



House of Keys
Legislative Buildings
Douglas
Isle of Man
IM1 3PW
British Isles

Y Chiare as Feed
Oikyn Slattyssagh
Doolish
Ellan Vannin
IM1 3PW
Ny Ellanyn Goaldagh

Tel: 01624 651513
Email: rob.callister@gov.im

Our Ref: RC/18/86

23rd August 2018

Mr. Dean Balkin
Planning Policy Officer
Cabinet Office, Third Floor
Government Office, Bucks Road
Douglas, Isle of Man
IM1 3PN

Dear Mr. Balkin,

Draft Area Plan for the East – Consultation Stage

The Consultation period for the Draft Area Plan for the East was opened on 25th May 2018, and you have asked members of the public to submit their views via an Online Survey, which closes 31st August 2018.

If possible, could you please take this correspondence as my initial thoughts and comments in respect of the Draft Area Plan for the East, which is based on various discussions I have had with Onchan Constituents in my previous role as an Onchan District Commissioner and now as their Member for the House of Keys.

Some of the comments enclosed will also be my own personal observations as an Onchan resident.

I would also like to put on record my sincere thanks for the work undertaken to date by the Minister for Policy and Reform, Mr. Chris Thomas, MHK, together with officers within the Cabinet Office and the Planning Department.

- **Draft Area Plan for the East - Written Statement (25th May 2018)**
- **The Isle of Man Population**
- **Brexit – UK Leaving the European Union**

In the written statement published by the Cabinet Office on 25th May 2018, they mention a framework for how Douglas, Onchan and the surrounding settlements will grow and change in the coming years, but there is no mention or discussion relating to the island's future population levels; they have simply carried out a Public Consultation and a Call for Sites to date.

Surely one of the key questions that should be asked from the outset, and before we publish any Draft Area Plan for the East, is what the island's future population could and should look like, and what facilities and infrastructure they will actually need over the next eight years.

Birth rates in most developed and Western countries have continued to fall. We are also an aging population according to some sources, just like our closest neighbours in the UK and Republic of Ireland, along with many other Western countries.

In my opinion, the Isle of Man is still yet to have a genuine debate on the island's population levels and what we would consider to be a maximum level, in order to ensure that this island remains a Special Place to Live and Work for future generations.



Since 1951, the Island's population has only grown by around 29,000, which gives an average increase of just 433 per annum over a 67 year period. So the figure of an additional 5,100 homes that are needed between 2011 and 2026 is questionable and I would certainly like to see how the Cabinet Office came up with this final figure.

Reading through the various Census Reports there is clear evidence that our population actually migrates during high levels of unemployment or when a particular sector reduces or closes. It would also appear that loyalty towards calling the Isle of Man home for a lifetime is reducing as people come to the island for employment or other short term opportunities before returning home or moving to another jurisdiction at a later point in time.

This might simply be because the percentage of people actually born in the Isle of Man continues to fall, and again according to the 2016 Census that figure now stands at 49.8%.

Therefore, any draft Eastern Plan needs to take into account people coming to the Isle of Man on a temporary basis, and we need to ensure that the Eastern Plan fully supports and encourages a high quality rental market on the island, especially in the Capital, along with updating legislation that actually protects the rights of the tenant and the landlord.

Negotiations around the UK's exit of the European Union are still ongoing and we don't actually know at this moment if the UK will end up with a Soft Brexit, Hard Brexit or a second round of votes, but it will certainly have an effect on the strategic objective with regards to future needs, infrastructure and resources etc.

The draft Eastern Plan will also need to reflect the Government's key objective to increase the island's working population, which will clearly be targeted around young professionals or young families.

- **Why do we need an additional 5,100 homes?**
- **Let's Build More Affordable Housing**
- **More Social / Local Authority Housing**

The draft Eastern Plan has identified that we need to build an additional 5,100 homes between 2011 and 2026 with 2,400 being built in the East, and as I have already outlined above, I do question the figures and how they were established.

However, according to the Area Plan for the East; Preliminary Publicity Main Consultation Document (dated Feb 2017), only 250 dwellings have been completed or have been started on site between 2011 and June 2015.

It is also vitally important that any future Eastern Plan actually reflects our local housing needs over the next eight years. The Isle of Man Housing Market Review Report for 2017 shows that the average property price is around £268,220 and that 50% of all houses sold on island are under £250,000.

Properties sold between £250,000 and £500,000 account for a further 43% of all sales.

Therefore the Isle of Man does not need a further million-pound development, and I hope that the Cabinet Office Planning Department will take this into account when publishing its Eastern Area Plan and / or any future Strategic Plan.

What we actually need is good quality and affordable housing for young professionals and families.

Policy 5 of the Isle of Man Strategic Plan states that in granting permission on land zoned for residential development or in predominantly residential areas, for developments of 8 or more dwellings, 25% should normally be affordable.

Unfortunately, that figure is far too low and it needs to be reviewed as part of the Eastern Area Plan.

There is also growing demand for more Local Authority / Social Housing across the island as more and more families and individuals are struggling to get a foothold on the property ladder at the moment.

That said, I do take an element of comfort that the Average House Price to Average Salary on the Isle of Man has fallen to 6.77, which is the lowest figure since 1999.

However, using the Median House Price to Median Earnings the figures remains high at 8.59, which is well beyond most people in this bracket.

It is also well beyond the risk appetite for most banks.

There will also always be a need for additional Local Authority / Social Housing and this needs to be reflected within any future Eastern Area Plan.

- **Onchan - The Service Centre**

According to the Area Plan for the East; Preliminary Publicity Main Consultation Document (dated Feb 2017) Onchan is described as a "Service Centre", which is outside the main urban area (Douglas) and that development will be concentrated to provide regeneration and choice of location for housing, employment and services.

I fully support that statement as Onchan is perfectly located and a greater emphasis should be put on the delivering of more employment and service opportunities within any future Eastern Area Plan.

Key stakeholders such as Central Government, Onchan District Commissioners, Shoprite and other Businesses should be encouraged to work in partnership, in order to deliver more employment and service opportunities within our village over the next eight years.

- **Traffic Management - Signpost, Hillberry Rd, Highfield Crescent & Birch Hill Crescent, Onchan**

Before I talk specifically about some of the sites for Onchan that appear in the Area Plan for the East; Draft Plan (all sites list) lessons must be learnt from previous developments, in order to ensure that the same mistakes do not reoccur.

Again according to the Area Plan for the East; Preliminary Publicity Main Consultation Document, the key objective is to ensure that sufficient infrastructure of the right type in the right place at the right time is important to facilitate the successful implementation of any approach to the distribution of development.

That is a bold statement, especially when we reflect and consider that in 2012, St Ninian's Lower School was opened, and although the School offers some fantastic facilities for students there was little or no change to the actual Traffic Management or Infrastructure in and around area.

Therefore, I have to ask when the time will be right for the Department of Infrastructure to review the traffic management in this area, as the road leading into Hillberry Road from Signpost Corner continually backs up during peak periods and on occasion goes well beyond the roundabout on Signpost Corner, which is a serious traffic concern.

There are also serious traffic management concerns relating to traffic exiting or entering Highfield Crescent and Birch Hill Crescent and Heywood Avenue during peak periods. Therefore in my opinion, Onchan requires a full traffic management system review before any further development is undertaken in this area.

- **Onchan Schools**

Area Plan for the East; Preliminary Publicity Main Consultation Document confirms that a growth of 2,290 dwellings in East would mean a need for 1,000 School Places (indicatively, 500 Primary and 500 Secondary).

I have already outlined some of my initial traffic concerns in and around St Ninian's Lower School, but if an additional 400 to 600 houses were actually built in and around Onchan over the next eight years, then Ashley Hill and Onchan School will require significant investment or possibly relocation to new purpose-built site, which combines both primary schools.



- **Sewerage, Rainwater and Flooding, Onchan**

One my biggest concerns in respect of any future development in the higher parts of Onchan, especially above Highfield Close and Birch Hill Crescent is the removal of sewage and rainwater, in order to prevent potential flooding of properties lower down in Onchan.

Since 2012 I have been involved in a few incidents in which properties have suffered from serious flooding from raw sewage and / or rainwater. This is simply because the drainage system in certain parts of Onchan is unable to cope with the amount of rainwater and sewage going through the drainage system during periods of heavy rainfall.

Laurel Avenue, Onchan is an example of this, as during heavy periods of rainfall, parts of Ashley Park, Onchan are flooded with raw sewage and rainwater. Fortunately, DOI, MUA & ODC are currently undertaking a schedule of works in Ashley Hill School, which will hopefully improve the situation for those residents involved.

Therefore a full review of the Onchan's sewerage and drainage system is required as a matter urgency, and before any further large development should be undertaken.

- **Bus Timetable**

I welcome a full review of Onchan's bus timetable as part of the draft Eastern Area Plan. I have highlighted some serious concerns and failings with regard to the current bus timetable outside the main route that runs through the Onchan Village.

Onchan is the second most populated area outside of Douglas and bus services should reflect the area and the number of people living in Onchan.

- **Site Report (OH004) - Ashley Road, Onchan**

Potentially building an additional 154 homes in this area will create traffic concerns, which I have already outlined with one of the land owners during a recent site visit.

A full traffic management review will have to be undertaken if any new estate traffic flows into Ashley Road, Ballachrink Drive, School Road and then entering and exiting via Whitebridge Road.

There are already parking concerns near the school and serious delays when exiting School Road during term time. Some Onchan residents have outlined their initial concerns through me, should any additional traffic be introduced via the Birch Hill estate, which is already experiencing serious traffic management issues.

- **Site Report (OH011) - Land at Ballachrink, Onchan**

Having read the report I genuinely cannot see how an additional 250 houses could be built in this area, especially if future designs expect the traffic from any new estate to enter and exit via the current Birch Hill estate.

Unfortunately, this area of Onchan simply cannot accommodate an additional 250 to 500 cars at this time, without major infrastructure and traffic management review. A development of this size would take several years complete and there would be considerable disruption to Birch Hill residents, especially those living Maple Avenue, Maple Close, Birch Hill Close, Birch Hill Crescent and Highfield Close.

An application for 127 houses with access off Birch Hill Crescent was refused on appeal in February 2005, so I do have to question how potentially 250 new houses could be given approval.

As the Site Assessment Report Template outlined, the site is zoned as "Open Space" on the adopted Onchan Local Plan. Therefore any proposed development would be contrary to the Local Plan.



The report also states that the Development would represent an intensification of the existing built fabric at the edge of the urban area, resulting in an undesirable visual impact.

There are also identified some areas having nature conservation potential, which need to be taken into consideration.

Summary of key points for consideration

- No major new Residential Development in Onchan until a full Traffic Evaluation has been undertaken and any recommendations implemented, in order to improve traffic flow through Onchan Village and surrounding area.
- No major new Residential Development in Onchan until the existing Sewerage Infrastructure has been fully evaluated, assessed and any recommendations implemented.
- A full review of Onchan's Schools to assess what infrastructure and facilities our local schools will require if an additional 400 to 600 homes are built in the area.
- A full review of the number of dwellings that are to be considered as affordable housing in any developments of 8 or more dwellings.
- Further developments must deliver good quality and affordable housing for young professionals and families, along with more Social Housing Units.
- A full review of Onchan Bus Timetable.

Hopefully I have highlighted a few points which the Cabinet Office and the Planning Office will take on board and consider as part of the Draft Area Plan for the East.

If you require any additional information, then please do not hesitate to contact me.

Yours sincerely

Rob Callister TEP, MICA, CMgr, MCMi, MHK
House of Keys Member for Onchan

Mobile: 07624 457511

E-mail: rob.callister@gov.im