



I am Tony Lloyd-Davies, Managing Director of Cornerstone Architects. I have an honours degree in architecture and am a full member of the Association for Project Management and provide my evidence to support the Ramsey Town Commissioners application to the Department of Infrastructure for an Order under Section 6 of the Local Government Act 1985 seeking to extend by Order, the boundary of the town of Ramsey Town.

I have 34 years' experience working in the built environment having my office base in Ramsey and an extensive knowledge of planning matters on the Island. I am a native Manxman and have lived in Ramsey for most of my life.

During my career I have represented both private and public bodies in planning matters and am familiar with the public inquiry process.



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## 1.0 Evidence basis

I have been requested to review the criteria 3, 4 and 5. I have reviewed the mapping associated with development within the boundaries of Ramsey and the immediate surrounding areas and provide evidence to identify recent settlement patterns having due regard for the:

- 1982 Development Plan.
- Ramsey Local Plan 1998.
- The West Ramsey Development Framework 2004.
- The Isle of Man Strategic Plan 2016.
- The Draft Area Plan for the North and West. (APNW)

In considering the content I have also referred to:

The Ramsey Town Commissioners application to the Department of Infrastructure for an Order under Section 6 of the Local Government Act 1985 seeking to extend by Order, the boundary of the town of Ramsey Town.

[Our Island Plan GD 2022/0095](#)

[Isle of Man Economic Strategy GD 2022/0080](#)

[Island Spatial Strategy Options Evidence Policy Paper P.EP 01 21<sup>st</sup> July 2023](#)

[Residential Land Availability Study \(Update16\) Planning approvals and Land Monitoring 2001-2023 July 2023 including rlas-north-tables 1309](#)

Statement of the Head of Planning Policy, Cabinet Office 30<sup>th</sup> October 2023.

Built Environment Reform Programme and the emergence of Biodiversity Net Gain Legislation.

## **2.0 Introduction**

- 2.1 On 12<sup>th</sup> January 2021 Ramsey Town Commissioners (RTC) applied to the Department of Infrastructure (DOI) under the Local Government Act 1985, Section 6(1) requesting the Department to extend, by Order, the boundary of Ramsey Town.
- 2.2 The DOI in progressing the Draft Order have determined to deal with the application in four elements reflecting the analysis of areas identified within the RTC initial submission made in January 2021. **See Appendix A1, A2, A3 and A4** setting out each area in the context of the extant settlement boundary of the Town of Ramsey. I refer to these as:
1. North Area
  2. West Area
  3. Glen Auldyn
  4. South Area
- 2.3 There have historically been four previous extensions to the Town boundary, the two most recent of which have occurred in 1969 resulting in the Ramsey Town Act 1970, and then in 1992 culminating in the Ramsey (Boundary Extension) Act 1993. **See Appendix B1 and B2** for the settlement boundary agreed at that time - indicated on the current, updated Isle of Man Government mapping data (November 2023) showing where recorded development on available sites has occurred during the plan period to date.
- 2.4 The criteria for consideration of Local Government Boundary Extensions 2004 were established in 2004 during an extensive Tynwald debate into a proposal to extend the Douglas Town Boundary. These are:
- (1) that the promoter's area and the area/s sought are really one community;**
  - (2) that there is community of interest in all or most public services, social agencies (for example schools, doctor's surgery/ies, recreation areas and community halls) and communal requirements of the future;**
  - (3) that the area sought is an overspill or outgrowth of the promoter's area;**
  - (4) that, wherever possible, clear physical boundaries are followed;**
  - (5) that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby;**
  - (6) that the balance of advantage lies in the acceptance of the scheme, though it may generally be admitted that the area sought may be valuable in various ways to the local authority by whom they are now governed;**
- 2.5 The criteria are further cited by the DOI in its reports on the proposed Port Erin Boundary Extension in 2019 including by the Chairperson of



the Public Inquiry dealing with that matter who confirmed he had considered the application based on these criteria.

- 2.6 Note: Applicant Local Authorities should, in submitting their applications, address each point. Similarly, any affected Local Authority wishing to comment or oppose such application should as far as possible, confine their comments to the above points.

However, applicant Local Authorities should also note that these criteria are not intended to be exhaustive.

The DOI considers that all these points are important and should be addressed but that an Applicant Authority may consider that there are other points or ways of addressing the issues additionally that may support its application and so the criteria are not exclusive to anything further being brought in support of the application.

**The following shall not be considered by the Inquiry under S.6 of the Local Government Act 1985:**

**\*the financial impact on an Authority either beneficially or negatively through the rateable income of a boundary application.**

What is being addressed in a boundary extension application is not the relative levels of the rates as between one Authority and another or the financial implications or questions of efficiency between Authorities. These issues are to be ruled Out of Order. The list of criteria has been placed in order of priority, although it is not intended to be exhaustive, or exclusive to any other relevant factors. There is, of course, no requirement that all the above points must be satisfied and one combination or another of them may be used.

- 2.7 I have been requested to address the criteria at **3**, my evidence sets out a background to the existing settlement boundary and concludes that there is no land available for the growth of the Town and that the existing town has outgrown the promoter's area. **4**, my evidence includes mapping data which confirms the logical boundary proposal follows clear physical boundaries where possible **and 5**, my evidence demonstrates that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby.
- 2.8 My evidence addresses each in turn and where appropriate my commentary is added to explain and emphasise points.
- 2.9 I consider that any application to extend a community boundary is driven by a series of factors which must be looked at independently, subjectively and with reasoned methodically before a decision on whether to accept as a collective whole or in part the application is reached.

- 2.10 I have assessed the government mapping for the area and refer to several annotations on base mapping to illustrate the structured reasoning of RTC in their application. These are referred to as appendices and relate to the content of my written statement.
- 2.10 I consider the best format to view these is through electronic visual media with the written statement as a cue as this can be enlarged on screen to closely inspect individual aspects. Hard copies are available on request.
- 2.11 I refer to the emerging Area Plan for the North and West and to an All Island Area Plan both of which are currently being proposed by the Cabinet Office.
- 2.12 I rely on the evidence of Mrs Diane Brown to this process. I quote directly from her report ref:

Statement of the Head of Planning Policy, Cabinet Office to support the Public Inquiry into the proposed Ramsey (Boundary Extension) Order 2023 **See Appendix C**

### **3 The weight attached to Existing and Emerging Plans**

3.1 In terms of how the Island Development Plan is taken into account in decision making on planning applications, it is listed as one of a number of considerations to be taken into account. S10(4) states that “In dealing with an application for planning approval...the Department shall have regard to – (a) the provisions of the development plan, so far as material to the application.” *In practice, this means that at the point of a decision being made, the approved development plan is taken into account.*

3.2 All development plans take time to complete. This is because of the need to gather and analyse information, the need to ensure sufficient public consultation, the time and resources necessary for a public inquiry and the approval process which follows relating to modifications, adoption and approval. *Questions are sometimes asked about the weight decision makers should place on emerging plans. For instance, sites may be allocated for development in an existing plan but might not be allocated in an emerging plan (which would include a Draft Plan). Emerging Plans can be seen as “other material considerations” but this doesn’t imply that they should be afforded a specific level of weight in decision making.*

3.3 *Unlike in England, where the National Planning Policy Framework (NPPF section 48) sets out that “Local Planning Authorities may give weight to relevant policies in emerging plans...” there is no equivalent guidance on the Isle of Man. Plans are recognised as being relevant and in operation until they are revoked, which happens when replacement plans are adopted (by Order) and then approved by Tynwald.*

3.4 From personal experience dealing with planning applications on the Island earlier in my career, *emerging plans tend to carry little weight until replaced formally by an approved plan*. The precise 'weight' remains a judgement made by planners and decision makers determining planning applications and considering the particular circumstances of the case. *In practice, there is more certainty about a plan's direction after it has been through Public Inquiry than one which hasn't. While no changes to a plan can be made after an Order has been signed - signalling its adoption - plans still need to be approved by Tynwald*. Tynwald does not have the power to amend an Adopted Plan.

3.4.1 The Area Plan for the North and West once approved will replace the Ramsey Local Plan and the 1982 Development Plan which are both relevant plans in and around Ramsey. They do remain the statutory development plans for the time being and so land which is currently allocated on these Plans could come forward for development at any time. For example, an application has been submitted for development at Vollan Fields, between Bride Road and Andreas Road, North Ramsey. The land is allocated in the Ramsey Local Plan but this was not taken forward in the Draft Area Plan for the North and West. It will be for DEFA to determine the application in the knowledge that there is emerging plan.

3.4.2 How the current status of the Draft Plan impacts on the assessment for any live planning application will be a matter for DEFA, taking into account many of the points mentioned above.

2.13 From this statement the factors influencing decision makers should be based on their own merit. In this case I submit that the application under consideration should not be influenced by emerging plans.

2.14 RTC are recognised as an UNESCO Biosphere Isle of Man partner and have pledged to help:

- Protect our natural resources
- Develop our economy in a sustainable way
- Support and promote our cultural heritage
- Make our environmental impact positive wherever possible
- Engage with the local community
- Promote our outstanding living landscape and seascape through active involvement with UNESCO Biosphere Isle of Man



### **3.0 Assessment of existing settlement**

- 3.1 Development within Ramsey Town and the wider Island is managed through government planning policies. There is a hierarchy to development control and Ramsey has a dedicated Ramsey Local Plan 1998 (Planning Circular 2/99) which sets out zoning for development within the settlement boundary. This is accompanied by two maps and a written statement **See Appendix D** which clearly set out the areas and their respective zoning allocations (I have amalgamated the North and South Plans to create a single map). This is an aged document now 25 years old. This was produced to replace in development terms the 1982 Development Plan **See Appendix E** (Mapping only) which is extant where there is no dedicated further planning policy.
- 3.2 The majority of this is now developed and only in extreme circumstances is the land use identified questioned. Most significantly this mapping is used to identify areas where development generally isn't supported.
- 3.3 It is also important to note that Planning Circular 10/91 - Island Strategic Plan North Eastern Sector Plan (B) Written statement and maps was, in terms of Ramsey superseded by the Ramsey Local Plan 1998 and the now Isle of Man Strategic Plan 2016 to recognise relevant policy.
- 3.4 West Ramsey also benefits from The West Ramsey Development Framework March 2004 which provides supplementary planning guidance and mapping **See Appendix F** which is in accordance with the Ramsey Local Plan. It allocates extensive areas for residential, industrial, and open space use and to which the Department will have regard in the determination of planning applications submitted in relation to the West Ramsey area. The 1998 Local Plan written statement required that the *'development of this land should be undertaken only in accordance with an approved scheme for the whole area'*. I quote:
- 3.4.1 'It is important to understand that this document was prepared to ensure proper regard (to) is had to interests of acknowledged importance and that the nature of the development is tailored to meet the needs of Ramsey.
- 3.4.2 Beyond the Town boundary to the West, in the Parish of Lezayre, there is further land zoned for development on the 1982 Development Plan. This development is not expected to take place before that in Ramsey, but the Development Framework has been prepared so as to be capable of accommodating, if necessary, further development to the west in the long term.

#### **OVERALL CONCEPT**

- 3.4.3 The proposals within the Ramsey Local Plan for the West Ramsey area provide a unique opportunity to create a new neighbourhood for Ramsey. The natural characteristics of the area and its proximity to the town centre, the Sulby River and the rural land to the West offer an

opportunity to create a quality environment for those who live and work in the area. The Development Framework seeks to identify the key elements of the existing landscape. By incorporating them and creating new structural landscape features, including open spaces and woodland planting, the intention is to provide a strong landscape structure in which to site the various elements of the neighbourhood.

- 3.4.4 The towns and villages of the Island have developed their own sense of place over many years. It is particularly important in a major development such as West Ramsey to identify those elements that can help create such a sense of place. This Development Framework aims to identify these elements including river corridors, tree belts, areas of salt marsh and notable buildings’.
- 3.5 The Development Framework recognises the frailty of the (then) existing development opportunities whilst providing for expansion for future generations. I submit that the need was established at that time through the robust zoning allocation process and through development control the available areas have now comprehensively been developed.
- 3.6 There are two notable exceptions:

**Planning Application: 20/01080/B**

**Proposal:** Residential development of 138 dwellings with associated drainage, highway works and public open space  
**Address:** Land At Lower Milntown (Fields 134278, 134279, 134280, 134281, 134282, 134283, 134284, 134288 & 134289) And Strip Of Land Between Auldyn River & Auldyn Meadows, Off Lezayre Road, Lezayre & Ramsey Isle Of Man.

Which has been through the planning process to appeal and been refused on the following grounds:

1. Notwithstanding that the site is allocated for development in the 1982 Development Plan, other material considerations, including the more recent flood risk modelling for the area, would result in the site being developed in isolation, unrelated both to the originally envisaged westward extension of Ramsey and to the existing settlement boundary. There would be material harm, in this regard, to the established character and appearance of this rural area. Although mitigated to a large extent, there would also be harm to biodiversity and ecology interests. Those harms are not outweighed by the benefits of the development proposed.

and

**Planning Application: 22/00679/B**

**Proposal:** Combined approval in principle and full approval for a residential development seeking planning permission for the erection of 66 dwellinghouses and 12 flats, site access, Spine Road through the site, drainage, car parking and associated landscaping (Phase 1). Outline

Planning permission for development of up to 127 new residential units in the form of dwellinghouses and flats, flexible commercial space, a new public house and new retail space with all matters reserved save for access

**Address:** Land At Poylldooey Fields And Part Fields 134271, 134253, 134270, 134272, 131273, 131276, 132274 & 134274 Ramsey Isle Of Man

- 3.7 Which despite being submitted for approval in early June 2022 is still awaiting formal consideration by the planning department. I note that there are several concerns relating to the viability of the development, particularly relating to development in the flood plain and compliance with the requirements of the Climate Change Act.
- 3.8 Both of which indicate that any developments of the residual undeveloped areas identified in the 1982 Development Plan and Ramsey Local Plan 1998 together with the West Ramsey Development Framework are unlikely to be successfully delivered.
- 3.9 Particularly of concern is that collectively these both represent the main areas available for development within the adopted zoning and materially as being at significant risk from flooding **See Appendix G** and as they are at significant risk from flooding are rightly being constrained from delivery for development. The planning department is correctly looking at the constraints on each site and where mitigation cannot be provided is restricting development. This is the planning process working effectively. It follows therefore that alternative areas for development should be explored.
- 3.10 The Central Ramsey area within the Local Plan has been reviewed in terms of National Strategy **See Appendix H** on [Sea Defences flooding](#) and coastal erosion. It has been identified in the predicted flood and coastal erosion risk assessment as hotspot No 1 on the top 100km grid squares overall ranking. I submit that development in this area should not be allowed.
- 3.11 I submit that development within the Town settlement boundary is all but exhausted and residual areas constrained. The total area enclosed within the existing settlement boundary is 905 acres and of that an area of 315 acres is at significant risk from flooding. **See Appendix J** This equates to circa 35% of the available land for development. I suggest that to develop this would be at best foolish and in worst case negligent of the decision makers to allow.
- 3.12 To provide for the future the Ramsey Town Commissioners have applied to the DoI to extend the boundary to allow structured and planned growth for coming generations.
- 3.13 I submit that the reasons for establishing the West Ramsey Development Framework and the associated zoning have not changed and the same fundamental requirements exist. My paragraphs 3.4.1, 3.4.2, 3.4.3 and 3.4.4 all recognise the need for appropriate zoning to be defined and structured. The RTC application is cognisant of the need to plan for the

future and proposes logical extensions abutting the existing settlement boundary.

- 3.14 The [Economic Strategy](#) clearly sets out the Isle of Man Government's aim of growing the Island's population of residents to 100,000 by 2037 to ensure the Island's economy and public services are sustainable. This requires support from landowners and developers to ensure adequate housing options are available to incoming residents. In a similar context [Our Island Plan](#) identifies housing as one of the critical issues that government needs to address. The government commitment is to "tackle the housing crisis by ensuring everyone has a suitable and affordable place to call home" and this is linked to the goal that "our housing stock meets the needs of our population now and into the future." To achieve this land must be made available for development.
- 3.15 The purpose of the Strategic Plan is to set out a spatial strategy to deliver on the Government objectives and ambitions for the future of the Island. The Strategic Plan must also be cognisant of current Local Plans and by intent set policy to provide for managed sustainable development.
- 3.16 In terms of housing, this should mean providing sufficient homes of the right type, size and tenure in sustainable locations to accommodate the intended growth in the Island's population to 100,000 residents by 2037.
- 3.17 The Strategic Plan should identify sufficient land to meet these minimum housing needs. This should be done through the allocation of a blend of allocated sites and Strategic Reserves, like the 'Plan, Monitor and Manage' process endorsed by the Strategic Plan 2016. This was acknowledged by the Inspector presiding over the Area Plan for the East inquiry. A clear review process, including a robust approach to monitoring housing delivery and a mechanism for releasing Strategic Reserve sites, is essential to ensure that the plan and its policies remain effective.
- 3.18 **Strategic Plan period and interim reviews**
- 3.18.1 The Strategic Plan should set out housing needs to 2037 to tie in with Government's population growth target. However, an overall plan period to 2041 appears more appropriate as it would cover at least 15 years following the adoption of the Plan and provide longer term certainty on other policy areas.
- 3.18.2 To ensure that the housing target remains robust, I would suggest that housing needs are reviewed after the 2031 Census. This would give the policies of the 'Our Island Plan', and the Strategic Plan, some time to bed in and the 2031 Census will provide an accurate guide to the success of the population growth target.

### 3.19 **Employment Land Needs**

3.19.1 The latest evidence on employment land requirements is the Employment Land Review 2015 (as updated in 2017). This evidence base document is already more than 5 years old and no longer provides a robust basis to inform Strategic Plan policies, particularly as it only provides estimates to 2026. An Employment Land Study looking at the situation now is required.

3.19.2 In the absence of more up-to-date evidence, it is difficult to assess what additional employment land allocations will be required to meet employment land needs over the plan period suffice to say there is a requirement for employment land to be available to develop.

3.20 [The Isle of Man Population Report 2023](#) is a valuable reference document to understand the internal migration (Section VI) patterns and suggests between July 2021 and July 2023 net migration from outwith Ramsey into the IM8 postcode as being 125 people. It is clear that there is a move away from the IM1 and IM2 areas to primarily Ramsey, this in spite of the large residential development in Ballasalla (the second most desirable location for internal migration) which has provided significant new houses in the period. I would expect this trend to continue.

3.21 The [Residential Land Availability Study](#) sets out current residential data and is useful as a guide to take up of planning approvals. It does not consider recent planning decisions in the area and in my opinion cannot be relied on in the current boundary extension process.

3.22 It should be noted that the application is for an extension of the Town Boundary only. It is not a request to change the zoning of any land which may or may not be included within the settlement boundary following this process.

**4.0 The Ramsey Local Plan 1998 – See Appendix D identified proposed residential development sites with a square around the letter.**

4.1. The mapping sets out the zoning identified within the written statement published as [Planning Circular 2/99](#).

4.2 **Area A – Thornhill**, housing of mixed densities. Except the area to the south of Thornhill Manor where there shall be no more than six houses. The area has now been developed for 66 houses with a current planning application seeking approval on the remaining plot referred to for 17 residential units.

Once developed this will complete the development of Area A.

4.3 **Area B – Ormly Hall**, Development may take place only in accordance with a scheme for the whole area which:

- a) Preserves as, green open space the land referred to in Policy R/R/P1(a);
- b) Provides for a new primary school if this is required by the Department of Education;
- c) Uses low density housing only; and
- d) Includes landscaping to the western boundary of the area and of the link to the Bride Road.

The area has now been almost fully developed for residential use – construction is on-going and coming to an end.

Once developed this will complete the development of Area B and 128 houses have been provided.

4.4 **Area C – Mooragh Promenade**, Dwellings should be of a high standard, and should be designed to acknowledge the architectural style, scale and massing of adjacent Victorian buildings, particularly on sites which face the Promenade and the harbourside. Heights of dwellings should be stepped down from the Promenade to the harbourside and Old River Road, and design and scale should be appropriate to a harbourside location. On the Peveril plot (Location of the replacement swimming pool) and the Manor house site (Location of The Ramsey Park Hotel), there could be included office use with on-site parking space and open space provision; these particular developments should be undertaken after consultation with the DAFF and should include appropriate measures to identify and transplant rare plants.

This area has been developed to provide a new public swimming pool, 60 bed hotel and 8 residential apartments.

A current planning application ref 22/01340/B has been approved.

**Proposal:** The development of eight townhouses and associated car parking and landscaping.



The site is within the area identified as being at significant risk from flooding. **See Appendix J**

The site (Commissioners Yard) on Old River Road has been the subject of several private investor/developer schemes to develop however none have come to fruition. I am not aware of the reason for this. The site is within the area identified as being at significant risk from flooding. **See Appendix J**

As part of the Peveril plot there remains a single narrow plot fronting onto Hope Street. During the Plan no development proposals have been brought forward. The site is within the area identified as being at significant risk from flooding. **See Appendix J**

During the lifetime of the Area Plan there has been several applications for development of the various 2 vacant sites on North Shore Road. Neither site has been developed and offer limited development opportunity. Both sites are within the area identified as being at risk from flooding. **See Appendix J**

There are no significant residual areas for significant development.

- 4.5 **Area D – Poyll Dooney/Balachrink**, Development of this land should be undertaken only in accordance with an approved scheme for the whole area. This should provide, on the Western two-thirds of the land, mixed density housing and a primary school site (if required by the Department of Education). On the Eastern third of the site, there should be light industrial development (Policy R/I/P1(B)). Drainage arrangements must be such as to avoid adverse impact on water quality, fish, and fresh water invertebrate fauna in the Sulby river.

The area has now been largely developed for residential use except for two areas, for one of which there is a current Planning Application ref 22/00679/B. This is also recognised within the APNW as site RR004.

**Proposal:** Combined approval in principle and full approval for a residential development seeking planning permission for the erection of 66 dwellinghouses and 12 flats, site access, Spine Road through the site, drainage, car parking and associated landscaping (Phase 1). Outline Planning permission for development of up to 127 new residential units in the form of dwellinghouses and flats, flexible commercial space, a new public house and new retail space with all matters reserved save for access.

The second area forming part of a significantly larger area approved under Planning Application ref 03/00790/B and representing the balance of approved development which has been completed.

The area undeveloped is the 38 self-build plots in the description. This is also recognised within the APNW as site RR005.

**Proposal:** Residential estate development comprising of roads, plots,

sewers, flood protection measures, drainage, public open space and layout for 26 semi-detached dwellings, 69 terraced dwellings, 42 apartments and 38 self-build plots.

Both sites sit firmly within the areas recognised as having significant flood risk. **See Appendix H**

4.6 **Area E - Lezayre Road/Gardeners Lane**, Development may be undertaken only in accordance with an overall scheme for the area. This scheme should be prepared after examination of the feasibility of providing a second crossing of the Sulby river, and should include:

- a) A minimum of 3 ha of land for light industrial use;
- b) A minimum of 2 ha of land for use as a recreation/play area;
- c) Generous landscaped space alongside the rivers and the former railway line and around Poyll Dooey House.

This area has been developed as Area D referred above where it flanks Gardeners Lane and the Glen Auldyn River. The remaining area has been the subject of a recent planning application.

**Planning Application: 20/01080/B**

**Proposal:** Residential development of 138 dwellings with associated drainage, highway works and public open space

**Address:** Land At Lower Milntown (Fields 134278, 134279, 134280, 134281, 134282, 134283, 134284, 134288 & 134289) And Strip Of Land Between Auldyn River & Auldyn Meadows, Off Lezayre Road, Lezayre & Ramsey Isle Of Man.

Which has been through the planning process to appeal and been refused on the following grounds:

1. Notwithstanding that the site is allocated for development in the 1982 Development Plan, other material considerations, including the more recent flood risk modelling for the area, would result in the site being developed in isolation, unrelated both to the originally envisaged westward extension of Ramsey and to the existing settlement boundary. There would be material harm, in this regard, to the established character and appearance of this rural area. Although mitigated to a large extent, there would also be harm to biodiversity and ecology interests. Those harms are not outweighed by the benefits of the development proposed.

It is also identified in the Draft APNW as Site RR009 and recommended for inclusion. I question whether the referred planning refusal will prevent development in any form as the reason for refusal is clear and there are better development options near the Town of Ramsey and adjoining the settlement boundary.

It should be noted that the application site was in part within the Ramsey Boundary and Part within Lezayre. The site is wholly identified for

development in the West Ramsey Development Framework **See Appendix F.**

- 4.7 **Area F – Ballure**, Most of this area is either developed, or has the benefit of planning permission. It is important that the completion of these developments or any proposals for further development should be such as to safeguard the settings of the Manx Electric Railway and St Mary's Church, and should have regard to the amenity value of existing trees and gardens.

This area has been fully developed.

- 4.8 **Area G – Claghbane and Ballastowell**, Current development proposals should result in the completion of both estates. Any further changes should have careful regard to existing space standards and planting, particularly close to public access routes.

This area has been fully developed.

- 4.9 **Area H – Fairfield**, A maximum of 7 dwellings may be provided, in accordance with the Approval in Principle already granted. All existing streamside and hedgerow trees should be retained. The area of the playing field should be kept as open space.

Plot 6 has an extant approval for a single dwelling. Planning Application ref 23/00465/B. There are no valid planning approvals for the residual plots in this area.

- 4.10 **Area I – Vullan Fields**, An additional area has been zoned for residential development as part of the area of mixed use. This area lies to the East of the A9 and to the North of the Bride Road, limited by the Town boundary to the north and by Volan Farm to the East. Development may proceed only in accordance with an overall scheme for the whole area. This scheme should include an appropriately landscaped soft Northern edge to the Town.

There is a current Planning Application ref 23/00744/B for development of this Area.

**Proposal:** Full approval for a residential development comprising up to 153 dwellings and community uses with associated highway and pedestrian access and infrastructure, drainage, landscaping and public open space together with approval in principle for a primary school on land at Vullan Fields together with enhancement of existing habitat on land to the east of Royal Park.

When approved this will be developed and no further land is available in this area.

- 4.11 During the lifespan of the Local Plan and to date several smaller areas which comply with [Policy R/R/P3: Infill/Backland](#) see page 10. Sites have been identified for development and have resulted in additional dwellings

being created. I have reviewed the mapping and confirm an additional 41 plots/sites have been built and are now occupied.

- 4.12 The green spaces left are attractive, natural 'breathing' spaces between established residential buildings, they are protected as such within planning legislation. **See Appendix K**
- 4.13 I conclude that there is no further land available within the settlement boundary which allows for development of residential properties such as to address the housing crisis or the Government Policy to grow the economy and population.
- 4.14 **The Ramsey Local Plan 1998 Employment, Industry and Public Utilities, See Appendix D, identified proposed Light Industrial Use with a circle around the letter.**

The plan recognises the need to attract employment to the area and refers to four areas for Industry.

Workshops, out of town offices and Public Utilities are all given weight and policy provided to support development:

- 4.15 **Policy R/I/P1 Light Industrial Development – the following areas are allocated for light industrial development subject to the general provisions stipulated.**
- 4.16 **Area A – North Shore Area.** Further industrial or warehousing units beyond those with planning consent will not be permitted unless required for the shipyard. There will be a presumption in favour of the relocation/rationalisation of existing service/utility/construction industries in the gas works area to allow for improved traffic circulation in accordance with an adopted traffic management plan. Only after implementation will any surplus land be approved for housing.

During the plan period limited industrial development has taken place in this area. Housing has also been approved on two parcels of land:

**Planning Application: 20/00433/B**

**Proposal:** Demolition of existing buildings within yard and creation of residential development of 10 dwellings with associated roads, landscaping and parking.

**Address:** Caines Yard Shipyard Road Ramsey IM8 3DR – In construction.

and

**Planning Applications: 13/91461/B**

**Proposal:** Demolition of redundant gas works structures and erection of thirty dwellings with associated roads and parking and re-cladding of existing commercial building.

**Address:** Former Gas Works Site North Shore Road Ramsey Isle Of Man IM8 3DF - Development completed.

There is no further available new development of this area.

- 4.17 **Area B – Riverside/Station Road/Ballachrink.** Development of this area may be undertaken only in accordance with an approved development brief for Poyll Dooney/ Ballachrink. The presumption will be in favour of an extension to Station Road to serve the area (ref Policy R/R/P2D) and the relocation of the bus maintenance facilities in this area. A pumping station shall be located following discussion with the Department of Transport and be subject to an appropriate landscaping scheme.

Except for the creation of a heavy goods car park no development has taken place in this area. This area is the subject of:

**Planning Application: 22/00679/B**

**Proposal:** Combined approval in principle and full approval for a residential development seeking planning permission for the erection of 66 dwellinghouses and 12 flats, site access, Spine Road through the site, drainage, car parking and associated landscaping (Phase 1). Outline Planning permission for development of up to 127 new residential units in the form of dwellinghouses and flats, flexible commercial space, a new public house and new retail space with all matters reserved save for access.

**Address:** Land At Poylldooey Fields And Part Fields 134271, 134253, 134270, 134272, 131273, 131276, 132274 & 134274 Ramsey Isle Of Man

The application is non-compliant in terms of zoning allocations in accordance with the 1998 Ramsey Local Plan and the West Ramsey Development Framework.

The site sits entirely within the area recognised as being at significant risk to flooding. **See Appendix J**

- 4.18 **Area C – Gardeners’ Lane/Lezayre Road.** A maximum of 3 Ha shall be reserved for industry as part of a scheme for the whole area (ref Policy R/R/P2E).

This area has been the subject of several planning applications and linked with the West Ramsey Development Framework zoning allocations.

**Planning Application: 20/01367/B**

**Proposal:** Development of 19 dwellings (class 3.3), retail unit (class 1.1), children's nursery (class 4.2), and associated drainage and highway services.

**Address:** Land North Of 15 Auldyn Walk Ramsey Isle Of Man provides commercial premises as set out and is largely developed.

More recently the balance of the site has been the subject of Planning refusal ref 20/01080/B the details of which are referred to earlier in my evidence at paragraphs 3.7 and 4.6.

This area has been largely developed for residential purposes and not for industrial as originally envisaged through the plan process.

The Area sits almost entirely within the area recognised as being at significant risk to flooding. **See Appendix J**

- 4.19 **Area D – Vollan Fields.** The area to the East of the A9, north of the Bride Road and limited by the town boundary to the North and the Vollan Farm to the East has been re-zoned for mixed use which may include light industrial development in the Easternmost area. Development may proceed only in accordance with an overall scheme for the whole area. (ref Policy R/R/P21).

The Area is subject to a current planning application which is under consideration ref P/A 23/00744/B and referred to at paragraph 4.10.

When approved this will be developed and no further land is available in this area.

- 4.20 I conclude that there is no further land available within the settlement boundary which allows for development of employment opportunities.
- 4.21 Policies associated with the industrial and commercial development can be seen in the written statement within [Planning Circular 2/99](#).

4.22 **Public Utilities**

- 4.23 The Milntown Power Station has been repurposed as a primary substation by Manx Utilities.
- 4.24 The North Shore Road Gas Works has been decommissioned and removed being replaced by residential dwellings as detailed in P/A 13/91461/B referred to in paragraph 4.16.
- 4.25 Sites which have provided significant development during the lifetime of the Ramsey Local Plan 1998 are:

DS1 Auldyn Walk

DS2 Auldyn Meadow Ph1

DS3 Briarville Gardens

DS4 Queens Valley

DS5 Royal Park Ph1



DS6 Royal Park Ph2

DS7 Palm Winds

DS8 Grand Island

DS9 Grove Park and North Shore

DS10 Gibbs Park and The Crescent

DS11 Pavillions

DS12 Queens Pier Apartments

**See Appendix L** Developed sites for their location within the settlement boundary.

## **5.0 Area Plan for the North and West.**

- 5.1 Through a separate and distinct process there is an ongoing review of the Area Plan for the North and West **See Appendix M** for the Town Centre mapping associated with the Draft Plan and **Appendix N** for the wider mapping within the settlement boundary.
- 5.2 The Draft Area Plan for the North and West is currently being prepared to align with the Isle of Man Strategic Plan 2016. The Area Plans have to be in general conformity with the Strategic Plan.
- 5.3 As part of the preparation of the Area Plan for the North and West the Cabinet Office has undertaken a call for sites to identify potential sites for development. For Ramsey and the North, the geographical area includes Ramsey, Andreas, Ballaugh, Bride, Jurby, Lezayre and the Maughold Ward of Garff.
- 5.4 The Plan has been issued in Draft format with the status for each site simply identified as Y for inclusion and N for exclusion. This process is yet to be tested through public inquiry.
- 5.5 This information must be read together with the [EPD2 All Sites List](#) – (see pages 20 and 21) I have listed those sites within the *Ramsey settlement boundary* where assessment has been made with a recommendation for inclusion.
- 5.6 There has been assessment of 25 sites within the settlement boundary and 11 of these have been excluded from the Draft Area Plan. The residual sites included in the Draft Plan and recommended for inclusion include sites identified in the [UUS Register](#) **See Appendix N** and are listed;
- 5.6.1 RM 001 – Mixed - Gladstone Park – Y. (Private ownership)
- 5.6.2 RM002- Mixed - Former Albert Road School – Y. (RTC part owner – an active scheme is being pursued to provide 32 2 bedroomed residential units. The balance of the site being a public car park)
- 5.6.3 RM003 – Mixed - Adj to Collins Lane – Y. (Private ownership)
- 5.6.4 RM004 – Mixed - Adj to Christian Street – Y. (Private ownership)
- 5.6.5 RM005 – Mixed - Two sites either side of East street – Y. (Private ownership).
- 5.6.6 RO002 – Open - Leighany Field – Y (Department of Education).
- 5.6.7 RO003 – Open - Mooragh, Vollan Crescent and Bride Road – Y (Private ownership).
- 5.6.8 RO004 – Open - Vollan fields – Y (Planning Application currently under consideration).
- 5.6.9 RR001 – Residential - Orchard, Creg Malin – Y (Private ownership – single plot).

- 5.6.10 RR005 – Residential - Field 134276 and part 134273 – Y (Private ownership Planning approval granted P/A 03/00790/B site well developed except area subject to significant flood risk).
- 5.6.11 RM006 – Mixed - Former Auction Site – Y (Private ownership currently being developed for 20 Apartments)
- 5.6.12 RM009 – Mixed - Former Skip Hire – Y (Private ownership).
- 5.6.13 RO002 – Open - Leighany – Y (Dept of Education) (Duplication)
- 5.6.14 RR009 – Residential - P/A 20/1080/B – Y. (Private ownership recent planning refusal as paragraphs 3.7 and 4.6).
- 5.7 I accept that the current APNW Plan process is the mechanism to identify new development areas.
- 5.8 Commercial/Employment land must be released to allow the Town to expand to meet the published objectives of the government.
- 5.9 Any proposed development whether residential or commercial /employment would be required to be at an acceptable density which respects the adjoining extant properties.
- 5.10 From my assessment the sites referred to allow little or no development beyond that for which there is extant planning permission or where sites are pending a decision being made.
- 5.11 The Cabinet Office is also tasked with providing an All-Island Area Plan and a full review of the Strategic Plan. The foreword to this reads:

“The Isle of Man Strategic Plan sets out the general policies for the development of and use of land across the Island. It is a key document when preparing Area Plans, other policy documents and in the determination of planning applications.

A full review of the Strategic Plan is an opportunity to support the delivery of [www.gov.im/islandplan](http://www.gov.im/islandplan) and the vision to have a Secure, Vibrant, Sustainable Island, specifically in terms of building Great communities.

Whilst the ethos of the 2007 Strategic Plan and its subsequent update have stood the test of time, this full review will embrace many of government’s new commitments – whether in terms of sustainability, climate change, energy and infrastructure and aspirations for the long-term economic growth. It will address how to plan for future infrastructure and determine key policies about how the Island looks and feels and how we experience it at eye level. The Plan will help set a solid reference point for place making through good policy provision. This is important in our towns and villages, how we move around and experience

the built environment, *and crucially how we plan for the future and meet our needs.*

Commencing the Preliminary Publicity signals the start of the public engagement in the plan process and we are keen to encourage a high level of interest. The new Plan will ultimately be partnered by the All-Island Plan, which will sit in conformity with the updated Strategic Plan.

*In this way, we are taking a long term, overarching holistic view in terms of the spatial planning needs of the whole island and with that in mind the plan period is to extend up to 2041. I am confident that this approach, along with the other work progressing under the Built Environment Reform Programme, will make for tangible, creative, beautiful and sustainable developments which enhance and provide for our island over the longer term. This will be an overarching national planning guide for the future”.*

5.12 [Preliminary Publicity](#) for the Isle of Man Strategic Plan Review has been concluded and the responses received will directly inform the Draft Strategic Plan which will, in turn, be subject to a further round of consultation ahead of public inquiry.

5.13 The Cabinet Office overview reads.

“Cabinet Office is undertaking the ‘Preliminary Publicity’ stage signalling the start of the review process into the Isle of Man Strategic Plan 2016. This is in line with Paragraph 2, Schedule 1, of the Town and Country Planning Act (1999). Preliminary Publicity represents the first statutory step of the Development Plan Procedure and sets out the matters that the draft plan will deal with.

The Strategic Plan provides the high-level planning policy framework for the future sustainable development of the Island and aims to ensure that the land use needs and other spatial planning requirements which may relate to economic, social and environmental matters are adequately met.

This is a comprehensive review process which will, once complete, replace the existing plan in its entirety. Some policies may simply be amended and updated but others will be added or potentially removed. The review provides the opportunity to embed Climate Change policies into statutory planning policy and reflect the core strategic objectives set out in Our Island Plan 2023 (GD No. 2022/0095), to build a secure, vibrant and sustainable future for our Island and specifically deliver one of the ‘Building Great Communities’ programmes”.

5.14 **Island Spatial Strategy Options Evidence Policy [Paper P.EP 01](#)** has been issued to inform the preliminary publicity process.

- 5.15 In assessing housing and employment land need it is important to consider the Island Spatial Strategy Options Evidence Policy Paper P.EP 01 produced by the Cabinet Office as part of the Isle of Man Strategic Plan Preliminary Publicity.
- 5.16 I refer to the source document which I replicate in *italics* and where appropriate my comments are added in standard text and any emphasis is shown in **bold italics** except where the text is a heading in the reference paper. My focus is on Part two: Housing Need and Distribution and Part Three: Employment Land Need and Distribution 2021-2037.
- 5.16.1 **2.1 Housing Need and Distribution**
- 5.16.2 *Housing policy has a significant impact on our towns, our villages and our countryside. It affects what our communities look like and how we feel about them and a strong sense of public feeling is no more apparent than when new estate development is being considered on the edge of our urban areas. Such transition areas between ‘town and country’ are often the most controversial; encroachment into green fields is not always needed, but **in some instances it may be the better solution to meet future development demands.***
- 5.16.3 *The Strategic Plan sets the broad planning framework for housing location, design, layout, supporting infrastructure requirements and tackles the issues associated with satisfying the Island’s housing needs. One of its core objectives is to identify the right level of housing opportunities needed over a defined period which in turn provides certainty for developers and communities about likely changes over time. Both the 2007 and 2016 Strategic Plan Update have included a total figure for the Island and a breakdown of need figures across the north, south, east and west (see Table 1.3). In terms of housing approvals and delivery since 2001, net figures are set out in Table 1.4.*
- 5.16.4 ***Housing Policies and Island Spatial Policies guide the general distribution of development around the Island and are closely linked.*** Both rely on population and household figures and estimated changes and these are the starting point in any plan making process that attempts to project what land and new homes are required over a defined period.
- 5.16.5 I accept that the starting point for housing policies and island spatial policies is an assessment of the population and household figures and estimated changes.
- 5.16.6 ***It is important to recognise that the population projection data provided by Statistics Isle of Man is an independent data set, and does not take into account Government’s policy goals.*** It focuses in the main on the presentation of statistics and trends albeit within a meaningful context. Cabinet Office in the delivery of its

*statutory duty to deliver the Island Development Plan can carry out further analysis. It has the ability to factor in other assumptions, evidence and policy goals in its translation of these projections into Island-wide housing need and land requirements at the national and local level.*

5.16.7 I submit that the Governments Policy goals should be factored into all population projections data. They are relevant as current government policy is the driver for population growth. The Isle of Man Economic strategy 2022-2023 is clear on this – I quote directly with emphasis as written –

5.16.8 **INFRASTRUCTURE AND SERVICES.** Further develop the **infrastructure** and **services** for the community to plan for an estimated population Of 100 000 by 2037, by actively **investing in key services and infrastructure** that **attract and retain economically active people**, supported by a range of **targeted incentives** and **disincentives** to **sustain targeted growth**.

*In terms of calculating housing need, an ‘Objective Assessment of Housing Need’ (OAHN), as commissioned by the Housing and Communities Board, will influence the policy approach for housing included in the Draft Plan. In the meantime, housing need for the plan period 2021 to 2041 (note this is based on a 10 year household growth) has been calculated using an updated methodology to that used in previous plans to reflect the approach used in other jurisdictions. Firstly though, a brief description of the current method.*

5.16.9 This is an emerging document and one on which the draft plan relies, to refer to existing, updated methodology in the knowledge that the outcome of a full review is awaited is simply wrong and will, given current Policy, likely underestimate the projected population requirements. Until the outcome of the Objective Assessment of Housing Need is known I submit that this projection data can’t relied upon and in the boundary extension process the zoning of land is irrelevant.

5.16.10 **2 How Housing Need has been Calculated in the Strategic Plan**

5.16.11 *The Strategic Plan 2016 uses a set of straightforward calculations to identify national housing need across the Island and the breakdown of that figure into the north, south, east and west.*

5.16.12 *This part of the Island Spatial Strategy Paper outlines how housing calculations have been done in the past and goes on to explain an alternative method more commonly used across the United Kingdom, States of Guernsey and Jersey. **Cabinet Office considers the adoption of this alternative method as a practical and sensible option for the Island.***



5.16.13 I am not an expert in calculating housing requirements. I understand that the UK Standard Method, which is being considered, is designed to calculate the minimum housing requirements to meet the projected population growth (in the UK).

5.16.14 However, the Isle of Man is trying to grow its population to 100,000 people, which is beyond the 'natural' population growth trends, which means that using the UK Standard Method will underestimate the housing the Island will need.

5.16.15 Housing needs should be established to at least 2037, and not to 2031 as currently proposed.

5.16.16 **2.3 A New Approach to the Assessment of Housing Need**

5.16.17 ***Work is underway to develop a standard methodology that the Island can use to calculate its housing need. A Housing Needs Assessment has been commissioned to carry out a comprehensive study of current and future housing requirements on the Island. The assessment is being undertaken to inform future housing policies which will be set out in the Draft Plan and also the work of the Housing and Communities Board.***

5.16.18 ***It is hoped the Assessment will help to identify households identified as currently being in housing need, the future housing requirements of established and newly forming households within the Island, as well as inward migrants from the UK and elsewhere in the world. Achieving such gross housing requirements can be offset against the likely supply of housing from within the existing stock to yield a net requirement for additional housing.***

5.16.19 *The intention is to have defined terminology in the Draft Plan in order to better understand the differences between housing 'requirement' (every Islander has a housing requirement), housing 'demand' (those people who can buy or rent a property in the private housing market), and housing 'need' (people who need assistance through social rent or subsidised access to the private sector such as the Shared Equity Purchase Assistance Schemes).*

5.16.20 *Being clearer about these terms will help identify the housing necessary to accommodate the Isle of Man's population and to examine the issue of appropriate minimum standards. Account will be taken of any progress made to introduce a Housing Association on the Island.*

5.16.21 The approach suggested seems sensible and a logical progressive development to identify need however it must also take into

consideration the desire of the Isle of Man government to grow the population to 100 000 in the next 14 years. It cannot rely on previous policy and statistics if we are to achieve the population stated.

5.16.22 **2.4 The Objective Assessment of Housing Need**

5.16.23 *The study which is being carried out seeks to establish the objective housing need for the period to 2037 and up to 2041. The Study will use Statistics Isle of Man data and further modelling scenarios to achieve a number of outputs:*

5.16.24 It is concerning that the period for the housing need assessment is not aligned to the timescale for the policy to grow the population to 100 000.

5.16.25 ***An overall level of housing need for the Island - this will be driven by future household growth over the plan period, and also to a large extent by assumed levels of net migration. However, in addition to the future household growth it is also important to take account of unmet needs at the start of the period from concealed households that should have already been able to form and homeless households who do not have a home of their own.***

5.16.26 If the assumptions are wrong there will be no market for any surplus proposed housing which in itself is a form of development control.

5.16.27 ***The mix of housing needed - this also depends on the size and make-up of the future population but must also take account of the propensity of existing households to move from their current home. For example, there is likely to be a substantial increase in older person households over the Plan Period, but most will be households already living on the Island – so the need for older person housing will inherently depend on the extent to which these households choose to (or have to) move to a more suitable home. The balance between market housing and affordable housing also depends on household mix, combined with information on income and homeownership. The work will help in the understanding of the likely need for private rented and affordable rented homes and first homes, older person housing, supported housing and the impact this will have on the general housing stock.***

5.16.28 There should also be consideration for skilled workers and their immediate and extended families moving to the island to provide for targeted growth to align with the policy to encourage skilled workers to come to the island.

5.16.29 ***A view on key drivers underpinning the housing market - this will look at the characteristics of the existing stock and key trends.***

*Indicators such as land prices, house prices, affordability, new housing development and turnover of the existing stock, short-term and long-term vacancies, overcrowding and under-occupation will be looked at. The Study will review the available population and household projections to better understand the key demographic drivers and consider the overall changes projected and also the changes within individual cohorts. The Study will look at projection scenarios and test alternative assumptions to understand the sensitivity of the household growth to a range of differing factors. This will potentially include a review of the different migration rates already assumed but would also consider factors such as household formation rates and the impact on average household sizes. Adopting different household formation rates allows the balance between housing need and housing demand to be properly tested.*

5.16.30 **Impact of Government's policy goals** - consideration will be given to the likely number of future workers, taking account of the projected population and sensitivity testing related to economic activity rates, including growing the Island's population up to 100,000 by 2037. These projections can then be aligned against future employment projections based on different economic scenarios.

5.16.31 Without this single factor accurately projected and realistically accounted for the current projections cannot be relied upon.

5.16.32 **2.5 Current Position on Gross Housing Need ahead of the Draft Plan**

5.16.33 *Ahead of the OAHN and taking into account existing Census based population data, Cabinet Office has identified a baseline housing need figure using household growth projections and affordability data. The method follows that encouraged in England under the National Planning Policy Framework – i.e. 'the standard method'.*

5.16.34 *Data Sources include:*

- i. *The Census (2021) and derivatives of the Survey provided by Statistics Isle of Man*
- ii. *The Isle of Man Housing Market Review 2022*

5.16.35 *It should be noted that whilst the National Planning Policy Framework expects authorities to use the 'standard method' to assess local housing need, it is currently being reviewed and elements of the method may change in the future. Cabinet Office has used the methodology to calculate what provisional figures would look like in terms of the minimum number of homes needed.*

- 5.16.36 The Standard method does not consider a net population growth target of 15% population increase.
- 5.16.37 Sections 2.6 – 2.8 are available in the link at paragraph 5.14
- 5.16.38 **2.9 The Need to Monitor Data and Evidence up to the Draft Plan**
- 5.16.39 ***Further evidence will become available ahead of the draft plan***
- 5.17.40 I submit that the boundary expansion of Ramsey is further evidence and will be considered ahead of the draft plan.
- 5.17.41 *and Cabinet Office is keen to receive views on the preliminary calculations/conclusions set out in the above tables. We are interested to know if:*
- *you agree with using the Standard Method?*
  - *you agree with the gross calculation on new dwellings needed for an estimated population of 100,000 by 2037?*
- 5.17.42 ***Cabinet Office recognises that projections become increasingly unreliable as time goes on which makes it imperative to make sensible decisions taking into account the most up to date statistical data available alongside this Administration's population goals.***
- 5.17.43 Fundamentally paragraph 5.17.42 accepts that processes such as the boundary extension under review provide valuable, pertinent data to allow correct policy strategies to be aligned and I submit that the RTC proposal one such approach and will set a benchmark for delivery Island wide.
- 5.17.44 **2.10 Spatial Distribution and Options for Change**
- 5.17.45 *The Town and Country Planning Act 1999 states that the Island Development Plan shall consist of a strategic plan and one or more area plans. The intention during this Administration was to have 3 Area Plans in place – The Area Plans for the East and South (both of which are in operation) and The Area Plan for the North and West (published in draft).*
- 5.17.46 *Cabinet Office is advancing the end goal of having an Island Development Plan made up of: A Strategic Plan and One Area Plan. The latter - a single 'All-Island Area Plan' - will look at land allocations and local planning matters across the whole Island at the same time. It will reflect the Spatial Strategy and Policy guidance set out in the Strategic Plan. Section 2(4) of the Town and Country Planning Act 1999 states that **an area plan shall be in general conformity with the strategic plan.***
- 5.17.47 *The Spatial Strategy to be followed in the future (as detailed in this paper) is still being considered. This means that the spread of and concentration of development is not yet certain. For the*

*purposes of understanding in principle how revised housing need figures would affect the the Island, calculations have been done on the basis of the existing settlement hierarchy. This allows an understanding of how new housing might be spread across the Island in the future, but on the basis of the current spatial strategy.*

5.17.48 I submit that the RTC application is cognisant of the emerging plans and is working towards a comprehensive development plan for the future with the boundary extension being the first stage of that process.

5.17.49 *Table 1.7 updates the spread of development across the Island according to planning approval data and settlement hierarchy position - i.e. approvals in the Main Centre (Douglas) and in the Service Centres, Service Villages and Villages. The table also looks at how the new data updates the broad 'distribution' across the the north, south, east and west.*

*Table 1.7: Analysis of changing housing distribution across the settlements using the existing settlement hierarchy.*

5.18 I conclude that the process will be full and address the development land shortage and submit that the application by RTC to extend their boundaries at this time is appropriate to inform further policy.

## **6.0 Unoccupied Urban Sites (UUS)**

6.1 In assessing the UUS I have reviewed each site, tracked the relevant planning history (any applications predating the Local Plan are ignored) and list the relevant details. These are identified and further comment is made in my assessment of the [Unoccupied Urban Sites Written Statement](#) and [Register](#). See **Appendix P** for the associated mapping.

6.2 Unoccupied Urban Sites North and West – Ramsey

6.3 **UUS 34:** **Two sites either side of East Street and Stanley Hotel** – Private Ownership 2 parties.

**PA07/01679/B** - Demolition of nos. 36 & 36A Parliament Street and construction of a 32-bedroom hotel with bar / restaurant at ground floor level - 36 - 40 Parliament Street Ramsey Isle of Man – Permitted. Demolition has been carried out and approval exists in perpetuity.

**PA08/00173/B** - Demolition of existing building and erection of a four storey building consisting of a bar and restaurant at ground floor level and six apartments above - 5 East Street Ramsey Isle of Man IM8 1DN – Permitted. Demolition has been carried out and approval exists in perpetuity.

**PA11/01587/B** - Erection of a four storey building to provide ground shop unit and bar / restaurant and nine apartments - 5 East Street & 42 Parliament Street Ramsey Isle of Man IM8 1DN - Permitted. Permission has expired.

6.4 **UUS 35:** **10-12 West Quay** - Private Ownership 2 parties. Applications have been submitted separately for each part of the site.

**PA14/00342/B** - Alterations and erection of extension to rear of existing shop - Looney's 30 & 32A Parliament Street Ramsey Isle of Man IM8 1AW – Permitted. Permission has expired.

**PA15/00311/B** - Alterations and extensions to property and change of use from retail and residential to retail and office accommodation - 11-12 West Quay Ramsey Isle of Man IM8 1DW – Permitted. Permission has expired. Development costs prevented this scheme from progressing due to the tight nature of the site and construction constraints.

**PA17/00930/B** - Conversion of existing building to a distillery, to include lifting and replacement of existing roof and alterations to the front elevation and installation of double doors - 10 West Quay Ramsey Isle of Man IM8 1DW – Permitted. Permission has expired.

6.5 **UUS 36:** **24 Parliament Street** – Private ownership not known to me.

**PA18/00284/B** - Alterations and roof extension to provide one retail unit (Class 1), four offices (Class 4) and one residential apartment - Auldyn House 24 Parliament Street / West Quay Ramsey Isle of Man IM8 1AP – Permitted. Permission has expired.

**PA21/00993/CON** - Registered Building consent for demolition of building (retrospective) - Auldyn House 24 Parliament Street Ramsey Isle of Man IM8 1AP – Permitted. Works completed.

**PA22/00639/B** - Erection of new four storey apartment building (class 3.4) with ground floor retail space (class 1.1) - 22 & 24 Parliament Street And 6 West Quay Ramsey Isle of Man IM8 1AP – Permitted. Site includes adjoining neighbour and requires demolition.

**PA22/01177/B** - Demolition of 24 Parliament Street (in association with 21/00993/CON) (retrospective) - Auldyn House 24 Parliament Street Ramsey Isle of Man IM8 1AP – Permitted. Works completed.

6.6 **UUS 37:** **St Olave's and adjacent vacant plot** – Private, ownership not known to me. Historically there has been many applications to develop the site including proposals for multiple dwellings. Development in each case has not proceeded. Access to the site is difficult and is a constraint on development opportunity.

**PA98/01966/A** - Approval in principle for the erection of a dwelling, kitchen garden at St Olave's, Bowring Road, Ramsey. - St Olave's Bowring Road Ramsey IM8 3ES – Permitted. Permission has expired.

**PA01/00131/B** - Erection of dwelling with garage - St Olave's Kitchen Garden Bowring Road Ramsey – Permitted. Permission has expired.

**PA04/02308/B** - Erection of two four storey blocks, each block containing eight flats 06/05/09 - St Olave's Kitchen Garden Bowring Road Ramsey - Permitted on Review. Permission has expired.

**PA06/01416/A** - Approval in principle for the erection of a dwelling - Part of Garden At St Olave's House Bowring Road Ramsey Isle of Man – Permitted. Permission has expired.

**PA09/00455/A** - Approval in principle to erect a detached dwelling - Part of Garden At St Olave's House Bowring Road Ramsey Isle of Man – Permitted. Permission has expired.

**PA12/00830/A** - Approval in principle for a sheltered accommodation development - St Olave's House Bowring Road Ramsey Isle of Man IM8 3ES – Permitted. Permission has expired.

**PA22/00444/B** - Erection of 2 detached dwellings with integral garages - Land Adjacent To St Olave's Jurby Road Ramsey Isle of Man – Permitted - approval is current and development can commence.

6.7 **UUS 38:** **Site adjacent to Collins Lane, West Quay** - Private ownership – it is interesting to note that there is a long history of planning approval on this site. The detailed application ref P/A89/00757/B has been the basis of each application. The owner/s have not commenced development.

**PA89/00062/A** - Approval in principle to demolition of disused garage and office and construction of 6 flats with covered car park, 21/22 West Quay, Ramsey - 21/22 West Quay, Ramsey - Permitted

**PA89/00757/B** - 22 West Quay, Ramsey. - Demolition of existing premises and construction of block of 6 No flats and car parking. 21 - 22 West Quay,

Ramsey. - 21 - 22 West Quay Ramsey Isle of Man – Permitted - Permission has expired.

**PA94/01849/B** - Construction of 6 flats with covered car parking, 21 & 22 West Quay, Ramsey. - 21 & 22 West Quay, Ramsey. - Permitted - Permission has expired. This application is a direct resubmission of P/A 89/00757/B.

**PA04/01413/B** - Erection of a block of six apartments with associated services and garaging on ground floor - 21/22 West Quay Ramsey IM8 1DL - Permitted - Permission has expired. This application is a direct resubmission of P/A 89/00757/B.

**PA16/00576/A** - Approval in principle for the erection of a four-storey apartment block - 21 - 22 West Quay Ramsey Isle Of Man - Permitted-Permission has expired. This application is a resubmission of P/A 89/00757/B.

**PA18/01234/B** - Variation of condition 1 of PA 16/00576/A for the approval in principle for the erection of a four-storey apartment block, to extend the period of approval for a further 2 years - 21 - 22 West Quay Ramsey Isle Of Man - Permitted - Permission has expired.

**PA21/00232/B** - Variation of condition 1 of PA18/01234/B for the approval in principle for the erection of a four-storey apartment block, to extend the period of approval for a further 2 years - 21 - 22 West Quay Ramsey Isle Of Man IM8 1DL – Permitted - Permission has expired.

**21/00622/C** - Change of use of vacant site to a temporary car park - 21 - 22 West Quay Ramsey Isle of Man IM8 1DL – Refused – This decision is consistent with the DEFA policy to prevent ad-hoc parking on vacant sites.

**23/00446/B-** Variation of condition 1 of PA21/00232/B (Original application PA18/01234/B) for the approval in principle for the erection of a four-storey apartment block, to extend the period of approval for a further 2 years - 21-22 West Quay Ramsey Isle of Man IM8 1DL – Permitted – subject to a reserved matters application being approved the site is available for immediate development.

6.8 **UUS 39:**        **Site adjacent to Christian Street and West Quay –**  
Private ownership

**PA08/00737/A** - Approval in principle to erect a building to provide seven apartments and associated parking - 33 West Quay Ramsey Isle of Man IM8 1DD - Refused at Appeal

**PA08/01012/B** - Erection of a building to provide retail and office space and seven residential apartments with associated parking - Former Barry Curran Motor Dealership Site West Quay Ramsey Isle of Man – Permitted - Permission has expired.

**PA09/00954/B** - Erection of a building to provide retail and office space and six residential apartments with associated parking provision - Former Barry Curran Motor Dealership Site West Quay Ramsey Isle of Man – Permitted - Permission has expired.

**PA19/00235/CON** - Application for the de-registration of the former Farmers Combine Warehouse (19/00293/REGBLD) in accordance with



7(1)(a) of the (Registered Buildings) Regulations 2013 - Former Farmers Combine Warehouse 33 West Quay Ramsey Isle of Man - Approved at Appeal

**PA21/00585/B** - Erection of a building to provide retail and office space, with associated access, parking, landscaping and drainage - Former Barry Curran And Farmers Combine Site West Quay Ramsey IM8 1DL – Permitted – Approval valid for 4 years from 6<sup>th</sup> October 2021. The site is available for immediate development.

6.9 **UUS 40:** **Former cattle market, Auction House, Derby Road –**  
Private ownership

**PA17/01194/B** - Construction of twenty apartments within three accommodation blocks with associated refuse storage, car parking and landscaping - Former Mart Site Bowring Road Ramsey Isle of Man – Permitted. DEVELOPMENT OF THIS SITE IS IN PROGRESS.

6.10 **UUS 41:** **Former Albert Road School, Albert Road –** RTC ownership in part, DOI ownership in part.

**PA12/00994/B** - Erection of a multi-purpose building containing community centre, function rooms, cafe/restaurant and offices, together with associated car parking and vehicular access - Site Of Former Albert Road School Albert Road Ramsey Isle of Man IM8 1JB - Deemed Withdrawn.

**PA12/01556/B** - Erection of a multi-purpose building containing community centre, function rooms, cafe/restaurant and offices, together with associated car parking and vehicular access (Amendments to PA 12/00994/B) - Site Of Former Albert Road School Albert Road Ramsey Isle of Man IM8 1JB – Permitted - Permission has expired.

**PA16/01103/B** - Erection of multi-purpose building containing three units of commercial use (Classes 1-4), offices, four apartments and three townhouses with associated parking and access. - Albert Road School Albert Road Ramsey Isle of Man IM8 1JB – Permitted - Permission has expired.

**PA21/01281/B** - Variation of condition 1 to PA 19/01164/B for erection of a two-storey complex comprising of twelve apartments with associated car parking and landscaping to extend the period of approval for a further 1 year is linked to a proposal for the development on part of the former school site for an additional 18 apartments. THIS IS AN RTC SCHEME AND IS CURRENTLY BEING PROGRESSED. The residual area is remaining in current plans as a public car park.

6.11 **UUS 42:** **Victoria Mall –** Private ownership – there has been several applications for change of use, associated with the individual units collectively known as the Victoria Mall. The buildings have more recently fallen into an almost dilapidated state and the site would benefit from an extensive scheme to fully refurbish or redevelop the site. From available resource there are no current proposals for this action.

**PA91/01748/B** - Creation of supermarket extension with car parking, former St. Maugholds School & car park area, off Christian Street, Ramsey.  
- Safeway Supermarket Christian Street Ramsey Isle of Man IM8 1DG - Permitted - Permission has expired.

**PA04/01679/B** - Erection of two storey unit retail area / 178 seat cinema / lecture theatre, 80 seat restaurant with associated services and erection of 2 & 3 storey unit for retail / office area and 3 no. 2 bed apartments with improvements to car park - Old Catholic School Site Albert Road Ramsey Isle of Man IM8 1JB – Permitted - Permission has expired.

- 6.12 **UUS 43:** **Britannia Hotel, Waterloo Road** - Private ownership. Development proposals have been prepared and a planning decision is imminent.

**PA20/00229/B** - Demolition of building (in association with Registered Building Application 20/00230/CON) - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR – Refused.

**PA20/00230/CON** - Registered Building Consent Application for the demolition elements to a building in a [conservation area](#) See Appendix Q and associated with planning application 20/00229/B - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR – Refused.

**PA23/00066/B** - Change of use from public house (use class 1.3) to create ten apartments (use class 3.4) while retaining original element of building, demolition of previous extensions and erection of new replacement extension. - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR – Pending Consideration

**PA23/00067/CON** - Demolition of previous extensions and erection of new replacement extension in association with application PA 23/00066/B - Britannia Hotel Waterloo Road Ramsey Isle of Man IM8 1DR - Pending Consideration

- 6.13 **UUS 44:** **Central Hotel, Bowring Road** – Privately owned.

The site has been re-opened as a licenced premises since the list was created.

- 6.14 **UUS 45:** **Old River Road** – RTC ownership.

There are no relevant planning applications for the development of this site. Historically private developers have assessed the site for development. No formal proposals have been presented for approval.

The RTC Policy Committee are reviewing the sites within their ownership to determine the best use of the sites and how they can address the needs of the town.

- 6.15 **UUS 46:** **Former Ramsey Bakery Site and adjacent plot, Station Road** – Private ownership

There are no relevant planning applications for the development of this site. The use as defined is that of the Ramsey Bakery and the internal layout, fitting out and offices is dedicated to that use.

I accept that this is a vacant site in approved use terms. I do however question whether the bakery site should be on the UUS list. Until the future of bread provision for the Island is fully understood redevelopment of the site may be premature.

The second site identified, on the corner of Gladstone Avenue and Bircham Avenue is a vacant site and would be suitable for small scale development. There has been no proposal brought forward for development.

- 6.16 **UUS 47:** **Water Street Car Park, Ramsey** – RTC ownership in part and private ownership.

Planning applications have been refused for the development of this site due to its being in the Ramsey [conservation area](#). See **Appendix Q** The private owner would welcome the opportunity to develop the site. The combination of the two sites would make a development opportunity. The RTC Policy Committee are reviewing the sites within their ownership to determine the best use of the sites and how they can address the needs of the town.

**PA90/01184/A** - Approval in principle for construction of 11 apartments with garaging, yard at junction of Tower Street/Water Street, Ramsey. - Garage Tower Street Ramsey Isle of Man - Refused on Review

**PA14/00888/B** - Demolition of redundant workshop to enable extension of existing car park (in association with 14/00889/CON) - Cannons Court Water Street Ramsey Isle of Man IM8 1JP - Refused

**PA14/00889/CON** - Registered Building consent for the demolition of redundant workshop to enable extension of existing car park (in association with 14/00888/B) - Cannons Court Water Street Ramsey Isle of Man IM8 1JP - Refused

- 6.17 **UUS 48:** **Raymotors, Brookfield Avenue / Albert Road, Ramsey** – Private ownership.

The site is a recognised commercial site in the town centre. The filling station, car wash and convenience store are well used and supported. The remaining buildings comprise vehicle showroom, workshops and dedicated car parking.

Those areas not utilised in the current use are small and fragmented. Development of these is unlikely to be attractive without the discontinuation of the existing uses.

**PA03/01070/B** - Showroom and workshop extension to replace existing workshop - Raymotors, Corner Of Queens Pier Road And Brookfield Avenue Ramsey - Approved at Appeal - this is the current usage. I do not consider this site to be vacant or available for development.

- 6.18 I submit that the USS sites represent a very limited opportunity for development and where possible active measures are being taken to

develop these. Development of these sites is important and will provide a small contribution towards the sustained growth of the Town. To ensure Ramsey grows at a rate to support projected population growth there is a need to expand the boundary as requested.

## 7.0 Isle of Man Strategic Plan 2016

7.1 Development adjacent to the settlement boundary is recognised in the [IOMSP](#) where a Local Plan allows:

**Housing Policy 4: New housing will be located primarily within our existing towns and villages, or, where appropriate, in sustainable urban extensions.....** Sustainable urban extension being defined as ‘Involves the planned expansion of a city or town and can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a wide range of facilities, and when developed at appropriate densities’.

7.2 It is recognised that the best opportunities for housing including affordable housing are on greenfield sites or on brownfield sites where delivery can be economically guaranteed.

7.3 Nowhere within the APNW Call for Sites documentation is it suggested that greenfield sites are excluded from this exercise, and I submit that, in accordance with current housing policy, **where logical, sustainable extensions can be provided, they should – in this case ahead of those identified in current zoning which are problematic and effectively not available for development as previously set out.** (My emphasis).

7.4 Residential development respecting the surrounding area and adjoining the settlement boundary would include: -

7.5 Mixed density and varying unit types to address the short fall in available housing recognised by IoM Government to provide choice for all ranging in size from 2 – 4 bedrooms to meet the changing needs of the Islands population.

7.6 Mixed format residential units to allow for private sector, public sector, affordable, sheltered accommodation, lifetime, residential care, and nursing homes.

7.7 Any houses would be of mixed sizes in sustainable locations, close to existing housing infrastructure and adjacent to the settlement boundary, into desirable, sustainable locations with particular regard for compliance with the Governments own [Housing strategy Principles 1-7](#) (Page 14) in respect of affordable homes.

7.8 Commercial/Employment land must be released to allow the Town to expand to meet the published objectives of the government.

7.9 Provision of boundary landscaping, woodland areas, and significant areas of open space within sites recognising existing field boundaries is required

and would maintain the countryside feel to reduce the impact of any new development in the boundary extension area.

- 7.10 New development offers an opportunity to approach construction with sustainability in mind:
- maximise carbon sequestration.
  - minimise greenhouse gas emissions.
  - maintain and enhance eco-systems.
  - achieve biodiversity net gain.
  - provide sustainable drainage systems.
  - provide active travel and public transport infrastructure.
- 7.11 New development is constrained by developing legislation and emerging Plans each of which are more cognisant of past lessons learnt. The design guidance as set out in the [Residential Design Guide 2021](#) and the IOMSP (including any amendment) provide much developed guidance on development constraints.
- 7.12 The Climate Change Act and the approach to a Net Zero society each add another layer of sustainable targets to any form of development.
- 7.13 Careful design and an approach to quality choices for materials and specification ensures any development is visually compatible with the neighbouring development areas and adheres to the intent of the Written Statement for the Draft Area Plan for the North and West's density guidance of 18 dwellings per hectare in service centre settlements of which Ramsey is one.
- 7.14 Any proposed development whether residential or commercial/employment would be required to be at an acceptable density which respects the adjoining extant properties.
- 7.15 The boundary extension as proposed recognises the four areas as set out. Each of which has a different character and provides different development opportunities.

## **8.0 Built Environment Reform Programme**

8.1 There is provision within the emerging processes, in particular the Built Environment Reform Programme ([BERP](#)) to improve the planning process and to better support development. It is aligned with the Government's Economic Strategy in particular towards the delivery of a further 1000 homes.

### **8.2 Objective 1**

8.2.1 Create Housing and Economic Needs and Land Assessments; taking into account demographic issues and understanding the deliverability of land to meet identified needs.

8.2.2 Carry out an Infrastructure Needs Assessment to identify infrastructure requirements to deliver the growth aspirations in the Island Plan and Economic Strategy.

8.2.3 Map Environmental Constraints and Opportunities to inform decision making and prioritisation.

### **8.3 The achievements in this process to date as published are:**

8.3.1 Implementing the process for Major Planning Applications.

8.3.2 Launching the Island Infrastructure Scheme.

8.3.3 Carrying out a customer survey and engaging with developers and stakeholders in order to target future changes to the planning process.

8.3.4 Amending public counter and Duty Planner times as informed by the survey.

8.3.5 Engaging with Planning Application consultees.

8.3.6 Developing a Concierge Service.

8.3.7 Publishing refreshed Planning Application validation guides.

8.3.8 Initial Review of the Section 13 process.

8.3.9 Publication of the Planning and Building Control Customer Charter.

8.3.10 Launching Neighbour Notification & Planning Committee referral alerts service.

8.3.11 Developing new processes for condition discharge, pre-application advice, and permitted development queries.

8.3.12 Improvements to the planning website at Gov.im.

8.3.13 Ongoing engagement with stakeholders to develop an approach to delivering Biodiversity Net Gain.

8.3.14 Preparation of updates to the Town and Country Planning Act.

8.4 From the achievements the critical and most relevant points to the boundary extension process are 8.3.2 and 8.3.13. Both of which actively seek additional protection to the countryside and through legislation will ensure funding is available to manage the Biodiversity Net Gain (BNG) and infrastructure requirements.

- 8.5 One of the proposals is to ensure that significant development is conditioned with a requirement to provide a BNG (at a level yet to be agreed) which requires that developers enter into a legal agreement to provide a dedicated area for the management of ecology for a period of 30 years following the implementation of an approval.



## 9.0 Area Assessments

- 9.1 The application has been set aside to be determined based on each of four agreed areas being considered separately. In my evidence I deal with each of the Criteria (3, 4 and 5) under the headings. I rely on my preceding background evidence and the documents referred to herein and submit that the criteria are all addressed in each case.

The existing topography within the areas is generally flat, with the exception within the Glen Auldyn and South Areas where Glens dominate, undulating with natural contours. It generally has matured established internal sod bank field boundaries, areas of dense woodland and low-lying areas.

Many boundaries with neighbouring residential properties are mature sod banks.

Legislation is being formulated to add a further tier of protection to the environment and developers through BNG requirements must protect and enhance our ecology/countryside.

## 9.2 North Area –

- 9.2.1 This area of land is significant to this application and Ramsey as it represents the most important area for future residential and community development on the outskirts of the town.
- 9.2.2 Flood risk and accurate flood maps have significantly reduced the availability of land for the development of Ramsey within the settlement boundary – **See Appendix J, Appendix R and Appendix S**
- 9.2.3 These also recognise areas within the North proposal where development will be constrained and which creates an opportunity for development of public open spaces, ones which can link with existing public rights of way, permissive rights of way and public footpaths. **See Appendix T**
- 9.2.4 Generally the topography of the area is above the Douglas 02 datum recognised as being the benchmark to identify areas at significant risk of flooding and the Climate Change Act requires stringent management of surface water to ensure new residential properties are protected. This includes a freeboard allowance of 600mm (residential) and 300mm (Commercial and all other developments) above the 100-year climate change flood level for all new developments.
- 9.2.5 The requirements for commercial/Industrial development are less stringent however no less important.

- 9.2.6 The area is fully accessible from established, serviced highways, the A9 (Andreas Road), A10 (Bride Road) and A13 (Jurby Road) all where connections to utilities are readily available.
- 9.2.7 The ongoing Area Plan Review, All Island Development Plan and BERP processes create a significant opportunity for further structured development to meet the needs of Ramsey for future generations.
- 9.2.8 With the projected Island population growth it is necessary to expand the town boundary to ensure proper facilities and amenities can be provided to support the needs of a Service Centre.
- 9.2.9 I submit that the reasons for establishing the West Ramsey Development Framework and the associated zoning have not changed and the same fundamental requirements exist. My paragraphs 3.4.1, 3.4.2, 3.4.3 and 3.4.4 all recognise the need for appropriate zoning to be defined and structured.
- 9.2.10 The RTC application for the North Area is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are primarily residential.
- 9.2.11 The area sought is an overspill **and** outgrowth of the promotor's area. (My emphasis)
- 9.2.12 The proposed boundary as indicated follows where possible clear, physical boundaries.
- 9.2.13 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.
- 9.2.14 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.
- 9.2.15 The inclusion of the Area with defined zoning and development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment to be secured. It represents an area where development is free from projected river and tidal flooding as set out in the flood maps.
- 9.2.16 The civic amenity centre falls within this area and is currently managed by the RTC and MUA jointly, there are representatives from each Parish on the Board.

### **9.3 West Area –**

- 9.3.1 This area of land is significant to this application and Ramsey as it represents the most important area for future employment land and community development on the outskirts of the town.
- 9.3.2 The area is geographically split to the north and south of the Sulby River.
- 9.3.3 This area of land is directly connected to the current industrial and commercial land as developed – at the north end this is characterised by the Mountain View Innovation Centre which is an area of economic growth and activity. It has seen the development of business and represents a significant employment hub.
- 9.3.4 More recently the Centre has been used as a destination venue hosting amongst others ‘Saturday Night Live’ and TT Launch events.
- 9.3.5 There exists an opportunity to enhance further this well-respected area to support the existing businesses through additional, complementary development.
- 9.3.6 At the southern end the first highway approach to Ramsey at the boundary is commercial development in the form of Banana Computers and the Millichap’s warehouse which has common boundaries with JP Corry who then share boundaries with the Manx Utilities at the site of the former power station. All of which forms the Town boundary to the West, separated only by the Glen Auldyn River.
- 9.3.7 I submit that with the refusal of the recent planning application referred to at my paragraphs 3.7 and 4.6 due in part to the well-documented flooding issues coupled with the content of my paragraph 9.2.4 renders this part of the town more suited to commercial development as the criteria for compliance with flood risk are less stringent. This would then fall more in line with the adopted West Ramsey Development Framework.
- 9.3.8 Part of this area is relatively low lying and prone to flooding. It would make excellent amenity land significantly enhancing the area in BNG terms and allowing the public footpaths to be expanded into the area and include for active travel planning with further dedicated cycle routes linking the town centre.
- 9.3.9 The Area is served by both the main A3 (Lezayre Road) and the A13 (Jurby Road) where connections to utilities are readily available.

- 9.3.10 There are no constraints on highway capacity and this would logically be the location for sensitive additional commercial and industrial development.
- 9.3.11 The RTC application for the West Area is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are primarily commercial/employment.
- 9.3.12 The area sought is an overspill **and** outgrowth of the promotor's area. (My emphasis)
- 9.3.13 The proposed boundary as indicated follows where possible clear, physical boundaries.
- 9.3.14 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.
- 9.3.15 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.
- 9.3.16 The inclusion of the Area with defined zoning and development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment to be secured.

#### **9.4 Glen Auldyn –**

- 9.4.1 This area of land is significant to this application and Ramsey as it represents an important area for inclusion as a community.
- 9.4.2 Glen Auldyn is an existing neighbourhood and settlement which benefits geographically from being near the Town of Ramsey, it shares its northern boundary with the existing settlement boundary of Ramsey.
- 9.4.3 The proposal would regularise the Ramsey Golf Club boundary to be within a single Parish.
- 9.4.4 Much of the Glen Auldyn proposal is within an area of [landscape classification](#) which is protected and which currently offers the people of the Isle of Man a variety of outdoor pursuits. Glen Auldyn is categorised as-

#### **B2 – GLEN AULDYN**

##### **Key Characteristics**

- A medium scale steep sided V-shaped valley surrounded by the Southern Uplands.
- Numerous large coniferous plantations on upper valley slopes.
- Fields of rough grass and pasture in a regular pattern on flatter lower valley bottom.
- Continuous linear settlement of mixed type along bottom of the lower valley around Glen Auldyn and Brookdale gives the valley a settled character.
- River runs alongside the enclosed valley bottom road with numerous concrete bridges over to access houses and slate road bridges.
- Enclosed character due to the steep valley slopes and roadside trees.
- Little sense of remoteness.
- Moderate sense of tranquillity.
- Numerous historic features, in the form of chapels, cairns and mounds.

### **Overall Character Description**

Coniferous plantations cover the majority of the upper valley sides with gorse, heather and rough grasses growing along the upland periphery. Numerous deeply cut tributaries, such as Fern Glen, with lush deciduous vegetation growing in the valley bottom along the river banks join the main valley as it leaves the upland area and deepens. The narrow valley bottom begins to widen with larger flatter fields of pasture and having a more regular pattern with hedgerows containing mature trees around Cronk Aalin. This area of open fields abuts the Ramsey Golf Course to the south and runs alongside the edge of the deciduous woodland of Claghbane Plantation, where the lower slopes of the Northern Uplands meet the urban edge of Ramsey.

The densely wooded valley sides slope steeply up behind the variety of bungalows and detached traditional and modern houses on the valley floor. These buildings with various coloured cement rendered, (predominantly white) and pebble dashed facades, line both their sides of the enclosed valley bottom road which is overhung with hedgerow trees. A mixture of hedge, wall and fence treatments enclosed front gardens, giving a sub-urban character in place. Further up the valley, the Glen Auldyn River runs parallel to and under the road with riparian vegetation and trees growing on the banks. Concrete bridges give access to the larger set back houses with exotic plant species in relatively spacious gardens, enclosed by traditional slate walls and larger hedges creating a less urban character as one progresses upstream to Ballamenagh. An enclosed character due to the steep valley slopes, roadside trees and large dark coniferous plantations. There is little sense of remoteness due to the numerous houses. The moderate sense of tranquillity in the area is broken by the sound of traffic.

### **Key Views**

- Channelled views framed by steep valley slopes

- Glimpsed views up wooded slopes to surrounding uplands.

#### **Historic Features**

- Keeills
- Tumulus, cairns and mounds

#### **Ecological Features**

- Aquatic and waterside habitats
- Upland heather moorland habitats
- Marginal farmland habitats
- Hedgerows with high biodiversity

#### **Evaluation of landscape sensitivities**

- Ecological value of the aquatic ecosystem and riparian habitats.
- Valley bottom and riverside woodland in the lower valley.
- Small-scale nature of buildings, within well wooded, intimate valley landscape.
- Vernacular character of buildings and bridges.
- Sense of history resulting from chapels, cairns, and mounds.

#### **Landscape Strategy**

The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of wooded valley bottom with housing sensitively located alongside the ecologically valuable riparian corridor.

9.4.5 The wider area within the application comprises the A1 Northern Uplands

#### **Landscape Strategy**

The overall strategy for the area should be to conserve and enhance the character, quality and distinctiveness of the open and exposed character of the moorland, its uninterrupted skyline and panoramic views, its sense of tranquillity and remoteness and its wealth of cultural heritage features.

9.4.6 From the adopted planning strategies the countryside and the unzoned areas identified are protected for their own sake. The boundary application does not alter this fact.

9.4.7 The RTC application for Glen Auldyn is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are fundamentally countryside, The Milntown Estate or Ramsey Golf Club.

9.4.7.1 The Countryside is protected for its own sake.

9.4.7.2 Milntown Estate is managed by the Milntown Trust which was established by Sir Clive Edwards on his death in 1999. The estate was formerly significantly larger and extended over lands which now form the Ramsey Golf Club – in part within the Ramsey Town Boundary, Ramsey Grammar School – Entirely within the Ramsey Town Boundary and Sky Hill – Entirely within Lezayre Parish.

9.4.7.3 Ramsey Golf Club extends to 92 Ac and is in three Parishes Ramsey, Lezayre and Garff. It was originally formed to provide a facility for the people of Ramsey and the North to play golf.

9.4.8 The area sought is an overspill **and** outgrowth of the promotor's area and will allow the supported continued provision of recreation.

This proposed boundary extension is about taking a longer-term perspective, to enable growth and build a sustainable community that manages its diverse human, natural and physical resources effectively. RTC, in considering the community needs, are seeking to pave the way to ensure accessible open spaces and full range of services are available to support future generations.

9.4.9 The proposed boundary as indicated follows where possible clear, physical boundaries.

9.4.10 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.

9.4.11 The Area represents an already accessible mature offering of public rights of way, footpaths, and a sustainable route to the surrounding trails, glens and the wider countryside and nature.

9.4.12 The Area is required to ensure open space commensurate with built development is provided for all to enjoy the open space and countryside from within the Town – there is limited opportunity for built fabric within this area.

9.4.13 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.

9.4.14 The inclusion of the Area with defined zoning and limited development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment in the area to be secured.

## 9.5 South Area –

- 9.5.1 This area of land is significant to this application and Ramsey as it represents an important area for inclusion as a community. It is widely perceived as being part of Ramsey in any case.
- 9.5.2 The area includes part of the afforested land at Lhergy Frissell, this land is owned by the RTC, although located within Garff, as can be seen within the [title plan in the application](#). (P32) The land is presently located in Garff Parish however is in the ownership of Ramsey Town, the area is leased to DEFA as a national glen access to which is taken directly from the Town at Ballure Road, Claugbane Walk and the Hairpin.
- 9.5.3 The South Area is proposed for inclusion to allow the Ramsey Boundary to catch up with the perceived boundary.
- 9.5.4 The golf course joining the north and east boundary of this area is, I suggest, historically embraced as a whole as being part of Ramsey. The fact that it sits within three boundaries should be addressed. There are no opportunities for built development on the golf course. The facility is for the people of Ramsey and the North to play golf only.
- 9.5.5 Much of the South Area proposal is within an area of [landscape classification](#) which is protected and which currently offers the people of the Isle of Man a variety of outdoor pursuits. The South Area is categorised as:

### F5 SULBY RIVER

#### Key Characteristics

- Lower reaches of the Sulby River corridor (as it flows across the northern plain towards the sea at Ramsey).
- River corridor lined with mature deciduous vegetation, creating a sense of enclosure.
- Small and medium-scale irregular fields set along both sides of the river channels.
- Fields delineated by a combination of mature, low Manx hedgerows and traditional grey stone walls (which also line the main road corridors).
- Scattered settlement pattern, along the river course (relatively isolated farmsteads and houses).
- Sulby forms main settlement at western edge (marking point at which river emerged from Sulby Glen), and Ramsey to the east (where the river flows out into the sea).
- Dramatic views to the typically wooded slopes of the Northern Uplands to the south.
- Relatively strong sense of tranquillity throughout most of the character area.



## Overall Character Description

This landscape character area contains the lower reaches of the Sulby River as it flows across the northern plain, eastwards towards the sea at Ramsey Bay. The course of the river begins within the Uplands, further to the south and flows rapidly, down Sulby Glen. At the foot of the Uplands, the course of the river becomes flatter and wider, with slower moving water. Within the character area, the river is lined along almost its entire length by mature deciduous vegetation, which often channels views along the river corridor and provides a strong sense of enclosure. Several small and medium scale irregular fields are set along both sides of the river channel (comprising a mixture of rough grassland, pasture and arable). These fields are delineated by a combination of mature, low Manx hedgerows and traditional grey stone walls. The main A3 (also forming part of the TT course) runs through the southern half of the area, hugging the base of the uplands to the south and a dismantled railway line also runs to the north of the river (now providing a mature landscape and recreation corridor). Several minor rural roads provide access to the area, and the river is crossed at fairly regular intervals along the west-east corridor. Sulby Bridge provides one of the main crossing points, and is a distinctive landmark feature within the surrounding landscape, alongside the colourful Ginger Hall hotel. Several farmsteads and relatively isolated houses also line the course of the river, set slightly back from the river channel. Traditional white walls and grey roofs dominate built character. The relatively intimate Sulby village nestles at the western end of the character area, marking the point at which the river corridor meets the low northern plain after its journey through Sulby Glen. Settlement character within the village is dominated by traditional Manx architecture, with several rows of colourful terraced houses and cottages.

*At the eastern end, the river flows into Ramsey (a medium sized seaside town), where the corridor becomes more open and is influenced by surrounding urban built development. As it meanders amongst the urban fabric, the river eventually forms the basis for Ramsey's working harbour and then flows out to sea.*

Although views are generally channelled along the river corridor, a strong recognisable sense of place is apparent at Sulby, Sulby Bridge, Ramsey and set slightly back from the river corridor along its length (views to the dramatic southern upland backdrop). Overall, there is a relatively strong sense of tranquillity throughout the character area.

### Key Views

- Views along the river corridor generally channelled by vegetation which lines the banks of the river.
- Dramatic views to the adjacent southern uplands, which provide a wooded backdrop within views southwards.

- At bridging points, open views from the river corridor may be obtained across adjacent fields which are set back from the line of the river.
- Views to and from the urban edges of Ramsey.

#### **Historic Features**

- Sulby Church (Registered Building)
- St. Stephen's Church (Registered Building).
- Lezayre Road War Memorial and Cemetery.

#### **Ecological Features**

- Mature, diverse deciduous vegetation lining the river corridor.
- Mature hedgerows at field boundaries.
- Diverse habitats within the river corridor.

#### **Evaluation of Inherent Landscape Sensitivities**

- Strong sense of tranquillity away from main roads.
- Scattered settlement patterns of farmsteads along river's course.
- Enclosed and wooded river corridor.
- Valuable aquatic riparian and wet meadow habitats alongside river.
- Minor rural roads enclosed by roadside vegetation.
- Vernacular character of buildings and churches.
- Presence of Manx Mile stones.
- Few vertical elements.
- Dramatic views south to Uplands.
- Field pattern delineated by a mixture of stone walls, relatively tall Manx hedge-banks and post and wire fences.

#### **Landscape Strategy**

The overall strategy should be to conserve and enhance the character, quality and distinctiveness of this rural area with its scattered settlement pattern, relatively strong field pattern, a network of enclosed minor rural roads and its ecologically valuable aquatic and riparian habitats.

- 9.5.6 From the adopted planning strategies the countryside and the unzoned areas identified are protected for their own sake. The boundary application does not alter this fact.
- 9.5.7 The RTC application for the South Area is cognisant of the need to plan for the future and is proposed as a logical extension abutting the existing settlement boundary where neighbours are fundamentally Ramsey Golf Club, South Ramsey residential areas or countryside.

- 9.5.8 The area sought is an overspill **and** outgrowth of the promotor's area and will allow the supported continued provision of recreation and outdoor pursuits. (My emphasis)
- 9.5.9 This proposed boundary extension is about taking a longer-term perspective, to enable growth and build a sustainable community that manages its diverse human, natural and physical resources effectively. RTC, in considering the community needs, are seeking to pave the way to ensure accessible open spaces and full range of services are available to support future generations.
- 9.5.10 The proposed boundary as indicated follows where possible clear, physical boundaries.
- 9.5.11 The Area proposed is required to address the fact that there is insufficient acreage left for development of the promotor's area within its borders and injury is suffered thereby.
- 9.5.12 The Area represents an already accessible mature offering of public rights of way, footpaths, and a sustainable route to the surrounding trails, glens and the wider countryside and nature.
- 9.5.13 The Area is required to ensure open space commensurate with future built development is provided for all to enjoy the open space and countryside from within the Town – there is limited opportunity for any built fabric within this area.
- 9.5.14 I submit that the inclusion of this area is of paramount importance to the RTC to ensure the balanced delivery of the first-class services and facilities expected from a service centre.
- 9.5.15 The inclusion of the Area with defined zoning and limited development briefs will allow economic growth in the knowledge that development will be supported and allow long-term investment in the area to be secured.
- 9.6 I confirm that each of the Areas identified for consideration meet the criteria to be considered in the boundary extension application which seeks to ensure that there is sufficient land within the town for future development.

## 10.0 Conclusions

- 10.1 My evidence sets out the related reference papers and explains the on-going processes within Government to align their targets for meeting their published economic strategy goals.
- 10.2 These require a review of existing planning policy through the Strategic Plan review which will pave a way for an All Island (development) Plan.
- 10.3 Both documents are in their infancy however neither change the fact that Ramsey Town has developed as far as is practicable the available space within its current settlement boundary.
- 10.4 I submit that the reasons for establishing the West Ramsey Development Framework in 2004 and the associated zoning have not changed and the same fundamental requirements exist. My paragraphs 3.4.1, 3.4.2, 3.4.3 and 3.4.4 all recognise the need for appropriate zoning to be defined and structured. The boundary extension as defined allows this to be reviewed and meaningful, deliverable development briefs to be established.
- 10.5 Significantly there has been a fundamental recognition that most of central Ramsey including the majority of the lowland area identified for development is located in what has been identified as the Island's number one hotspot for extreme flooding. This renders the area unsuitable for further development.
- 10.6 I confirm that the criteria for consideration are met and my evidence sets out how 'The Ramsey Town Commissioners application to the Department of Infrastructure for an Order under Section 6 of the Local Government Act 1985 seeking to extend by Order, the boundary of the town of Ramsey Town', including the proposed boundary is the logical approach and is a cohesive strategy towards providing security for future generations.
- 10.7 I confirm criteria for consideration:
- 3) **that the area sought is an overspill or outgrowth of the promoter's area**
  - 4) **that, wherever possible, clear physical boundaries are followed**
  - 5) **that there is insufficient acreage left for the development of the promoter's area within its borders and injury is suffered thereby**
- are fulfilled.
- 10.8 I commend Sir that you recommend to the Department of Infrastructure that the application by the Ramsey Town Commissioners in the format requested is approved without amendment.

## **11.0 Appendices**

Appendix A1 - North Area

Appendix A2 - West Area

Appendix A3 - Glen Auldyn

Appendix A4 - South Area

Appendix B1 - Existing Settlement Boundary

Appendix B2 - 1992 Town Boundary Extension

Appendix C - Statement of the Head of Planning Policy

Appendix D - Ramsey Local Plan 1998

Appendix E - 1982 Development Plan

Appendix F - West Ramsey Development Framework

Appendix G - West Ramsey Development Framework with High FRA's

Appendix H - Ramsey Urban Area and Catchment Management Area

Appendix J - Ramsey Local Plan 1998 with High FRA's

Appendix K - 'Breathing' Spaces

Appendix L - Significant Developed Sites Since 1998 Plan

Appendix M - APNW Ramsey Town Centre

Appendix N - APNW Ramsey

Appendix P - Unoccupied Urban Sites North and West Ramsey

Appendix Q - Conservation Areas and Registered Buildings

Appendix R - Flood Risk Map

Appendix S - Flood Risk Areas Unsuitable for Development

Appendix T - Public Rights of Way