



Our Ref: MS/SC407

18th July 2024

Public Inquiry Coordinator
On behalf of the Cabinet Office
Central Government Office
Douglas
Isle of Man
IM1 2SF

FAO [REDACTED]

Dear [REDACTED]

Re: North and west Area Plan Public Inquiry – National Infrastructure Strategy (NIS)

Firstly, thank you to your office and the Planning Inspector for letting me speak at the Inquiry on behalf of my Client Baccarat Ltd.

As you are aware our point was that the only high level highways and Infrastructure document that exists for the Isle of Man is the National Infrastructure Strategy. In reading the Cabinet Office (CO) data prior to the Inquiry no consideration appeared to have been given to this document and [REDACTED] representing the CO confirmed same at the opening round table discussion.

The Inspector then correctly asked that [REDACTED] and her Team provide the basis on which the effect traffic generated by development sites has assessed to determine its effect on the Islands highway network. On the basis her reply was that highways only commented on individual site criteria, it seems unlikely this study was carried out. Subsequently, I believe [REDACTED] on Wednesday (17/07 2024) made a statement at the start of the day which confirmed no new or updated study had taken place on the impact the plan for the North & West would have on the Islands highway network. The joint consideration of the north and the west together is a significant step in that it is in fact a consideration of 50% of what would be an All Island Plan, irrespective of its life expectancy, the Plan is of high importance to the scope it must cover. Matters of any kind cannot be perceived as being left for the All Island Plan to address.

This being the case the proposals to the Plan demonstrates a major omission, as significant development in the north and west is likely to have a cumulative effect not only locally around the development sites in question but to the major junctions that surround Douglas via commuter traffic movements. As pointed out, the update of the NIS in July 2018 identified that both Quarter Bridge and Governors Hill roundabouts were (at that time) operating at 85% above their capacity – with that figure in all likelihood now being higher. A significant factor in further diluting capacity of Braddan Bridge and Quarter Bridge is the recent approval of 320 housing units exiting all but directly onto Braddan Bridge when the NIS had previously expected the site to be serviced off Ballafletcher Road.

Geographically allocations in the plan for the North & West will cause more traffic movement through these junctions under stress west and north west of Douglas than the allocations recommended in the Area plan for the East. It therefore follows that for any significant housing numbers to be allocated for immediate development North or West must come with a deliverable program of funded mitigation commitments.

In respect of the A1 from Peel to Douglas which latterly arrives at Union Mills Village, where there exists exits on to the A1 which have through time and changes of use outgrown their safety, and Strang Road offering only restricted access, all Douglas bound traffic arrives at Braddan Bridge and then onto Quarterbridge where capacity is already an issue. As identified in the EAP Process (supported by Highways) a developer funded link road to distribute traffic from the west and north prior to traffic reaching Union Mills could be created. Housing need at that time was the justification not to progress the development which could provide such infrastructure. Not only has this incumbent of need now been surpassed through the lack of sites being brought forward in the plan period, but any significant numbers of housing proposed in the Plan for the West and North is likely to cause unacceptable pressure on junctions already under stress. A link road west of Union Mills incorporating access to the hospital from the north and west linking into the traffic network creates the Douglas "Outer Ring Road", a link which has been in the offing since the relocation of the hospital and the increasing development of this care complex. This the only real mitigation which could support significant development in Peel or any settlement west of Union Mills now appears reliant on the speed in which this mitigation can be provided.

Mitigation of traffic distribution along the A1 Peel to Douglas highway is potentially a major incumbent issue in that in answering the housing demand the impact of commuter traffic generated within the plan proposals are currently without thought to the provision of the necessary infrastructure to serve outside of the immediate local areas. Nothing appears to have been considered in the context of the significant impact on the Islands highway network, particularly the A1 Peel to Douglas commuter route.

We would ask that this letter is put before the Inspector as it is a material consideration.

Yours sincerely




for
Savage & Chadwick Architects
cc Baccarat Ltd