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17th April 2024

By Email Only: planning@gov.im

Jennifer Chance

Director of Planning & Building Control
Planning and Building Control Directorate
Department of Environment
Food and Agriculture
First Floor, Murray House
Mount Havelock
Douglas, Isle of Man
IM1 2SF

Dear Ms Chance

Ref: 22/00679/B

Also FAO: Planning Inspector

The Planning Application for Residential Development, Commercial Space, Retail Space and a Public House on Land at Poyll Dooye Fields and Part Fields by Blythe Church Investments Holdings Ltd Planning Application Number 22/00679/B (“the Planning Application”)

1. Thank you for the letter from your department dated 4^h March 2024 and a subsequent letter dated 28th March 2024.
2. We note in the letter dated 4^h March 2024, that the Planning Application was refused by the Planning Committee on the basis that:
 - 2.1. Insufficient survey data and ecological protection measures were suggested to address the impact of development on the the Sulby River Saltmarsh and diverse natural habitat, including Protected Species and Red List plants.
 - 2.2. Unconvincing flood mitigation measures leading to inadequate protection against flooding to the extent that the safety of occupants of the development would not be adequately protected.

- 2.3. Inadequate design and construction details for the proposed Spine Road, which would not be constructed to an adoptable standard, the submitted highway drainage details are inadequate to ensure that post development the Spine Road would be constructed in accordance with the requirements of the Manual for Manx Roads.
3. The Isle of Man Green Party, together with the campaigners for Save Poyll Dooey, and the two thousand, four hundred and seventy two (2472) signees of the 'Prevent Urban Development in Poyll Dooey' petition, are pleased to see that the Planning Application was refused on the basis of the points outlined above.
 4. We, hereby, provide our Statement of Case against the appeal lodged with Planning and Building Control by Blythe Church Investments Limited.
 5. The Isle of Man, as a comprising entity, was designated as a UNESCO Biosphere on 21st March 2016. UNESCO is the United Nations' Scientific, Educational and Cultural Organisation. A 'biosphere' is the scientific word for the living surface of our planet. A UNESCO Biosphere is an international site of excellence; special places for nature where people also live and work, where there is a balanced relationship between people and nature.
 6. Sustainable development, being one of the key aims of the UNESCO Biosphere, refers to how we live in a way that sustains the economy, environment and society. All Biospheres have two things in common: a special environment and a population committed to keeping it that way.
 7. Conservation of our natural and built environment, our culture and heritage, our communities and our special sense of place, is another key aim of the UNESCO Biosphere. Our Biosphere is one of the few places in the world that can offer the variety of cultural experiences, historic environments and natural landscapes, all in close proximity, that make the Isle of Man such a special place to live, work and visit.
 8. Sustainability is simply means meeting the needs of today without compromising our ability to meet the needs of tomorrow. Sustainable development and 'The Man and the Biosphere' (MAB) programme is UNESCO's leading initiative in biodiversity conservation and sustainable development by enhancing the relationship between people and their environments.
 9. Four-fifths of the Isle of Man is managed for agriculture, traditional mixed farms meaning a beautiful landscape of small fields and hedge banks. There is a network of paths and ramblage in the uplands, which provide easy access to explore the wildlife and natural wonders of the IoM, including the Hen harrier.
 10. On the basis that the Isle of Man is a UNESCO Biosphere, that sustainable development is a key aim of UNESCO Biospheres, and that the vast majority of the Isle of Man is managed for agriculture, the site at Poyll Dooey Fields and Part Fields, are vital to the natural landscape, and to the relationship between people and their environments.
 11. Poyll Dooey fields, and likewise, the Nature Reserve and Saltmarsh, are a diverse natural habitat that not only provides vital space for wildlife and Protected Species, but also for people who wish to immerse themselves in the natural landscape that acts as a Green Belt through Ramsey.
 12. There are few natural landscapes and environments which can be accessed from Ramsey Town that are within walking distance along paved roads. Ramsey is surrounded by farmland, often connected with roads which are unsuitable for pedestrians. Poyll Dooey encompasses the last remaining accessible site for the residents and visitors of Ramsey.



13. The Isle of Man Government's Programme for Government, legislation and strategies include:
 - 13.1. Active Travel Strategy 2018-2021
 - 13.2. Draft Children's Weight Management Strategy
 - 13.3. Isle of Man Government Action Plan for Achieving Net Zero Emissions by 2050
 - 13.4. Managing Our Natural Wealth Biodiversity Strategy 2015-2025
 - 13.5. Isle of Man Strategic and Area Plans

14. The development proposed in the Planning Application contravenes all of the items listed in point 13, as per the below sub-points-
 - 14.1. The provision of roads, which are not only unsuitable to be adopted by the Department of Infrastructure, contravenes the Active Travel Strategy by emboldening the ability for individuals to utilise non-active versions of travel.
 - 14.2. Families without gardens, or adequate outdoor space, rely heavily on open spaces which are open to the public, such as Poyll Dooey Fields and Part Fields. Providing natural outdoor venues will support the Draft Children's Weight Management Strategy.
 - 14.3. The development outlined in the Planning Application will see the removal and destruction of vast canopy surface areas of naturally growing trees in the Poyll Dooey Fields and Part Field, together with soil disturbance, and use of immense quantities of concrete and other materials, in contrast to the aims outlined in Isle of Man Government Action Plan for Achieving Net Zero Emissions by 2050, making the targets less likely to be achieved.
 - 14.4. The 'Managing Our Natural Wealth Biodiversity Strategy 2015-2025' (<https://www.gov.im/media/1346374/biodiversity-strategy-2015-final-version.pdf>) (the 'Biodiversity Strategy') clearly sets out the obligations of the strategy. The aims, objectives and strategic actions state that the Isle of Man aims to:
 - 14.4.1. manage biodiversity change to minimise loss,
 - 14.4.2. maintain and where necessary restore or enhance biodiversity and
 - 14.4.3. actively involve society in understanding, appreciating and safeguarding biodiversity.
 - 14.5. Independent investigative studies conducted by Manx Wildlife Trust ([2200679B REP Comment 6.1 Manx Wildlife Trust 13.10.22.pdf](#)) have confirmed that the development proposed in the Planning Application will contravene the Biodiversity Strategy. The development will produce a **net biodiversity loss** which is unacceptable both in real terms and legislative terms.
 - 14.6. The Draft Area Plan for the North and West, (the 'Area Plan') outlined Poyll Dooey Fields and Part Fields as **open space** and have **not** zoned the areas for development. The

Area Plan takes into consideration the value of the site to people living in Ramsey and on the Island. The Area Plan aims to:

- 14.6.1. Build better communities
- 14.6.2. Support health and well-being goals
- 14.6.3. Support a vibrant economy
- 14.6.4. Protect the environment
- 14.6.5. One Vision for the Isle of Man and the delivery of the 'Our Island Plan'

14.7. The development proposed in the Planning Application does not outline the formation of 'better communities' as specified in the Area Plan as the road has been deemed inadequate to be adopted, the reduction in open space will reduce opportunities to support health and well-being goals, and also negate the protection of the environment.

15. In conclusion, it is imperative for the Planning Inspector and all those with decision making power, to consider the points raised in this objection letter. Our collective concerns about environmental preservation, community well-being, and the integrity of our natural habitats cannot be overstated. We urge you all to prioritise sustainable development practices that respect and safeguard our environment for future generations and denounce those like this that do not.

16. We appreciate the consideration of all of the points raised in this letter and the time you have taken to read them.

Yours sincerely

Lamara Craine

Isle of Man Green Party

ISLE OF MAN GREEN PARTY

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cc. (by email only)

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