

Our Ref: P18-1538/JT/PA

31st August 2018

Planning and Building Control Directorate
Department of Environment, Food and Agriculture
First Floor
Murray House
Mount Havelock
Douglas
Isle of Man
IM1 2SF

Dear Sir/Madam

**Draft Area Plan for the East Consultation
Representations on behalf of the Braddan Parish Commissioners**

I write on behalf of the Braddan Parish Commissioners in response to the current consultation on 'The Draft Plan for the East' (DPE, May 2018).

The Braddan Parish Commissioners are an important partner in the delivery of The Isle of Man (IOM) Cabinet Office's strategic objectives as set out within the DPE and is keen to continue to work with their partners to deliver much needed new housing, employment and infrastructure, whilst ensuring that this is sympathetic to the rural nature of the Parish and protects the Parish's identity as separate to Douglas, in line with the wider spatial objectives of the DPE.

The following representation seeks to respond to the topics and policies proposed by the DPE and is therefore structured as follows:

- The Role of the Area Plan for the East and the Spatial Vision Statement for the East;
- The Natural Environment;
- The Urban Environment;
- Transport and Utilities;
- Employment;
- Tourism; and
- Residential

1) The Role of the Area Plan for the East and the Spatial Vision Statement for the East

The Braddan Parish Commissioners recognise and support the 'vision' for the East Area and the resultant settlement hierarchy as consistent with the 'IOM Strategic Plan' (IOMSP, 2016).

It is accepted that within the 'Service Villages' (including Union Mills) that '*housing should be provided to meet local needs and in appropriate cases to broaden the choice of location of housing*' consistent with Table 4 of the DPE. Moreover, the Spatial Policy of Table 4 is further supported where it states with regards to 'Villages' (including Strang):

*"Development should maintain the existing settlement character and should be of an **appropriate scale** to meet local needs for housing and employment opportunities. The Area Plan will define the development boundaries of such settlements so as to **maintain their existing character**" [our emphasis]*

It is therefore of the **highest priority** for the Braddan Parish Commissioners that any future development in the Parish and at the villages of Strang and Union Mills in particular, should seek to meet local needs and not lead to the coalescence of the villages. Accordingly, and as will be expanded upon in the following sections, it is questioned why such a significant scale of development is proposed to be directed towards Union Mills and Strang (totalling approx. 360 new dwellings across sites 'BH031' and 'BH032'), which has the effect of joining the two settlements together.

The current scale of development proposed is therefore objected to on grounds that it fails to address local needs or maintain the existing character of the villages, contrary to the stated 'Policy Approach' in Table 4 of the DPE and also of 'Strategic Policy 3' of IOMSP 2016 where it states:

"Proposals for development must ensure that the individual character of our towns and villages is protected or enhanced by:
a) **Avoiding coalescence and maintaining adequate physical separate between settlements**" [our emphasis]

The Braddan Parish Commissioners consider that the focus for development should be in and around Douglas and Onchan as the East Area's principal and most sustainable settlements and the Parish supports the current policy of constraining the release of further greenfield sites to aid in the regeneration of Douglas Town Centre. Accordingly, the DPE's 'Spatial Vision' set out at paragraph 3.4.5 is challenged where it states:

"In the smaller settlements around Douglas and Onchan, their character will largely be retained but there will be some development to ensure the long term development of communities with the right services who will be given better chances to feel real connections to where they live. Settlements such as...Union Mills and Strang in particular will have opportunities in the short term and the long term through Strategic Reserves, for more services and an improved sense of community"

The proposed Spatial Vision to 'largely retain' the character of Union Mills and Strang is considered to be at odds with the Strategic Policy of 'protecting and enhancing' the character of the same settlements and the Parish consider that infill plots and small extensions to the village boundaries of up to 15 new dwellings would:

- i) Be more in-keeping with the character of the area;
- ii) Be more proportionate to the ranking of Union Mills and Strang in the settlement hierarchy;
- iii) More precisely meet the identified local housing needs of the Parish; and
- iv) Offer better opportunities to integrate new development into the villages and create an enhanced sense of community (which would not be achieved by such large-scale development as proposed).

On these grounds, and as will be expanded upon in the sections below, the Commissioners **Object** to the large-scale housing development proposed to the north of Union Mills (site 'BH031') and the Strategic Reserve site proposed to the north of Strang (site 'BH032') .

With regards to paragraph 3.4.2 of the DPE and specifically the 'Peel Road Corridor', the Braddan Parish Commissioners would support the change of use of the Snugborough Trading Estate. The Trading Estate is located adjacent to a large residential area and is known to cause adverse issues in respect of noise and air pollution nuisance. As an example, the Calor Gas Works would be more appropriately placed in East Baldwin (at the former Litts site which has contaminated ground unsuitable for residential development).

Accordingly, the DPE also provides an opportunity to seek to relocate 'bad neighbour' industrial/commercial uses to more appropriate locations and provide an opportunity to deliver new homes on previously developed land, therefore alleviating the need to release greenfield sites.

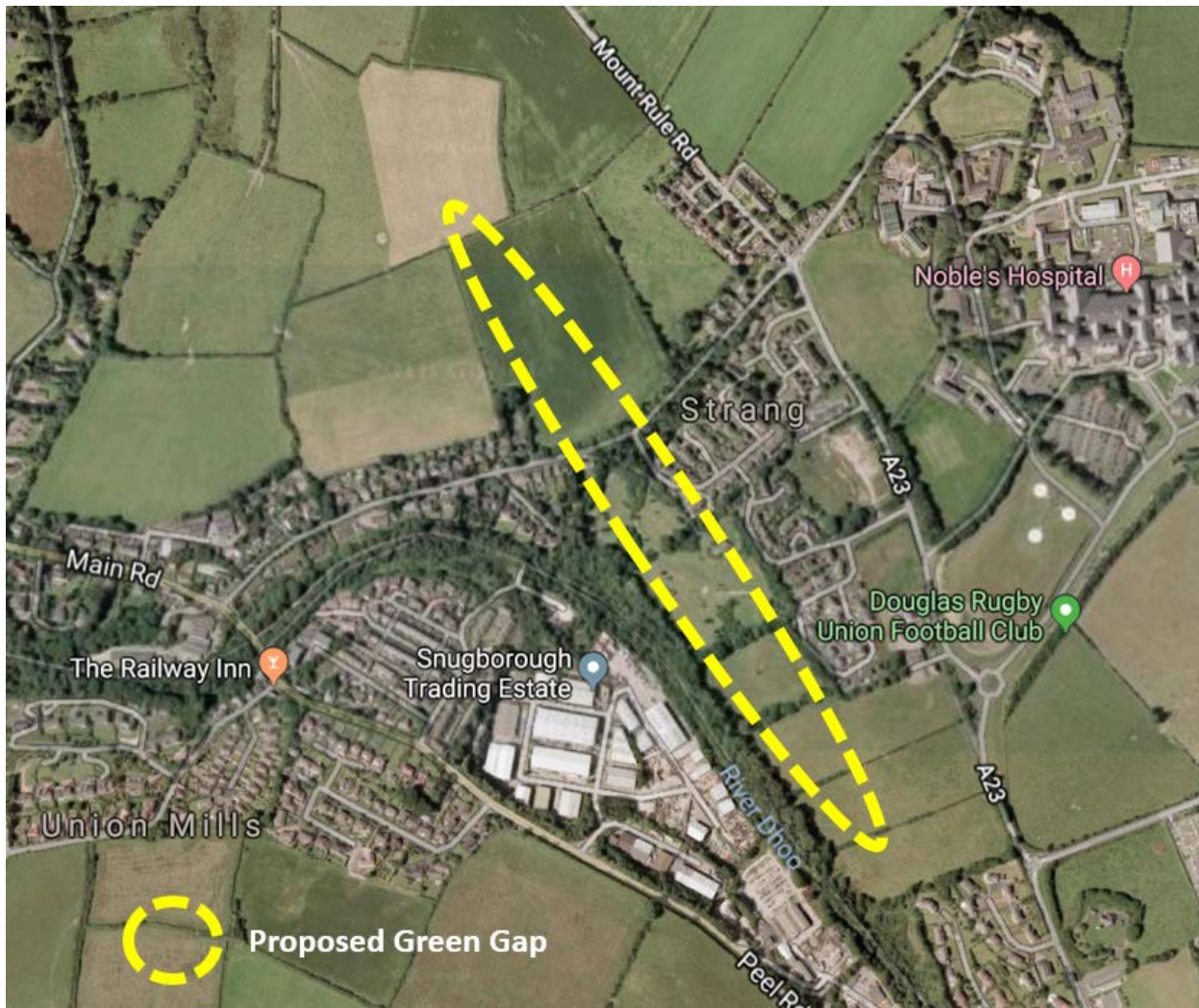
2) The Natural Environment

The IOMSP 2016 sets out in Strategic Policy 3 and Spatial Policy 7 the requirement to protect settlements from coalescence and enables the Area Plans to identify 'Green Gaps'. Paragraph 5.15.2 of the DPE states:

"These Green Gaps can be described as multi-functional green infrastructure areas which stand out as strategically important open land areas between settlements. They normally represent a physical separation between settlements, often being natural / semi-natural green spaces, which have public amenity value. Consciously or unconsciously, these areas contribute to feeling of leaving one place and going into another. It is these areas that help to keep settlements distinct. Green Gaps can be important wildlife corridors, helping to limit habitat fragmentation and providing migration routes."

However, the DPE currently fails to recognise the threat to the 'gap' between the villages of Union Mills and Strang, which is separated only by a thin strip of parkland and agricultural fields. It is considered that this area should be designated as a 'Green Gap' within the DPE as illustrated in Figure 1 below to ensure the settlements do not coalesce, in accordance with Strategic Policy 3 and Spatial Policy 7 of the IOMSP 2016.

Figure 1: Proposed Green Gap between Union Mills and Strang



Moreover, the existing gap between the Peel Road and Tromode Road corridors is considered to provide a sense of openness and clear transition between the urban edge of Douglas and the rural area of Braddan. This area is currently proposed for Residential Allocation (site references: DBH002 and BH030) and it is considered that the allocation of these sites fails to protect the settlements from coalescence by eroding the physical separation between the settlements, contrary to policy and therefore fails to 'keep settlements distinct' as intended by the policies of the DPE.

Accordingly, the Braddan Parish Commissioners **object** to the proposed Residential Allocation of sites DBH002 and BH030 on the grounds that this will lead directly to the coalescence of settlements and therefore considers that this area should instead be

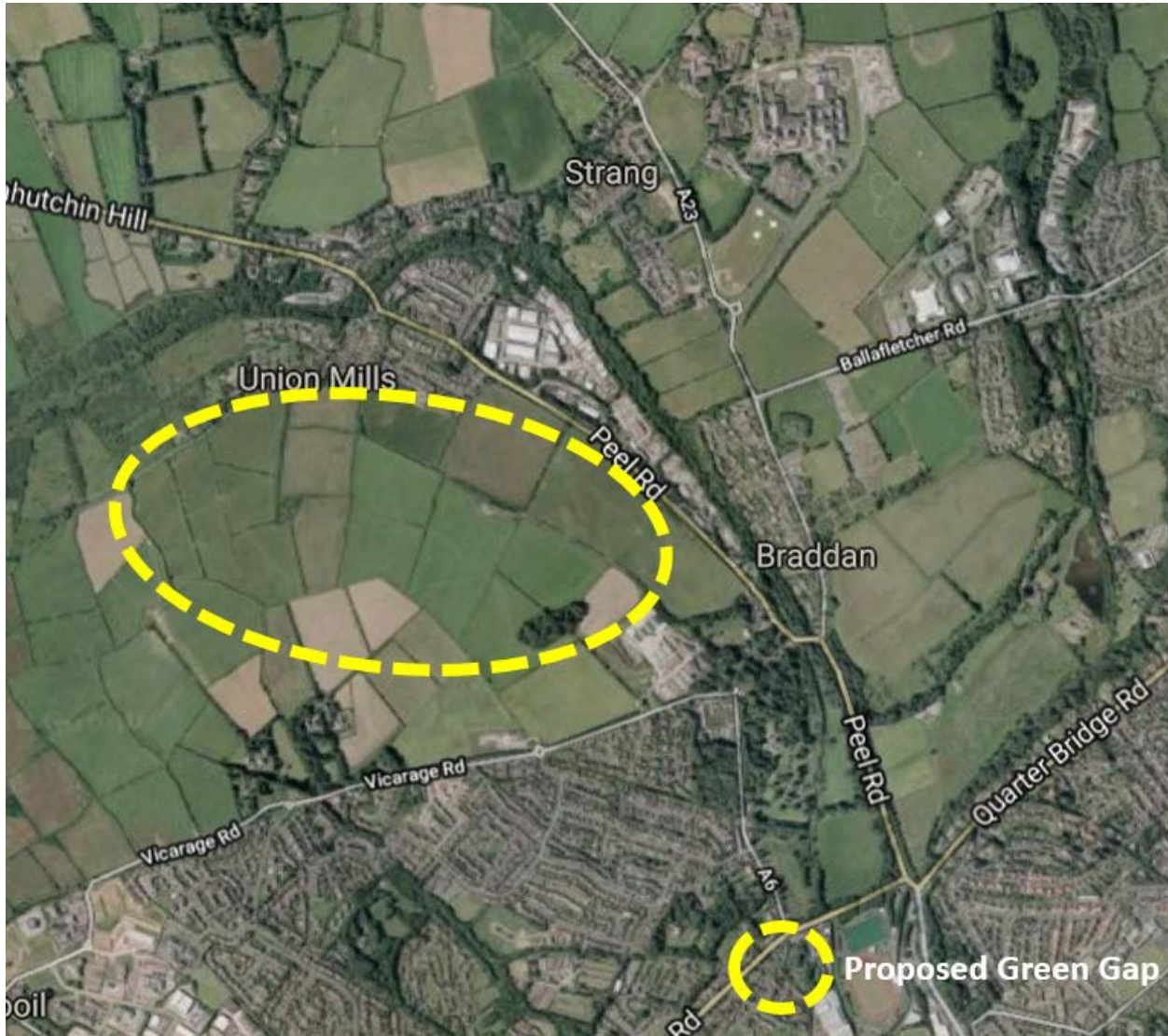
designated as a 'Green Gap' to ensure the continued separation of urban Douglas and rural Braddan as illustrated in Figure 2 below.

Figure 2: Proposed Green Gap between Douglas and Braddan - Peel Road and Tromode Road Gap



In addition, as highlighted in Figure 3 below, it is further proposed that the area to the south of Union Mills, between Vicarage Road and Peel Road (and to the north of proposed Allocations BM006 & BE004), would also benefit from designation as a 'Green Gap' to prevent future coalescence between Union Mills and Douglas at this location.

Figure 3: Proposed Green Gap between Douglas and Braddan – Vicarage Road and Peel Road Gap



3) The Urban Environment

In respect of the 'Urban Environment', the Braddan Parish Commissioners supports the objectives and desired outcomes of Chapter 6 of the DPE to ensure high quality places are delivered over the next plan period. However, the Parish consider that the DPE currently fails to sufficiently identify and celebrate fully the historic urban environment of Braddan.

Accordingly, the Commissioners support the provisions of DPE 'Urban Environment Proposal 7' which supports the progression of work into the review of and consideration of new

Conservation Areas in the East and wishes the following areas in Braddan to be considered further and potentially designated as Conservation Areas to ensure the historic value of these areas continues to be protected and enhanced by high-quality development of sympathetic design:

- i) Mount Rule;
- ii) The Baldwins; and
- iii) Oakhill, Port Soderick

The Braddan Parish Commissioners intend to provide further evidence in support of the designation of the above areas as new Conservation Areas at the forthcoming Local Plan Inquiry. However, in summary, the Commissioners consider that the above areas have undergone little change during the last 50 years or longer and as such consider it appropriate to designate these as Conservation Areas in order to protect against inappropriate and large-scale development.

4) Transport and Utilities

With regards to the DPE's Transport and Utilities strategy, the Braddan Parish Commissioners support the strategic objectives of minimising journeys by private car, making best use of public transport, encouraging pedestrian movement and promoting a more integrated transport network.

However, the Commissioners consider that there has been an under investment in such alternative sustainable forms of travel and in particular wish to see reference to encouraging cycle parking and changing facilities, particularly as part of new employment development to help encourage a greater uptake in cycle-to-work schemes to help cut congestion.

In addition, the Commissioners consider that the DPE should support provision of a 'Park & Ride' facility either on the western edge of Union Mills along the A1 (Ballahutchin Hill) or towards the A5 (New Castletown Road) to help reduce congestion within Douglas.

With regards to Telecommunications Policy 'Utilities Proposal 3' and 'Telecommunications Proposals 1', the Commissioners do not support the installation of mobile phone masts in close proximity to schools, hospitals and nurseries and wish to see this specifically reflected in the DPE's policy wording to ensure such proposals are suitably located away from sensitive receptors.

Relating to drainage and the management of water flows, the Parish support the strategies set out in 'Utilities Proposal 6' to seek to reduce the impact of flooding, but in particular wish to ensure the quantum of development proposed within the DPE is of a sustainable level to meet identified housing needs to prevent unnecessary concreting of the countryside which would otherwise exacerbate flood issues. Moreover, where development is proposed, it is essential that such development incorporates Sustainable Urban Drainage Systems (SUDS) in order to protect and enhance natural water systems while controlling and minimising potential adverse flood effects further downstream.

5) Employment

The Braddan Parish Commissioners support the focus of employment generating uses towards Douglas (IOMSP Strategic Policy 6) and consider that the regeneration of Douglas Town Centre for mixed use development (including employment) should remain the priority for the East Area as this provides the most appropriate opportunities to deliver sustainable development in an area supported by complementary transport links, housing, retail and leisure uses.

The Commissioners support the objectives of encouraging investment in employment generating opportunities, but wish to highlight that there are currently limited employment opportunities in Union Mills (and the other smaller villages in the Parish) and therefore wishes to ensure that any such investment is proportionate to the scale of the existing villages and supporting infrastructure so as not to adversely affect the character of the villages. Accordingly, new employment opportunities in Union Mills and Strang will be supported provided they provide opportunities for local people and are of a proportionate scale that would not lead to a need for large scale residential growth.

In particular, Proposed Allocation 'BM006' is identified for residential development (for approx. 90 new homes). However, the Commissioners consider that this site would represent a suitable extension of employment land by extending the adjoining industrial area to the east (which includes Proposed Allocation BE004). This links with comments above and the potential of site BM006 to support the decanting of employment uses at the Snugborough Trading Estate and thereby freeing up previously developed (brownfield) land for potential residential development, alleviating the need to release greenfield sites.

6) Tourism

The Braddan Parish Commissioners support the general objectives of the Area Plan for the East to support the 'Isle of Man Destination Management Plan 2016-2020' which aims to increase the contribution of the tourism sector to the Island's economy by 20% by 2020.

However, the Commissioners consider that the DPE downplays the Island's contribution to arts and crafts. In particular, there is a great association with Archibald Knox, whose birth and resting places are in Braddan and accordingly, the Commissioners consider that the DPE provides a unique opportunity to promote this world famous artist as well as emphasising the Island's tremendous history in arts and crafts.

7) Residential

The Braddan Parish Commissioners principle concerns with the DPE relates to the sheer scale of new residential development being promoted in the Plan, which is considered to be completely disproportionate to actual identified housing needs and distributed towards unsustainable locations within the Parish. The consequences of which are contrary to the provisions of the IOMSP 2016 (for example in respect of coalescence and harm to the character of the villages as set out above).

The IOMSP 2016 ‘Strategic Policy 11’ and ‘Housing Policy 3’ plans to deliver **5,100 net new homes in the period 2011 – 2026.**

IOMSP 2016 ‘Housing Policy 3’ further seeks to distribute the Island’s housing needs as follows:

Table 1: Housing Policy 3 Distribution

Area	Proposed No. of New Homes
North	770
South	1,120
East	2,440
West	770
Total	5,100

The DPE carries forward the provisions of the IOMSP 2016 and identifies at paragraph 12.8 that between 2011-2026 a total of just 196 new homes have been completed/commenced in the last 7 years, leaving a residual housing need of 2,244 net new homes over the remaining 8 years of the Plan. Therefore, even before any detailed investigation of how the housing need figure was calculated is undertaken, it is necessary to question the actual capacity and capability of the Island’s housebuilders to deliver the amount of homes proposed in the DPE given past delivery records.

The housing need figure of 5,100 net new homes is derived from past Census data (Isle of Man Census 2011) which estimated that by 2026 the IOM’s population would increase by 9,029 people to a total of 93,526 and comprise some 40,484 households, some 4,885 additional households than in 2011¹. This calculation takes into account a declining household size rate of 0.04 every 10 years. The IOMSP 2016 then applies a 4% vacancy factor, equivalent of 195 dwellings, to reach 5,080 dwellings, then rounded to reach the adopted target of 5,100 net new homes.

These projections included a net in-migration rate of 500 people per annum². However, both the IOMSP 2016 and the DPE 2018 fail to recognise that in-migration has been falling steadily since 2010 from a peak of approx. 700 people per annum³. Whilst the rate is indeed currently around 500 people per annum, the DPE’s projections are based on a constant net in-migration figure of 500 people per annum, when in reality this should likely factor in a degree of continuing decline of in-migration consistent with past trends.

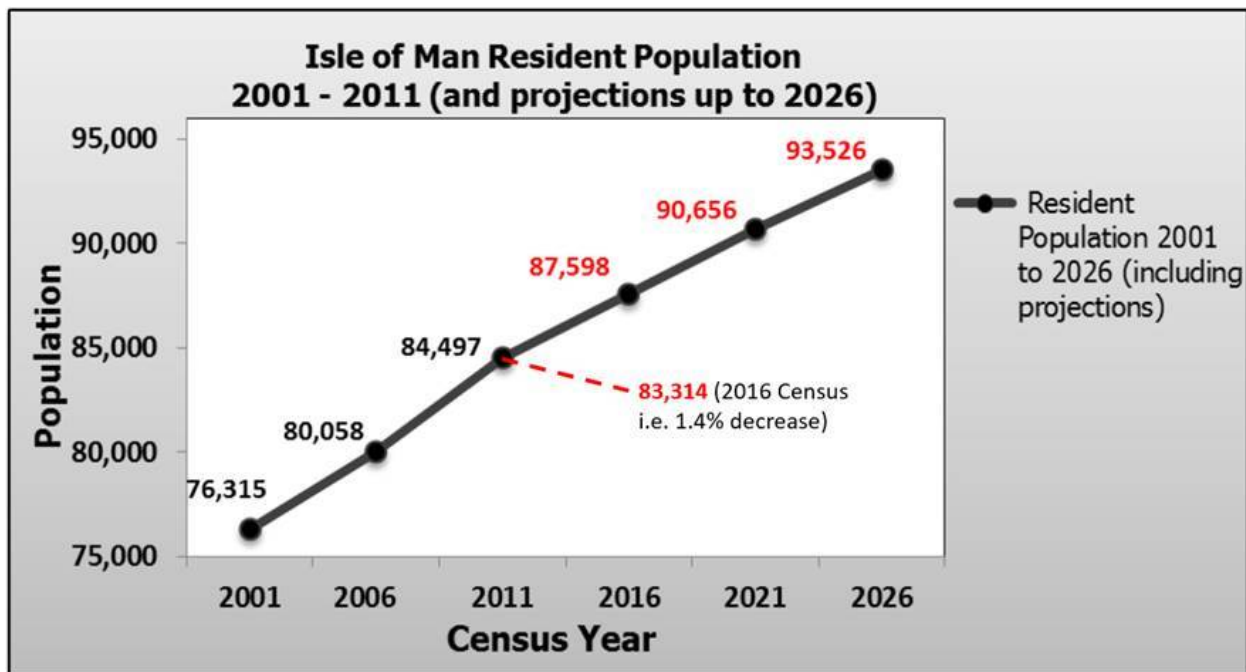
Moreover, the 2016 Isle of Man Census (published in March 2017) showed the first fall in population in 30 years. Figure 4 below therefore shows what the IOMSP 2016 projected, compared to the actual situation.

¹ DPE (2018) - paragraphs 8.4 – 8.4.9

² IOM Strategic Plan 2016 – paragraph 8.4.1

³ Migration data (net per 1000 head of pop): <https://indexmundi.com/g/g.aspx?c=im&v=27>

Figure 4: Comparison between Projected and Actual Population



Paragraph 12.9.1 of the DPE references the findings of the 2016 Census and the paper titled “Meeting our Population Challenges (February 2018)” and paragraph 12.9.2 seeks to set out the justification for continuing to rely on the housing targets set out in the IOMSP 2016. However, whilst the IOMSP 2016 and DPE 2018 seeks to plan for growth up to 2026, the paper (Meeting our Population Challenges) actually provides up-to-date population projections up to 2036.

Therefore, when extrapolating the data and using the median population forecasts as expressed in the DPE, in addition to accounting for decreasing household size over time, **Appendix 1** illustrates that the actual total number of new homes required on the Isle of Man to keep up with demand is approx. 2,384 net new dwellings (i.e. less than half of that proposed by the IOMSP 2016 and DPE 2018).

The housing need projection figures presented in **Appendix 1** uses the ratio of homes to population to maintain a level of housing provision in to the future that is consistent with past and present levels. The calculation uses population forecasts from recent IOM Government figures in the document “Meeting our Population Challenges” (February 2018).

The ratio of people to dwellings has shown a gradual decline of roughly 1.2% per 5-year census period between 2001 and 2016, from 2.42ppd (people per dwelling) in 2001 to 2.33ppd in 2016. Our calculation applies the same degree of decline to 2036 and applies the ratio to the population forecasts for each 5-year census period between 2021 and 2036, at which point the ratio has fallen to 2.22ppd. The effect of this decline is to moderately

increase the housing demand, although one can assume that the trend is likely to trough and rebound at some stage in the future.

Accordingly, in line with the percentage split set out in IOMSP 2016 'Housing Policy 3', the proportion of new homes to be directed to the 'East Area' should in fact be in the region of 1,120 dwellings, not 2,440 as currently proposed within the DPE (2018).

As such, the justification at paragraph 12.9.2 of the DPE 2018 that "*based on these findings, [of the 'Meeting our Population Challenges' (February 2018) paper], the department is prepared to rely on the housing need figure set out in the Strategic Plan 2016*" is challenged.

Moreover, when applying the IOM's methodology for calculating site capacity as set out in evidence base paper 'Areas Plan for the East: Draft Plan Land Supply, May 2018' and as presented in **Appendix 2**, it is evident that the Proposed 'Housing' and 'Mixed Use' Allocations identified within the DPE 2018 at paragraphs 12.20.3 – 12.20.11 actually plan to deliver approx. 3,780 new dwellings, far in excess of even the IOMSP 2016 target (i.e. of 2,440 new homes).

When adding the 'Strategic Reserve' sites, to this calculation, the potential housing supply figure jumps to 4,985 new dwellings.

Even allowing for some flexibility in the delivery of the Proposed Allocations, the DPE 2018 is clearly proposing an unsustainably high level of new housing development and significantly more than the 2,440 new homes required by the IOMSP 2016.

Furthermore, as illustrated in **Appendix 2**, the DPE Allocates sufficient sites within existing settlement boundaries (i.e. the most sustainable and accessible previously developed brownfield sites) for approx. 882 new homes. This leaves a residual total of just 238 new homes against the actual identified housing needs to be delivered outside the settlement boundaries (i.e. on new greenfield sites).

Appendix 2 further identifies that the DPE currently allocates sufficient sites on the edge of Douglas and Onchan for approx. 2,347 new homes and therefore sufficient potential housing land is clearly available to meet the East Area's housing needs without the need to direct large-scale housing development towards the smaller and less sustainable settlements, including Union Mills and Strang. For these reasons, and in combination with comments above in relation to 'The Natural Environment', the Commissioners **object** to the proposed Allocation for Housing sites 'BH031', 'DBH002' & 'BH030' and proposed Strategic Reserve site 'BH032'.

The Braddan Parish Commissioners do not wish to restrict housing development in the Parish completely however and accordingly, in order to maintain the vitality and viability of public services in the villages surrounding Douglas, are therefore supportive of small scale developments of up to 15 dwellings on appropriate infill and the edge of the village locations where this would contribute positively to the character and vitality of the area and enhance community cohesion as highlighted in Figure 5 below.

Figure 5: Potential for Small-Scale Residential Development



In summary therefore, the level of growth proposed within the DPE 2018, not only exceeds the targets set within the IOMSP 2016, but it is also shown that the IOMSP 2016 targets are far in excess of the actual level of need based on the IOM's own population and household census data and projection forecasts.

It is essential in order to preserve and enhance and character of the Parish that the level of housing growth set out in the DPE 2018 is proportionate to the actual level of housing need. As demonstrated above however, the level of growth proposed within the DPE 2018 is completely unsustainable and seeks to distribute new large-scale housing development towards unsustainable locations, contrary to the strategic and spatial objectives of the IOMSP 2016, and which would result in significant and irreversible harm to the Parish.

8) Closing Remarks

The Braddan Parish Commissioners thank the Cabinet Office for the opportunity to comment on the DPE 2018 proposals and hope that their comments will be taken into account in preparing the next version of the Area Plan for the East.

If you should have any queries in relation to the above, then please do not hesitate to contact me.

Yours faithfully



Peter Atkin
Associate Planner
peter.atkin@pegasusgroup.co.uk

Enc.

Appendix 1: Calculation of Actual Housing Need

	2001	2006	2011	2016	2021	2026	2031	2036	Change 2016-2026	Change 2016-2036
Households	31,521	33,390	35,599	35,763	36,936.30	38,146.70	39,214.44	40,482.88	2,383.70	4,719.88
Population	76,315	80,058	84,497	83,314	84,953.50	86,593.00	88,232.50	89,872.00	3,279.00	6,558.00
Ratio	2.42	2.40	2.37	2.33	2.3	2.27	2.25	2.22		
		0.83%	1.25%	1.69%	1.29%	1.30%	0.88%	1.33%		

Appendix 2: Proposed Allocations Site Yield Estimates

Site Reference	Site Name	Proposed Designation	Area	Total Site Size (ha)	Developable Area		% Site Developed for Housing		Density Douglas Masterplan Area = 100dph Douglas North or South = 40dph Ochan = 28dph Other = 20dph	Estimated Yield / No. of Dwellings
					<3ha = 100% 3-10ha = 80% >10ha = 70%		Mixed Use=50% <3ha=100% 3-10ha=90% >10ha=80%			
					Percentage (%)	Area (ha)	Percentage (%)	Area (ha)		
Proposed Allocations										
Douglas										
BH030	Land South of Ballafletcher Road, Braddan	Predominantly Residential	North	2.32	1.0	2.32	1.0	2.32	40	93
DBH002	Land off Braddan Road, Braddan	Predominantly Residential	North	30.23	0.7	21.16	0.8	16.93	40	677
BM006	Land adjacent Vicarage Road, Braddan	Predominantly Residential	South	2.32	1.0	2.32	1.0	2.32	40	93
DH001	Westmoreland Road, Douglas	Mixed Use	North	2.46	1.0	2.46	0.5	1.23	40	49
DH002	Jonny Watterson's Lane, Douglas	Predominantly Residential	North	7.0	0.8	5.60	0.9	5.04	40	202
DH057	East of Ballanard Road and West of DM001	Predominantly Residential	North	14.8	0.7	10.36	0.8	8.29	40	332
DM001	Land North and West of Johnny Watterson Lane	Predominantly Residential	North	13.32	0.7	9.32	0.8	7.46	40	298
DH004	31-39 South Quay, Douglas	Predominantly Residential	Masterplan	0.24	1.0	0.24	1.0	0.24	100	24
DH009	Ballanard Road, Adj Castle Green	Predominantly Residential	North	7.48	0.8	5.98	0.9	5.39	40	215
DH011	Land at Ballanard Woods	Predominantly Residential	North	9.27	0.8	7.42	0.8	5.93	40	237
DH016	Land adj Anna Cur House	Predominantly Residential	South	0.6	1.0	0.6	1.0	0.6	40	24
DH019	South Quay	Predominantly Residential	Masterplan	0.58	1.0	0.58	1.0	0.58	100	58
DH021	South Quay	Mixed Use	Masterplan	0.09	1.0	0.09	0.5	0.05	100	5
DH022	Corner of Circular Road and Peel Road	Mixed Use	Masterplan	0.79	1.0	0.79	0.5	0.40	100	40
DH025	Fairfield Junior School	Predominantly Residential	North	0.28	1.0	0.28	1.0	0.28	40	11
DH037	Lower Duke's Lane	Predominantly Residential	North	0.54	1.0	0.54	1.0	0.54	40	22
DH039	Site of former Park Road School	Predominantly Residential	North	0.84	1.0	0.84	1.0	0.84	40	34
DH042	Land at Albany Road and Sartfell Road	Predominantly Residential	North	0.25	1.0	0.25	1.0	0.25	40	10
DH046	Victoria Road Prison and Edale (including Eastcliffe)	Predominantly Residential	North	1.39	1.0	1.39	1.0	1.39	40	56
DH048	Glenside	Predominantly Residential	North	1.21	1.0	1.21	1.0	1.21	40	48
DM002	Land at Lake Road, Douglas	Mixed Use	Masterplan	1.15	1.0	1.15	0.5	0.58	100	58
DM003	Loch Promenade - Masterplan SS2	Mixed Use	Masterplan	0.42	1.0	0.42	0.5	0.21	100	21

DM004	Lord Street / Parade Street - Masterplan QS1 & 2	Mixed Use	Masterplan	0.52	1.0	0.52	0.5	0.26	100	26
DM007	Masterplan TF1 & TF2	Mixed Use	Masterplan	1.94	1.0	1.94	0.5	0.97	100	97
DM008	Masterplan TF3 & TF6	Mixed Use	Masterplan	0.83	1.0	0.83	0.5	0.42	100	42
DM013	Little Switzerland	Mixed Use	North	2.2	1.0	2.2	1.0	2.2	40	88
Onchan										
DM012	Summerland	Mixed Use	Onchan	1.45	1.0	1.45	0.5	0.73	28	20
OH011	Land at Ballachrink	Predominantly Residential	Onchan	9.9	0.8	7.92	0.9	7.13	28	200
OH016	Former Follies Cabaret Restaurant, Harbour Road	Housing Site	Onchan	0.45	1.0	0.45	1.0	0.45	28	13
Laxey										
GH011	Land at Ballacollister, Laxey	Predominantly Residential	Laxey	2.15	1.0	2.15	1.0	2.15	20	43
GH015	Upper Garden, Briar Dale, south Cape, Laxey	Predominantly Residential	Laxey	0.22	1.0	0.22	1.0	0.22	20	4
GH020	Adj to Ard Reayrt	Predominantly Residential	Laxey	1.68	1.0	1.68	1.0	1.68	20	34
GH023	Former Prince's Motors Site	Predominantly Residential	Laxey	0.18	1.0	0.18	1.0	0.18	20	4
GH038	Site between Ballacollister Road, Rencell Hill and Axenfel Lane	Predominantly Residential	Laxey	0.82	1.0	0.82	1.0	0.82	20	16
Union Mills										
BH031	Camlock, Braddan	Predominantly Residential	Union Mills	20.54	0.7	14.378	0.8	11.50	20	230
BH043	Former Farmhouse, Snugborough Farm	Predominantly Residential	Union Mills	0.22	1.0	0.22	1.0	0.22	20	4
Glen Vine										
MH018	Ballabeg, Main Road, Glen Vine	Predominantly Residential	Glen Vine	0.7	1.0	0.7	1.0	0.7	20	14
MH023	Site of Former Ballagarey Nursery Field Adj to Greeba Avenue	Predominantly Residential	Glen Vine	0.9	1.0	0.9	1.0	0.9	20	18
Crosby										
MH003	Close Jaig Beg, Old Church Road, Crosby	Predominantly Residential	Crosby	2.6	1.0	2.6	1.0	2.6	20	52
MH021	Part of Ballaglonney Farm, Crosby	Predominantly Residential	Crosby	1.77	1.0	1.77	1.0	1.77	20	35
Baldrine										
GH013	Field off Baldrine Road, Baldrine	Predominantly Residential	Baldrine	2.2	1.0	2.2	1.0	2.2	20	44
GH026	Adj to Highfield Drive	Predominantly Residential	Baldrine	1.24	1.0	1.24	1.0	1.24	20	25
GM001	Field off Baldrine Road, Baldrine	Predominantly Residential	Baldrine	5.88	0.8	4.70	0.9	4.23	20	85
Newtown										
SH013	Land at Newtown	Predominantly Residential	Newtown	3.48	0.8	2.78	0.9	2.51	20	50
Strang										
BH034	Mannin Infirmary Site	Predominantly Residential	Strang	1.46	1.0	1.46	1.0	1.46	20	29

Sub-Total											3778
Strategic Reserve Sites											
Douglas											
DH057	East of Ballanard Road and the West of DM001	Predominantly Residential	North	23.54	0.7	16.48	0.8	13.18	40	527	
DH003	Former Brickworks, Ballanard Road, Douglas	Predominantly Residential	North	0.43	1	0.43	1	0.43	40	17	
DH010	Shee Dy Vea, Ballanard Road, Douglas	Predominantly Residential	North	0.06	1	0.06	1	0.06	40	2	
Onchan											
OH004	Ashley Road, Onchan	Predominantly Residential	Onchan	10.19	0.7	7.133	0.8	5.7064	28	160	
Crosby											
MH001	Ballagloney Close, Crosby	Predominantly Residential	Crosby	4.52	0.8	3.616	0.9	3.2544	20	65	
MM001	Land at Ballaglonney Farm, Crosby	Predominantly Residential	Crosby	21.77	0.7	15.239	0.8	12.1912	20	244	
Baldrine											
GH027	East of A2	Predominantly Residential	Baldrine	3.8	0.8	3.04	0.9	2.736	20	55	
GH028	Chapel Lane, Baldrine	Predominantly Residential	Baldrine	0.39	1	0.39	1	0.39	20	8	
Strang											
BH032	Land North of Coronation Terrace, Strang	Predominantly Residential	Strang	11.5	0.7	8.05	0.8	6.44	20	129	
Sub-Total											1207
TOTAL											4985
Minus 5% to allow for sites not coming forward as anticipated											4,736
Sites within 'Existing Settlement Boundaries' as per 'Draft Map 3 Proposals'											882
Sites on the edge of Douglas and Onchan											2347