



Isle of Man
Government
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Draft Area Plan for the North and West - Proposed changes explanatory note

COD 8

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1 Introduction

- 1.1 This document seeks to clarify evidence relating to the approach adopted by Cabinet Office in the [Public Inquiry Papers \(PIPs\)](#). The Department believes that there may have been some misinterpretation of the figures published and that it may be helpful to clarify a number of points. This document seeks to provide additional explanation which may benefit the upcoming Inquiry and the public's understanding of the issues.

2 Background

- 2.1 On 22nd March 2024, Cabinet Office announced that a Public Inquiry was to be held into the Draft Area Plan for the North and West. Cabinet Office published a series of PIPs which formed the Department's response to the Draft Plan consultation and updated some of the Draft Plan evidence papers.

3 Clarification of Cabinet Office's evidence and proposed changes

- 3.1 Since the publication of the PIPs, Cabinet Office has become aware that some references relating to data/figures and Cabinet Office's approach, shared publicly, may be incorrect. It appears to Cabinet Office that it may be helpful to address the following points ahead of Inquiry:
- the level of public consultation undertaken by Cabinet Office;
 - issues around densities of development sites;
 - the distinction between gross site size and net developable area; and
 - the site yields for potential development sites on the edge of Peel.
- 3.2 It should be noted that this document supports the PIPs already published on 22nd March 2024 and will be shared with the Inspector and added to the [Cabinet Office Documents List](#) as COD 8.

4 Consultation by Cabinet Office since the start of the process

- 4.1 Cabinet Office has conducted four separate public consultations (receiving 1,384 responses). These being:
- **Call for Sites:** 31 May 2019 – 28 Feb 2020
 - **Preliminary Publicity:** 16 April 2021 - 25 June 2021
 - **Preliminary Publicity - additional sites (supplementary stage):** 24 September 2021 - 10 December 2021
 - **Draft Plan:** 24 June 2022 – 16 September 2022¹.

¹ [Published responses to the Draft Plan consultation](#)

4.2 Cabinet Office understands that the proposed changes to the Draft Plan set out in the PIPs released in March 2024 will be open to discussion at the Inquiry where there are specific objections.

5 Understanding the PIP references to density and net developable area

- 5.1 [Table 7](#) of the Draft Area Plan for the North and West (2022) set out density figures per settlement. In hindsight, Officers realised that reading Table 7 and Built Environment Proposal 3 without the benefit of supporting evidence may have caused some confusion about the origin of the figures. One of Cabinet Office’s proposed changes therefore is to remove Table 7 from the draft plan.
- 5.2 Cabinet Office has also refined the ‘density assumptions’ to reflect the difficulties of developing in conservation areas i.e. lower densities are more likely to be approved.
- 5.3 It is important to note that when calculating site yields, density calculations are applied to the net developable area not the gross site size.
- 5.4 Cabinet Office has recommended in its Proposed Changes to include guidance on density within Development Briefs in order to ensure the most efficient use of development sites.

6 Residential development in Peel

- 6.1 Cabinet Office has proposed additional development sites adjacent to the settlement boundary of Peel (GMR008, GMR009 and GMR023).
- 6.2 Since the publication of the PIPs, there has been feedback to the Department which suggests it would be helpful to explain why it considers additional sites are necessary. The figures below are taken from [PIP 5 – All Sites Table](#)².
- 6.3 The sites have a combined gross site area (Ha.) of 35.8 Ha. The gross site area represents the total physical extent of the site.
- 6.4 When calculating yields, Cabinet Office use the net developable area which takes into account infrastructure such as roads. This reduces the extent of the site for development (see figure 1).

Site Code	Gross Site Size (Ha.)	Net Developable Area (Ha.)
GMR008	15.33	10.73
GMR009	10.64	7.45
GMR023	9.77	7.82
	35.8	26.00

Figure 1: Gross site area of GMR008, GMR009 and GMR023

² A detailed explanation of the assumptions made in PIP 5 can be found in [PIP 7](#)

6.5 The image below left shows the 'gross' site size. On the image to the right, it's clear that the whole site cannot be used for development – this represents the 'net developable area'.

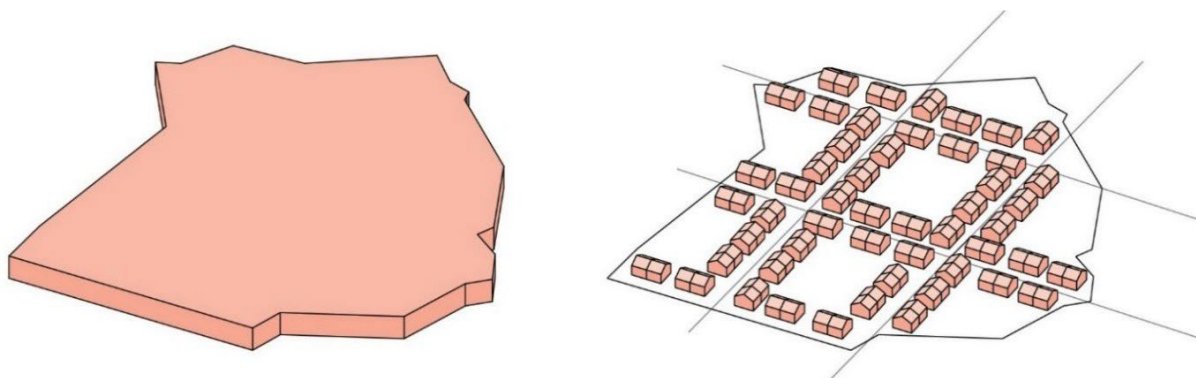


Figure 2: Gross site size (left) and net developable area (right) – for indicative purposes only.

6.6 The area of a site for development is further reduced when taking into account the goal of achieving biodiversity net gain (in the future) and other community and social uses. This simply means being realistic about what a particular site will be able to deliver once built out.

6.7 A density assumption is used to work out the number of developable housing units³. The developable housing units figure represents a scenario where all development proposals come forward.

Site Code	Developable Housing Units
GMR008	225
GMR009	156
GMR023	164
	546

Figure 3: Number of Developable Housing Units of GMR008, GMR009 and GMR023

6.8 [Residential Land Availability Study](#) data shows that not all planning approvals are taken up or fully built out. In recognising this, the likely yield of a valid planning application is an important metric. The likely yield of a valid application is calculated by taking the developable housing units figure and factoring in development probability which assumes that the larger the site, the less likely it is to come forward or be developed fully (see figure 4).

Site Code	Likely Yield of Valid Approval
GMR008	124
GMR009	86
GMR023	90
	300

Figure 4: Likely yield of a valid planning approval on GMR008, GMR009 and GMR023

³ A detailed explanation of the density assumptions can be found in [PIP 7](#)

6.9 The end of the Strategic Plan period is approaching. Therefore, Cabinet Office has *pro-rata* the likely yield of a valid planning approval to determine the yield within the Plan period. This is consistent with [Housing Policy 1](#) and [Housing Policy 3](#)⁴ of the Strategic Plan.

Site Code	Estimated Yield to Plan period (31st March 2026)
GMR008	54 ⁵
GMR009	38
GMR023	39
	131

Figure 5: Likely yield within the Plan period for GMR008, GMR009 and GMR023

⁴ Housing Policy 1 specifies that sufficient opportunities should be made for those units specified in Housing Policy 3 to be *built* over the Plan period.

⁵ (Likely yield of a valid planning application/number of months since beginning of Area Plan for the North and West process) X months remaining in the Plan period
 In the case of GMR008 – (124/48) X 21 = 54



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