

**The Area Plan for the East**

**Preliminary Publicity Response Form**

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**Local Authority**

## **Introduction**

Commissioners thank the Cabinet Office for the opportunity to respond to the consultation document.

It has been agreed that at this stage, rather than examining the document in great detail on every specific item and areas, the Commissioners would put forward their broad aspirations as to where they would like to be in 15 years in the context of the Plan.

They have considered the accuracy of the plan, checked whether the assessments were correct and highlighted any issues that need to be addressed in the Parish.

Whilst they have not taken the submission as an opportunity to put forward detailed solutions to identified problems, there are a few specific areas that warrant their comments.

The Commissioners intend to continue dialogue with the Cabinet Office throughout the entire process and may put forward briefs into the Plan where they feel appropriate.

At this stage the Commissioners are content with the documents put forward and the process being followed (although as an aside some of the colour coding makes the document difficult to interpret).

Their submission considers all the questions put forward in the Main Consultation Document and responds when the questions are relevant.

## **Employment Land**

- Existing employment land provision?
- The amount and type of employment land which is needed?
- Where new employment sites should be concentrated?

As a general statement, it is the Authorities opinion that the land put forward is excessive and well beyond the East's requirements. The Commissioners accept that this is however an opportunity for developers and land owners to make their case.

In response to the questions above, it is felt that it is important to make the most effective use of brown field sites before building extends on to the green belt. Perhaps green belt land should be held as a strategic reserve for when a further and specific or specialised need is identified which cannot in any way be accommodated on brown field sites.

There is a feeling that the employment land in Douglas, the centre of the population, should be given priority.

There is also a concern that the use of certain areas of industrial land in the Parish are no longer appropriate. In particular the eastern end of the elongated Snugborough Trading Estate, from Rural Industries to the former Parkinsons site (now Blackburn Construction) and adjacent to River Walk should be reassessed and possibly rezoned for housing.

If it is within the scope of the Plan, consideration should be given to whether all the businesses in Snugborough Estate are now appropriate. Should waste handling, retail, wholesale and light industry all be operated from within this one area.

A similar situation of appropriate use of land exists at Corlett Sons and Cowley yard which is the rear of Union Mills Post Office, the Memorial Hall, and borders on Camlork Farm.

That area could be more appropriately used for housing as it is (predominantly) no longer relevant to the farming industry.

In relation to the largest area put forward for employment land in the Parish , Cooil Road, they accept that whilst work has already commenced on the site , it is felt that any further use of that should be phased in gradually after other sites are properly developed. It should not be developed speculatively.

In conclusion of this matter, it is better to have properly designed industrial sites in the appropriate areas rather than having a piecemeal approach

## **Settlement Boundaries**

- *Do you think any changes are necessary to the draft Existing Settlement Boundaries or the Land Uses shown on the Inset Maps in Annex 2?*

The Commissioners wish to make it fundamentally clear that Braddan should not be the overspill for underused sites in Douglas. Whilst they are prepared to consider some development in the Parish, there is a real concern over the scale of developments put forward.

Similar to the Commissioners response to Employment Land, some areas should be accepted as reserve sites for later development if the islands population increases to a stage where the need cannot be met from existing stock or brown field development.

Whilst there are aspirations toward home ownership, it is important in a large rural Parish that any development creates a sense of place and reinforces what we have, without changing the character of the area.

In this respect the Commissioners look forward to the planned survey regarding “groups of houses in the countryside “.

As an example, the Commissioners would not be opposed to smaller developments, of possibly 2 or 3 houses, on sites-such as Mount Rule, Ballaveare or Quines Hill, but these should only be allowed to help maintain a “community”.

There is a line of thought that land at the rear of Strang Road crossroads could be used as a small Village development and amenities would be provided by the proposed new development by the Commissioners on Strang Corner Field.

What is vital is the need to retain, protect and even reinforce a clear gap between urban areas of Douglas, Onchan and Braddan.

The Commissioners continue their opposition to developments that allow any coalescence with Union Mills and Strang.

The Commissioners will retain their stance against infill of the fields between River Walk and Leece Lodge.

- *Are there any areas of Open Space which are not shown on the inset Maps?*

There are three areas that have not been identified on the maps as Open space and the Commissioners wish to put these forward:

1. Grianagh Park
2. Union Mills Football Club - Ballaoates Road
3. Strang Corner (community use)

- *Do you think there are any sites which should be considered for development?*

What can be deduced from the plan is that low density housing doesn't seem to be supported. If part of the Island's development strategy is to attract high net worth businesses, appropriate provision should be made for houses with gardens that are proportionate to the value of the property

The Plan should set out areas such as Castleward which has adequate space for larger houses which would not be seen as infill. The objection to this site due to poor access has however been noted but the problem is not insurmountable, and any development would not be visually obtrusive.

- *Do you have any general comments on the Site Assessment Framework or specific comments on how an individual site has been assessed?*

The Commissioners are content with the stated methodology.

- *How do you think the Plan should deal with the issues of land designations between settlements?*

The answer goes to a previous response in that there is a need to zone green gaps and the white land to stay as it is.

Whilst there should be a strong presumption against new development, this should not stop people in that community (or those wishing to add to the feeling of a community), being prevented from a small development and without sterilising the land.

Any applications should therefore be considered on their merits.

## **PART THREE**

### **Page 16 Consultation Questions (Section 4) Overall Conclusions**

- *Do you have any comments on the Scenarios 1, 2, 3 (Do you think different Scenarios should be considered?)*
- *Which Scenario (or combination of Scenarios) do you think would be the most appropriate to form the basis of the Draft Plan?*
- *How could the Plan ensure that the necessary infrastructure is in place (in terms of capacity, quality and resilience)?*

The comments on 3 scenarios have been accepted.

The Commissioners would favour Scenario 1 which favours the lowest amount of potential development in their Parish.

## **PART FOUR**

### **Page 22 Consultation Questions – Section 6**

- *Should the Plan encourage building at higher densities (either generally or in specific areas) and, if so how?*

The best way to re-invigorate Douglas is to increase its population by way of encouraging housing above commercial properties or building upwards with underground parking.

- *How should the plan approach the issues of Affordable Housing and Elderly Persons Housing and Sheltered Accommodation?*

The need for Affordable Housing should be based on demand. The findings of the Tolson Report commissioned by the Department of Infrastructure can give guidance

of the future need for affordable housing. Interestingly lists for public sector houses in the East and outside Douglas are low at the moment. The reason for this low number needs to be examined.

- *Are there areas where new/improved community facilities would be of significant benefit?*

Strang Corner Field Community Leisure facility proposed by the Commissioners, should meet the needs of Braddan area, but because it will be used by people living outside the Parish, it should have a Government subsidy.

- *Do you think there are areas not included in Table 4 which should be assessed as potential Groups of Houses in the Countryside?*

As previously highlighted, Castleward should be considered.

- *Are there areas where the identification of a Regeneration Area would provide significant benefit?*
  - Corlett Sons and Cowley Yard, Union Mills which is shown as mixed use and should be housing
  - Union Mills Industrial Estate (possibly for sheltered housing)
  - Snugborough Trading Estate. Rezone lower part opposite River Walk.

## **PART FIVE**

### **Page 24 Consultation Questions – Section 7**

- *How can we best support our Town Centres?*

The Authority supports the principles of active travel and the reduction of road traffic should be encouraged. As a contribution perhaps park and ride facilities in outlying areas such as the bottom of Ballahutchin or Cooil Road.

This has to be complimented by adequate facilities for the safe storage of bikes and changing facilities in Douglas

A slight upgrade to the Heritage Trail from West to East would be required to improve its condition and this would help walkers and cyclists.

An old chestnut for cyclists coming from the West through Braddan, is a safer way to cross the New Castletown Road (NCR) at Quarterbridge and allowing them to access the newly established cyclepath. After safely crossing the NCR an alternative route into the centre of town could be via the former railway lines.

## **Green Gaps**

- *Are there any areas which should be considered as a potential Green Gap?*

There has been a response to this question earlier in the document , but for confirmation purposes, land between River Walk and Leece Lodge should be retained as well as the area known as Drinkwater Land which is land between Tromode Heights and Braddan School on Braddan Road.

- *Are there any areas where improvement to the footpaths/cycle network would be of significant benefit?*

As above.

**Braddan Parish Commissioners**  
**26<sup>th</sup> May 2017**