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31st March 2025

Hon David Ashford MBE MHK
Minister for Cabinet Office
Mrs Diane Kelsey MLC
Member for Cabinet Office
Isle of Man Government
Bucks Road
Douglas
Isle of Man

Dear David, Dear Diane,

[Modified Draft North West Area Plan](#)

I wanted to write directly and at a political level on key concerns related to the Modified Draft North West Area Plan which was published in January, and is as a result of the Inquiry process, and resulting modifications, recommended by the Inspector and / or Cabinet Office officials.

Whilst my points will, as expected, relate mainly to sites GMR008, GMR009 and GMR023 in Peel, I believe they are substantial enough to justify the removal of those sites as being designated for housing post the recently closed consultation and **prior** to the Area Plan going to Council of Ministers (and subsequently) Tynwald for proposed adoption. I would ask Cabinet Office Political Board to consider this following the below and also upon reflection of consultation responses.

I am hugely disappointed that key constraints and important policies were removed in the Modified Draft, and I actually believe this is at odds with Government Policy to **plan for infrastructure** to support an increased population.

The allocation of greenfield sites **GMR009, 008 and 023** alone for residential development would **enable 507 developable housing units and increase the population in Peel by 1,181 at a conservative estimate**, based on an average household size of 2.33 persons (as per the current Strategic Plan). However, given the makeup of the area / adjacent developments which are best described as family estates, household size is highly likely to be more.

There are other sites also proposed for residential allocation in Peel, so the overall effect / impact would be much larger.

It has also been brought to my attention that there has been direct representation to the AG's and possibly the Cabinet Office around process as relates to law (I attach some of that to this email).

Furthermore, I understand there is wider concern about the Inquiry process / Inspector handling which will also come forward in due course (not specifically related to Peel). I anticipate this will come forward before or when it gets to Tynwald Debate.

There has also been concern raised about how difficult the latest consultation response process has been to navigate, myself and others have also observed that the **general effects** of Modifications have not been sufficiently explained or outlined.

There has also been no way for people to respond to what may ultimately be proposed for adoption, unless the aspect of concern has been modified post Inquiry. People (not just in Peel) have had to attempt to overcome this injustice in various ways. This is particularly unfair where sites were added post 2022 consultation / pre-Inquiry, but not Modified after – leaving a massive advantage for those who wish to push a development agenda, at a disservice to the public at large who have had little way to give a final view. It is also very hard to see how the Independent Inspector has taken on valid concerns, leaving many aspects wanting in terms of robust testing. Finally, it concerns me that Cabinet Office made so many submissions into the Inquiry last minute, and I wonder about the visibility and authorisation of those submissions which in some cases may have led to fundamental changes.

I recognise of course that the Council of Ministers committed to progressing an Area Plan for the North and West, before the process effectively starts again, in terms of preparing for an All Island Area Plan, which would, when complete, replace all extant plans.

Therefore I am making the case to you (in light of the various issues raised above and detailed below) that instead of enabling the 507 developable housing units at greenfield sites GMR009, 008 and 023, that instead Cabinet Office removes the proposed residential / housing designation for these sites from the plan proposed for adoption and as an alternative:

- **Recognises that a number of units are due to be achieved at the large unoccupied brownfield site (PR001) at the Edward Loades Building / Olive Court on the Ramsey Road.**

This is material because work on this long standing brownfield site with a planning application approval in principle is this week underway, with demolition started¹. This is not accounted for the modified Area Plan, which now proposes this site for light industrial².

- **If so desired, looks to achieve the net amount (less indicative figure to be achieved from above site) elsewhere through an “All Island Area Plan” process (or another area designation mechanism).** This could, in my view, be sensibly done in a way that distributes housing to support the sustainability of smaller communities and actually support their existing infrastructure provision.

Both of these points would in fact better support Government policy objectives balanced development planning, rather than opportunism, and sustained intensive development of one area, which is what the modified draft Area Plan would do to Peel.

It should be noted that aside from 3 sites I am focusing on, there are still other proposals for housing designation in Peel that are less controversial, and perhaps fit more neatly into the current settlement of the town.

Issues with the Modified Draft Area Plan (MDAP) (post Inquiry)

I will address these sequentially in specific reference to the changes made to the MDAP.

I cannot overstate the strong feelings of residents in Peel who are most especially concerned about infrastructure. This will be reflected I am sure on submissions into the consultation. On a basic level, Peel still has raw sewage going into the sea.

In the first draft of the Area Plan there was some policy comfort that there would be some constraints. These have been removed. It is morally wrong and at odds with Government policy.

1. **Sewage Infrastructure policy constraint removed**

The original draft specified greater constraint by stating as a firm policy that “No development shall take place until the Regional Sewage Treatment Works planned to serve Peel and the West is operational” - this has been weakened down after arguments made (by Dandara) at the Public Inquiry. **The new phrasing does not actually make sense (covered in point 6 below).**

¹ The current owner will be proceeding with housing development, and had no interest in other development, so it is housing or an empty site.

² “light industrial, research and development and storage and distribution uses”

2. Infrastructure Impact removed- makes proposals untenable

The original draft of the NW Area Plan also **referred to assessing impact on health and education.**

This has now been proposed to be removed, making further development / zoning untenable. I reference [page 121 here](#) Below is the paragraph which has been removed. It was assumed that this proposal would sensibly relate to all new residential sites on the edges of Peel, but there has been no updated alternative included.

*“Open Space and Community Proposal 1: **Applications** on those sites identified as **PR002** and **RR009** (**new residential sites on the edges of Peel** and Ramsey respectively) must demonstrate that they have taken into account the needs of future (as well as existing) residents in terms of health and social care, education, neighbourhood shops as well as demand for other community facilities, open space/play space.*

There is a reference to “masterplanning” at page 135 as follows, but this does not achieve anything especially as it only says “**may** include” and no reference to considering impact:

“Development must be in accordance with an approved Masterplan for the entire area which may be broken down into Phase 1 and Phase 2 development (as referred to above) and must address the following matters: Individual development phases; areas of public open space; route and junction arrangements for the District Link Road; sustainable transport options which recognise the need to encourage active travel; substantial structural landscaping buffers and the consideration of appropriate community facilities in accordance with local need.

*These **may** include: education and health and social care facilities, a neighbourhood centre and recreational open space.”*

In any case, Masterplans in planning terms do not achieve anything in and of themselves - especially when framed like this.

It needs also to be stated that the event of so many additional houses and residents being added would almost certainly require expansion of both QEII and Peel Clothworkers’ schools.

Aside from cost for this, the MDAP actually pens in QEII by developing around it (meaning that any extension would take away from playing fields). QEII has also been waiting years for a STEM block which is unfunded, and at my last check some years ago, I was advised by DESC that Peel Clothworkers was, in terms of primary schools, the second most in need of extension.

This ‘penning in’ has been at the “gain” of enabling more housing designation at a site by the main Douglas Road (see also point 10 below) which furthermore serves to unlock more development land as far as I can see – so overdevelopment agendas are clearly trumping community and long-term infrastructure planning senses.

3. “Sustainable urban extension”?

The MDAP introduces the new concept of “sustainable urban extension” in connection with Peel in connection with these sites. This is an entirely new addition, marked up in the document. I cannot find reference to these new insertion in the Inspector’s Recommended Major changes, so the question is, on what valid and approved basis has this policy / concept been introduced? Is this actually a whole new town? The phrasing reflects the planned expansion of a city or a town. **No previous policy decision that I am aware of has determined this intentionally.** So the question is, under what authority has this been determined, or is it yet to be?

Of note is this definition of Urban Extension³:

*“The Planning Portal glossary 7 defines an urban extension as a development that ‘Involves the **planned expansion** of a city or town and can contribute to creating **more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities.**”*

Given the points made in 1) & 2) this is not achieved by the MDAP.

Furthermore this proposed “sustainable urban extension” of Peel (do we call it Poortown as it is actually in German?) is not “sustainable” not least because there is (for practical reasons) insufficient employment land / provision in the town. This in effect makes it more akin not to a sustainable extension, or a sustainable town, but more of a dormitory town, with people doubtless travelling to and from Douglas. This is not sustainable or in line with other Government policies, either with the environment, or aspirations for towns and communities.

In planning terms, the allocation of these greenfield sites for housing do not meet any definition of sustainable.

Furthermore, the consultation process recently concluded was designed in a way that did not facilitate object to inclusion of the “sustainable urban extensions” in Peel / German, which indicates the process is not in compliance with Schedule 1 of the Act.

³ Definition is from “Best Practice in Urban Extensions and New Settlements” A report on emerging good practice https://www.tcpa.org.uk/wp-content/uploads/2021/11/best_practice.pdf published by the Town and Country Planning Association

In addition, it was raised at my public meeting that the new proposed allocated land on the outskirts of Peel is far bigger than even the existing sites added in the 1980 Plan (see Appendix 1) It would enable overdevelopment with infrastructure and other planning needs ignored.

4. Housing numbers: downplayed and misleading

Potential housing numbers have been played down in the main recent documentation (i.e. the written statement) but can be obtained upon direct enquiry and in reference to a document prepared only for the Public Inquiry (the All Sites List PIP⁵). There has been no awareness over this and it indefensible⁵.

What has happened is that reference to units under the plan period (and now defunct⁶) which is recognised) or “likely yield” is used. **Neither are credible.** I believe this is used to effectively mask the full potential effect of allocating sites for housing and the key numbers to be realised are the “developable housing units”. I am enclosing a copy of an email which covers this.

There is nothing accurate in terms of housing numbers which is currently for approval, or for the Public (or has been for consultation) and nothing in the MDAP which expresses the true extent and ultimate number of developable housing units.

This also means the full effect of the modifications is not explained.

Rather, a much lower number is quoted in the MDAP on page 149/ 150 in the Table. It is therefore lacking transparency and accuracy as in reality the plan provides for so much more than what is referenced, so it is misleading.

I had hoped that the Inquiry process would thoroughly test some aspects, such as reference to housing units and also to density.

5. Housing Density: Removed

At the Public Inquiry there was representation made in various ways related to housing density, mainly driven by a view that housing should not be too dense. These points were raised also at the Council of Ministers’ Road Show in Peel.

⁴ <https://nwinquiry.gov.im/media/y3oczxfw/pip-5-all-sites-table.pdf>

⁵ in the APNW papers in the consultation there is currently no way to ascertain the true number of dwellings proposed, which is approximately 1,950 net developable units for the whole plan (with “expected yield” of 950), most in greenfield sites. This has not featured in any media coverage and the only figure featuring in the final APNW documents is a “pro-rata” figure to 2026 of around 420. The lack of true figures in the consultation documents which are proposed for adoption is indefensible.

⁶ It is recognised in documents modifications that realistically the plan will of course have effect until it is replaced, therefore making reference to numbers in the plan period as previously presented, either irrelevant or only relevant if they reflect fully the long-term potential in terms of developable housing units/.

The reaction seems to have been to remove all reference to housing / minimum density, by removing an entire section titled Building Density at 8.16 in the MDAP on page 66.

Tellingly the following reference is also **removed**:

“In some instances, it may be that land should not be developed until the necessary infrastructure is implemented to support it.”

The following is still referenced though, but it is **not borne out** by what the Plan now actually proposes:

From page 60 of the MDAP

“Peel has the highest development density of all of the settlements in the North and West, with the greatest concentration occurring within the historic core. The 2021 Census data shows a low property vacancy rate of 11%, but there are a number of unoccupied urban sites that need to be re-vitalised, which can help to meet the settlement’s development needs.

Development on the periphery of Peel in the last 20 years or so has meant there have been challenges in successfully integrating ‘new Peel’ with the historic core and has stretched the availability of existing community facilities. These factors combine to limit the options for infill development.”

I am clearly speaking for Peel, but politically, it should be noted that reference to density has been removed throughout the Plan for many areas.

In addition, the following has been **removed in its entirety** as a policy:

“Built Environment Proposal 3: New applications within defined settlements in the North and West must set out the density of proposed development demonstrating local density figures and the characteristics of the local area have been taken into account.”

6. The new phrasing around sewage treatment does not make sense:

The 2022 draft written statement and the version that went to the Public Inquiry contained the following strong policy wording which brought comfort and provided clear policy constraint which would have had a bearing and been a reference point for future planning applications.

The aforementioned documents stated:

“No development shall take place until the Regional Sewage Treatment Works planned to serve Peel and the West is operational. If there is certainty about when the new works will be operational, it may be possible for a planning condition to be used to restrict properties being occupied until the necessary regional infrastructure is in operation. This is to ensure that there no significant additional discharge of untreated sewage/wastewater into Peel Bay.”

In the version for the Public Inquiry, this policy was replicated / incorporated into the Development Briefs for newly added sites GMR008, GMR009 and GMR023.

Post the Inquiry, and in the MDAP this policy has been **removed entirely** (following representation to officers from Dandara and a query from a participant as to what operational meant at the Inquiry), I believe with a view to being watered down, but actually it now makes no sense, or is in fact saying there can be no development until the new Regional Sewage Treatment works is..... well..... maxed out?

It is now stated as:

*“No development shall take place until the Regional Sewage Treatment Works planned to serve Peel and the West is at its **initial operational capacity**. If there is certainty about when the new works will reach this stage, it may be possible for a planning condition to be used to restrict properties being occupied until the necessary regional infrastructure is available.*

This is to ensure that there is no significant additional discharge of untreated sewage/wastewater into Peel Bay. In all cases, the effective management of sewage and wastewater is a priority and applications must set out a design proposal and timeline for connection to the main sewerage network to enable delivery of sewage from this site for treatment at the RSTW.”

Now, it is not for me to discern this, but it could be that the Inspector, or Cabinet Office Officers or both have made a big error in changing this policy phrasing, and a mistake in phrasing. It is possible the word “capability” was intended, as a policy change, but that is not my problem.

I obviously wish to make the point again that Peel has waited too long for sewage treatment, just to allow more houses and it is truly the infrastructure shame of the Island and should not be further enabled by Government, notwithstanding the interests and wishes of landowners and developers and notwithstanding even, the need for more housing across the island.

It really is a poor reflection that this strong policy was sought to be watered down.

7. Incoherent arguments for a “district link road”

This idea should have been more thoroughly examined at the Public Inquiry. There is no valid basis for the road which was apparent at the Public Inquiry, given arguments made by Cabinet Office that it would assist residents from Kirk Michael coming into Peel and to Douglas, but the ultimate justification was that a road would "enable more housing". This was very revealing and on the day, drew an audible reaction from the attending Public from both Kirk Michael and Peel. At a recent Public meeting I called, it was clear from a former Dandara employee, who is now representing 3 landowners, that it is Dandara and others who want the road.

If the road could have been more coherently justified, it may be a different matter, but I think do now have an accurate picture. I would urge Cabinet Office at this final stage to not get drawn into enabling this in a final form to support agendas that are not the agenda of the Public or the Government.

The map is also incorrect or deceptive and shows a district link road (on proposed new greenfield sites) finishing right before some allotments.....

8. Insufficient play space and sports pitches

This has been raised by Isle of Play and I don't believe it has been adequately addressed or tested by the Public Inquiry process.

In any case, regard simply must be had that in Peel the existing community and play space is not maintained and is in a very poor state of repair, so provision is greatly lacking, and distribution seems to focus on one area. This does not support the sort of communities and provision that Government wants to encourage.

9. Cemetery expansion space removed

Field labelled GMC002: The original North & West Area Plan allowed for the extension of a conventional 'lawn cemetery' to the West of the existing cemetery by the Burial Authority for Peel and German. This has now been removed, even though at the present rate of use, the cemetery has under 10 years space remaining on the site. It is now proposed to be allocated for housing. This needs to be properly reflected upon and reconsidered (I attach a formal letter from the Dean of the Cathedral). Again, it shows a focus upon housing above everything else.

The letter points out that "It is therefore essential to safeguard a conventional burial ground for the future population of Peel and German, not just for the next decade or so, but long into the future. Land once lost for housing can never be recovered as a cemetery."

The Peel and German Burial Authority would urge those reviewing the North and West Area Plan not to sacrifice short term solutions for long term necessity.

10. Peel expansion already exceeds rest of the North and West

Peel has grown more than anywhere else in the North and West since 1989, under the current Peel Local Plan, and despite the associated rate collection increase, people are in despair with the state of the town, as well as the lack of sewage treatment provision, and the fact that we seem to have a split / sprawl of a town. Therefore Cabinet Office needs to be seen to be responsible in terms of what it is promoting in terms of further development potential.

In case it is not realised, under the current MDAP, Peel is well set to exceed development in other areas of the North and West again. I find it hard to imagine that anyone would see this as doing the right thing, and it will ONLY play to the interests of developers and landowner, and not the Public interest.

I do recognise that it has been the job of planning officers to respond to opportunities to develop and wishes in that regard. But there also needs to be vigilance, in terms of overdevelopment, especially on green fields, and a sense of responsibility so that Government can credibly advance its agenda and plans, in line with expressed policy.

Therefore, proceeding with this Plan as is, with the inclusion of those extra sites GMR009, 008 and 023 I would suggest presents a risk to Government.

Thank you for your consideration.

Yours sincerely

Kate Lord-Brennan MHK
Glenfaba & Peel

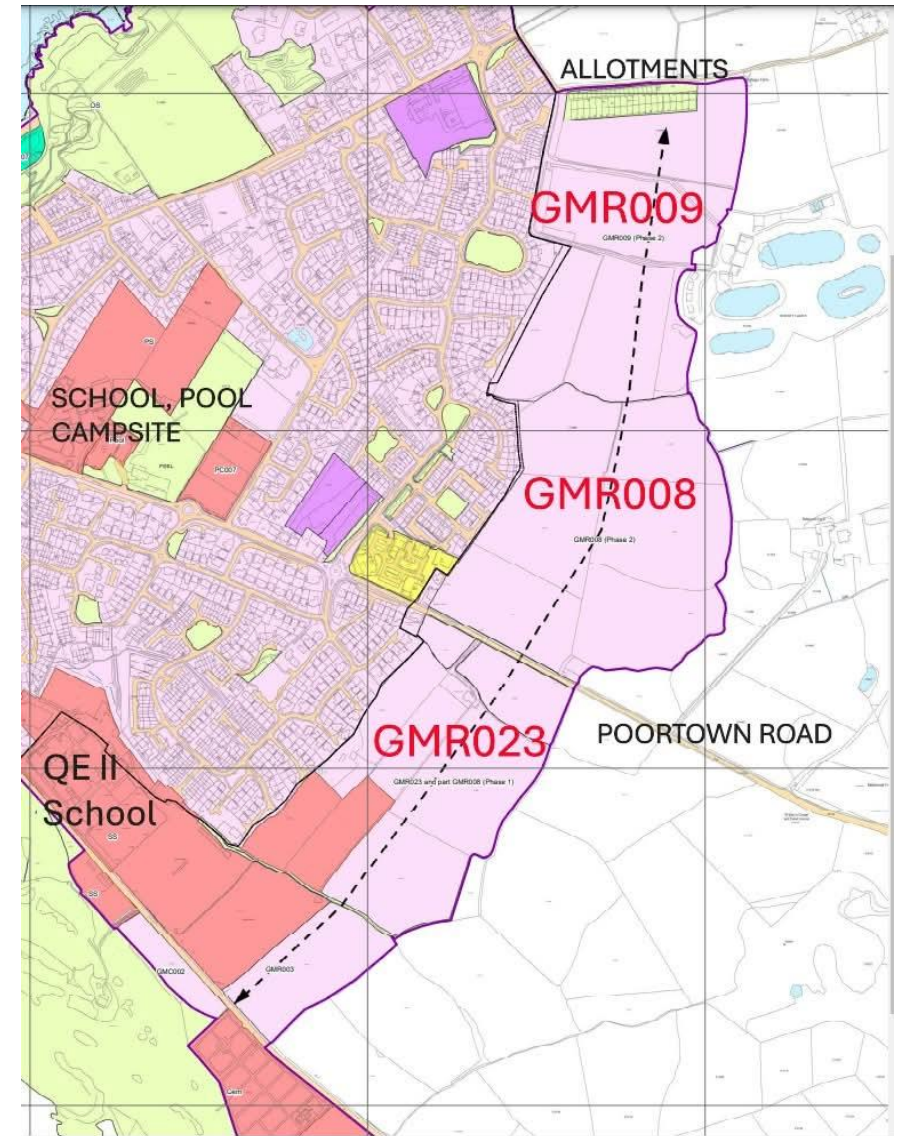
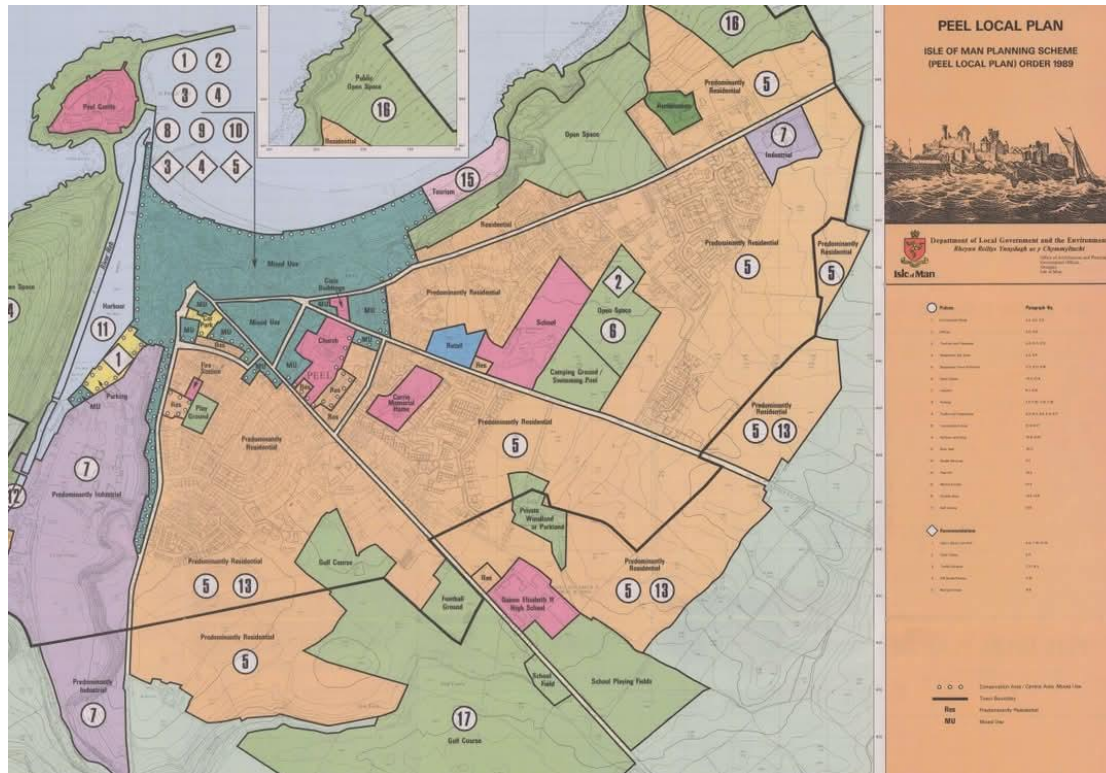
cc. Hon Tim Crookall, MHK
Mr Rob Callister, MHK
Dr Megan Mathias
Mrs Kirsty Hemsley

Appendix 1:
1989 Peel Local Plan
Proposed allocation under Peel Map Associated with MDAP (marked up for ease)

Enclosed:

- 1) Email exchange with Senior Planning Policy Officer re number of Units. Table 17 referred to was deemed misleading at the Inquiry as it did not include key information.
- 2) Letter from Cathedral re cemetery emailed to planning policy team
- 3) Letter to AGs re process / recent consultation and its compliance with law and concerns about lack of documentation regarding the true number of dwellings proposed
- 4) Copy of my submission to the formal consultation.

Appendix 1



From: Grubb, Ethan <Ethan.Grubb@gov.im>
Sent: Wednesday, 12 March 2025 16:42
To: Kate Lord-Brennan <kate.lord-brennan@gov.im>
Cc: Brown, Diane (CO) <Diane.Brown@gov.im>; Diane Kelsey <Diane.kelseyMLC@gov.im>
Subject: RE: number of units (Modified draft plan)

Dear Ms Lord-Brennan MHK,

To help simplify the figures and assumptions, I would like to offer the following supplementary information. The 'probability of development' is a measure used to estimate the likelihood that a site will be developed for housing. As outlined in Table 1 of PIP 7 'Land Supply', which was informed by the 2011-2023 Residential Land Availability Study (Update 16), around 65% of planning approvals in the North and West were not taken up. Smaller sites are more likely to be developed than larger sites (over 10 hectares), so they are assigned a higher probability of development. These assumptions are reflected in the development yields, with the expected number of housing units being adjusted, based on the site's probability of development.

Sites GMR008, GMR009, GMR023, GMC002, and GMR003, which are proposed on the edge of Peel, need to be master planned before any of these sites come forward for development. The development brief for these sites, at paragraph 14.10.2, point 5, sets out the need for a masterplan.

The figures in Table 17 are indicative of the number of new dwellings that each site might provide. To quote from the Draft Written Statement at para 14.11.1 they are "an estimate of the yields those sites might deliver."

The method of calculating such is proven to be relatively accurate in terms of estimating the potential yield of sites. For example, PA24/0005/B at Ballaterson Farm, Peel, was approved for 92 dwellings. Our assessment of the site, based on the assumptions in PIP 7, estimated that the likely yield of an application on the site would be 84 dwellings. Similarly, the recently approved Ballafletcher Road development, Braddan, PA22/00675/B was approved for 320 dwellings, while our assumptions estimated 300 dwellings.

To assist you in understanding how assumptions have been applied, please refer to Table 2 in PIP 5 '[All Sites Table](#)'. This sets out the development potential on sites before the public inquiry. This does not take into account any changes which happened as a result of the Inspector's Recommendations. [COD 10](#) showed how the changes proposed to the edge of Peel effect the size allocated for residential use. It also showed the change in Dwellings estimated within the plan period as a result of the proposed changes. As mentioned in my previous email, a likely yield change of an application on these sites would be 25 dwellings.

It is important to make the distinction between specifying the number of dwellings that may come forward within the plan period and the number that would be delivered once the sites are built out in their entirety. The number of dwellings in the plan period are prepared for the purposes of the Area Plan housing calculations to demonstrate compliance with Housing Policy 1, 2 & 3 of the Strategic Plan. The sites must first have a master plan approved and are to be developed in phases. This is complicated further by the multiple land ownerships, potentially requiring further sub phases. Therefore, in reality the number of homes that will be approved and taken up within the plan period on these sites is likely to be zero. Instead, housing delivery will be provided on smaller sites across the plan area.

I hope the above is helpful in answering your queries.

Kind regards,



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[MS Teams](#)



[LinkedIn](#)

Any views expressed in this email are those of the officer only and are without prejudice to any formal decision made under the provisions of the Town and Country Planning Act 1999 and any relevant secondary legislation.

From: Lord-Brennan, Kate (MHK) <Kate.Lord-Brennan@gov.im>
Sent: 12 March 2025 14:40
To: Grubb, Ethan <Ethan.Grubb@gov.im>
Cc: Brown, Diane (CO) <Diane.Brown@gov.im>; Kelsey, Diane (MLC) <Diane.KelseyMLC@gov.im>
Subject: FW: number of units (Modified draft plan)

Dear Ethan

Can I have a response on the below please?


Kind wishes,

Kate

Kate Lord-Brennan MHK

Member of the House of Keys

Constituency Representative for Glenfaba and Peel

 +44 1624 685596 | 07624 298482

From: Lord-Brennan, Kate (MHK)
Sent: 05 March 2025 16:17
To: CO, North & West <NorthandWest@gov.im>
Cc: Brown, Diane (CO) <Diane.Brown@gov.im>; Kelsey, Diane (MLC) <Diane.KelseyMLC@gov.im>
Subject: RE: number of units (Modified draft plan)

Dear Ethan

Thank you very much – yes at this stage we need to break things down as simply as possible, so people on all fronts are clear on what might be enabled and what is proposed to happen.

There is a massive difference in the figures under “Developable Housing Units” and “Likely Yield of Valid Planning Application” in that table - I guess a key question then is **how is the probability of development gauged?** And wouldn’t those figures be impacted potentially in various ways, if a planning application was put in say, for 1 scheme for multiple sites, thereby increasing the yield?

Please can you advise where the info below in Table 2 is published in its most recent form or its source?

I believe anything under this proposed NW area plan, notwithstanding the plan period would still in effect stand, and note that it has been acknowledged by CABO previously that “ Cabinet Office acknowledges that the Area Plan for the North and West, once approved by Tynwald, will last beyond the current Plan period.” And also "Cabinet Office acknowledge that this plan comes towards the end of the plan period and is likely to last beyond 2026 until the updated Strategic Plan and All-Island Area Plan”

Therefore, the idea of dwellings in the plan period in terms of a near term calculation, and indeed reference to that, at this stage is not really a valid reference – and probably a bit of a distraction?

Kind wishes,

Kate

Kate Lord-Brennan MHK

Member of the House of Keys

From: Grubb, Ethan <Ethan.Grubb@gov.im> **On Behalf Of** CO, North & West
Sent: 05 March 2025 15:41
To: Lord-Brennan, Kate (MHK) <Kate.Lord-Brennan@gov.im>
Cc: Brown, Diane (CO) <Diane.Brown@gov.im>; Kelsey, Diane (MLC) <Diane.KelseyMLC@gov.im>
Subject: RE: number of units (Modified draft plan)

Dear Ms Lord-Brennan MHK,

The housing yields outlined in Table 17 of the Written Statement (Paper 4) represent the expected yields of the proposal sites for the remainder of the plan period. This accounts for the likelihood that not all sites will be fully developed, ensuring that there are sufficient development opportunities to support the construction of 1,540 homes in the Plan area. Additionally, paragraph 14.3.6 has been incorporated following the Inspector's Recommended Major Change 51, reflecting the Inspector's endorsement of the Cabinet Office's pragmatic approach to housing land supply.

The quantum of housing and the methodology behind these calculations are set out in Table 1 of PIP 7 '[Land Supply](#)'. This methodology is predominantly the same as that used during the preparation for the Area Plan for the East. If you need any help understanding the assumptions, please get back in touch.

The difference between the figures for the edge of Peel as set out in March 2024 (as illustrated in [PIP 3 Map 6](#)) and the current position of the Cabinet Office (as shown in [Paper 5 Map 6](#)) is an increase of 11 dwellings within the plan period. The likely yield of a valid planning application for this additional land would be 25 dwellings.

To help you understand the calculations we have broken down all of the sites in Peel by the Developable Housing Units, the Likely Yield of a Planning Application and the Number of Dwellings anticipated in the Plan Period. Developable Housing Units take into account the Net Developable Area, which deducts land which will be used for roads, children's play space, amenity space and landscaping on the site. A percentage of the Net Developable Area is set aside for Biodiversity Net Gain and Community and Social uses on site, the expected density of dwellings for the site is then multiplied by the remaining area to calculate the Developable Housing Units. The likely yield is the

developable housing units multiplied by the probability of development. The dwellings in the plan period is calculated on a pro rata to the end of the plan period.

Table 2. Proposed Housing Development Sites in Peel

		Developable Housing Units	Likely Yield of Valid Planning Application	Dwellings in Plan Period
D. Available sites in Peel (without planning approval)*		12		
E. Allocated sites in the Modifications stage*				
PR002	Fields 311843, 311884, 314538, 314542, 314543 & 314539 Ballaterson, Glenfaba Road	129	84	37
PR004 (Part)	Field 314539, Ballaterson	58	35	15
GMR008	Fields 311964, 311965, 311966, 311967, 311997, 311998, 311999, 312003	225	124	54
GMR009	Land adjacent to Ballagyr Lane	156	86	38
GMR023	Fields 314533, 314528, 316052, 314445, 314530 & 312064. Land between Douglas and Poortown road	136	75	32
GMR003	Field 311905, Douglas Road	34	25	11

GMC002	Field 311902 (Site A), Douglas Road	20	15	7
Total		770	444	194

*These figures are indicative, prepared for the use in the preparation of the Area Plan and do not form part of the Development Brief, the policy any future application will be considered against. Development viability, unknown site constraints and section 13 planning asks will all further affect the total number of homes deliverable and that will be explored at the detailed planning application stage.

I hope the above answer is sufficient for your needs but should you have any other queries please do not hesitate to contact us.

Kind regards,

Ethan

Ethan Grubb AssocRTPI | Senior Planning Policy Officer | Cabinet Office
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Any views expressed in this email are those of the officer only and are without prejudice to any formal decision made under the provisions of the Town and Country Planning Act 1999 and any relevant secondary legislation.

From: Lord-Brennan, Kate (MHK) <Kate.Lord-Brennan@gov.im>
Sent: 03 March 2025 13:50
To: CO, North & West <NorthandWest@gov.im>
Cc: Kelsey, Diane (MLC) <Diane.KelseyMLC@gov.im>
Subject: number of units (Modified draft plan)

Good Afternoon,

In reference to each of the following, can I be advised as to the anticipated number of dwellings?

- a) Sites GMR023, GMR008 and GMR009
- b) GMR008, GMR009, GMR023, GMR003, & GMC002 (this is listed on page 150 [here](#)) but as 142 dwellings (is that accurate?)
- c) All the allocated sites in Peel


Kind wishes,

Kate

Kate Lord-Brennan MHK

Member of the House of Keys

Constituency Representative for Glenfaba and Peel

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Representing the constituency of [Glenfaba and Peel](#) – I care and I challenge

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Community, Worship, Culture

Consultation relating to Revised Plans
for the North and West

26th March 2025



**CATHEDRAL
ISLE OF MAN**

The Deanery, Albany Road
Peel, Isle of Man IM5 1JS

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To Whom it may Concern

Re: North & West Area Plan Field labelled GMC002

The original North & West Area Plan allowed for the extension of a conventional 'lawn cemetery' to the West of the existing cemetery by the Burial Authority for Peel and German. Previously this site had planning permission for cemetery use.

The current cemetery, at the present rate of use, has under 10 years space remaining on the site. The site is bordered by the golf course on its southern flank and the Peel/Douglas Road on its northern flank.

Clearly the cemetery has infrastructure which it would be best to make use of, so the value of having an extension that borders the existing site will make us of the same infrastructure (Chapel and Key Car Park). This makes economic sense to the rate payers, as the Burial Authority is funded by a precept on the rates.

The proposal first mooted in 2009 has been to create a woodland cemetery to the east side of the exiting cemetery on the approach to Peel. This will have the effect of:

- screening with trees many thousands of graves on the brow of the hill/skyline on this main approach to Peel
- Providing a new kind of cemetery to meet slowly changing demand for style of burial
- Providing a new public open space/park in German on the outskirts of Peel.

On the west side the proposal is the provision of a conventional lawn cemetery. Formal Planning approval was given for this and the eastern site in 2010. The site plan and approval stamp are attached for information (**Appendix 1**).

Purchase negotiations at the time had been taking place with the then owner of the site Mr. Dale of The Creggans, Peveril Road, Peel, IM5 1QA who was approached by letter on 29th August 2009. At that stage Mr Dale indicated verbally he was happy for the Burial Authority to purchase the site. Mr. Dale's death brought these negotiations to an end.

While there is an increasing tendency for people to want cremation with a headstone and a smaller plot, conventional burial is still in demand and is likely to be into the foreseeable future. Either way, cremation plots and burial sites are still required.

Cemeteries in the Isle of Man are very different to their English counterparts. Land on the Isle of Man for burials is sold in perpetuity, rather than leased for a period of time, so land cannot be recycled for further burials. Older gravesites might be enabled to undergo re-wilding, but essentially these sites (if not their long-term care) remain with the owner and their heirs in perpetuity. It is therefore essential to safeguard a conventional burial ground for the future population of Peel and German, not just for the next decade or so, but long into the future. Land once lost for housing can never be recovered as a cemetery.

The Specific site to the West of the existing Cemetery Field labelled GMC002

A planning application (No: 09/01936/C) was submitted, the land having been investigated for its suitability for burials from a soil and water table point of view. (A Report dated 4th March 2010 by John Gray Consulting Structural & Civil Engineers of 5 Drinkwater Street, Douglas, Isle of Man IM1 1AT was submitted with the plans and was accepted by the planning Authority as part of the planning consent).

For information the plans, which were received by the planning authority on 24 November 2009, received a formal decision notice on 10 February 2010 and planning approval in 17 March 2010. The plans for site are an addenda to this document. The new cemetery extension to the west provided for the addition 1,300 plots.

The Peel and German Burial Authority would urge those reviewing the North and West Area plan not to sacrifice short term solutions for long term necessity.

Yours faithfully,

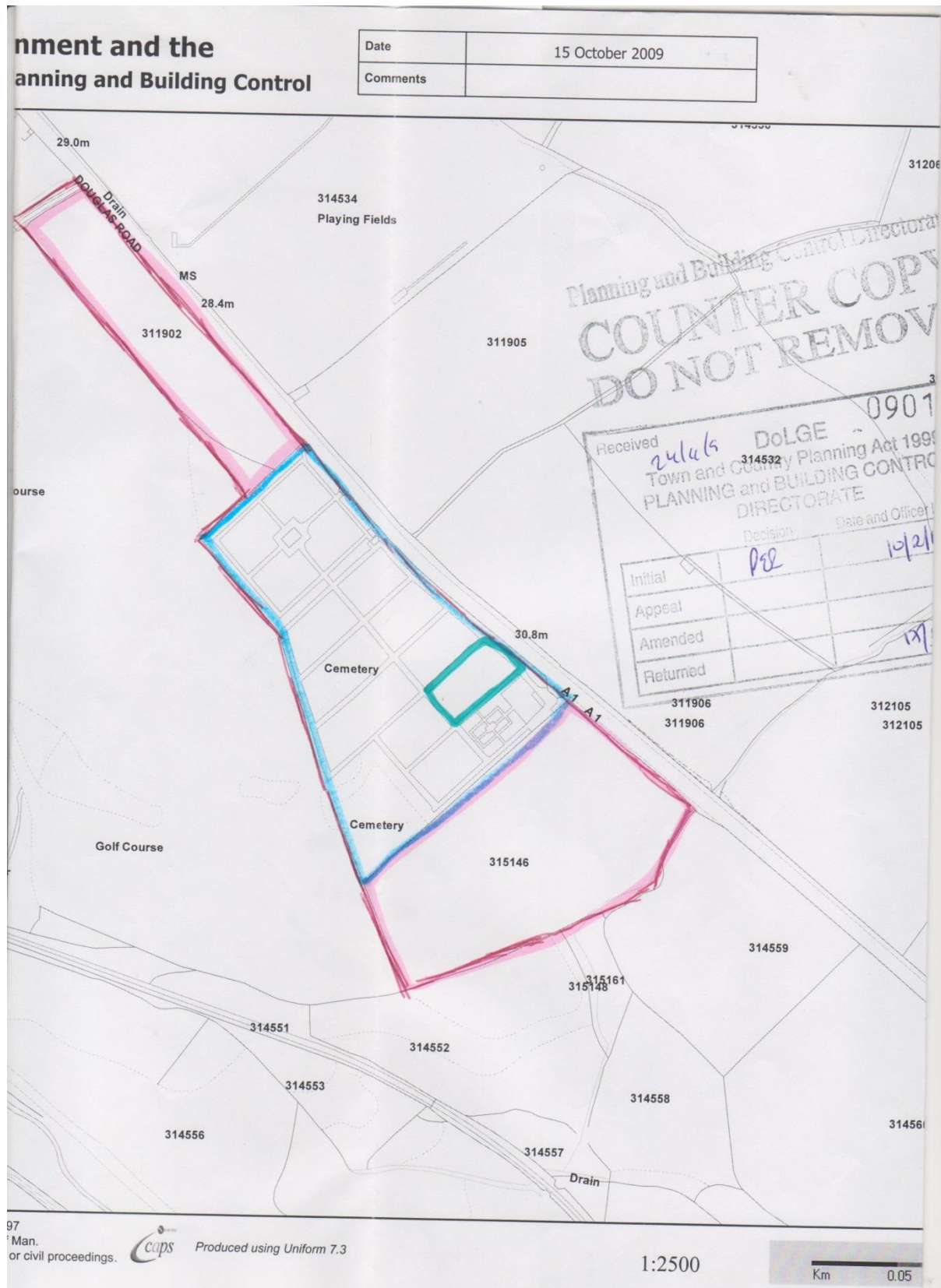


A handwritten signature in black ink, appearing to read 'Nigel Godfrey'.

Chair of German Burial Authority
The Very Reverend Nigel Godfrey
Dean of St German's Cathedral, Peel



Appendix 1 (Planning Approval)



Mr Walter Wannenburgh
Legislative Buildings
Finch Road
Douglas
IM1 3PW

19th February 2025

Dear Sir,

1. I have serious concerns over the process that has been implemented by the Cabinet Office (CO) in respect of the Area Plan for the North and West (APNW). I do not believe that the process is in conformity with legislation, specifically Schedule 1 of the Town and Country Planning Act (TCPA) 1999.
2. Professionally, I am a university-employed research scientist. I have nearly 10 years of experience engaging with Manx planning policy and its development, for example being invited to give evidence on my research in Tynwald to the Select Committee on Built Heritage in 2023.
3. For clarity, CO have produced three 'versions' of the APNW: **(A)** the Draft Plan made in 2022 within 12 months of a period of preliminary publicity; **(B)** a significantly modified plan made March 2024 that formed the basis of CO's submissions to the APNW public inquiry; and **(C)** a post-inquiry version made January 2025.
4. Substantial and material changes were made between versions **(A)** and **(B)**, which reflected a change in the Executive and thus the Council of Minister's priorities.
5. Schedule 1 of the TCPA1999 requires that – during the making of a development plan and following the public inquiry – CO may either progress the *Draft Plan* without modification or apply Modifications to the *Draft Plan* **(A)**. If *Modifications* are to be applied ("in terms of the draft plan" – Schedule 1), CO must publish a notice stating the "general effects" of the *Modifications* and then enable the public to provide submissions on "any of the Modifications" during a period of consultation.
6. In the current consultation, CO have failed to correctly define the *Modifications*. CO have defined *Modifications* in terms of the change from plan version **(B)** to **(C)**, rather than **(A)** to **(C)**. Their *Modifications* are based on changes proposed by the Inspector of the public inquiry, whereas substantial changes were made by CO between the *Draft Plan* and the public inquiry papers. Where they are defined in Paper 3, Modifications often have their 'source' stated as an Inspector recommendation, whereas their true origin was CO's pre-inquiry papers, and only relate to smaller amendments rather than the true difference. For example, a site [GMR008, GMR009, GMR023, GMC002 and GMR003] (35 hectares) was allocated for development by CO in **(B)**, yet the only *Modifications* that relate to this site (M63 and M67) relate to minor details of their development briefs and further additional land rather than the addition of paragraph 14.10.2, the site brief box, and map changes in their entirety that allocated the original 35 hectares and made the original brief in **(B)**. Importantly, these aspects are marked as red tracked changes from the original in the Written Statement in **(C)**, demonstrating a mismatch between the changes and *Modifications*.
7. CO have not stated the "general effects" of the *Modifications*, as (i) they have not attempted to describe effects of the *Modifications* as proposed in any detail, and (ii) as the *Modifications* have been incorrectly defined their description does not reflect the true effects. For example, the community guide to the consultation states under "What Modifications are proposed?":

"Proposed Modifications include some changes supported by Cabinet Office before the Inquiry as well as the

Recommended Major Changes from the Inspector's Report. Modifications include changes to the plan's Proposals and the addition of new potential development sites." [my emphasis]

I suggest that "changes to the plan's Proposals" does not provide an adequate reflection of the effects of policy changes since the *Draft Plan (A)*, only reflecting an action rather than any effects. As one example of a major effect caused by changes made between **(A)** and **(C)**, the *Draft Plan* supporting document on housing need stated that housing need in the West was minus 94 thus negligible greenfield development was required. The version of the APNW in the public inquiry **(B)** included addition of over 1,900 net developable units in the North and West (as shown in the 'all sites table' supporting information), which required allocation of over 50 hectares of additional greenfield land to residential in the West outside of existing settlement boundaries.

8. The *Modifications* stated do not correspond to actual changes made to the text and maps. In consultation Paper 3, CO state the "general effect" of each *Modification*, but this cannot be related to changes to text and maps. CO have provided a change-tracked copy of the *Draft Plan* with changes applied in red text, but this is merely a further modified copy of **(B)**. It is not possible therefore to see the actual changes between **(A)** and **(C)**; for example, text from **(B)** has been deleted and its deletion seemingly proposed as a *Modification* yet is neither present in **(A)** or **(C)**.
9. The consultation is not in compliance with Schedule 1 of TCPA1999 as it is not possible to object to "any of the modifications" made, only loosely-defined and limited ones. There are no cross-references provided to indicate which text or map changes correspond to which *Modification*. Substantial additions, deletions and changes to the text in the change-tracked Written Statement appear to have no corresponding *Modification*; it is therefore currently impossible to provide a consultation response to many proposed changes. CO have structured the consultation by *Modification* number. It is therefore not possible to object to any of the modifications that have been made thus cannot be in compliance with Schedule 1 of TCPA1999.
10. The current consultation is missing key documents required for the public to examine the full effects of the proposed *Modifications*. Supporting documents for the APNW have not been provided in the latest version **(C)**, which were provided with **(A)** and **(B)**. For example, a key piece of evidence is the 'all sites table' (i.e. land provision) that contains key information CO used to derive Table 17 (i.e. acreage, net developable units, yield modifiers, expected yield). At the public inquiry, the version of Table 17 presented was deemed misleading by the Inspector as it did not include key information and CO had to produce a more informative table for inquiry participants. In this consultation **(C)**, CO have fallen back to the original format for Table 17, thus it is currently impossible to know from the information provided the actual expected yield of land allocated for residential development, a key piece of information. As the 'all sites table' has been excluded, one cannot work out the expected yield (i.e. number of dwellings for which land has actually been allocated) from the underlying data.
11. CO are aware of the correct process to define *Modifications*, as they followed it for the last development plan they made in 2018. For The Area Plan for the East (TAPE) post-inquiry consultation: *Modifications* were defined based on the pre-inquiry *Draft Plan*; changes to text and maps were clearly cross-referenced with a modification number in brackets; and all supporting information from previous versions (including the all-sites table) was provided.
12. As well as the legal matters above, I hold serious concerns over the quality and transparency of the consultation that I intend to raise with CO directly. In my opinion, the consultation falls far short of the Council of Minister's agreed principles for public consultation, which it states: "should generally be regarded as binding on Government Departments".

Regards



Andrew C Martin

Response ID ANON-UVCN-NK8W-4

Submitted to Modifications to the Draft Area Plan for the North and West
Submitted on 2025-03-27 17:38:20

About you

What is your name?

Name:
Kate Lord-Brennan MHK

What is your email address?

Email:
kate.lord-brennan@gov.im

I am a...

Other (please specify)

Other::
MHK - further written representation to follow

Are you responding on behalf of an organisation?

Yes

Organisation:
All of Peel

May we publish your response?

Yes, you can publish my response in full

Modifications 54 to 79: Chapter 14 - Residential (Housing)

Modification 54 - Do you have any comments on the amendment to section 14.2.

Not Answered

Please explain your answer::

Modification 55 - Do you have any comments on the addition to paragraph 14.3.6, recognising that the Plan may remain beyond the Plan Period.

Support

Please explain your answer::

I support this and it reflects the reality, however the figures do not reflect this. Basically the reduced shock / perceived impact value achieved by referencing the plan period in terms of number of houses etc, is really still preserved in the document, notwithstanding this acknowledgement that the plan period, is really irrelevant.

The effect of the proposed modification ("Cabinet Office looks to plan modestly beyond the end of the Plan Period in 2026") is not accurate nor can it be born out - I am not sure if this is some grave misunderstanding by the Inspector or a nuance from Cabinet Office planning policy officials.

The bottom line is that lands are either allocated or they are not, and if allocated, the only figure that ultimately matters, is the developable housing units, because that is the true potential. Other figures, plan period, and "yield" are irrelevant.

It is correct to acknowledge that the plan if adopted would stay in place until it is replaced.

Modification 56 - Do you have any comments on the amendment to Section 14.4 and Housing Outcome 1a.

Object

Please explain your answer::

It isn't sustainable and there is nothing in the plan re seeking to deliver mix of housing types.

Modification 57 - Do you have any comments on the amend to Table 15 according to the changes proposed to Table 16.

Not Answered

Please explain your answer::

Modification 58 - Do you have any comments on the rewording of paragraph 14.7.1.

Object

Please explain your answer::

Absolutely object to this having reviewed 14.7.1

Specifically the following new additions which are entirely new policy concepts. Stating the below is also a falsehood.

" It is judged that these are sustainable sites which are deliverable within the plan period. In the case of the sites on the edge of Peel and Ramsey, proposals would benefit from the significant employment and leisure opportunities afforded by these larger settlements."

Peel does not have significant employment opportunities, that is part of the point!

It also states:

14.7.2 Together, these sites have the potential to deliver 422 dwellings within the Plan Period.

In terms of affordable housing, it is estimated that these sites could deliver 105 affordable homes under Housing Policy 5.

This is incorrect since, by the other modification, all references to the Plan Period should be removed.

In terms of initial changes to 14.7.1 I would like to know, who made representation to this effect, when and what basis. I cannot believe it has been persuasive.

Modification 59 - Do you have any comments on the amend to paragraph 14.7.2 in accordance with Table 16.

Not Answered

Please explain your answer::

Modification 60 - Do you have any comments on the rewording of paragraph 14.8.2 point v.

Not Answered

Please explain your answer::

Modification 61 - Do you have any comments on the rewording of paragraph 14.8.2 point vi.

Not Answered

Please explain your answer::

Modification 62 - Do you have any comments on the rewording of Residential Proposal 2 to clarify which sites the proposal relates to.

Not Answered

Please explain your answer::

Modification 63 - Do you have any comments on the amended Development Briefs for sites PR002, GMR008, 009, 023, 003 and GMC002.

Object

Please explain your answer::

Consultation Submission from Kate Lord-Brennan MHK (detailed letter to follow).

This objection applies not only to the modifications, which don't go far enough to address concerns, but also to the overall zoning of fields GMR008, GMR009, and GMR023 for residential development, as well as to the proposed district link road.

The draft plan as modified now refers to "sustainable urban extensions" for Peel (page133). The residents of Peel do not support this new concept or expansion. There is no valid basis for the road which was apparent at the public inquiry, given arguments made by Cabinet Office that it would assist residents from Kirk Michael coming into Peel and to Douglas, but the ultimate justification was that a road would "enable more housing". The way this expansion is planned is simply too much, since Peel has had more development than anywhere in the North and West since 1989 by government's own published and available figures, a fact which I stated at the Inquiry. The planning is completely unbalanced and it is not "sustainable" given the lack, for

practical reasons of employment land in the town.

I will be expanding on these arguments / points and others directly and imminently, at a political level as the constituency MHK.

None of this proposed zoning is being done to the benefit of local residents or the town and it is unbalanced overall to expect Peel again to take such a sprawl of further development outside current settlement boundaries and on green fields. It is particularly unjust since proposals have been backed in various ways by Peel Town Commissioners, which was after May 2024 only subtly acknowledged, but recently publicly acknowledged, but they were never directly open with the public about their shared advice, agenda and representation alongside Dandara and landowners. This is not the fault of Cabinet Office, who simply respond to submissions, prior to the rightful Inquiry process, but it has added to the strong feeling of Peel in terms of "why is this happening to Peel, given the infrastructure issues we already have" when the local authority have not transparently owned their position in a timely way and in plain terms .

Government simply should not enable this type of behaviour.

These sites GMR008, GMR009, and GMR023 should be removed from the proposed plan to be adopted. They should not even be kept as any sort of "strategic reserve".

There is also the proximity of the quarry and related explosive storage. The school (QEII) is effectively being penned in. The proposed road by the map finishes right before the allotments - is that so it is palatable in a presentational way?

For ease I am writing detailed comments about the modifications to the written statement that are unacceptable at a political level. In summary though, it is angering that previous constraints, in terms of policy and assessment of impact, have been watered down. Some of this was based on the representation of Dandara. I feel no weight at all has been given to the members of the public, and I include myself in that, who gave their input into the Inquiry.

I had hoped some of issues represented would be addressed / examined through the public Inquiry process, but they have not been.

Cabinet Office need to rethink this, before anything is sent to Council of Ministers, prior to Tynwald, and seek to find that equivalent number of housing units elsewhere and through an All Island Area Plan process. As I have always said, you could even consider establishing a new village / settlement somewhere that would support other small communities and help them be sustainable, rather than adding to the dormitory town effect in Peel.

Detailed points will follow at a political level.

Modification 64 - Do you have any comments on the removal of all references to development density in Development Briefs.

Object

Please explain your answer::

Not clear why removed. I think many were arguing for reduced density. To just removing the reference surely just removes policy specification, and also avoids scrutiny?

Modification 65 - Do you have any comments on the amendment to all Development Briefs for greenfield sites in relation to Biodiversity Net Gain.

Object

Please explain your answer::

Yes it is pointless

Modification 66 - Do you have any comments on the modification of greenfield Development Briefs with the requirement for soil quality survey where development would entail the loss of class 1 or 2 soils.

Neutral

Please explain your answer::

again pointless - you are proposing allocation of massive fields / sites

Modification 67 - Do you have any comments on the amendment of Development Briefs for GMR008, 009, 023, 003 and GMC002.

Object

Please explain your answer::

Response to follow at political level in detail re changes to written statement.

Modification 68 - Do you have any comments on the amendment of Development Brief for RR009 to require consideration for Flood Risk Assessment and of a Sustainable Urban Drainage System.

Not Answered

Please explain your answer::

Modification 69 - Do you have any comments on the proposal of RR006 and RR007 for development and changes to the Development Brief.

Not Answered

Please explain your answer::

Modification 70 - Do you have any comments on the proposal of AR004 for residential use.

Not Answered

Please explain your answer::

Modification 71 - Do you have any comments on the addition of MR007 and MR008 as proposal sites and creation of development briefs in paragraphs 14.10.7 and 14.10.8.

Not Answered

Please explain your answer::

Modification 72 - Do you have any comments on the removal of LR007 and accompanying Development Brief.

Not Answered

Please explain your answer::

Modification 73 - Do you have any comments on the removal of LR040 and accompanying Development Brief.

Not Answered

Please explain your answer::

Modification 74 - Do you have any comments on the addition of LR001 and accompanying Development Brief.

Not Answered

Please explain your answer::

Modification 75 - Do you have any comments on the proposal of GMR006 in addition to GMR001 and changes to Development Brief.

Not Answered

Please explain your answer::

Modification 76 - Do you have any comments on the proposal of PTR004(b) and accompanying Development Brief.

Not Answered

Please explain your answer::

Modification 77 - Do you have any comments on the proposal of site GR021.

Not Answered

Please explain your answer::

Modification 78 - Do you have any comments on the proposal of site GR022.

Not Answered

Please explain your answer::

Modification 79 - Do you have any comments on the amend to Table 16 as set out in the Inspector's Report.

Not Answered

Please explain your answer::