can work together to show the lifetime of our Island. CO fully supports this approach and will continue to pursue planning solutions which celebrate the best of old and new architecture and street design. Lack of unity was raised as an issue particularly in Douglas and inappropriate modern buildings were highlighted by a number of respondents. It is important that elements of street design, such as lighting, railings and pathway materials, are also considered in the design process.

5.7 *Housing regeneration*

5.7.1 Some respondents raised the need to regenerate dilapidated housing stock in Douglas, particularly before building additional housing in the East. This issue is primarily an area of focus for the housing department of Douglas Borough Council with who CO is pleased to work to ensure the delivery of regenerated housing.

5.8 *Urban gulls*

5.8.1 Several respondents were confused at the inclusion of gulls in this chapter, believing that this is a building regulations issue and that the problem was overstated. This section will be reviewed going into the final draft.

5.9 *Douglas Harbour*

5.9.1 While the Draft Area Plan only reproduces the work of DOI on Harbours Strategy, CO is in a position to feedback comments from this consultation on new deep water berth proposals, in particular as regards carbon emissions and footprint and the real potential for tourism expansion through the cruise industry.

5.9.2 Several respondents wanted to see regeneration of the North and South Quays and the replacement of industrial buildings with a mixture of retail and residential accommodation. The Quayside Comprehensive Treatment Area will be a focus of regeneration moving forward.

5.10 *Urban vs rural living*

5.10.1 Some respondents maintain that residential choice is central and that a lack of conveniences and services is an acceptable pay off for the amenity of living in the countryside. While CO respects this position, changing attitudes to car use and the need to “life-time proof” homes and communities to provide better quality of life for older residents means that there is an obligation to increase the sustainability of villages for social and environmental gain.

6 Chapter 7

6.1 *Impact of development on the highway network*

6.1.1 Many respondents raised concerns about the effect of increased housing numbers on the transport networks. These issues have been explored in detail in PIP 2 - Impact on the highway network of the Draft Area Plan for the East.

6.2 *TT and MGP traffic impact*

6.2.1 A number of respondents raised concerns regarding pressures on the existing road network during TT. Traffic movements during major events are a very important consideration. Not only journey generation, but also safety and emergency access, must be considered. The nature of access restrictions during TT events in particular, generates peculiar traffic effects in certain areas. These are all subject of advice from the roads manager, the Department of Infrastructure. In the creation of the Draft Plan and updated evidence papers, attention has been paid to the traffic pressures created by development of individual sites and a holistic overview paying attention to commuter traffic, TT/MGP traffic and hospital traffic.

6.3 *Traffic pressure points*

6.3.1 Several traffic pressure points were highlighted by multiple respondents, including: Quarterbridge and Jubilee Oak Roundabouts, Government Hill Roundabout, Ballafletcher Road, Onchan Main Road and Lord Street Roundabout. Ongoing work with DOI is taking place to ensure that planned development in the East takes account of these trouble spots and works to reduce congestion in these areas where possible.

6.4 *Heritage transport*

6.4.1 Several respondents suggested that the utility of heritage transport has been overstated in the Draft Plan. The intention was never to suggest that the Steam Railway, Horse Trams and Manx Electric Railway can provide alternative commuter transport, but that they have an important role to play in the unique visitor appeal of the Island, and to function most effectively they must be integrated into the broader public transport system through physical connections and complimentary timetable design.

6.5 *Tourist links*

6.5.1 One respondent suggested that there be a focus on limiting new development on the main arteries out of Douglas as these are crucial links for visitors to the Island. While it is impossible to limit all development on these link roads, CO support the intention to ensure that these arteries are attractive and well maintained.

6.6 *Douglas Promenades*

6.6.1 Douglas Promenades featured prominently in the consultation responses, with many respondents concerned about the appearance and utility of the Proms and how they then function as an advertisement for the Island. Since the publication of the Draft Plan significant work has started on the Promenades Regeneration Project which will address many of the concerns raised during the consultation.

6.7 *Electric vehicles*

6.7.1 Some respondents used the opportunity of the consultation to highlight alternative strategies for transport on the Island, including comprehensive electrification of vehicles and the introduction of a light rail system. Such suggestions, while outside the scope of the Plan, are welcomed as they provided planners with evidence of support for different responses to the Island's current transport issues.

6.7.2 Several respondents were keen to see requirements for electric vehicle charging points imposed on all new developments. CO is happy to support this and has developed the appropriate policy with the assistance of DOI.

6.8 *Parking*

6.8.1 Parking in Douglas was raised as an issue, particularly as regards the loss of parking spaces on the Prom during the regeneration works. Several respondents were concerned about parking pressures in the Town Centre and supported the creation of a new multi-storey car park. A Car Parking Study is forthcoming for the DOI and this will explore these concerns in much greater detail than is appropriate here.

6.9 *Public transport*

6.9.1 On the subject on public transport, one respondent stated that more hubs are required outside Douglas. This is an issue which will be addressed through future Area Plans.

6.9.2 Several respondents supported the introduction of a Park & Ride to reduce traffic congestion and alleviate parking issues in Douglas. This is a development which deserves further investigation and careful planning.

6.9.3 There was significant support from respondents for improved provision of cycling lanes and bicycle storage. By working together with DOI, CO will deliver the Active Travel Strategy and ensure that new development delivers appropriate provision for pedestrians and cyclists.

6.10 *Utilities*

6.10.1 Some concerns were raised regarding utilities in rural areas, in particular connection to the main sewage system, septic tank systems and associated tail drains and data network systems. CO is working closely with the DOI and Manx Utilities to address capacity issues and to identify opportunities to deliver improvements to the system.

6.11 *Active travel*

6.11.1 There was significant support for focusing development within Douglas and therefore reducing pressure on the external road network and increasing opportunities for Active Travel.

6.11.2 One respondent raised the issue of crossings for school children as a crucial means of delivering the Active Travel strategy. They highlighted Fairy Cottage, Laxey and Baldrine Park as potential crossing points.

7 Chapter 8

7.1 *Changing working patterns*

7.1.1 Some respondents raised the point that future working patterns, such as an increase in employees working from home, would have an impact on traffic flows to and from employment sites and that this should be factored into future development planning.

7.2 *New workspaces*

7.2.1 There was support for an imaginative approach towards creating work premises for SMEs and creatives, including the conversion of existing buildings.

7.3 *Employment spatial strategy*

7.3.1 Some respondents were concerned that too much employment development is being focused in Douglas to the detriment of the rest of the Island. An alternative approach would be to promote employment opportunities throughout the Island which would help to support local communities. CO does not believe that the two approaches are mutually exclusive and future Area Plans will give a renewed focus on promoting economic development throughout the Island.

7.4 *Brownfield sites*

7.4.1 Many respondents would like to see the majority of employment development on brownfield sites in Douglas instead of on previously undeveloped sites. CO is happy to promote the delivery and development of brownfield sites for appropriate employment uses.

7.5 *Out-of-town employment sites*

7.5.1 There was a strong sense that infrastructure and services need to be improved in out of town employment sites. One respondent suggested that a better catering offer at Cooil Road would reduce the number of unnecessary lunchtime trips to Douglas. The same respondent suggested a new cycle path from the Saddlestone/ Farm Hill Area to reduce the number of car trips. These are both interesting points which CO consider when looking at the future development of Cooil Road. The suggestion of increasing the evening retail offer is an interesting one but does not tally with the current town centre-first retail strategy, nor does the general provision of more retail outlets with their own parking designed to be visited by car.

7.6 *Employment and population growth*

- 7.6.1** Some respondents questioned the assumption of future economic growth linked to population growth and suggested that a more realistic response might be to prepare for the potential shrinkage of employment on the Island.
- 7.6.2** Regarding employment areas on the Island, some respondents have raised concerns about the growth of Cooil Road to the detriment of office and retail spaces in within Douglas. It will always be the case that certain uses cannot be accommodated within the Town Centre, though, wherever possible, a “Town Centre-first” policy will continue to be implemented.

8 Chapter 9

8.1 *Regeneration of Douglas Town Centre*

- 8.1.1** A number of respondents have raised concerns about the current condition of Douglas Town Centre and its ability to attract and maintain potential island residents and tourists. CO is aware of these issues and believes that the Draft Area Plan includes instruments to raise the profile of Douglas, including the creation of Comprehensive Treatment Areas, policies to restrict temporary car parks and expanded brownfield policy. The regeneration of Douglas Town Centre is of primary importance, and CO is confident that with the support of its stakeholders that major transformation can be delivered. Government itself is a significant landowner with Douglas and must be proactive in delivering currently vacant sites.
- 8.1.2** The former Shoprite on Chester Street was highlighted by several respondents as having potential for a new retail offer, such as a major clothing retail. CO is keen to identify and promote the reuse of such sites.
- 8.1.3** There was an unwillingness amongst respondents for Douglas to try to reproduce the standard British High Street and support for a more distinctive, independent offer.
- 8.1.4** Several respondents impressed the need to deliver the aesthetic vision of an Island harbour town on Douglas. CO recognises the special qualities of Douglas as a coastal town and has endeavoured to put these assets to the fore in the written statement.

8.2 *Urban living*

- 8.2.1** There was significant support for bringing people back into central Douglas by converting disused office buildings and upper floors to residential use. Several respondents noted the importance of active frontage in the Town Centre to maintain a sense of vibrancy. However, there was less support for creating homes without parking. This is a perennial issue as space is at a premium in the Town Centre and there must be a shift in attitudes towards Active Travel for this type of accommodation to be taken up. CO will continue to work closely with our colleagues in DOI to ensure that the housing supply adapts to changing lifestyle patterns.
- 8.2.2** One respondent was concerned with making Douglas a welcoming place for families, and highlighted the necessity of nursery spaces being available in the Town Centre and high level of walkability suitable for pushchairs. This is of equal concern to CO and development briefs will consider this provision in more detail.

9 Chapter 10

- 9.1** There has been a significant amount of support for the development of tourism, particularly in the centre of Douglas. The challenge now is to ensure that tourism development is delivered hand in hand with services for residents, including well-functioning transport links.
- 9.2** Signage too was highlighted as important, with the updated signage on Strand Street and others being noted for their utility.
- 9.3** The potential for tourism development of location such as the Sea Terminal tower and Castle Mona as highlighted and the distinctive architecture of these locations be celebrated.
- 9.4** Some respondents made the point that as the Island has Biosphere status it would be most appropriate to promote eco-tourism which supports the Island's natural environment.

9.5 Some respondents questioned how appropriate an increase in cruise boat facilities is for Douglas, and how long it would take to see a return on this investment. While CO cannot comment on the commercial aspect of this project, it will work to ensure that all developments are delivered with the amenity of Douglas workers and residents in mind.

9.6 *Tourist accommodation*

9.6.1 Several respondents believed that high quality and affordable, modern accommodation is required to attract targeted tourist markets. There has been dramatic change in the tourist accommodation in recent years with the establishment of Air BnB which gives tourist much more diversity in terms of accommodation choice.

10 Chapter 11

10.1 *Community facilities*

10.1.1 Several respondents have suggested that the Draft Plan makes insufficient provision for public facilities such as schools, community centres, hospitals and doctor's surgeries. Some respondents have expressed concern that predicted population growth would outstrip the provision of services. A number of sites in the Plan have been designated as "Mixed Use" with the intention of incorporating such uses in the future. Development Briefs will look more closely at where and how public facilities can be delivered, particularly in areas of significant residential expansion. Including on site facilities, some of which may be partially funded under the incoming Community Infrastructure Levy, will reduce car trips into Douglas and increase a sense of community cohesion. This is particularly crucial when incorporating a new estate into an existing neighbourhood.

10.1.2 An area which has come under particular scrutiny during the consultation is Baldrine. While some residents welcomed new homes, many others were opposed to the expansion of Baldrine as a residential area. A crucial issue was services, with many residents feeling that population growth would be unsustainable without greater provision of public facilities such as a village shop. CO is keen to work with residents to ensure that any future development brings with it benefits to the existing community and more local services to reduce the number of car trips required to Laxey and Douglas for basic amenities.

10.1.3 One respondent highlighted the ideal situation of Onchan Village Walk as a location for future services due to its central location and parking provision.

10.2 *Open space*

10.2.1 One respondent suggested the former Prison Site and former Park Road School site as a location for new open space. A development brief for this site will be drafted in conjunction with Douglas Borough Council and an element of open space will be considered for the future of the site.

10.2.2 Many respondents believed that parks, recreational and public spaces were just as important as housing when considering development. Access to public spaces was considered a major draw of urban living. CO is in complete agreement and will use the development brief drafting process to identify locations where this provision can be put in place.

10.3 *Recreation areas*

10.3.1 Several respondents expressed the opinion that facilities such as children's play areas should be compulsory in large housing developments. One respondent discussed the potential for play parks to also contain adult fitness equipment and public artworks. This has important tie-ins with health and wellbeing work currently being done by the Department of Health and Social Care and CO is keen to investigate how it can facilitate the development of such facilities. On a similar note, one respondent highlighted the need for allotments in Onchan.

11 Chapter 12

11.1 *Population and housing need*

11.1.1 The overwhelming focus of responses has been on the issue of housing need figures and how these should respond to the findings of the 2016 interim census. A full discussion of these issues is presented in Evidence Paper 5: Population and Housing Need.

11.2 *The housing market*

- 11.2.1** Concerns ranged from the effect on the current supply of vacant property on the Island, including unsold properties, to a dampening effect on house prices due to an oversupply of new builds to a reduction in the quality of life of Island residents leading to increased emigration. Several respondents expressed concern at the lack of available affordable housing for young people on the Island, and others were concerned that too much affordable housing was not reaching those who needed it in, instead being bought up for the buy-to-let market.
- 11.2.2** The housing market on the Island faces a range of issues, not all of which can be countered directly through Planning Policy. Issues such as accessing finance and the availability of affordable and first-time buyers are complex, but the provision of new build housing can provide a market-led solution. The review of the Housing Strategy is due to be put before Tynwald in October. Several respondents have raised the need for specific types of housing, especially first-time buyer homes and small residential homes. The delivery of appropriate housing types is essential to the successful implementation of the Area Plan for the East and is something that will be analysed in detail at the individual site level.
- 11.2.3** Many respondents expressed the opinion that the Island features an “oversupply of small, low quality housing over large sprawling estates”. CO recognises that there is need for an uplift in the quality and appearance of housing and, for this reason, has made this a focus of the written statement. Attractive and energy efficient new housing which is designed to blend with its surrounding should be the aim of developers and landowners. Emphasis will be placed on preserving hedges, sod banks, dry stoned walls and five-barred gates which so epitomise the Manx countryside and provide form and legibility to the human landscape.
- 11.2.4** Many respondents mentioned the number of currently empty and derelict buildings in the East and especially in Douglas. CO recognises that this is an issue for the whole of Douglas and, with this in mind, has created policies within Chapter 6 of the Plan to address this, particularly in the case of historic properties. Further review of policies to facilitate the regeneration of such properties will feature in the upcoming review of the Strategic Plan.
- 11.2.5** Several respondents have expressed concern that future housing development will result in the creation of more identikit housing estates with poor design and lacking in facilities and green spaces. CO will work diligently to ensure an uplift in design and the sensitive planning of communities. There was support for housing choice and the provision of a diversity of housing styles and locations at a range of price points.

11.2.6 While some building on previously undeveloped land is inevitable and essential if the Island is to maintain a construction industry and a supply of affordable homes for first time buyers, a renewed focus on utilising brownfield sites and optimising the use of available land through modern design practices will be essential moving forward.

11.2.7 Several respondents were adamant that the purpose of development is to create communities, not merely houses, with the requisite facilities, open space and infrastructure to ensure safe access for families, disabled people and the elderly.

11.2.8 A number of respondents made comments on the Group of Houses in the Countryside study and its findings. This section of the plan has now been excised and a wider study will be undertaken to identify Groups throughout the Island and investigate their potential for development.

12 Chapter 13

12.1 There was widespread support for CTAs from respondents, particularly given that several “trouble spots” such as the Villiers have been chosen for this focused redevelopment strategy.