



Ramsey Town Commissioners
Barrantee Rhumsaa

T. P. Whiteway
Town Clerk and Chief Executive
Commissioner for Oaths

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12th November 2021

Your Ref:

Our Ref: WD8/BW/WQ

The Secretary
The Planning Committee
Planning and Building Control Directorate
Department of Environment Food and Agriculture
First Floor Murray House
Mount Havelock
Douglas
IM1 2SF

Dear Madam

PA 21/01169/B Construction of a flood wall, reconstruction of highway and drainage system, West Quay, Ramsey

Ramsey Town Commissioners considered the above application at their public meeting on Monday 8th November 2021, and I am directed to advise that the Commissioners have resolved to **OBJECT** to the proposal which they feel fails to meet policies laid out in the Isle of Man Strategic Plan 2016 (IOMSP), as discussed below: -

Strategic Objectives –IOMSP Chapter 3

The IOMSP lays out a number of strategic objectives: -

3.3 Environment

(a) To support the precautionary principle, which assumes that activity might be damaging unless it can be proved otherwise in respect of development where significant environmental implications are involved.

The proposals present no evidence that the removal of a considerable amount of existing car parking will not have significant damaging implications in terms of additional traffic movements within the town, the ability of the existing road infrastructure to accommodate such, nor the impact of displacement of existing parking to other areas of the town.

(d) To protect the individual character and identity of settlements, and to identify and protect those green spaces in built areas which contribute positively to public amenity

West Quay sits within the Conservation area of Ramsey. The use of materials specified in the proposals do not protect nor enhance the individual character and identity of Ramsey and are not locally sourced.

Town Hall and Library, Parliament Square, Ramsey, Isle of Man. IM8 1RT
Halley yn Valley as Liurlann, Rhumsaa, Ellan Vannin.
VAT Reg. No. GB 000 0631 62

3.4 Economy

(c) To safeguard and provide for the needs of existing and new location-dependent businesses.

As a key service centre Ramsey hosts a wide range retail and service business which meet the needs of the town and of the northern wider catchment area. The retail area of Ramsey (which has recently been regenerated) is thriving and one of the unique selling points identified by the local independent businesses who have chosen to open in Ramsey is the convenience of parking. Similarly feedback from the public is that they choose Ramsey to shop as parking is convenient. Parking is not something which should be kept at 90% capacity as that creates a stressful and inconvenient environment which is not conducive to a pleasant experience in the town centre.

The application as submitted, and the resultant loss of parking, will have a detrimental impact on the needs of existing businesses, customers for which are drawn not only from the town, but also from the wider northern catchment and further afield and who are therefore unlikely to adopt active travel as a means of reaching the town.

3.5 Transport

(a) To develop an integrated transport strategy which balances the growth of car usage with the promotion of more sustainable alternatives such as public transport, cycling and walking.

An integrated transport strategy does not appear to have been developed that balances growth of car usage and active travel.

(c) To encourage development which would result in a more integrated transport network.

The proposals as submitted do not appear to have allowed for any public transport integration.

(g) To safeguard the existing and future efficient operation of the Island's ports for fishing, commercial and leisure use, without compromising environmental objectives.

Ramsey Quayside comprises the last working harbour of its type on the Island, it is widely used by fishing vessels as a home port and for the discharge of catches.

The proposal adversely affects the availability of the quayside to commercial fishing vessels both for discharging catches and for access for maintenance and repair whilst alongside. During the Winter period the proposed recreational buildout is unlikely to be utilised due to the weather conditions and it is taking away access to the fishing fleet.

Strategic Policies – IOMSP Chapter 4

Strategic Policy 2

New development will be located primarily within our existing towns and villages, or, where appropriate, in sustainable urban extensions of these towns and villages.

There are a number of brownfield sites within the town development of which could be hindered by the reduction in parking as most are unable to accommodate parking within the site and rely on the on-street parking. Parking permits for town centre residents in Parliament Street are used on the West Quay, as planning does not differentiate this type of parking, and there is an increase in the number of applications to turn office space into living accommodation within the town centre, the demand for on-street parking is likely to increase.

The proposal incorporates a loss of parking which could detract from investment in brown field sites and renovation and reuse of existing underutilised buildings.

Strategic Policy 3

Proposals for development must ensure that the individual character of our towns and villages is protected or enhanced by:

(a) avoiding coalescence and maintaining adequate physical separation between settlements; and

(b) having regard in the design of new development to the use of local materials and character.

West Quay sits within the Conservation area of Ramsey. The proposed seating area and glass walls features will detract from the character of the existing quayside.

The use of materials specified in the proposals do not protect nor enhance the individual character and identity of Ramsey and are not locally sourced.

Island Spatial Strategy – IOMSP Chapter 5

Spatial Policy 2

Development outside Douglas is concentrated on identified Service Centres of which Ramsey is the most remote holds the largest catchment area.

The application as submitted, and the resultant loss of parking, will have a detrimental impact on the needs of existing businesses, customers for which are drawn not only from the town, but also from the wider northern catchment and further afield and who are therefore unlikely to adopt active travel as a means of reaching the town.

Paragraph 5.10 to the plan refers to continued regeneration of Ramsey, most housing growth for the north is focussed in Ramsey and the growth of employment opportunities focused on the Town Centre. The proposed development, and the associated reduction in available free on-street car parking is considered to be counterproductive to this strategic vision.

IOMSP – General Development Considerations Chapter 6

General Policy 2

Development which is in accordance with the land-use zoning and proposals in the appropriate Area Plan and with other policies of this Strategic Plan will normally be permitted, provided that the development:

(c) does not affect adversely the character of the surrounding landscape or townscape;

Ramsey Quayside comprises the last working harbour of its type on the Island, it is widely used by fishing vessels as a home port and for the discharge of catches. The proposal adversely affects the availability of the quayside to commercial vessels both discharging catches and for access for maintenance and repair whilst alongside. During the Winter period the buildout is unlikely to be utilised due to the weather conditions and it is taking away access.

(g) does not affect adversely the amenity of local residents or the character of the locality;

The proposal adversely impacts on the existing amenity to residents in removing a substantial element of free on street parking.

(h) provides satisfactory amenity standards in itself, including where appropriate safe and convenient access for all highway users, together with adequate parking, servicing and manoeuvring space;

The proposal, and in particular the reduction in parking, results in an unsatisfactory level of amenity for residents, business and visitors to the town with inadequate provision of parking.

(i) does not have an unacceptable effect on road safety or traffic flows on the local highways;

The reduction in parking, and the proposal to redesignate existing long stay parking to short stay, will inevitably result in greater movement of traffic within the town seeking parking. The application fails to address this, in particular a traffic management impact study is needed alongside a detailed parking study.

IOMSP – The Environment Chapter 7

Environment Policy 35

Within Conservation Areas, the Department will permit only development which would preserve or enhance the character or appearance of the Area, and will ensure that the special features contributing to the character and quality are protected against inappropriate development.

The proposed seating area and glass walls features will detract from the character of the existing quayside, which remains a working harbour servicing the needs of both commercial transport and sea fishing fleets.

IOMSP Business and Tourism – Chapter 9

This chapter of the IOMSP concentrates on the land use implications of business activity, including industry, storage and distribution, office and commercial development, retailing and tourism.

Ramsey is recognised as a Service Town, and that it provides employment opportunities, and retail and other services, to the wider northern catchment, and that it is the base of a substantial part of the Island fishing fleet.

The loss of parking resulting from the proposed development is considered to be detrimental to future development and employment opportunities in the town, and will detract from the town's attraction as a retail centre due to the removal of a considerable amount of available convenient parking. The application does not adequately show that this detriment will not occur.

IOMSP - Transport, Infrastructure And Utilities - Chapter 11

Transport Policy 2

The layout of development should, where appropriate, make provision for new bus, pedestrian and cycle routes, including linking into existing systems.

Whilst recognising the desire to increase pedestrian facilities there are already two perfectly adequate pedestrian routes along the quayside being the harbour walkway and the pavement to the south side of West Quay. There is a single recorded collision involving a pedestrian with a vehicle failing to give sufficient space reported in the Stage 1 Road Safety Review, the incident actually involved a person loading a vehicle. This would suggest that the existing pedestrian provision, in the context of the existing road and parking layout, including chevron parking, is safe and does not warrant change on safety grounds. The removal of chevron parking removes the safety for passengers exiting a vehicle safely. Parallel parking requires people opening doors into what will be a narrower live carriageway.

Transport Policy 8:

The Department will require all applications for major development to be accompanied by a Transport Assessment.

Para 11.5.1 of the Strategic Plan states "The level of car parking provided in new development is critical to creating more sustainable development. Too little and the traffic generated can create problems on adjacent streets. The application fails to address the impact of reducing existing parking on the West Quay on parking in other areas of the town, and the impact of additional vehicle movement within the town area as a consequence.

The proposed pavement installation south of the proposed wall is the main cause of narrowing of carriageway removing option for chevron parking. DOI have stated that there they are using the user hierarchy for the street to require pavement to provide for disabled and mobility impaired individuals (being the top of the hierarchy of needs). However, if you are to view Ramsey as a whole (rather than quayside in isolation the hierarchy places the requirements of disabled users as a priority in Parliament St as the town centre and the Western Quayside as a secondary parking area. Also if the pavement is designed to provide a pleasant route alongside the harbour for views a 1.3m concrete wall will be an impediment for most mobility impaired individuals, allowing access to the north of the wall would be more beneficial in this respect.

Whilst there is an increase in the number of charging point for electrical vehicles, not one has been placed in a disabled bay. This will force disabled people to park in the charging spaces where there could be issues in exiting their vehicle and leaving the disabled spaces underutilized.

While a road safety assessment is provided for the application site a Transport Assessment and Equality Impact Assessment have not been provided, this assessment should address issues such as parking and traffic movement throughout the town and the impact of the loss of parking on the Quayside.

The Road safety Assessment also highlights an issue with the length of uninterrupted parking between West and East Street, noting that further crossing points need to be considered which could result in a further reduction in parking.

Transport Policy 13

Development in or around harbours should neither compromise the ability of the harbour to accommodate other commercial or recreational users in a viable manner, nor be detrimental to the character of those harbours of historic interest.

The proposal compromises the ability of the harbour to accommodate commercial vessels and the use of glass walls and seating areas impacts on the character of the existing harbour. Any necessary flood wall installation must have regard to the character to the area best demonstrated using stone in major buildings.

Reference is made to the to the Manual for Manx Roads paragraph 5.3.5 of which states:-

The Department also realises that alternative modes of transport will only be used where journeys are appropriate and real choice is available. With much of the Island being rural in nature, many residents have no other option than to use their own cars; therefore, car parking will remain an important issue. However, with the growth in electric vehicle production and supply, the Department considers that electric vehicle charging points should be built into new developments from the outset.

With much of the Island being rural in nature, many residents have no other option than to use their own cars. Ramsey is the main service centre and retail hub not just for Ramsey residents but the rural north of the island which has a high percentage of elderly individuals, this makes it imperative that the

level of parking is suitable for people who have limited options but driving for their visits to the towns retail centre.

The manual for Manx for Manx Roads also prioritises individuals with reduced mobility. By removing parking vulnerable people will be expected to travel further if they can't get a convenient parking space which in the winter months will have a negative effect on the local businesses. No consideration has been given to people that have a short-term disability and are not able to move great distances following illness or medical procedures and are not entitled to blue badge.

The proposal does not consider the businesses along the quay and the access required. Three properties have garages, yet the scheme has parking allocated directly in front of them

Appendix 7 – Parking Standards

Para A.7.4 states ... *"It is equally essential that there are available sufficient areas of public car parking either in car parks or on street, and that adequate controls are in place for these spaces to be available to those who need them."*

The proposal fails to satisfy this requirement in seeking to dramatically reduce public car parking.

I would be grateful if you could please bring this response to the attention of the Planning Committee when they consider the application.

Kind Regards

A handwritten signature in black ink, appearing to read 'B. Wallace', written in a cursive style.

B. Wallace (Ms)
Technical Services Manager