

IOM Strategy Plan Flawed!

We have analysed IOM Government's Area Plan for the East which is based on the 2016 Strategic Plan. The conclusions are seriously flawed and should not be used as the basis for housing strategies. In the Area Plan Forward the Minister notes that 'Preparing new plans takes time but it is vital to get it right'. This is especially important now when uncertainty regarding the Island's future means ensuring accuracy must take precedence over haste. In our opinion, a responsible, democratic Government interested in the wellbeing of its electorate should answer these basic questions:

1. **Fundamental Assumptions are wrong.** From our analysis of the available data, there could be a difference more than 9000 between reasonable assumptions of population growth and those being used by Government. This means that over 5000 new houses are scheduled for build when none may be needed. The consequences for the Island could be catastrophic, with many houses being unoccupied or unsaleable, families unable to move up the property ladder and families suffering negative equity.

Question 1. What is the basis for assuming economic growth will stimulate a net population influx of over 500 people each year when immigration and economic growth have recently been in decline?

2. **Protection of the Environment.** Douglas, along with other towns on the Isle of Man, has many derelict areas. Greenfield sites have great amenity value and agriculture on the Island may have opportunities to develop following Brexit. These along with many other obvious reasons mean that greenfield sites should be surrendered to developers only in extremis. Yet the Area Plan allows over 100 hectares of greenfield in the East to be developed in the next 8 years.

Question 2. Why doesn't Government help preserve greenfield sites while encouraging the rejuvenation of derelict town areas by sensible use of incentives and planning controls?

3. **Empty Properties.** The Isle of Man has a rate of over 15% vacant properties which is very high compared with other jurisdictions. These empty dwellings are not even included in the many brownfield sites noted available for development within the area covered by the Plan.

Question 3. What is the explanation for the high and rising % level of vacant properties and why are these assets not being used? Why does the Plan not concentrate initially on existing property and brownfield sites before embarking on greenfield site development, which may not then be required?

4. Key Problems Ignored. Key planning issues have been ignored, even though they will give rise to significant infrastructure costs and decrease in the quality of life of those living in the Douglas area or travelling to it. Among the topics not addressed are: the impact of congestion on Braddan Road, Tromode Road and the Quarterbridge Junction of 300 additional vehicles each day; the loss of individual communities as the coalescence of Braddan and Douglas takes place with the building of the estates; the need to replace or extend Braddan School, currently over its capacity of 158 pupils and faced with potentially another 500/1000 if Government's proposals are implemented; the impairment to visual attractiveness of the landscape as the estates will be built on high ground; and the disruption during TT period as so many additional commuters seek to access their homes.

Question 4. Why do the Plans not assess these important concerns ahead of finalising proposals; they contravene accepted planning procedures and will lead to considerable reduction in quality of life of many people on the Isle of Man?

5. Government's Principles Flouted. The Isle of Man Strategic Plan 2016, approved by Tynwald on the 15th March 2016, set out clear principles and policies to determine the future development of the Isle of Man. Policies that reflect the uniqueness of our Island home and would protect it, reflecting a "caring community". The Plan for the East states that this Strategic Plan "sits at the top of the hierarchy in terms of statutory development plans on the Island and any Area Plans produced must, in general be in conformity with the Strategic Plan". Many of these good intentions are incorporated in the Written Statement of the Area Plan, but these are then undermined by the site selection process. Other Strategic Plan

policies like the importance of 'Green Gaps' such as a Green Belt west of Douglas are ignored.

Question 5. Why have those policies approved by Tynwald and included in the Strategic Plan been allowed to be flouted by the unelected authors of the Area Plan for the East?

- 6. Serious Transport Problems.** Government's own assessments conclude, "the Quarterbridge & Governors Hill junctions will continue to operate at greater than 85% capacity and the increased traffic flows predicted in all assessments will increase congestion at these junctions" and reference is made to the ongoing assessments and transport network modelling to be refined prior to the Public Enquiry. The Plans propose an additional 2500 properties in the East, the majority earmarked for either Braddan or Onchan, this number of properties could add 5000 cars at peak traffic times and may well require significant road network improvements. These infrastructure implications and costs should be established before sites are approved.

Question 6. Has Government undertaken a comprehensive assessment of the impact of the anticipated increase in traffic on congestion and what additional road works will be required, at what cost to Government and disruption to the travelling public?

- 7. Reasons for Population Growth.** The Plan assumes that the need for additional residential properties will flow from increased economic activity that stimulates high net migration of working people.

Question 7. What is Government's precise economic strategy and what are the assumptions for such high levels of net migration?

This is a summary of some initial points and associated questions which emerge from our study of available Government publications and statements. We will be happy to furnish additional supporting information, participate in meetings or answer questions upon request. Our aim is to ensure there is a detailed study and proper analysis before irreversible

decisions are made on this issue of such fundamental importance to the Isle of Man's environment and people.

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