

EVIDENCE PAPER OBJECTING TO THE PROPOSED RE-ZONING OF SITE SH013 AND THE USE OF GREENFIELD SITES IN THE COUNTRYSIDE AS STRATEGIC RESERVES

15th August 2019

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The Greenfields site SH013, proposed for 65 dwellings adjoining the small rural settlement of Newtown

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EVIDENCE PAPER CONCERNING THE PROPOSED RE-ZONING OF SITE SH013

1. Summary and Background

This paper and the supporting evidence, attached in the appendices, have been prepared by a Local Group in Newtown (the “Save Our Santon” group). The evidence and arguments against SH013 presented herein are supported by over 100 adult residents of Newtown, representing about considerably more than half the households in the settlement. Under a separate cover, we have attached a formal letter to the Public Inspector from these residents confirming their support and the support of over 150 people from elsewhere on the island.

This paper sets out evidence for the following, reasoned, arguments:

- There is no clear requirement for the identification and creation of “Strategic Reserves” during the Plan period (**Section 2**);
- The use of areas of the countryside, as defined in the Strategic Plan for “Strategic Reserves” conflicts with Environment Policy 1 of the 2016 Strategic Plan. As such there should be no “Strategic Housing Reserves” on Greenfields sites in the countryside (**Section 3**).
- The specific site SH013, adjoining Newtown, should not be re-zoned as a “Strategic Reserve” because:
 - There were inaccuracies in the original site assessment reports (**Section 4.1**);
 - More than three quarters of the site is a candidate to become a Manx Wildlife Site and is known to contain Schedule 5 and Schedule 7 protected species (**Section 4.2**);
 - Re-zoning of site SH013 will irreparably damage the character of the Settlement and of the Landscape in an Area of High Landscape or Coastal Value and Scenic Significance (AHLV). As such, SH013 does not fulfil key spatial and environmental policies of the 2016 Strategic Plan (**Section 4.3**).

2. There is no requirement for Strategic Housing Reserves

The Draft Area Plan for the East adopted Housing Policy 1 of the 2016 Strategic Plan and called for 2440 new dwellings. This figure was based upon forward projections set out in the 2016 Strategic Plan which itself used 2011 census data and critically, assumed a net in-migration of 500 people per year from 2011 onwards.

In 2016, the interim census data however showed that the Isle of Man population was, in fact in decline between 2011 and 2016. The updated EP5 (dated Jun 2019) acknowledges this and uses a new baseline population from the 2016 instead. The resulting calculation set out in EP5, after assuming the same vacancy rate and housing needs in the East, implies only 1357 houses are needed.

This more accurate forecast is 45% lower than the original requirement, even though it continues to rely on assumption of net 500 in-migration from 2016 onwards. So far so good, but the Cabinet Office goes on to observe that:

“.....monitoring of the migration figures has revealed that numbers are increasing. Using the latest Quarterly Economic and Statistical Update figures, the data between March 16 to March 19, net inward migration is currently at 377 on average for that three year period...”

So, even the Cabinet Office acknowledges that the assumption used for in-migration has also been incorrect since 2016, and they have over-stated it by 33%. Having acknowledged the error, the Cabinet Office has failed to update the projections accordingly. Furthermore, for reasons that are wholly unclear, the Cabinet Office continues to propose a policy establishing a plan for 2440 new dwellings, adjusted only for the latest RLAS update (which once again reduces the figure, but to 2170).

2.1 So what is the actual housing need?

If we take the latest Quarterly Statistics Update figures for net migration for the last three years and add in the latest RLAS data for the housing need in the East, then this shows a requirement for only 1171 (see table below and Appendix 2 for the workings).

Table: Total Housing Needs for Area Plan for the East, using latest actuals

	As per original Strategic Plan	As Presented in July update to EP5	Adjusted for Cabinet Office Net Migration Figures for last three years	Adjusted for Cabinet Office Net Migration Figures and latest RLAS figures for East
Change in Households 2011 to 2026	4885	2718	2,503	2503
Adjust for 4% vacancy	5100	2827	2,603	2603
Housing Need in the East	2440	1357	1,249	1171

1171 dwellings represents the most accurate housing need in the East *based on data known to date and using the Cabinet's Offices preferred assumption of 500 net in-migration from 2019 onwards.*

The latest Draft Plan contains sites for 1716 houses with a further 120 houses on “Strategic Reserve” sites. Therefore the sites allocated to residential development already exceed the actual housing need by more than 45% before even considering Strategic Reserves.

2.2 But aren't Strategic Reserves a useful Contingency?

No they are not. The creation of a contingency in any aspect of life is not free – it always comes at a cost. The key question is whether the utility of the contingency outweighs that cost. The addition of Strategic Reserves during the Plan Period represents a wholly unnecessary contingency because the base figures already have a substantial in-built contingency:

The method of calculating the housing required in the East is set out in DP EP3. This notes that the housing yield across all sites has been adjusted significantly downward to account for:

- Net developable area on a site (yield is reduced by up to 30% per site)
- Probability of Development (yield is reduced by up to a further 40% in aggregate - this is more conservative than observed data)
- Percentage of a site that will be community services such as shops (yield is reduced by up to a further 20% - which is highly conservative given that nearly all sites allocated for housing are now within 2.5 miles from Douglas, well within reach of many varied community facilities)

So, for an individual site, the actual yield can be more than double the yield set out in the Cabinet Office's calculation. This is prudent planning and ensures there is contingency to cover non-development and other issues. However, it means that there is already contingency contained within the sites being brought forward, before the Strategic Reserves are considered. No additional contingency is required.

2.3 What is the cost of having a higher than necessary Contingency?

Any commercial or public project needs reasonable, rational contingency planning. It is sensible. However, this always comes at a cost, which is why good project managers typically restrict contingencies to 10% or less of total project costs – but in the case of the Area Plan the contingency is already running at more than 45%.

The costs of running an additional contingency in the form of Strategic Reserves include:

- Unnecessary time and taxpayers' money being spent on having to consider such sites now and in the future, and maintain a separate planning classification for them (which, it should be noted, is a largely untested classification in the Isle of Man, introduced only recently for the Area Plans);

- It creates significant, unnecessary uncertainty for the people that live around such sites because they will always face the prospect that the sites may at some point become housing;
- A highly problematic incentive structure is created around such sites.

To exemplify the last point, PIP 7 (Release Methodology for Strategic Reserves) notes:

“...development will not be permitted that could prejudice its future release and use...”.

One side effect of this means that local efforts, for example, to encourage wildlife on a site, will be disallowed as it will prejudice a future release! In fact, using greenfield sites in the countryside as reserves will incentivise activity on the land that will support its future release and use for housing. Amongst other things, this will include *the destruction of local wildlife and any protected species that may be present today – but are unlikely to be there when such sites look like they might be called forward.*

2.4 OK, so there's really no argument for Strategic Reserves then.

In summary, the actual housing needs for the East during the Plan Period, based on the latest data are for only 1171 new dwellings, while sites are being put forward to the Inquiry that will yield *far more* than 1716 due to assumptions relating to site yield. This is before Strategic Reserves are even considered. At the very least, this represents a contingency of more than 45% above the projected needs.

There is, therefore, absolutely no rational need for additional “Strategic Reserves” that will create ongoing uncertainty for residents and will actively incentivize poor land management practices.

3. Strategic Reserves in the Countryside conflict with Environment Policy 1.

Environment Policy 1 of the 2016 Strategic Plan states: ***"The countryside and its ecology will be protected for its own sake....Development which would adversely affect the countryside will not be permitted unless there is an over-riding national need in land use planning terms which outweighs the requirement to protect these areas and for which there is no reasonable and acceptable alternative."***

The 2016 Strategic Plan separately sets out the framework for Strategic Reserves noting that the Plan:

"...accepts that the regular assessment and monitoring of housing and population statistics over time may require corresponding changes to be made in the provision of new housing land..."

In other words Strategic Reserves exist because there is no need for development now, but there might be in the future. So, by definition, there is no over-riding national need for any Strategic Reserve sites in the countryside at the present moment.

More critically, sites are being brought forward that will yield 45% more dwellings than the current need for the East (section 2 above). Logically, if the government is determined to proceed with this classification, then the 45% of sites in excess of the actual housing requirement should form the Reserve – not a further series of sites on top of this. Where otherwise do we stop?

Finally, there are only seven years left on the current Plan and, given the requirement that there must be *'no reasonable and acceptable alternatives'* at the time they are brought forward, means that it is almost inconceivable that there will be any prospect of an "over-riding national need" during the plan period that could justify bringing forward Strategic Reserves in the Countryside – yet these sites will remain tainted forever with the presumption of development, when they may or may not represent the next best alternatives in, say, 15 years time.

3.1 But Actual Development won't happen on the site until there is a need for it.

Re-zoning of a site as a Strategic Reserve is consigning that site to become housing by giving it a presumption of development. After this, it is simply a question of time. The mechanic of the Strategic Reserve is ultimately to provide a fast-track method in the future for bringing forward land for housing when needs change. However, EP1 requires that ***'no reasonable and acceptable alternatives'*** must exist if such site is in the Countryside.

To fulfil that requirement in the future, the methodology for calling forward Reserve Sites must, by definition, include a trawl of all possible alternative sites that may exist at the time the site is called forward.

PIP 7, the Strategic Reserve Release Methodology, fails to include any such notion or mechanic for doing this trawl of alternatives. Moreover, the mechanism for establishing need is set out in less than half a page (page 1 of PIP7) and fails to account for how all alternatives will be explored before a Reserve in the Countryside is released.

So, in summary, there should be no Strategic Reserve Sites in the Countryside included in the Area Plan for the East given:

- the strength and clarity of Environment Policy 1, combined with;
- the built-in contingency of the current site proposals that will wholly [over] satisfy current national needs.

4. Site SH013 Should not be re-zoned in any way.

4.1 Background to site SH013

Site SH013 is a greenfields site comprising of wetland, a small woodland thicket and an area of managed grassland. It is situated in an Area of High Landscape or Coastal Value and Scenic Significance (AHLV) and contains many of the key characteristics and features of the Santon Incised Slopes Character assessment. The site was subject to a previous application in 2001 for the development of 43 dwellings but was rejected on multiple grounds (see **Appendix 7**). The current proposal has taken advantage of the call for sites and is proposing an even more ambitious 65 dwellings on the site.

The site itself abuts the village of Newtown. Newtown comprises a small group of houses concentrated around two road junctions on the A5, one at Moaney Road and one at Clannagh Road. There are 91 houses within the area defined as the settlement in The Area Plan for the East documentation.

While there has been some linear development southwards on the east side of the A5, this has been restricted as the road to the south of Ballavartyn, along which the houses have been built, is a cul-de-sac; to the west of the A5, with the exception of the Ballanoa Estate, the houses are largely contained between the Moaney and Clannagh Roads. The village has thus avoided linear development or sprawl and is consequentially compact, with all the houses sitting close to the A5.

The implementation of the Planning Approval for 43 houses at Ballanoa Estate, granted at Appeal in October 2000, almost doubled the size of the village; that Application was the third of three, almost identical, highly contentious applications, the first of which was lodged in 1998. The third application was refused at Review and only granted at Appeal.

It should be noted that the Ballanoa application was granted prior to the existence of the Strategic Plan. Prior to the addition of the Ballanoa Estate, the village only contained 48 houses.

4.2 SH013 was incorrectly assessed in 2017

There are a number of simple factual inaccuracies in the site assessment conducted in 2017. Given that the assessors were unable to access the site, this is understandable, but as a result, we believe that at least two detailed constraints should have been coded red, but were only coded amber. The inaccuracies are as follows:-

- a) DC9 (Wildlife Interest) has been incorrectly coded orange as being 'adjacent' to a site of conservation interest. In fact, more than three-quarters of the site is a candidate Manx Wildlife Site. It should therefore be coded 'red' as potential conservation

interest has been identified on the site. This is a critical mis-observation and is explored further in **Section 4.3**

- b) In the commentary to DC9, the assessor further believes that the site is 'managed grassland, with some vegetation on the periphery'. This is simply incorrect. To the south of the Clannagh road, only the most Northerly field is grazed pasture. This represents less than 25% of the usable site. The remainder comprises of (i) a wooded thicket (of just under 1ha) containing multiple watercourses and several ponds and dubs, and (ii) wetland fields that do not appear to have been actively grazed for some time (being approx 1.5ha). This is a key missing observation on the site, as it is not simple pastureland that is being re-zoned, but a far more complex, diverse ecosystem.
- c) Again, in the commentary to DC12 (protecting trees), the assessor notes that there are only some large trees on the field boundaries. This is inaccurate – as above, just under 1ha of the site contains a woodland thicket comprising of many trees and dense undergrowth.
- d) DC7 (maintaining landscape character) is scored 'Orange' and in the comments, the assessor notes: *"...The site currently comprises pastoral land which is demarcated by manx hedgerow boundaries. Such fields are identified as a key characteristic in the Santon Incised slopes landscape Character Area, however this site is not highly visible from the A5 due to the presence of existing dwellings which front onto the A5 and back onto site SH013...Development of the site would not therefore significantly change the character of Newtown, as experienced by travelling along the A5..."*

Firstly, as above, the site does not comprise of pastoral land – just under a third of the usable area comprises of an area of a woodland thicket with tall trees and dense undergrowth and shrubs. Secondly, the character of Newtown cannot be experienced by anyone driving along a 50mph highway whether or not any part of the village is visible from the road. The character of the settlement and of the landscape are enjoyed from the other public roads, paths and from adjoining properties. Viewed from anywhere other than the A5, it is clear that development of site will significantly alter the visual character of Newtown. This point is explored further in **Section 4.4**

- e) DC8 (Visual Amenity) is scored 'Yellow' on the basis that there would be limited impact on visual amenity. Arguably, this should have been scored Orange as visual amenity from adjacent roads (excluding the A5), paths, and from the Ballanoa estate are all affected. **Appendix 2** contains photos showing views of the site from all of these locations and it is evident that the loss of visual amenity could not be mitigated.
- f) We welcome the observation by the assessor that the Clannagh road junction could not support a development on this scale. The site proposer notes that the land to the North of the junction could be used to improve the junction. As a group of local residents we do not have the resources to commission a full traffic model. However,

we conducted a simple count of traffic during two peak times during the week commencing 5th August, from which it is clear that the traffic issue will be waiting time at the junction. There is no easy remedy for this beyond installing traffic lights or a roundabout which would be completely impractical on the main arterial route from Douglas to the South. The data collected was as follows:

- More than half of the observed traffic during the one hour peak period observed used the junction between 8.30am and 8.45am;
- The average waiting time for cars leaving Clannagh road was 28 seconds during this peak period;
- The SYSTRA modelling for SH013 for the traffic impact is contained in PiP3. This suggests that an additional 38 cars would use this junction in the morning, based on 42 dwellings on the site. Extrapolating this, if the site yields its maximum of 65 dwellings, suggests up to 58 outbound trips.
- Assuming that the distribution remains the same and 50% of that additional traffic will use the junction between 8.30 and 8.45am, this would generate a permanent queue at the junction during peak times. Widening the junction will simply not solve this.
- Finally, we note that the first application for the site in 2001 was also rejected on the grounds of increased traffic (see **Appendix 7**).

- g) The final slight inaccuracy in the assessment concerns deliverability. In answer to question F4 (ownership) the assessment notes only one owner, being the site proposer. However, the site plan incorporates an access road direct to the A5 – which will provide the secondary access that is required for a development of this scale (we understand that any housing development in excess of about 25 dwellings requires secondary access). This access road is not owned by the site proposer and although we have been unable to contact the owner of this road in the time available, **Appendix 3** contains comments from the owner that were submitted during the 2018 consultation period, clearly expressing that she would not be willing to allow her drive to be used as access. This raises questions on the deliverability of the site.

Based on the above, we do not believe that the site was fairly assessed and needs to be re-appraised, in particular in relation to the two concerns set out below in Sections 4.3 (presence of protected species) and 3.4 (Impact on the Character of the Settlement and Landscape).

4.3 The Development of SH013 will harm a candidate wildlife site and disturb Protected Species

The final site assessment report notes that the site is “...*Partially within an MWT candidate local Wildlife Site, which, whilst not a statutory designation, is of interest...*”. This is an understatement:

- More than 75% of the usable site is, in fact, an MWT candidate Wildlife Site (see aerial photo below showing the overlap between the MWT site and SH013);
- The fact that it is a candidate site is of more than ‘of interest’. Although it is not yet a statutory designation, MWT Wildlife Site status is a significant flag for planning as it denotes areas of natural vegetation or areas that contains key species or species protected under the IoM 1980 Wildlife Act. As such it must be subject to a more detailed Wildlife Assessment before it is put to planning;

Map 1: Manx Wildlife Candidate sites overlaid onto the usable part of site SH013



In practice Site SH013 contains a rich, diverse ecosystem as it is largely unmanaged wetland, with a woodland thicket, several watercourses, ponds and dubs. The photos shown at **Appendix 4** clearly illustrate the diversity of the site. Furthermore, there are known to be at least two Schedule 5 and Schedule 7 protected species in the area:

- the common frog (frequently spotted locally – **Appendix 4, photo 4** is a photo taken in July, about 75m from the North West boundary of SH013); and,
- Heath Spotted Orchids. As well as locals having knowledge of orchids in the area, sightings of the Heath Spotted Orchid have been recorded by the Botanical Society of the British Isles in the local area and the marshy wetland ecology within SH013 is perfect for the species.

As local residents, we did not have the time or resources to commission a full wildlife survey, however Andree Dubbeldam of the MWT kindly reviewed the site based on local photographs and aerial shots and his assessment is set out in **Appendix 5**. As well as confirming that “...the eligibility for Wildlife Zoning is very strong under multiple criteria...”, critically he notes:

“There is definite evidence for the presence of the common Frog (Schedule 5)...It would be highly unlikely that the Heath Spotted Orchids (Schedule 7) is not present”.

In addition, Dr Richard Selman, the Head of the Ecosystems Policy Unit in DEFA, in reviewing site SH014 which is immediately adjacent to SH013, noted: “...Preliminary ecological appraisal recommended and follow-up surveys may be necessary. Scrub, grassland and wetland habitats present. Note, protected orchids present in adjacent areas - potential for them here, too...” (Dr Selman’s full notes are at **Appendix 6**). This further underscores the likelihood that there is significant wildlife interest at the site that includes Protected Species.

Dr. Selman also noted (personal comm) that the information EPU had available was only from a 1990 survey. This survey only noted the site as managed grassland, so DEFA did not comment on this site in the last set of DEFA comments on the Area Plan. However, Mr Selman said that the additional information set out here and in MWT’s desk appraisal of the site (**Appendix 5**) represented new data, so they would want to review and provide further comments on site SH013.

4.3.1 Why not just mitigate the impact on Protected Species?

Given the presence of Frogs and Orchids, the critical question is whether or not the such species can be protected in such a large development. The translocation of Orchids is no longer considered to be a valid option for mitigation and the likely recommendation will be that any development must avoid the immediate vicinity of orchids (**Aline Thomas, DEFA Ecosystem Policy Team, personal communication**). Orchids are likely to be present in the

marshy areas of the two most southerly fields, which, subject to a full survey, would rule out development there.

Andree Dubbeldam of the MWT goes further than this and notes (Appendix 5) that due to the diversity of the ecosystem:

“...there is no on-site mitigation that would retain the current ecological interest of the Wildlife Site [in SH013] under most development scenarios...”.

In other words, the area marked as a candidate Wildlife Site cannot conceivably be developed, reducing the developable land to the field immediately to the south of the Clannagh road.

4.3.2 But Can't the Wildlife Assessments be conducted when this is brought forward for planning, which may not be for several years?

Absolutely not. If the land is re-zoned now as a Strategic Reserve, there will be a presumption in favour of development and its eventual re-zoning for housing is a near inevitability. As per the argument set out in **Section 2**, the incentive structure that a Strategic Reserve creates will be such that any obstacles for future planning will be likely removed. Re-classification will likely guarantee the destruction of the site's ecosystem.

The conclusion is that this site must not be re-zoned without a full Wildlife Assessment and subsequent viability studies being undertaken now. The proposed mitigation strategy of avoiding the MWT candidate site would then need to be included within in any site brief for the future.

4.4 Development of SH013 will change the character of the Settlement and the surrounding Landscape

The site itself is in area assessed as being an Area of High Landscape or Coastal Value and Scenic Significance (AHLV). According to the 2016 Strategic Plan AHLV status means that:

*“...Within these areas the protection of the character of the landscape **will be the most important consideration** unless it can be shown that:*

- (a) the development would not harm the character and quality of the landscape; or*
- (b) the location for the development is essential...”*

As set out in **Section 2**, there is a strong argument that the location of the development is *not* essential – so it fails this test. In addition, **Appendix 2** sets out views of the site from multiple angles around Newtown. These photos clearly illustrate the landscape features that are noted of significance in the ‘Santon Incised Slopes Landscape Character Assessment’. According to the Landscape Character Assessment (2008), referred to in the Strategic Plan, these features include, amongst others:

- ‘glimpsed views framed by vegetation in the valley bottoms’ (these can be seen on site SH013 in photo 1, 3, 4 and 5 at **Appendix 2**)
- Manx field hedgerow boundaries (shown in most photos of SH013 at **Appendix 2**)

Appendix 2 also illustrates the approximate boundary of the location for the proposed 65 houses on SH013. It is clear from these views, that SH013 will significantly alter these key features of the Landscape Character when the site is viewed from: (i) the Clannagh Road, (ii) the Moaney Road, (iii) the Rheast Road, or from (iv) the Ballanoa Estate.

It is only the views from the A5 that would not be affected. But since this road is a 50mph highway where passers-by rarely look beyond the road in front of them, consideration of these views is, arguably, irrelevant, versus the views from the village itself and the country lanes around it.

Therefore it is apparent that re-zoning of SH013 does not fulfil Environment Policy 2 of the Strategic Plan.

4.4.1 The Character of the Settlement is being changed

Newtown is at the bottom of the settlement hierarchy and is one of the smallest villages in the hierarchy. As such, Spatial Policy 4 states: *“...development should maintain the existing settlement character and should be of an appropriate scale to meet local needs for housing and limited employment opportunities...”*

It is not at all clear that SH013 fulfils this policy.

The author of the Site Assessment Report argues that: *“...Excluding the triangular shaped parcel of land north of Clannagh Road, development of site SH013 could therefore represent*

the natural direction of growth for the settlement and with sensitive design would not therefore result in the partial loss of any key landscape features locally...”

This is, of course, one person’s judgement. Indeed, when planning permission was sought on site SH013 in 2001 for 42 houses, the application was rejected. One of the grounds was on the basis that:

“...in any case, the development here proposed, would prejudice the proper overall layout of the wider area...”

The full rejection of the original application is at **Appendix 7**. Critically it begs the question of what has changed in the intervening 16 years that has caused a planning officer to consider that this development was not in keeping with the local area previously? The answer, of course, is that nothing has changed in Santon – This is a difference of opinion.

One key change has occurred however: the framework to guard against changes in the character of the landscape and settlements in small rural settlements is much stronger. So, we would strongly argue that given the Environmental and Spatial policies of the 2016 Strategic Plan, if the application was rejected on these grounds previously, there is no reason that it should be entertained again.

4.4.2 Is there a better way of judging the character of a settlement?

Whilst any development on site SH013 would be inappropriate, the proposal put forward by site proposer for the development of 65 dwelling is wholly inappropriate in its scale and ambition.

When the Planning Approval for the Ballanoa Estate was granted in 2000, the character of the village was not protected by the policies enshrined in the Strategic Plan, first in 2007 and then re-stated in 2016. However, those protections now exist and, as the Strategic Plan and The Area Plan for the East are both integral parts of the Development Plan, that protection must be afforded to Newtown at this time.

In assessing the character of the village, the density and pattern of the existing housing must be material considerations, along with the overall scale of the development versus the original settlement.

With the exception of Ballanoa, which has a concentrated housing density of just over 19 houses per hectare, the houses in Newtown are quite evenly distributed at a density of just under 8 houses per hectare. Should it be concluded that any elements of Site SH013 might be suitable for residential development, the density of the same should be restricted accordingly; otherwise, the character of the settlement will be irreparably damaged.

Similarly if we consider the size of the settlement as a fundamental part of its character, it is clear that increasing the number of dwellings by more than 60% and the overall size of the village by more than 45%, is fundamentally and significantly altering the character of the settlement. It is neither a logical extension nor infill.

The size of the development and the density of the development is therefore completely at odds with the Spatial Policy 4 of the Strategic Plan. This simple observation is further supported by the previous rejection of the similar, but even smaller, proposal on the site in 2001.

5. CONCLUSION AND RECOMMENDATION

The issues set out above, supported by the evidence in each of the Appendices, clearly illustrate that the re-zoning of site SH013 would be wholly at odds with the spirit, intent and fact of the Strategic Development Plan. There is a simple weight of argument against the re-zoning of SH013 that cannot be dismissed:

- There is no current requirement for housing that cannot *easily* be met by potential development sites within easy reach of Douglas and within the active travel zone. There is therefore no overriding national need to re-zone site SH013 in accordance with Environment Policy 1, particularly when a release framework that fulfils the policies of the Strategic Plan still does not exist;
- SH013 is, in large part, a candidate Wildlife Site containing schedule 5 and schedule 7 Protected Species. Government and Independent experts indicate that no mitigation strategy is likely to exist given the type and scale of bio-diversity present on the site. A full assessment and mitigation plan must be conducted before any further consideration at all;
- There are multiple inaccuracies and mis-observations in the original Site Assessment giving rise to a range of related issues, including traffic problems and possible access issues that will make development on this site problematic. At the very minimum the site should be re-appraised accurately and all Government departments given the opportunity to re-submit comments based on up to date information;
- The development of SH013 will increase the small village of Newtown by more than 60% changing its character irreparably and changing the character of the surrounding landscape in an area designated as an AHLV. The site does not, in any way, constitute a “logical extension” or an “infill” of the existing settlement in the terms that Tynwald had envisaged when approving the Strategic Plan. As such, the site’s re-zoning should not proceed.

Planners have previously rejected this site on similar grounds to those set out here, including the extent to which it is out of keeping with the wider layout of the area. This earlier rejection was prior to the introduction of tighter restrictions protecting settlements such as Newtown enshrined in the 2016 Strategic Development Plan. So re-zoning this land now is clearly entirely at odds with the visions and policies set out in the Plan.

The Strategic Plan for all its complexity, does make a simple, powerful statement in Environment Policy 1 and we must not forget this in our rush to develop:

...The countryside and its ecology will be protected for its own sake...Development which would adversely affect the countryside will not be permitted unless there is an over-riding national need...

There is no need. Please do not re-zone this land. Please do not destroy our countryside.