

Consultation on the Isle of Man Strategic Plan Review – Preliminary Publicity

Closing Date: 29th September 2023

Douglas City Council Response

Islands Spatial Strategy

1. Which of the following years do you think the Strategic Plan period should run until?
 - 2036;**
 - 2041;
 - Other

2. In respect of affordable housing provision, which of the following broad policy options do you prefer?
 - Policy Option 1 - Shared Equity Purchase Assistance Scheme should be retained for perpetuity;**
 - Policy Option 2 - Shared Equity Purchase Assistance Scheme should be retained for a period of 5 years (as they are now);
 - Policy Option 3 - Shared Equity Purchase Assistance Scheme should be retained for a period of 10 years?

3. When considering how the Island's settlements may be developed in the future, which of the broad policy options identified in Table 1.2 of the Spatial Strategy Evidence Paper do you prefer? (see attached table 1.2 extract)
 - Policy Option 1: Future development continues to be distributed across all identified settlements on the Island depending on their position in the settlement hierarchy.
 - Policy Option 2: Future development is focused in the East only, specifically around the settlements of Douglas, Onchan, Union Mills and the Strang.**
 - Policy Option 3: Future development is dispersed across the Island which could be in more rural locations if there can be better alignment with infrastructure availability.
 - I have no views on this question

If you find some, but not all aspects of Option 2 agreeable, please specify which aspects of Option 2 you agree with, option to select 1 or a combination of the broad policy options.

4. Is there a variation of Policy Option 1 that you want to highlight/propose?

Focus of the development should have focus within the Capital of the Island. The Capital should be a hub for living, work and pleasure. Creating more opportunity for growth due to the number of people living and working in the capital and also reducing down on unnecessary travel.

Settlements that have no capacity for growth should be identified and excluded so that other settlements can be promoted up the hierarchy.

5. Do you agree with the method of calculating housing need set out in part Two of the Spatial Strategy Evidence Paper i.e. the 'Standard Method'

- I agree.**
- I have a neutral view.
- I do not agree.
- I have no views on this question

6. Do you agree with the gross calculation of 7,400 new dwellings needed between 2021 to 2037 to meet the population of 100,00 people set out in Part 2 of the Spatial Strategy Evidence Paper? Agree to disagree

- I agree.
- It is too high.**
- It is too low.
- I have no views on this question.

7. Do you agree with the residual housing need of 1,847 as set out in Table 1.9 of the Spatial Strategy Evidence Paper? (see attached table 2.11 extract)

- I agree.
- It is too high.**
- It is too low.
- I have no views on this question.

8. Do you have any comments on a 2.16 average household size by 2032?

The average household size has the opportunity to grow, the provisions of housing on the Island is traditional in the majority. If the population is to grow then we should assume this would be a working age population where families would be resident and as such there will be opportunities for household size growth. Also, as the cost of living increases there are more young people remaining in the family home for longer, increasing the average household size more naturally.

There is also an aging population who are asset rich and as such they are occupying larger properties with low number of occupants.

The key is to provide the right type of housing and make it easier for people to move to the correct housing. Market conditions are not conducive for many people to take the risk of moving, especially the older population. Bungalows and flats are elevated in price and therefore this makes it a difficult choice.

There is little acknowledgment in the documents of peoples working habits, patterns, with many now choosing to work from home or operate a business from the home. Is there an opportunity to bring remote workers to the Island? Should this be explored?

People are using their homes differently, spare rooms are no longer bedrooms they are Offices. Garden room extensions are common place.

Better designed homes could assist in generating higher average household sizes e.g. older people living with children/carers. Younger people living with parents longer.

If the space is suitable then this will encourage and reduce cost of ownership.

Allowing older people to move to more affordable homes and freeing up equity in homes.

9. Do you have any comments on a 2.22 average household size by 2032?

It is an achievable number and there are positives in increasing this number, reducing the requirement for more houses but housing more people.

10. How supportive would you be of interim reviews of the housing figures within the Strategic Plan via the National Policy Directive? Supportive to unsupportive

- I am supportive.**
- I have neutral views.
- I am unsupportive.
- I have no views on this question.

11. Do you agree with the gross calculation of 6.26 ha. of employment land needed to 2026 as specified in Table 1.12 of the Spatial Strategy paper based on existing evidence?

- I agree**
- It is too high
- It is too low
- I have no views on this question

12. Should retail and general office development continue to be directed to town centres?

- Yes**
- No

Should there be exceptions, where retail and general office development might be located outside of a Town Centre? If yes - what?

Yes – New custom built commercial headquarters in areas with existing infrastructure to provide local support and cater to workforce. Or, located on established business park areas.

Also for retail premises that are unsuitable for Town Centre premises based upon product/services to be sold.

13. In terms of renewable energy generation, which of the following broad policy options do you most agree with?
- Policy Option 1 – To retain the rural exception policy in General Policy 3 that relates to over-riding national need – recognising that strategic renewable energy initiatives would be considered to be of “over-riding national need”.
 - Policy Option 2 – Include an additional rural exception policy within General Policy 3 specifically for renewable energy initiatives e.g. on-shore wind development, allowing for consideration based on its merits allowing for a careful balancing of the impacts including factors for and against.
 - **Policy Option 3 – Other, please expand on using the text box below.**

If policy option 3, please expand;

Include an additional rural exception policy within General Policy 3 specifically for renewable energy initiatives e.g. on-shore wind development, allowing for consideration based on its merits allowing for a careful balancing of the impacts including factors for and against. Government should be giving wide consideration to all renewable energy sources and this should be Island wide. Onus on the need to justify refusal rather than justify approval.

14. Do you have any other comments to make on the themes discussed in the Main Consultation Document?

Please provide the page number(s) from the consultation document that your comment(s) refer to:

P.E.P Main Paper:

Page 37 – mentions guiding leisure uses in town centres, the Council welcomes this.

Page 43 – possible suggestion that more infrastructure will be pushed onto Local Authorities. Question was raised as to what does “this could supplement existing national infrastructure strategic thinking to facilitate more aligned delivery at the local level” mean. The Council is not adverse to this as long as it is properly funded.

Page 44 – all key references are welcomed and are overdue.

Page 45 – all points are welcomed from a climate change perspective.

Rural Housing

15. In respect of potential changes to rural housing policy, which of the following statements do you most agree with?
- **There should be a presumption against residential development in the countryside without exception;**
 - Housing in the countryside may be permitted in exceptional circumstances.

- I have no views on this question.
16. In respect of replacement dwellings in the countryside, should there be greater protection for vernacular Manx cottages/dwellings for instance in terms of demolition, replacement or extension?
- **Yes**
 - No
 - I have no views on this question
17. Should there be design guidance or pattern books relating to rural dwellings and other development? These could cover matters such as design features, size, materials, layout, landscaping, external treatment and care for vernacular buildings etc.
- **Yes**
 - No
 - I have no views on this question
18. In respect of tourism, which of the following statements do you agree with most?
- **Tourism development in the countryside should be the exception i.e. based on opportunities in existing buildings;**
 - Some new accommodation (of scale) is acceptable in the countryside including on our coasts.
- If you agree that some new accommodation (of scale) is acceptable in the countryside, including on our coasts, which of the below types of accommodation might you find acceptable in principle? Serviced; non serviced; or other.*
- Serviced only to help ensure tourism use.**
19. In respect of Manx Tholtans, which will be defined, which of the following broad policy options do you prefer?
- Policy Option 1 – They should not be developed and they should be retained in their ruinous state.
 - Policy Option 2 – They should be viewed as 'bothies' with virtually no services and thus little environmental impact. Any development could be linked to a footpath network.
 - **Policy Option 3 - They should be renovated with a greater degree of service provision for tourism or permanent residential uses.**

Biodiversity Net Gain

20. Do you agree that a target for Biodiversity Net Gain should be set?
- **I agree.**
 - I have a neutral view.
 - I do not agree.

- I have no views on this question.
21. Should there be a standard or a tiered approach to Biodiversity Net Gain?
- Standard approach.
 - Tiered approach.
 - **I don't know.**
22. Do you agree that a Biodiversity Net Gain Tariff should be set for small planning applications such as the extension of a dwelling?
- I agree.
 - I have a neutral view.
 - **I do not agree.**
 - I have no views on this question.
23. Do you agree that Biodiversity Net Gain policies should be linked to an independent verification process in respect of the delivery of Biodiversity Net Gain supply?
- **I agree.**
 - I have a neutral view.
 - I do not agree.
 - I have no views on this question.
24. While not every topic or existing policy can be covered with a specific question we would like to hear if you have any other thoughts or proposals for consideration as part of this review. Let us know in the text box below.

Question 3 – This question is not relevant if you are not an individual, it should therefore be linked to Q4 'which of the following are you' or it should be removed altogether. Question was raised as to whether collection of this data is necessary, if determined it should be left in there should be an option for 'prefer not to say'.

Question 6 – Justification for choosing 2036 is to keep in line with population target of 100,000 by 2037 and raised income thresholds by 2032. How will the policy and plan be implemented in retrospect?

Question 7 – The Council considers that if Shared equity schemes are going to remain, they should be for perpetuity. However the Council feels that this is a good opportunity to review the scheme, is it working? The Council also considers that shared equity schemes should be one of many schemes available and that a wide range of options should be considered.

What is the uptake of First Time Buyers Scheme?

Individual need should be stand-alone.

Consideration should be given to reintroducing BPN scheme which was very successful in the 1970's and 1980's.

Question 28 – we have selected policy option three but consider that this should be linked to tourism only and not for more permanent residential dwellings.

Question 30 – we have responded “I don’t know” based upon the fact that we can see merits of both a standard and tiered approach. It is difficult to provide a comment without seeing what it would look like.

Question 32 – is the off-set BNG provision a replacement for Section 13 or in addition to Section 13? As this is a new big topic the Council would welcome workshops in relation to it.

General - a separate waste strategy for domestic waste and how it was collected should be introduced, as the current waste strategy within the Strategic Plan was primarily only about commercial waste and its disposal.

General - infrastructure levies for Greenfield site development should be considered, this would assist in closing the cost gap between brownfield and Greenfield site development. That money could be used to improve infrastructure links with a particular focus on active travel infrastructure to the next service centre.

General - consider amending planning rules to steadily reduce car parking requirements and for larger developments a sustainable transport report should be expected. The sustainable transport report should lay out links of the development to public transport modes, walking and cycling.

P22, of PEP 1 – mentions the possibility of a housing association on the island so an opportunity could be taken to comment on this as part of the consultation response.

P42 of PEP1, last para – technically this should read ‘head office’ not just ‘office’.

Would like to see policy vision to include the following two points with stats and how they have been considered in the numbers for housing needs and development.

- a) Number of “no fixed abode” including homeless, sofa surfing, half-way temporary accommodation.**
- b) Number of vacant properties and reason for vacancy linked to likelihood of them being brought back into circulation. Current data seems to only consider vacancy based upon housing market churn or undergoing renovation.**