

Appendix 1

Development briefs: consultation feedback and responses

PART 1: SITE-SPECIFIC ISSUES

SITE: H5 (1): Field J1109, La Grande Route de St. Jean, St John



Key issues identified in the brief:

- Site area: The overall site area is approximately 1.21 hectares (6.71 vergées). Having regard to the specific requirement to provide shared open space on this site, together with considerations related to both its ecological and heritage sensitivity, the developable space on this site is considered to be approximately 0.8 hectares (4.4 vergées).
- Open space: there is an expectation that this site will provide public open space that is accessible to the wider community.

SITE: H5 (1): Field J1109, La Grande Route de St. Jean, St John	
COMMENT	RESPONSE
<p>The reason the very difficult decision was taken to re zone fields for affordable housing is due to the unprecedented housing needs of our community and the pressing need for affordable housing to meet identified needs. The content of the SPG seems to lose sight of this and focus on other matters. A prime example is the statement below from the SPG which displayed the disconnect between islanders needs (as reinforced by our recent community consultation event held on the 14th June 2023) and the content of the SPG : ' Given the requirement to mitigate the impact of the development of J1109 upon the ecological sensitivity of adjacent bat roosts; the setting of the listed building immediately to the north; and the enclosed valley to the west, it is considered that up to one third of the site (0.4 ha) should be provided as some form of open space. The need for open community space is not questioned and something we would want to include within in the scheme whether there was a requirement for it or not. The suggestion of 1/3rd appears to be based on no research within the community and it is additionally disappointing when all other re zoned housing site only suggest 10% of the site is required to be open space. This would be a 200% increase when compared to the other re zoned sites. I can also confirm the Parish Constable who requested open space to be included also believes that 1/3rd of the site is far too much and will be a wasted opportunity.</p> <p>As currently written the SPG seems to make suggestions on what the community desire's and provides evidence to support these suggestions through links to previous government documentation, however they are incorrect. An example of this is 'there was a clear and explicit recognition that its development should contribute to the provision of green open space of benefit to the wider community of Sion Village (see P.36-2021 Amd (91))' an extract of this exact reference is below, there is no mention of 'Green' open space. The document is clear and explicit in the requirement of 'Public Open Space'. This gives a sense of obfuscation to the SPG that is inherent throughout. Public open space and Green open space are two very different things with different values and end users. It's important to remember that this site was voted to be re zoned for affordable housing to bolster the already failing targets to meet the needs for housing in the island. This target is sliding further and further from the requirements set in the Island plan, with multiple housing developments either no longer happening or hugely delayed.</p> <p>The original target for J1109 was 42 , which is achievable on a site of this size and still provide a fantastic area for open community space. However, the current target in the SPG being 28 - 36 has been reduced significantly. The adverse effects of this are not mentioned and seem to be completely ignored. There is no clarity on what this open space will be, how it will be managed, who will maintain it, who will pay to maintain it or research to show the benefit this size of area will bring. Please note, there is already a waiting list at the St Johns Parish hall of over of 200 people looking for affordable</p>	<p>Purpose of rezoning and development briefs (points 3, 5, 7, 9 and 10)</p> <p>This site was a field, where there was a presumption against its development, until it was rezoned by the States to provide affordable homes, as part of the island plan review. The purpose of this guidance is to give effect to that decision and to identify the planning issues that developers should address as part of the development of any scheme and associated planning application.</p> <p>Whilst the delivery of affordable homes is the principal purpose of this policy and guidance there are other material factors that have to be considered, by law, as part of the determination of any planning application.</p> <p>The purpose of development briefs is to provide greater certainty about those issues that are required to be considered. Failure to have regard to the guidance, and the other material factors highlighted in it, poses greater risk that planning permission may not be secured.</p> <p>Engagement (points 4, 6, 8 and 11)</p> <p>The process of consultation on the draft briefs provides owners, prospective applicants/developers, and the local community, to help shape the guidance and ultimately, the development that is delivered.</p> <p>It is a matter for the developer whether and how they choose to engage in this process. No supporting evidence (on bat data or ecological assessment) has been provided as part of any representation. This will remain to be assessed at the planning application stage.</p> <p>The Minister will have regard to all of the comments made, from all with an interest in the site, in consideration of the revised guidance.</p> <p>Detail: open space and buffer zones provision (points 1 and 2)</p> <p>The guidance states that up to one third of the site should be provided to deal with the specific challenges and constraints of the site related to the need to (1) provide a larger area of public open space (above the 10% normally required); (2) mitigate the impact of the development upon the setting of the adjacent listed building; and (3) mitigate the impact of the development upon the adjacent bat roost of the rare Grey long-eared bat.</p> <p>The development brief does not set a definitive minimum requirement in terms</p>

housing within the Parish. The Parish Constable, Andy Jehan The Parish Committee Rural and the overarching Parish Community all agree that for one third of this site to be restricted to open space would be a disaster and a completely wasted opportunity to provide desperately needed family homes.

This is once again further compounded by the statement 'Separate provision also needs to be made for children's play space' further attempting to reduce the space onsite for family homes. We would suggest at a maximum 15% of the site is given for open space and this space is free to be used by the wider community as well as the residents of the development. This is a researched based number, supported politically, by the community and works in the context of actually making the site viable.

There are other areas of the document that add further confusion, and as a consequence lack credibility. For example: 'the existing low-granite wall should be salvaged and re-instated to form the new site boundary' to be followed a few lines later by 'appropriate root protection measures in place to minimise the disruption caused to this boundary by the requirements for site access'. If the roadside granite wall is removed for the granite to be salvaged and re used, the trees will not survive due to their proximity. We have liaised with Tree surgeons and landscape professionals to confirm this.

The document uses the nearby Bat roost as a reason to support the notion of 1/3rd of the site to be open space together with installing an unfounded 20 meter buffer zone on two portions of the site rendering them useless in terms of providing any housing. The buffer zone suggested along northern boundary of the site was always anticipated, albeit is hugely excessive. Research undertaken and reported in the 'Bat Conservation 2021 edition; Global Evidence for the Effects of Intervention' clearly shows that even where development takes place on a property where Bats are roosting, this rarely effects the roost numbers and in some cases, numbers of bats increased 'One before-and-after study in Ireland found similar numbers of long-eared bats roosting within an attic after existing access points were retained during renovations. One replicated, before-and-after study in the UK found that four of nine bat roosts retained within developments were used as maternity colonies, in two cases by similar or greater numbers of bats after development had taken place' In the same report 'A replicated, before-and-after study in 2011–2015 of nine bat maternity roosts retained within building developments across Scotland...two of the roosts were used by greater or similar numbers of bats'.

The SPG seems to be making some subjective suggestions that will impede and the ability for this project to deliver the family homes that are needed and were the purposes for the rezoning. The roof of the neighbouring church was developed into housing as well as adding units of accommodation to the rear of the property, all with external lighting and the Bat roost remains insitu and used by the Colony. To substantiate our position we have engaged Nurture Ecology who are in the process of undertaking bat activity surveys (transect and static surveys) of the site, spanning a 12 month period. (pipistrelle and long-eared species) emerging from the adjacent Sion Church roost confirming the previous, much more intrusive and destructive building work (in the building which contains the roost)

of the space to be provided but, instead, set out an indication of the potential scale of this facility. What is most important is that the facility is well-designed and integral to the development of the site and the wider Sion Village.

The extent, form and design of open space should be the subject of engagement and consultation with community stakeholders as part of pre-application discussion required under the auspices of Policy GD2 – Community participation in large-scale development proposals.

The undertaking of bat surveys is noted and welcomed. No evidence has yet to be provided, however, in terms of bat survey data, which might reduce the level of mitigation (in the form of buffers and corridors) required. The guidance will, however, remain flexible such that the extent of area might be reduced where evidence supports its potential reduction.

In addition, further clarification has been made to indicate that there may be potential to incorporate the required children's play space; together with the public open space within the area required for the buffers/corridors, where it is located such that its impact is reduced and where it is designed to be sympathetic to wildlife.

Change

- Make clear that the guidance remains flexible and that variation to the level of mitigation required will be considered where it can be justified in relation to the provision of supporting information related to bat movement and the use of the site and surrounding areas.

Detail: Grey long-eared bats (points 2 and 6).

It is acknowledged that there is limited research data available on GLEB in Jersey, a situation that is in part being addressed through various research initiatives. In this situation it is, therefore, imperative that there is sufficient data provided in relation to this species and the impacts of proposed development of this site upon it as part of the planning process. Any such data should seek to demonstrate and evidence how the bats in this locality are using the landscape and its features.

Whilst noting the published evidence cited, none of it relates to the GLEB or the situation involved in the development of this site where the key concern is the impact of development on the commuting and foraging needs of the nearby maternity colony that could be impacted by the development of J1109.

GoJ is willing and able to consider this data as soon as it is available and can be

has not affected the roost.

It is our intention to create a significant, densely planted dark corridor for bats along the northern boundary that would splay off at the rear of the church where the bats head north into darkness as they do not fly over the houses already built at the back of the church. The western boundary will be subject to dense planting. It is not feasible or proportionate to create a 20m buffer along the western boundary in addition to the north, as opportunities for commuting and foraging bats exist along the other site of this boundary within adjacent field J1109A, which has not been re-zoned for development and provides dark habitat for foraging long-eared bats (and other species). The above will be included within the IEA we have procured. We would seriously question any suggestion that a 20m buffer to the North and west boundary be necessary, given our own understanding resulting from on-site research. A 10 meter buffer to the North significant, densely planted dark corridor including low level / mitigated lighting is a professionally recognised balanced solution. The western boundary would simply need significant and dense planting with surrounding areas and field providing more than enough foraging opportunities.

The drainage situation needs to be made a priority and at the time of writing we have not been able to get the Drainage impact assessment from IHE however we have made a FOI request for the information. It is understood local upgrades will allow this site to be developed sooner and this needs to be made a priority instead of leaving opened end with no public target date in site. This will allow us to time construction with completion of the upgrade works so both are ready at the same time.

CONCLUSION In bullet points for ease;

1. Open space at 1/3rd is neither desired or practical, we would suggest 15%. This is backed by the Parish Constable and wider community.
2. Buffer zones are excessive and based on no factual research. These need consideration and the eastern buffer zone should be removed. This will deem the site undeliverable by any entity.
3. The purpose of re zoning the fields was to help with the failing affordable housing numbers available to islanders. Currently it seems the SPG has lost sight of the reason for re zoning and favoured other means. This needs to change.
4. Open engagement with us and stakeholders is a necessity to ensure the scheme is viable and can be delivered asap.
5. The outstanding information needs to be made a priority by all of government and the States Assembly as the promise to make housing a no.1 priority clearly hasn't happened and the brief as written is further evidence of this.
6. Work with us, not against us to use the live data we have on the Bat roost and other ecological assessments that we have already undertaken.
7. Work with us to help create a document that isn't contradictory or more complicated than it needs

provided: none has been forthcoming to date.

GOJ is happy to engage with any applicant and their agents from the earliest stages of a development proposal and the assessment of its impact, to achieve the best and most appropriate outcomes.

Detail: treatment of eastern boundary.

The apparent confusion over the treatment of the eastern boundary is noted. It is not contradictory, and really quite straightforward: the existing hedgerow and boundary wall should be retained as far as possible. Changes will, however, need to be made to enable some of the highway requirements. This will, inevitably result in the loss of some of the existing wall and some of the trees. The trees and walls that remain, should be protected from any further damage from development, by appropriate protection during works. That section of wall required to be removed should be salvaged and used to create any re-aligned section of boundary wall, to be accompanied by new tree planting.

Change

- Clarify treatment of eastern boundary.

<p>to be to aid delivery at the speed required.</p> <p>8. Whilst these sites are not solely about volume of units, the current brief falls far short of the expectation of the community, which is evident from our public engagement evening held on the 14th June 2023 and the feedback received. For clarity this event was also attended by Constable Andy Jehan, Deputy Hilary Jeune, Deputy Andy Howell &amp; Deputy Elaine Miller.</p> <p>9. The longer it takes for the government to prepare a practical brief that allows us as developers to bring forward a planning application, the higher construction costs will be and ultimately make the entire housing market continue to suffer. We must increase supply as an absolute priority.</p> <p>10. We have two housing providers who want to engage with us to secure all the units for their current waitlists. Both providers indisputably want to purchase the scheme we have drawn that shows 40 homes and 15% open public space.</p> <p>11. We employ you to factor in our comments or risk make this site undeliverable for any entity, be it a government lead body or private developer.</p>	
<p>This submission is made [REDACTED] in response to the publication of the Development Briefs for the Affordable Housing sites identified in Policy H5 of the Island Plan.</p> <p>Initially, it must be identified that it has taken 416 days (nearly 60 weeks), since the adoption of the Island Plan to issue this document. The H5 sites are required to be delivered in accordance with guidance to be issued by the Minister and this has taken such a long time to be issued (even in a draft form) that the H5 sites are now highly unlikely to yield any completions in the current Island Plan period (to the end of 2025). This timetable should be viewed in the context of the Minister for Housing and Communities identifying that the Island has a "housing crisis".</p> <p>Indeed, within the introductory text to the Island Plan (page 9) the Minister for the Environment recognises this issue and there is a quote from an Environment, Housing and Infrastructure Scrutiny Panel (September 2020) where the Minister states: "we are in a serious, serious problem about housing issues. I think that is probably one of the biggest areas the probably the majority of States Members are really focusing on in the new plan".</p> <p>It should also be viewed in the context of the Development Briefs for all H5 sites being aggregated into a single draft SPG. This means that the Minister will need to be satisfied that all issues, for all sites, are suitably resolved before the document is adopted. This will hinder the progression of sites which do not have outstanding issues.</p> <p>It should also be noted that the consultation for the development briefs has not included any direct engagement out in the community. The Island Plan itself contains Policy GD2, requiring community participation in large scale projects, and that the Minister will publish guidance as to his expectations of such a process. It is questionable whether the present consultation process would comply with such Guidance (whenever it might be forthcoming).</p>	<p>Process: timescale</p> <p>The Minister's focus has been on developing guidance to support the relentless focus on housing. New and revised guidance has been issued on density; residential parking; and residential space standards, together with design guidance for new homes in the countryside and the built-up area; and the management of large homes.</p> <p>This suite of new and revised guidance will help ensure the delivery of more and better homes and places to live for islanders, as well as informing the development of new homes on rezoned sites. It was important that this guidance was developed in advance of the development of rezoned sites.</p> <p>Draft development briefs for 15 housing sites have been issued together in the interest of efficiency. It remains within the Minister's gift to publish revised guidance in response to consultation together, or separately, to best enable the progression of sites.</p> <p>Process: community consultation</p> <p>The advent of issuing drafts for consultation is indicative that consultation will precede the adoption of revised guidance.</p> <p>It is a fundamental misunderstanding of Policy GD2 to suggest that consultation on the draft development briefs is required to align with the processes expected under the auspices of this policy. It is evident that Policy GD2 requires consultation with the local community on the details of proposed schemes, not</p>

It is essential that the context of the H5 sites is also understood. The Island Plan sets out a housing development target for the plan period (2021 to the end of 2025) of 4000 new homes. The (former) Minister did promote a number of H5 sites that were not accepted by the Assembly, but what we are left with is a Plan that makes site-specific provision for about 460 new homes (all on the rezoned sites), which is just 12% of the required target.

The balance of the necessary supply is anticipated to be met by windfall sites which are not designated in the Island Plan and appear to be extrapolated from data in relation to previous delivery rates. We know, from the Assessment of Housing Supply Methodology submitted to the Island Plan Examination, that over the period 2011-21 this delivery averaged just 369 units per annum. We also know, from the same source, that the most recent years were just 331 units and 321 units. Despite a whole chapter in the Island Plan in relation to "Performance and Delivery" no data on housing land supply has been published since the Examination in Public in November 2021.

The development target of 4000 new homes by the end of 2025 requires 800 new homes per year, and recent windfall rates (which the Island Plan strategy relies on) are less than half of this.

The Assessment of Housing Supply Methodology notes that permission is in place for various sites, and includes the Revere and Stafford site, where 106 units have actually been removed from the supply. It also identifies a further list of potential Government sources, being: • South Hill – 150 units • The Limes – 125 units • Westaway Court – 75 units • Ambulance Station – 75 units • Le Bas Centre – 100 units • La Motte Street offices – 100 units • St Saviours Hospital – 150 units.

Of this list, just one is likely to be delivered in the current plan period (The Limes). None of the others are capable of delivered ahead of the end of 2025. South Hill has been refused twice at Planning Committee, Westaway Court previously provided accommodation for health staff, and has been refurbished for the same use. Permission has lapsed on the Ambulance Station site and no planning applications are being progressed for any others. It should also be noted that the Jersey Gas Site also had outline permission for residential development, but this has also lapsed and the site is likely to be used as a school.

Housing supply is (in policy terms) apparently a priority issue, impacting on the wellbeing of people who cannot find (or afford) suitable accommodation, and it will also impact on the economy of the island as staff (including Civil Servants) cannot be attracted and retained. In practice – as recorded above – the evidence suggests that it is not a priority at all.

After this 'scene setting' it is hugely disappointing that the developable area of J1109 is reduced from 1.21 ha in the Island Plan, to just 0.8 hectares in the Development Brief. The indicative capacity has gone from 42 to 28 homes. This was the third-largest of all the H5 sites and has now had a third of its capacity (14 homes) removed. This removed capacity in lieu of the provision of open space which is not a requirement of adopted Policy H5. It is a clear protocol that SPG (the Development Brief) has to be 'supplementary' to the primary Island Plan policies. This was clearly stated by the Minister in the recent

on the establishment of planning parameters for the development of sites.

The issuing of guidance, to support the interpretation and use of Policy GD2, is being programmed relative to other Ministerial work priorities.

Process: performance framework

The absence of the publication of regular housing performance data is acknowledged. This is largely due to the failings of the current IT system operated by I&E (Regulation), as identified in the Review of Planning Services (2023), where data for planning permission and building bye-law completions is held. The Minister's Action Plan commits to the delivery of a robust IT system, to support, amongst other things, better performance monitoring.

Process: housing supply

Policy H5, and this guidance, is specifically focused on the delivery of affordable homes: other issues cited concern overall housing supply and other land within public control which, whilst relevant to the matter of housing in general, are not material to this guidance.

Detail: amount of open space

The draft guidance makes clear that at least 10% of the site should be provided as shared open space, which is consistent with all other rezoned sites.

The development brief does not set a definitive minimum requirement in terms of the space to be provided but, instead, set out an indication of the potential scale of this facility. What is most important is that the facility is well-designed and integral to the development of the site and the wider Sion Village.

The extent, form and design of open space should be the subject of engagement and consultation with community stakeholders as part of pre-application discussion required under the auspices of Policy GD2 – Community participation in large-scale development proposals.

The provision of shared open space should not, however, be conflated with the need to mitigate the impact of development upon the setting of Sion Chapel and the proximity of a known bat roost. These are separate issues which need to be addressed in any event. There may be opportunity, however, to deliver an integrated solution if the open space is located and designed in manner that reduces its impact on wildlife and is wildlife-friendly.

Detail: future management of communal spaces

The issue of future management and maintenance of communal spaces and

<p>debate in relation to P.114/2022, yet there is no requirement in H5, nor any other policy, for J1109 to somehow be 'special' and be treated differently to all the other sites in relation to open space requirements.</p> <p>It has been identified that the one-third requirement emerged from the original promotion of this site for affordable housing, however, this has not been evidenced anywhere. Amendment 91 to P.36/2021 is referenced in the draft Development Brief, but this does not seem to include such a specific quantum as a commitment. It simply asks that provision is to be made for public open space, and identifies a yield of 42 homes. It would be disingenuous to now require the open space instead of the houses, when this was not the original position, and is not set out in H5.</p> <p>It is also quite apparent from our own public consultation exercise, exhibition and direct engagement, that the community are more concerned with the quality of open space, rather than the quantum. Already in Sion there is an 'awkward' area remaining from the Field 1078 development, comprising about 1000 sqm plus 9 car parking spaces, which is supposed to be community open space, but is left as rough grass. This is a prime example of how it is the use and management of a space – not its area – which benefits the community.</p> <p>It is the submission of the landowner that having designed these H5 sites there is a responsibility (as articulated in the Island Plan) to ensure optimum density. It is therefore imperative that a balanced approach is to be taken, focused primarily on the very reasons that the site is designed under Policy H5.</p> <p>We request that the open space requirement for J1109 be reduced to 15%, to include a mechanism for future management. It is also requested that the briefs be adopted individually, so that those sites which are least constrained can be progressed, and help meet pressing housing needs, as required by the Island Pan.</p>	<p>services is noted. The Minister will consider change to the draft guidance to specifically identify the need to establish appropriate mechanisms for future management and maintenance, where residents have a say.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Add reference to the guidance to require the use of planning obligation agreements to ensure the long-term management and maintenance of all communal aspects of developments, over which residents have a say.</li> </ul>
<p>Members of the Comité Rurale have had significant feedback from the community in Sion, and in turn have actively engaged with the developers who have acquired the site. The draft SPG should be amended to reflect the following points;</p> <p>The re-zoning of a prime agricultural field should seek to maximise the density of units, the draft SPG's proposed wildlife boundary buffers on north and western boundaries would dramatically reduce that density. The bats' habitual flight paths have been mapped and only cover a small section of the northern edge of the site, the SPG should be amended to match.</p> <p>Provision of a community open space on the north eastern corner of the site that is available to all residents of Sion, not just those living in J1109, as part of the planning obligation agreement. The community open space would also provide the necessary boundary buffer for bat flight paths.</p> <p>Ownership of this open space to be transferred to the Parish at completion of the development as part of the planning obligation agreement, which would then ensure long term access for all residents, as</p>	<p>Biodiversity/ buffer strips</p> <p>The draft guidance is based on sound ecological advice.</p> <p>The undertaking of bat surveys is noted and welcomed. No evidence has yet to be provided, however, in terms of bat survey data, which might reduce the level of mitigation (in the form of buffers and corridors) required. The guidance will, however, remain flexible such that the extent of area within the site might be reduced where evidence supports its potential reduction.</p> <p>The provision of 'buffer strips' outwith the boundaries of the site may help to mitigate the impact of development, and potentially reduce the scope of any buffer required to be provided within J1109. Any planning application would, however, need to demonstrate that the applicant can control and deliver any such provision outwith the boundary of the site</p>

<p>well as maintenance and insurance for any installed amenities or play facilities.</p> <p>If still considered necessary then the provision of environmental gains on other land (i.e. strips within lower grade agricultural fields) would be preferable so as to maximise the re-zoned field's unit density, reducing the need to re-zone other land in the future.</p> <p>The existing roadside wall, hedging and trees should be retained as far as possible and there is no justification for removing the existing hedge entirely to create a new pavement on the eastern edge of the site that does not lead anywhere or join any other pavement.</p> <p>All feedback supports a pedestrian crossing across the main road, and if the crossing was located towards the north eastern corner of the site, adjacent to the existing bus layby, this would minimise the need to remove existing trees, hedging &amp; wall.</p> <p>The location of the crossing needs to be part of a wider road safety review and plan to cover cyclists as well as pedestrians, given that field T1404 (Page 74) is also part of Sion Village and will also increase vehicle, cycle and pedestrian traffic. These two sites should be considered together because they will form part of an enlarged Sion community, as described in P9 'creating good places to live', which implies consideration must be given to the wider setting where new developments would impact the community already living there.</p> <p>Re-zoning of prime agricultural land for development should be undertaken in as sustainable a way as possible, to prioritise sustainability and limit environmental impact. To achieve this; the unit designs should be to energy efficient "passivhaus" standard, designed from outset for future installation on roofs for JEC placed solar panels, rain water harvesting including for toilets, topsoil that is removed during construction to be retained and returned to the gardens rather than the usual rubble/ second grade soil left after construction.</p> <p>The designs so far have been described as uninspiring and substandard, the visual and aesthetic aspects need to be improved.</p>	<p>Further clarification has been made to indicate that there may be potential to incorporate the required children's play space; together with the public open space within the area required for the buffers/corridors, where it is located such that its impact is reduced and where it is designed to be sympathetic to wildlife.</p> <p>Shared open space</p> <p>The draft guidance already makes clear the need to provide shared open space, to be provided for the benefit of the wider community; and that this is best provided along the northern part of the site.</p> <p>Future management and maintenance</p> <p>The need to ensure future management and maintenance of any shared open space is noted. The potential for this to be secured by its transfer to the Parish of St John is also noted.</p> <p>The Minister will consider change to the guidance to make explicit reference to the requirement for this issue to be addressed on all rezoned sites.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Add reference to the guidance to require the use of planning obligation agreements to ensure the long-term management and maintenance of all communal aspects of developments, over which residents have a say. This might include the transfer of all or parts of shared spaces to parochial authorities.</li> </ul> <p>Eastern pavement</p> <p>There is a requirement to provide a footpath on the eastern edge of the site, to provide all residents with safe access to/from the site, and specifically to the bus stop to the north; and the location of a pedestrian crossing.</p> <p>The draft guidance states that this should be provided within the existing hedgeline in order that the existing hedgeline should be retained as far as possible.</p> <p>Wider highway improvements</p> <p>The delivery of highway improvements, required as a consequence of the development and managed by the use of POAs, will be co-ordinated by I&amp;E (Regulation), working with I&amp;E (Transport and Operations), through the assessment of respective planning applications, to deliver comprehensive improvement.</p> <p>Sustainable forms of development</p>
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	<p>The development of homes on this site will be required to outperform the target energy rate by 20% in order to satisfy Policy ME1 of the bridging Island Plan.</p> <p>Other Island Plan policies require development to address issues of minimising water use, waste reduction and the use of sustainable drainage systems. The guidance will be revised to ensure that these policy references are made explicit.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Add explicit policy references to island plan policy requirements to deliver sustainable forms of housing.</li> </ul>
<p>I write in support of the Comite Rurale comments. The Parish of St John has a background of working through Island Plan debates, consulting with Parishioners, and looking for Solutions.</p> <p>We have tried our hardest to work with Planning and following their advice, so to read that our Amendment was in the wrong place was very strange.</p> <p>In terms of Affordable Housing we supported the Rezoning of J1109 on the provision of having some Community space for all to use. I endorse the comments of the Comite Rurale that the space should be in the North East corner rather than long corridors on the North and West.</p> <p>In supporting the Affordable homes for first time buyers we did so on the basis that we wanted to look at opportunities for more senior members of our Community to move into appropriate properties (right Size)</p> <p>In taking the holistic view, supporting Affordable at Sion and Right Size in the Village area, we are NOT supportive of 3 bed homes in settings that we don't believe support such developments.</p> <p>I hope that the Ministers will work with us to find workable solutions that could actually realise even more units than proposed. We understand about the need for purchase and rental and this is why we have proposed selling some units and using the funds from the sale to purchase equity in existing family housing stock, therefore bringing it back into the "affordable" category. This is what was included in my amendment, is included in Hansard and importantly what members supported and voted on.</p> <p>The Parish of St John's Housing Association is registered with the Royal Court and the Board acts as such in its decision making process. Funds are managed by the Association and our remit is to provide housing and look to increase that supply in the Parish of St John. We support the use of the Gateway mechanism for those nominated for purchasing first time affordable homes and we use a points basis to allocate our Social rental properties.</p> <p>I look forward to working with Ministers and Officers to find solutions that work for both the Parish and the Island.</p>	<p>Process: rezoning for affordable homes</p> <p>The Minister for the Environment proposed the 91<sup>st</sup> <a href="#">amendment</a> to the draft bridging Island Plan to, amongst other things, add J1109 to the list of sites to be zoned for affordable homes, under Policy H5. States Members voted to approve this amendment. The site is in 'the right place' to enable the delivery of affordable homes.</p> <p>Shared open space</p> <p>The draft guidance already makes clear the need to provide shared open space, to be provided for the benefit of the wider community; and that this is best provided along the northern part of the site.</p> <p>Mix of homes</p> <p>The guidance states that this site might be best developed to provide predominantly 3- and 4-bed family homes, together with a limited number of smaller homes, providing a mix of social-rented (45%) and affordable homes for purchase (55%).</p> <p>Policy H5 provides some flexibility and enables the Minister for Housing and Communities to consider proposals from applicants for alternative types of homes or an alternative tenure split, on the basis of any reasoned justification. The Minister would be pleased to engage with the Parish of St John about any such proposal.</p>

<p>The brief focusses heavily upon biodiversity, listed building setting and public open space, to the detriment of the site's ability to achieve the affordable for homes for which the site was designated. An extensive biodiversity survey is requested along with a Heritage Impact Statement and archaeological assessment.</p> <p>Whilst all these issues are generally understood, the extent of the requirements listed is unduly onerous particularly given the size of the site. These additional requirements and constraints significantly reduce the number of homes that can be created – from 42 to 28 at 35 dph.</p> <p>We would ask whether the size and shape of the useable areas of the site have been drawn and calculated, prior to the publication of this draft, so as to fully appreciate the impact of these additional requirements and constraints.</p> <p>The use of the site predominantly for family housing is accepted, but the SPG is relatively vague regarding the mix of unit sizes.</p> <p>There appears to be an understandable desire to mitigate the visual impact of the development from the road from where the site is most often seen, yet the highways requirements involve a central refuge and extensive visibility splays, which together will necessitate the redesign of the road edge to the site, and the loss of large amounts of existing vegetation, and habitats. Given the significant financial contribution required for traffic calming, the details of this should be made available for the developer who will fund it, so that it can be incorporated into the planning application, and we would hope that with this calming, the need for substantial alterations to the road edge including the loss of planting, could be reduced.</p> <p>Equally, with a bus subsidy contribution of £85,500, and a stated desire to achieve higher densities, car and cycle parking requirements should be relaxed.</p> <p>Like many other sites, the timing and cost of developing this site will be dictated by the need to update the drainage system, the costs and dates of which are not yet set.</p>	<p>Purpose of rezoning and development briefs</p> <p>This site was a field, where there was a presumption against its development, until it was rezoned by the States to provide affordable homes, as part of the island plan review. The purpose of this guidance is to give effect to that decision and to identify the planning issues that developers should address as part of the development of any scheme and associated planning application.</p> <p>Whilst the delivery of affordable homes is the principal purpose of this policy and guidance there are other material factors that have to be considered, by law, as part of the determination of any planning application.</p> <p>The purpose of development briefs is to provide greater certainty about those issues that are required to be considered. Failure to have regard to the guidance, and the other material factors highlighted in it, poses greater risk that planning permission may not be secured.</p> <p>Mix of units</p> <p>The guidance is not prescriptive in its mixture of unit sizes other than to highlight that it should provide a mixture of homes, including smaller homes, to accord with Polich H4 of the island plan..</p> <p>Highway improvements</p> <p>As stated above, the purpose of the development brief is to highlight the planning issues that need to be considered by the developer. The detail of these issues, such as the provision of facilities for pedestrians and traffic-calming, should be discussed with I&amp;E (Transport and Operations) in advance of any planning application being made.</p> <p>The Minister for the Environment has published revised <a href="#">parking standards</a> which are material to the development of this site. Car parking standards are reduced, when compared with existing and proposed draft standards: whilst standards have been introduced for cycle parking, these have also been reduced from those originally proposed. This should assist with the delivery of a more efficient form of development of this site, whilst still necessitating and justifying the contribution to the enhancement of the local bus service.</p> <p>Drainage timeline</p> <p>The programmed dates for the progression of the provision of the requisite drainage infrastructure is set out in the guidance.</p>
<p>This field is prime agricultural land and with sustainability at the forefront should never have been put</p>	<p>Process</p>

up for redevelopment. The housing problem will not go away and will carry on needing more and more fields. At some point there has to be a time that we say no more! We are meant to be becoming more self sufficient and sustainable as an island but instead the government is hell bent on ignoring the once important green field rule which was put in place to safe guard the agricultural heart of the island. This is just complete laziness and lack of foresight. When the whole of Jersey has been ruined by concreting over our fields our children won't want to stay here anyway and the problem will be solved! Enough is enough a large field is being desecrated for 36 houses hardly a solution to the housing problem but still mega houses for one family are being able to be developed on public areas for example at Greve de Lecq and Bouley bay these areas had been changed already and could have been redeveloped with imagination, homes terraced and integrated into the environment with coastal planting schemes to soften and blend into the environment going back up the hill providing the much needed homes.

As we don't have any say in the rape of our beautiful island our thoughts ( for what it's worth not that we will be listened too) on the proposed plan is as follows:

Loss of long view and our privacy:

We are [REDACTED] of the proposed development the grade 3 listed building Sion Lodge (JN0074) although mentioned as more distant our direct long view is of the Chapel which we love and enjoy very much and may historically have had a connection with the chapel. It is mentioned that other long views of the housing estate are assessed and have been kept as low impact as possible, to loose this view will impact our property immensely. We also note that two houses on the proposed plan closest to our property are orientated to face directly into our private area completely taking away our privacy. We would be grateful if the numbers of houses drop further that these would be considered as the potential ones to be taken out, another solution would be to orientate the houses to lie parallel to the main road mirroring the terrace of properties opposite the chapel, this would keep our privacy and possibly retain a partial view of the chapel.

Southern hedge line

The agricultural fields south of this hedge line really benefit from the wind break that this makes I hope that the hedge will be left in tact and that it is further filled out and thickened.

The hedge line along the main road to the east is also an important wind break for the poly tunnels at Bonny's Garden Centre. We are on the top of the ridge and get very high winds the hedges are important and this hedge in particular is at risk of being taken out to provide the line of sight needed for the development. Replanting young trees will not be much help against the wind for a number of years.

Proposed public space:

Would it not be more beneficial for the proposed public space to be located against the Southern hedge directly next to our field J1110? This would encourage the bats to set up a feeding route onto a huge area of organically farmed fields and potential hunting ground (if they don't already do this). Our

The decision to rezone this site for the development of affordable homes has been made by the States Assembly when it approved the bridging Island Plan in March 2022.

The process of reviewing the plan was an open and transparent one, affording islanders opportunity to be engaged in shaping the new plan.

The supplementary planning guidance cannot change the island plan but seeks to give effect to it.

It's publication, in draft, affords opportunity for change of the details contained within it.

Details: long view

The impact of development on private views is not a material planning factor.

As stated in the draft guidance, the impact of development on the setting of listed buildings is material factor which should be considered and assessed as part of the planning application process.

Details: privacy

Whilst not directly adjacent to the boundary, the impact of the development upon the residential amenity of private open space is noted, and the guidance will be amended to reference this.

Change

- Add reference to the guidance to highlight the need to consider the impact of development upon private amenity space.

Details: southern hedge line

The function of the southern hedge line, where it exists, is noted. The draft guidance states that the south-western boundary should be strengthened (where there is no or limited planting). There is no reference to the remaining part of the southern boundary. The guidance will be amended to reference this.

Change

- Add reference to the hedge line along the southern boundary to retained and strengthened.

Details: proposed public space

The comments about this are noted. The siting of this is a matter for the developer, but there is also a requirement to have regard to the location of the bat roost and the setting of Sion Church, which would suggest that its location

<p>field, the Grow field, the field opposite the coop and the field directly west of the grow project and down to the wooded valley and ponds are all farmed organically and would lead the bats onto an area that has no lighting and no further development.</p> <p>This would also allow the houses on the plan closest to the southern hedge to have some afternoon sunlight in their gardens. On the present plan they will be in heavy shade from the mature tree line. We also have chickens directly on the other side of this hedge and this would help mitigate any potential issues that a new community may have with farm animals being so close to their back gardens and provide a thicker buffer zone between.</p>	<p>would be more beneficial along the northern and western boundaries.</p>
<p>1. Landscaping</p> <p>I note that <i>“Existing natural features that are retained as part of development proposals, be they mature trees or established hedgerows, provide a context and character for the development”</i> and <i>“The site will be an important new edge to the settlement, requiring care in views and boundary treatments”</i>, <i>“...the development should establish a positive relationship with La Grande Route de St Jean”</i> and that <i>“Other considerations (see landscaping and open space; biodiversity and heritage) necessitate the strengthening of this boundary and the provision of additional green infrastructure here, which should mitigate any potential adverse impact on the amenity of this neighbouring use”</i></p> <p>There are several references to the importance and need to maintain mature hedgerows, trees and boundaries. However, it seems that the priority for this is directed at the South, West and North of the site incorporating boundary buffers for the protection of wildlife and biodiversity. I am concerned that this will be prioritised over and affect the integrity of the mature hedgerow and granite wall on the Eastern boundary of the site. The Eastern boundary currently contributes substantially to the presentation of the site in a rural context, protecting and shielding the site from the road in close proximity. In addition this hedgerow contributes much to shield the surrounding homes from the site itself. The site itself is elevated above the current road surface on La Grande Route De St Jean and the homes directly opposite. This also contributes to the need for this boundary to be considerably planned and shielded from the major highway.</p> <p>I am a homeowner [REDACTED] of this site. I am concerned that with the stated priority of the other boundaries on the site in terms of hedgerow and buffers that this boundary will be left unshielded, with limited buffer areas, therefore affecting the view and feel of the site and overlooking the homes and gardens within close proximity.</p> <p>I would like plans to ensure that homes will be planned and zoned with an appropriate buffer e.g. a minimum of 20m from the Eastern boundary. Within this planning I would hope for retention of the mature hedgerow and granite wall of the site to protect the feel of the site and shield the site from the road and surrounding homes.</p> <p>2. Neighbours</p>	<p>Treatment of eastern boundary.</p> <p>The guidance will be amended to clarify the treatment of the eastern boundary. The existing hedgerow and boundary wall should be retained as far as possible. Changes will, however, need to be made to enable some of the highway requirements. This will, inevitably result in the loss of some of the existing wall and some of the trees. The trees and walls that remain, should be protected from any further damage from development, by appropriate protection during works. That section of wall required to be removed should be salvaged and used to create any re-aligned section of boundary wall, to be accompanied by new tree planting.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Clarify treatment of eastern boundary.</li> </ul> <p>Residential amenity of properties to the east</p> <p>In light of the requirement to retain and strengthen the eastern boundary, and the existence of a main road between the homes at Le Clos de Porte, it is not considered that development of J1109 will be prejudicial to the amenity of residents. This matter will, however, remain to be considered and assessed under the auspices of Policy GD1 of the bridging Island Plan in the context of a planning application.</p> <p>Site access and highway improvements</p> <p>The siting and specification of any site access will need to be the subject of consideration and assessment with I&amp;E (Transport and Operations) to ensure optimal safety for all road users.</p> <p>The provision of new facilities for pedestrians and traffic-calming, should also be discussed with I&amp;E (Transport and Operations), and should deliver comprehensive highway improvements to Sion Village.</p>

I note that *"Existing natural features that are retained as part of development proposals, be they mature trees or established hedgerows, provide a context and character for the development"* and *"Both neighbours' access visibility should be safeguarded and improved to required highway standards"* and *"proposals should seek to retain and strengthen the eastern boundary, as far as possible, with appropriate root protection measures in place to minimise the disruption caused to this boundary by the requirements for site access. Any loss of existing hedgerow should be replaced, having regard to the need to secure adequate visibility"* and *"The site will be an important new edge to the settlement, requiring care in views and boundary treatments"*

As stated above my home is [REDACTED] of the site. My immediate neighbour [REDACTED] boundary. I am concerned that the planning brief does not take into account the impact to homes across La Grande Route De St Jean on the Eastern side of the site. There are significant references to neighbours on North, South and West boundaries but the presence of an 8-10m roadway does not resolve the potential issues of height / proximity / views / visibility from the Eastern boundary. The impact to the Eastern boundary, when taking into account the increase in footfall and traffic is at least as significant as the other boundaries.

I would like plans to identify, recognise and consider properties on the Eastern side of the site as neighbours who are affected by this development. The eastern boundary should include a significant buffer area and landscaping that shields the development from nearby residences.

### 3. Road Access

I note that *"This section of La Grande Route de St Jean enjoys a 20-mph speed limit and vehicular access to the site should be secured by a safeguarded visibility splay of 2.4 x 25 m. The site access road should be 5 metres wide with 1.5m footways either side"* and *(the entrance to Grand Route de St Jean) "This is likely to be the only connection to the settlement so should feel safe and easy to use for the wider and new community."*

Current access to this site is from the North Eastern corner. This access point will allow for lines of visibility but will be affected by current exit from Sion Village estate. Access from the South Eastern corner of the site will be affected by the proximity of neighbouring homes and the Co Op development. Any access point on the Eastern boundary of the site will significantly affect and be affected by the exits from Bonnys Garden Centre, Le Clos de La Porte or adjacent properties. I am concerned that unless set some considerable distance away from these exits there is the potential for traffic hazard due to weight of traffic and increased footfall. The issue of lines of visibility when exiting From Le Clos De La Porte is currently an significant, requiring mirror use from partially visible corners. The removal of this mirror, addition of further entry points to the road from the new site and the considerable increase in footfall and traffic heightens the risk and reduces the safety of road users and pedestrians.

I would like reassurance from the planning process that entry / exit from the new site will not impact

These will remain to be assessed, in the context of a planning application, under the auspices of Policy TT1 of the bridging Island Plan.

#### Drainage infrastructure

As stated in the draft brief adequate surface water and foul sewerage provision will need to be made, with the likelihood that public investment will be required to deal with the capacity of the wider foul sewerage network.

Development proposals will remain to be assessed, in the context of a planning application, under the auspices of Policy WER6 and WER7 of the bridging Island Plan.

#### Construction phase

The implementation of planning permission will inevitably lead to some local impact related to noise and dust emissions. The management of these impacts will, however, be the subject of conditions to be appended to any award of planning permission.

#### Change

- Add requirement for planning permission to be conditional in order to manage potential impacts during construction phase.

on the "blind" corner from Bonnys Garden Centre and Le Clos De La Porte

For residents of Clos De La Porte and adjacent properties access to La Grande Route De St Jean is the only pedestrian and vehicular access. Any restrictions on this access point will have significant impact on safety and wellbeing of residents.

I would like reassurance from the planning process to ensure that safe and unrestricted access is protected for these properties during construction and following the development of the project.

The 20mph traffic restrictions within Sion Village are limited in their effectiveness. The recent Co Op development has already added to the weight of traffic and vehicle entry and exit from this carriageway. Further access to / from the west side of La Grande Route De St Jean will only add to this load. There is a significant amount of highway and infrastructure proposed including an increase in access roads, road width, pavement width, road furniture, refuge areas, road crossing and bus stop improvement. Any increase in traffic calming to account for the increase in traffic and footfall in this area, including the addition of central refuge, pedestrian crossing and bus stops will add to the hazards in proximity.

I would like plans to ensure that any adjustments to the width and layout of the pavements and road will increase safety and access rather than reduce these. I would like plans to ensure that proposed increase in access roads, road width, pavement width, road furniture, refuge areas, road crossings and bus stops will be incorporated within the design of the site but will be not be adjacent to Le Clos De La Porte or Bonnys Garde Centre where access visibility is limited..

#### 4. Drainage infrastructure

I note that *"There are issues with the capacity of the foul sewer network to be able to accommodate the development of this site and other developments served by it"*

As a resident I am aware of considerable drainage issues on the East side of the site, including frequent blockage to the foul sewer network. Being in an elevated position the drainage and flood control of the site will impact on properties in this area. The proposed infrastructure work to develop the capacity required for this development will undoubtedly cause some disruption to local residents.

I would like plans to ensure that drainage systems, including rain water and flood risk do not impact the Northern and Eastern boundary, where a significantly higher number of properties and residences are located. The adjacent fields to the Western and Southern boundaries would I hope, allow for appropriate drainage improvement.

#### 5. Construction phase and site waste management

I note that: *"(the site) is part of the island's interior agricultural land" and "Any waste arising from the development of the site should be minimised and managed in accordance with a site waste management plan"*

<p>As previously stated the proximity of the site to properties on all boundaries raises a concern of noise pollution, vehicle pollution, waste and dust production during the construction phase of the project. The dust and air quality from this elevated site to residents can be significant during agricultural use. I am very concerned that this will be increased hugely during any construction phase of the project, particularly as a family with members who suffer from respiratory conditions. There is no reference to the impact of construction patterns, noise, timing, traffic, pollution including noise and dust arising from the project. This will undoubtedly cause disruption to local residents. As mentioned the issues with buffer zones, distance from La Grande Route De St Jean and maintenance of a significant hedgerow shielding the site will have a significant effect on this.</p> <p>I would like the plans to specifically address what measures will be taken to prevent this construction affecting the health and quality of life of local residents through increased dust, noise and air pollution.</p> <p>I have previously submitted concerns regarding this site and the suitability of planning decisions. I have not received any reassurances from this submission. I would appreciate that these concerns are acknowledged and addressed in any future decisions.</p>	
<p>Please find below my suggestions for the development brief.</p> <p>Field J1109 St.John, Sion.</p> <ol style="list-style-type: none"> <li>1. Space for Play. Policy H5. This should be included in the center, main part, of the site, not on the edge, for child protection and safety, and away from the access to the main road. The space for play should be equipped and set out by the builders, but ongoing ownership, maintenance and upkeep should be the legal responsibility of the Parish, and this need to be in place before building work is started. Policy C18. To quote the draft <i>"An important characteristic of a safe and welcoming space for children and young people will be where there is good natural surveillance where families can feel confident that their children can be safe and seen;"</i>, so a central village square location is preferable.</li> <li>2. Recreation is not just for infants, but for all ages. A petanque court and gardens and a summer house would be a useful addition to the lack of community facilities for the Sion area.</li> <li>3. Consideration should be made for a communal games room and youth activities, its not all about fine weather outdoor infants playground's. This would help meet the requirements of involving the wider community into the new development. Policy GD2.</li> <li>4. Planning for biodiversity. The protection of the northern side of the site, bat roost and flight area is important, and the required 20m wide strip should <u>not</u> include any structures, playgrounds, ball pitches, car parking ect. This area whilst its public space has a very important role in protecting the biodiversity and protected species on the site, and must not be regarded as an area that can be used for any other purpose than having walking paths laid through it. Again the ownership</li> </ol>	<p>Space for play</p> <p>Comments about the location, potential form of play space provision is noted. As stated, the location of play space will influence the extent to which it is considered safe and welcoming: this will be tested in the context of a scheme design at the planning application stage.</p> <p>Provision might be made for all ages but this should be proportionate to the nature and scale of the development and, on this basis, the provision of a communal games room is not considered to be justifiable.</p> <p>Future management and maintenance</p> <p>The need to ensure future management and maintenance of any shared open space is noted. The potential for this to be secured by its transfer to the Parish of St John is also noted.</p> <p>The Minister will consider change to the guidance to make explicit reference to the requirement for this issue to be addressed on all rezoned sites.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Add reference to the guidance to require the use of planning obligation agreements to ensure the long-term management and maintenance of all communal aspects of developments, over which residents have a say. This might include the transfer of all or parts of shared spaces to parochial</li> </ul>

<p>and maintenance of what is essentially a woodland walk need to be agreed before building is allowed.</p> <ol style="list-style-type: none"> <li>5. Drainage. it is already stated that both the foul and surface drainage on La Grande route de St.Jean is already a capacity, and this and the adjacent T1404 will overload the drainage capacity. A planning requirement should be that the drains need to be upgraded to prevent overload before these fields are built on, especially as the nearby valleys are part of the water catchment area, and a lot of adjacent properties rely on well and borehole water. No building should be allowed to be occupied until the West Hill storage tank is complete, and the foul water drains on La Grande Route de St.Jean have been upgraded.</li> <li>6. This is a county area, and the minimum density requirement of 28 3 bed homes should apply. This reduces the amount of car parking required, and the proposed 34 homes is too high. A central one of two houses could easily be removed from the plan to create a safe playground, village square/garden arrangement.</li> <li>7. Street lighting. There should be little or no street lighting. This is a countryside area, with semi dark skies, and no main road lighting, and this should be maintained.</li> <li>8. Main road changes. These should be at a minimum. Any crossing points should consider their users, and two are required. One to the north to link to the Sion Village Estate, the route most likely to be used by unaccompanied children, and one to the south in the direction of the Trinity co-op and future T1404 development. The main road, if changed, should have a pavement of both sides, adjacent to the road, separate to any internal development paths. The trees and traditional plantings along the main road need replacing, and again their ownership and maintenance needs to be agreed before any development is allowed.</li> <li>9. Heritage and Archaeology. As field J1107 is in an historical occupation area, and is surrounded by known sources of archaeology, from stone age flint works to Roman and Bronze age finds, an archaeology study of this field is needed before building is commenced. This could involve the Societe Jersiaise Archaeology Dept, Jersey Heritage and The Jersey Metal Detecting Society, both in general surveys and some test trenches and after rotovating field walking and detecting. It would be a pity to lose any archaeology, when there are low or zero cost methods available before building, in this potentially historically rich site.</li> <li>10. Traffic calming. It is noted in section f) traffic calming is talked about. The whole of the 20mph Sioan zone is in need of traffic calming. The bottom near Ruelle Pinel and the Top near the United Reform Church need a textured road surface marking the beginning of the area, with further traffic calming needed between the Trinity co-op and the southern end. Completion of traffic calming should be part of the planning application requirements.</li> <li>11. Northbound bus stops. The north bus stop to the south of the site exits onto the road with no</li> </ol>	<p>authorities.</p> <p>Drainage The drainage requirements are clearly specified in the draft brief. These will remain to be tested by a drainage impact assessment.</p> <p>Density In order to make best use of land that is to be developed a minimum density of 35 dwellings per hectare is sought of the development of this site. Any higher density of development should have regard to the quality of design, relative to its context; the quality type and mix of homes being created; and placemaking, as set out in the brief.</p> <p>Highway improvements There is no specified requirement to light the highway as an integral part of this development. The draft development brief for J1109 and T1404, both in Sion, require the provision of pedestrian crossing facilities. The effect of this should be to ensure these facilities at the north and southern end of the village, and to calm traffic. Provision is also made within the brief for contributions to be made for traffic-calming measures to be supported in respect of both schemes, the specification of which should be agreed with I&amp;E (Transport and Operations). The brief for J1109 requires the provision of a footpath along, or preferably behind, the eastern boundary of the site, with a connection to the bus top to the north.</p> <p>Heritage and Archaeology. The guidance stipulates a requirement for a desk-based archaeological assessment to be undertaken.</p>
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<p>pavements, and in the design brief and combined with T 1404 this needs sorting out, with a proper length of pavement waiting area. The north side of the site is served by the existing Sion Chapel stop, which only requires proper access onto the north end of this development and a pedestrian Island at this end of the site to help cross the road.</p>	
<p>Please see below for our comments on the Development briefs: affordable housing sites consultation specifically about H5 (1): Field J1109, La Grande Route de St. Jean, St John.</p> <ul style="list-style-type: none"> <li>• Reference is made to Sion church. It should be noted that the former caretaker's cottage (now known as 1 church mews) is also a grade 1 listed building to which no reference is made. Equal consideration of the impacts of the development should be given to the former caretaker's cottage.</li> <li>• We live at [REDACTED] We wouldn't want the view from our front to be of a play area.</li> <li>• We agree the northern boundary hedge must be protected and strengthened with a minimum depth stipulated in a planning obligation. This would not only be beneficial from a biodiversity perspective but also allow visibility of the church and other listed buildings. It needs to be clear where this boundary starts. Is it from the edge of the field or is the border of the church mews development included in this.</li> <li>• Linked to this, having an open space to the north of the site next to the 2 tallest buildings of the church and 1 church mews would keep a gap between the houses and the listed buildings, allowing visibility to be maintained whilst reducing the possibility of the new houses being overlooked by the current properties.</li> <li>• Similarly we don't feel the children's play area should be included as part of the northern biodiversity corridor. We currently do get young people congregated at the front of Sion 1880 (old methodist church) at night and likely they would congregate in this play area instead.</li> <li>• Building a bus shelter in the layby outside the church would be inappropriate from a heritage perspective. A more appropriate location for a bus shelter would be outside the Trinity coop where there is currently a dangerous north bound stop where you have to step off in the road. This would also tie in with the proposed new houses being built behind the coop.</li> <li>• Rather than having to remove all the trees from the eastern edge of the site, a footpath could be created inside the boundary. If the eastern boundary does need to be moved we would like to see the granite currently there reused in the new boundary.</li> <li>• The road through the development to access new houses should be kept in the middle of the site rather than around the edge of the field.</li> <li>• If a pedestrian island in the road is required. It should be at the south eastern end of the development as People are most likely to cross the road to get to the coop which is south east of the site. The alternative would be people will cross the road to get to the bus stops on either side of the road which would be at the north eastern edge of the site.</li> <li>• If a pavement is to run the length of the eastern boundary then there should be an exit point to be</li> </ul>	<p>Sion Methodist Church (JN0075)</p> <p>The listing description and the extent of listing make clear that the church's former manse (or chapel-keeper's cottage) and Sunday School are embraced by and form part of the extent of heritage interest of this site. The impact of the development of the proposed development on the heritage interest and setting of these parts of the heritage asset will be required to be considered as part of the heritage impact assessment identified in the brief.</p> <p>Play area: location.</p> <p>The siting of this is a matter for the developer but it is considered best located in a location where it might be most accessible to the wider community (such as the NE part of the site). There is also a requirement to provide landscaped buffers along the northern and western boundaries in order to mitigate the impact of development on the bat roost and the setting of Sion Church. The extent to which this might be the most appropriate location for play space remains to be considered.</p> <p>The impact of the location of play space for the residential amenity of adjacent properties will be a material consideration in the planning process.</p> <p>Treatment of eastern boundary.</p> <p>The guidance will be amended to clarify the treatment of the eastern boundary. The existing hedgerow and boundary wall should be retained as far as possible. Changes will, however, need to be made to enable some of the highway requirements. This will, inevitably result in the loss of some of the existing wall and some of the trees. The trees and walls that remain, should be protected from any further damage from development, by appropriate protection during works. That section of wall required to be removed should be salvaged and used to create any re-aligned section of boundary wall, to be accompanied by new tree planting.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Clarify treatment of eastern boundary.</li> </ul>

<p>able to cross the main road at either end or else there is no point in the pavement.</p> <ul style="list-style-type: none"> <li>• Maintenance of the communal areas /community space /children's play area needs to be clarified.</li> </ul> <p>There has been an issue at Sion village across the road from this new development which has meant a children's play area was required but never actually installed.</p>	<p>Bus shelters</p> <p>As stated in the brief, the impact of the provision of a bus shelter to the north of the site upon the setting of the listed church will be a material consideration.</p> <p>The development brief for T1404 requires the potential for crossing facilities to the northbound bus top to be enhanced.</p> <p>Site access and highway improvements</p> <p>The siting and specification of any site access will need to be the subject of consideration and assessment with I&amp;E (Transport and Operations) to ensure optimal safety for all road users.</p> <p>Similarly, the provision of new facilities for pedestrians and traffic-calming, should also be discussed with I&amp;E (Transport and Operations), and should deliver comprehensive highway improvements to Sion Village.</p> <p>These will remain to be assessed, in the context of a planning application, under the auspices of Policy TT1 of the bridging Island Plan.</p> <p>Future management and maintenance</p> <p>The need to ensure future management and maintenance of any shared open space is noted. The potential for this to be secured by its transfer to the Parish of St John is also noted.</p> <p>The Minister will consider change to the guidance to make explicit reference to the requirement for this issue to be addressed on all rezoned sites.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Add reference to the guidance to require the use of planning obligation agreements to ensure the long-term management and maintenance of all communal aspects of developments, over which residents have a say. This might include the transfer of all or parts of shared spaces to parochial authorities.</li> </ul>
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**SITE: H5 (2): Field J229, La Route du Nord, St John**



Key issues identified in the brief:

- The site was originally proposed, through amendment of the draft Island Plan, as an age-restricted form of development, offering potential to provide a further phase of development to complement the existing rental accommodation, of 22 homes, provided by the Greenwood Housing Association to the south.
- The site has been approved by the States Assembly and brought forward to contribute to the island's wider needs for affordable homes under Policy H5 . Whilst not specifically allocated for age-restricted rental homes, the site might still provide affordable homes to those people who need ongoing support to live independently when assessed through the Jersey Housing Gateway and fitting into the supported housing band.

**SITE: H5 (2): Field J229, La Route du Nord, St John**

**COMMENT**

On the 12<sup>th</sup> July 2021 the Constable of St. John lodged a proposed amendment (Island Plan 2022-25: Approval (P.36/2021)- Thirty fourth amendment Field J229, St. John) which specifically brought forward an amendment to designate Field J229 to be “including age-restricted homes (for people over-55)”, to help meet the needs of an ageing society, to provide homes for rent to be administered by the Greenwood Housing Association. This amendment was debated and voted for by the Assembly and was overwhelmingly supported.

The draft SPG states on Page 24

*“The site was originally proposed, through amendment of the draft Island Plan, as an age- restricted from of development, offering potential to provide a further phase of development to complement the existing rental accommodation, of 22 homes, provided by the Greenwood Housing Association to the south. The site has not, however, been rezoned for the provision of age-restricted homes, but has been approved by the States Assembly and brought forward to contribute to the island’s wider needs for affordable homes under Policy H5”*

This does not reflect the basis of the approved States Amendments as voted for by the Assembly during the Bridging Island Plan debate and neither does it accord to agreements made with the Planning Department in regard to the site specific housing type/tenure and mix.

Therefore, in respect of Field J229 the SPG should be amended to reflect sole use for over-55’s sheltered housing, administered by the Greenwood Housing Association, as agreed by the Assembly.

**RESPONSE**

Process and housing type

This statement is incorrect and the basis of this representation thus flawed.

Island Plan 2022-25: Approval (P.36/2021)- Thirty fourth amendment Field J229, St. John was withdrawn by the Connétable of St John, a set out in the consolidated Order Paper for the Island Plan Review debate of 14 March 2022 (see Item E. Withdrawal of lodged propositions: [Order Paper 2010 \(gov.je\)](#)).

Instead, the Connétable of St. John [proposed](#) the 4<sup>th</sup> amendment to the 91<sup>st</sup> amendment: to include Field J229, La Route du Nord, St. John, in the list of sites to be zoned for affordable homes.

The wording of the amended position, upon which the Assembly voted, is as follows:

THE STATES are asked to decide whether they are of opinion –

to approve, in accordance with Article 3(1) of the Planning and Building (Jersey) Law 2002, as amended by the Covid-19 (Island Plan) (Jersey) Regulations 2021,

(f) the following should be inserted within the list of sites to be zoned for affordable homes in Policy H5 – Provision of affordable homes –

ii. J229, La Route du Nord, St. John

The States Assembly [voted](#) to APPROVE the Connétable of St. John's 4<sup>th</sup> amendment to the 91<sup>st</sup> amendment. 33 States Members voted in favour; seven voted against.

The site is accordingly rezoned for the provision of affordable homes, and not specifically for the provision of age-restricted housing.

As stated in the development brief, however, whilst not specifically allocated for age-restricted rental homes, the site might still provide affordable homes to those people who need ongoing support to live independently when assessed through the Jersey Housing Gateway and fitting into the supported housing band.

Ministers will continue to work with the Parish of St John to see how this objective might be realised.

### SITE H5 (3): Field J236, La Rue du Cimetiere, St John



Key issues identified in the brief:

- The site was originally proposed, through amendment of the draft Island Plan, for the provision of 'affordable step-down properties to enable people to right size whilst still holding equity in a property.
- The site has been approved by the States Assembly and brought forward to contribute to the island's wider needs for affordable homes under Policy H5. The site is required to deliver a mix of social-rented dwellings (45%), and affordable homes for purchase (55%) A departure from this tenure mix might be justified where provision might be made across more than one site, and where the development of the site(s) would be linked to deliver the overall requirement. Whilst it is considered that this site is best developed to provide predominantly 3- and 4-bed family homes, together with a limited number of smaller homes, there may be potential for a greater proportion of smaller homes to be delivered on the site to meet parish needs.
- Local residents are aggrieved that this site has been included in the plan without their engagement: they also consider that there is an abuse of process as the size of the site, in their view, has been inaccurately portrayed, which could have lead to a different decision about rezoning. There was an error in the preparation of the published map, where the site was defined as being 3 HA, as opposed to 0.27 HA. The decision to rezone, however, was based on a plan which correctly defined the site boundary.

SITE H5 (3): Field J236, La Rue du Cimetiere, St John	
COMMENT	RESPONSE
<p>The Constable also brought forward an amendment on the 14<sup>th</sup> February 2022 (Island Plan 2022-25: Approval (P.36/2021)- Ninety-first amendment P.36/2021 AMD(91) ) - Fifth Amendment in relation to Field J236 which specifically states "...to develop some affordable stepdown properties to enable people to right size while still holding equity in a property ..." The amendment also highlighted a financial utilisation of money to assist families with purchasing affordable homes in other parts of the Parish. This amendment was debated and voted for by the Assembly and was overwhelmingly supported.</p> <p>The draft SPG states Page 30</p> <p><i>"The site was originally proposed, through amendment of the draft Island Plan, as a site to provide 'affordable step-down properties to enable people to right size whilst still holding equity in a property.'</i></p> <p><i>The site has not, however, been specifically rezoned for the provision of right-sizing homes for purchase, but has been approved by the States Assembly and brought forward to contribute to the island's wider needs for affordable homes under Policy H5 (see: P.36-2021 Amd.(91)Amd.(5).pdf (gov.je)). On this basis, the site is required to deliver a mix of social-rented dwellings (45%), and affordable homes for purchase (55%)"</i></p> <p>Again this does not correctly reflect the basis of the approved States Amendments and neither does it accord to agreements made with the Planning Department in regard to the site specific housing type/tenure and mix. In addition, the draft SPG overstates the area of the field which is 0.28 hectares not 0.3, which further reduces the number of units it can provide.</p> <p>In respect of Field J229 the SPG should be amended to reflect sole use for right-sizing development with the financial connection to shared equity as agreed by the Assembly.</p>	<p>Process and housing type</p> <p>This statement is incorrect and the basis of this representation thus flawed.</p> <p>Island Plan 2022-25: Approval (P.36/2021)- Thirty fifth amendment Field J236, St. John was withdrawn by the Connétable of St John, a set out in the consolidated Order Paper for the Island Plan Review debate of 14 March 2022 (see Item E. Withdrawal of lodged propositions: <a href="#">Order Paper 2010 (gov.je)</a>).</p> <p>Instead, the Connétable of St. John <a href="#">proposed</a> the 5<sup>th</sup> amendment to the 91<sup>st</sup> amendment: to include Field J236, La Rue du Cimetière, St. John, in the list of sites to be zoned for affordable homes.</p> <p>The wording of the amended position, upon which the Assembly voted, is as follows:</p> <p style="padding-left: 40px;">THE STATES are asked to decide whether they are of opinion –</p> <p style="padding-left: 40px;">to approve, in accordance with Article 3(1) of the Planning and Building (Jersey) Law 2002, as amended by the Covid-19 (Island Plan) (Jersey) Regulations 2021,</p> <p style="padding-left: 40px;">(f) the following should be inserted within the list of sites to be zoned for affordable homes in Policy H5 – Provision of affordable homes –</p> <p style="padding-left: 80px;">ii. J236, La Rue du Cimetière, St. John</p> <p>The States Assembly <a href="#">voted</a> to APPROVE the Connétable of St. John's 5<sup>th</sup> amendment to the 91<sup>st</sup> amendment. 36 States Members voted in favour; three voted against.</p> <p>The site is accordingly rezoned for the provision of affordable homes, and not specifically for the provision of 'affordable step-down properties to enable people to right size whilst still holding equity in a property.'</p> <p>As stated in the development brief, however, the site is required to deliver a mix of social-rented dwellings (45%), and affordable homes for purchase (55%) A departure from this tenure mix might be justified where provision might be made across more than one site, and where the development of the site(s) would be linked to deliver the overall requirement.</p> <p>It is considered that this site is best developed to provide predominantly 3- and 4-bed family homes, together with a limited number of smaller homes. There is,</p>

	<p>however, potential for a greater proportion of smaller homes to be delivered on the site to meet parish needs.</p> <p>Ministers will continue to work with the Parish of St John to see how this objective might be realised.</p>
<p>I have the following and strong objections to the proposed development on J236 and SPG related to it - points referenced as per SPG draft:</p> <ol style="list-style-type: none"> <li>1. a. The site area is 0.267ha, not 0.3 or indeed 0.6 hectares as shown on live and current interactive map, screen shot taken earlier and attached below.</li> <li>1. b. This site is not within but on the very western edge of built up area of St John Village bordering Fields J242 (regularly used for grazing /Jersey herds), the Cemetery and fields beyond to the west and south all the way to St Mary village.</li> <li>1. c. The site is not former agricultural land it is perfectly viable agricultural land, neglected by its owners. This Filed was part of [REDACTED] for centuries and farmed until former owners bought it in 1980-ies and developed it into 4 separate properties, with this portion of field left in their ownership. Until recently the field was designated as protected open space. The southern border of the field, area in excess of 100m.sq. is owned and maintained by [REDACTED]</li> </ol> <p>2. The proposed density tenure is overstated and would be completely out of character with its surroundings. The Field is within meters of its southern boundary and is about 1.5m elevated ie. higher than Cedar Farm ground floor level. The Listed building (JN0118) will become invisible as a result of the proposed contemporary affordable 3-4 bedroom housing development.</p> <p>The SPG acknowledges that the site was proposed for step-down properties, it however does not acknowledge that NONE of the stakeholders have been consulted or even informed of the proposed last minute changes (M Webster definition: one who is involved in or affected by a course of action) i.e. in this case 10 neighbouring properties. It makes one wonder why Consult or indeed comment if views are to be disregarded.</p> <p>The density proposed is out of place and out of scale of the western edge of the village. Based on 35 dwellings/ ha it will only accommodate 9, given that incorrect areas are stated in various document. Taking into account character and density of the surrounding area (referred in SPG under Design and Planning consideration as relevant) the site would yield 4 dwellings max.</p> <ol style="list-style-type: none"> <li>3. a. The existing boundaries and context are not just a polite consideration but a paramount requirement with any intervention on J236. The footpath connections along the lane are not possible due to rather narrow measurements between the two dwarf granite walls of 3.5m and trees if intention to protect them is an honest one.</li> <li>3. b. The proposed development would ensure anything but maintaining the character of a green lane</li> </ol>	<p>Process: this proposed use of this site for the development of homes has been part of the island plan review process, and as such, stakeholders have been afforded opportunity to comment on the principle of its use for this purpose. Whilst this was carried out during the pandemic, and mixture of in-person and virtual tools were used, to accord with the varied public restrictions that were in place at the time.</p> <p>The site was submitted for assessment as part of the 'call for sites' The assessment of it, and all other sites submitted for consideration, was published in April 2021 (see: <a href="#">R Housing land and assessment of sites (gov.je)</a>), at the same time as the draft bridging Island Plan. There was much publicity about this. The site was not supported for inclusion in the draft bridging Island Plan by the Minister for the Environment at that time.</p> <p>In light of its exclusion from the draft plan, however, the Connétable of St John proposed an amendment to the plan in order that it might be rezoned for the provision of age-restricted homes under Policy H6 – Supported housing (see: <a href="#">P.36-2021 Amd.(35).pdf (gov.je)</a>). This was lodged and published on 12 July 2021.</p> <p>In submitting his amendment, the Connétable suggested that this had the support of the Comité Commune Rurale de St Jean, which was elected by the parishioners, and whose work had the support of the parish, involving wide consultation with parishioners.</p> <p>The Minister for the Environment did not support this amendment. He published his response to all representations, including States Members' amendment, on 01 September 2021: <a href="#">Draft Bridging Island Plan: Post-consultation report (gov.je)</a>. See Part 5: <a href="#">R Draft Bridging Island Plan - Post-consultation report - part 5.pdf (gov.je)</a> and Part 3 (SR37) <a href="#">R Draft Bridging Island Plan - Post-consultation report - part 3.pdf (gov.je)</a></p> <p>Independent planning inspectors considered all States member's amendment to the plan at an examination in public (EIP). The examination, the matters under discussion, and the programme, were all publicly announced, and any interested party was able to engage in this process, or to attend it. Field J236</p>

La Rue du Cimetiere, the privacy for properties to the south and north or the space for quiet reflection for those attending funerals and cemetery in their own time. Your proposal will bring in excess of 20 vehicles to site plus visitors, maintenance vehicles, services etc.

3.c./d. Can the author please quantify "as much of the existing / tree and hedgegrow planting is retained". If this SPG is to be taken seriously, the statement should acknowledge that NO TREES OR MATURE HEDGES ARE TO BE REMOVED. Presence of bats in the Cedar tree to the east boundary has been recorded and shared with Gov. department.

The same applies to "as much of the the low granite rubble wall along boundary should be retained". It is all well and good on paper but I cannot see that being possible if development goes ahead in any shape or form.

Requirements for biodiversity impact statement is a great idea, providing its purpose is to identify and protect the habitat in situ, rather than to provide reason to build bird and bat boxes out of concrete. That initiative is applicable to cities and towns but green fields and mature trees are perfectly capable of providing habitat as nature intended.

3.e. La Rue de Cimetiere is a green lane and creating a 'streetscene' is not just inappropriate but a total disregard to its origin, Cedar Farm and Cedar Cottage, both built in late 18th century, two out of handful of houses with access from the lane.

The church views will be completely obliterated with any development on this field for anyone but the residents of those to be 3/4 bed homes, despite the claim that it should be acknowledged in any schemes, hopefully and especially for benefit of those already housed in the area.

3.f. The 25m visibility splays are simply impossible to achieve if any of the wall or indeed trees on La Rue du Cimetiere are to be retained. The current junction onto La Route de St Jean to the south will not be able to accommodate required visibility splay in any instance as the boundary wall to St John Cemetery is listed (JN0118), pointed under 3.e. Of the SPG.

Typically people with families will have two cars as standard, as the bus journey into town (even less so if travelling anywhere else in the Island) is not an option for commuting. Enhancing bus service (beyond providing school buses, which are well used), is just another scoring point in this exercise. Busses operate on hourly basis for a reason, there are not enough people to make extra services viable!

3.g. Drainage and other infrastructure issues - not mentioned in the SPG that three properties to the south have services in the Field J236. This field was rejected during BIP 2022-2025 debate on the basis that there is 'no downstream drainage capacity and that pumping flows directly to the local Rue de Buttes pumping station would need to be considered'. Bearing in mind that the site lies within the water pollution safeguard area bringing in more pollution risks to this area of Filed is unjustified.

It is environmentally most unfriendly idea to tarmac and build further into countryside and to rezone

was discussed at the EiP on Day 3 on Wednesday 17 November 2021, where there was representation from the Connétable and Le Comité de la Commune Rurale de St Jean (see: [C Jersey Hearings and Participants Programme 1 12 21.pdf \(gov.je\)](#)).

In their report, the planning inspectors said:

*3.99 Policy H6 deals with supported housing. The Deputy of St Martin has lodged an amendment (MA16) seeking the removal of field MN410 from the list of affordable homes in Policy H5, reference to people over-55 included in Policy H6 and a designation of MN410 in H6 as a site for retirement homes administered by a trust in conjunction with the parish. Two similar amendments to H6 are sought by the Connétable of St John for field J236 (MA35) and field J229 (MA34). These amendments by the Deputy of St Martin and the Connétable of St John are looking to provide for local parishioners over-55 and to further the ambition to release family homes onto the market. While both these aims are commendable, we agree with the Minister that the evidential justification for the amendments is not convincing and that the needs of the over-55s are catered for by other policies in the DBIP and through the work of the Gateway. Policy H6 is specifically intended to cater for those who need support – it is not intended to apply generally to anyone aged over 55. We consider that Policy H6 is best left as a specific policy addressing the housing needs of those who need support.*

*3.100 In terms of the relationship with the built-up-area, J229 lies in a sensitive landscape that forms an important area of countryside between St John's village and the coast to the north. J236 is in a less sensitive landscape area and could be integrated with the village in a more satisfactory manner. The Minister does not support the need for the designation of housing sites for open market housing for people aged over-55. We agree with the Minister's position but if this changes we suggest that J236 is a better candidate than J229.*

Their report ([R Jersey Draft Bridging Island Plan EiP Inspectors Report to Minister for the Environment.pdf \(gov.je\)](#)) was published on 25 January 2022, and announced in the media.

Island Plan 2022-25: Approval (P.36/2021)- Thirty fourth amendment Field J229, St. John was withdrawn by

In light of both the inspectors' report and the Minister's view, the Connétable of St John subsequently withdrew his amendment - , as set out in the consolidated Order Paper for the Island Plan Review debate of 14 March 2022 (see Item E. Withdrawal of lodged propositions: [Order Paper 2010 \(gov.je\)](#)) - to rezone the



agricultural land in this location. Our Constable is aware of our strongest objections regarding this Filed so are the number of Ministers.

I trust my remarks will be considered, unlike those regarding zoning J236 during BIP consultation period carried out during lockdown.

site for age-restricted homes and, instead, proposed the 5<sup>th</sup> [amendment](#) to the 91<sup>st</sup> amendment: to include Field J236, La Rue du Cimetière, St. John, in the list of sites to be zoned for affordable homes.

The States Assembly [voted](#) to APPROVE the Connétable of St. John's 5<sup>th</sup> amendment to the 91<sup>st</sup> amendment. 36 States Members voted in favour; three voted against.

It is evident from the above, that the proposal to rezone this site for the development of homes has been in the public domain since April 2021, and there have been opportunities for parishioners to engage directly with the sponsors of the proposal or the island plan review process. The fact that representations have been made against the use of the site for development does mean that they have not been considered.

Given that the principle of development on this site is established in the bridging Island Plan, further consultation is being undertaken on the detailed planning issues that will help shape its development through the preparation of a development brief. The Minister for the Environment will consider responses to this, as set out in this report

Detail: site area

The site of Field J236, in its entirety, is measured at 0.36 hectares on the Jersey GIS. It is clear, however, from the details of the Connétable's amendment (at appendix 1), that it is not the whole of the site that was proposed for rezoning, and that it involves approximately 0.27 hectares of land. This was the basis on which the States Assembly considered the Connétable's amendment.

It is described in the brief as being approximately 0.3 hectares: this will be revised to 0.27 ha.

Change

- Change site area from approximately 0.3 ha to 0.27 ha. (and subsequent revision to yield: from 11-14, to 10-13 homes)

Detail: built-up area

The site is within the built-up area of St John's Village, as defined in the bridging Island Plan (see: [Bridging Island Plan 2022 - 2025 Interactive Web App \(arcgis.com\)](#))

Detail: land use

The site was formerly used for agriculture. Its size and location render it no

longer of value to the agricultural industry. It is thus appropriately described as former agricultural land.

Detail: density

The Minister for the Environment has recently adopted minimum density standards for the island's built-up areas which, for local centres such as St John's Village, is set at 35 dwellings per hectare. As stated in the guidance, however, any resultant density of development will be informed by a positive design-led approach having regard to: the quality of design, relative to its context; the quality, type and mix of homes being created; and placemaking.

Detail: listed buildings

The presence of the grade 3 listed building Cedar Farm (JN0117) within the setting of the site to the south, is acknowledged in the brief as are distant views of the church. The impact of development upon the setting of this nearby building and the more distant church will be a material consideration, as also stated in the brief.

Detail: footpath connections

The brief does not require footpath connections 'along the lane'.

It clearly states that footpath provision should be made along the site frontage (behind the treeline); with further pedestrian crossing facilities provided elsewhere in the locality.

Detail: retention of trees and hedgerows

The guidance explicitly states that as much of the existing tree cover should be retained as possible. The existence of any protected species will need to be considered relative to the provisions of the Wildlife (Jersey) Law.

Detail: visibility splays

Gaining access to the site will require the loss of parts of the wall and existing tree and hedgerow cover. This should be minimised as far as possible, as stated in the brief.

The limited visibility of the junction of La Rue du Cimetiere and La Grande Route de St Jean is acknowledged in the brief. The specification of crossing facilities here will need to be the subject of agreement with I&E (Transport and operations).

	<p>Detail: drainage</p> <p>The brief makes explicit the drainage requirements, for both foul and surface water infrastructure. Any planning application will need to be supported by a more detailed drainage impact assessment, as set out in the brief.</p>
<p>We write as [REDACTED] the above proposed site.</p> <p>According to the draft SPG "It is considered that J236 is best developed to provide predominantly 3- and 4-bed family homes, together with a limited number of smaller homes. There is, however, potential for a greater proportion of smaller homes to be delivered on the site to meet parish needs." When this site was introduced to the States for rezoning from protected open space to development land it was on the basis that it would provide privately owned step-down, or right-size units in the village, with the delivery of Affordable Housing (family homes) in the Parish being met at the rezoned site in Sion and step down rental properties at J229, La Route du Nord as an extension to the existing Parish retirement rental properties.</p> <p>After considerable discussion and consideration between The Constable and neighbouring/nearby residents it is our understanding that he has now conceded that the selection process for the site was not properly considered nor consulted upon from the outset and the field is entirely unsuitable for any development whatsoever for a multitude of reasons including the fact that the area of land is smaller than originally envisaged. We understand that he is therefore proposing that this site is swapped out with an alternative, more viable site elsewhere within the village and J236 returned to its previous status of Protected Open Space.</p> <p>Correspondence from concerned parties has been prepared and will be sent to the Council of Ministers over the next few days which sets out the current position in much greater detail. This will be discussed at a meeting with the Constable and the Council of Ministers later in June.</p> <p>Whilst the entire zoning of the field is once again in doubt and no clear consensus on what if anything will be built there it would be impossible at this stage to comment in detail on any other aspects of draft supplementary planning guidance but should a decision be made that development in some form or other would be granted then we would expect to be consulted further so that we can comment in detail.</p> <p>Further to our previous correspondence by email dated 8<sup>th</sup> June 2023 please find attached correspondence that has since then been sent to various ministers regarding field J236 which is self-explanatory.</p> <p>We also had the opportunity along with other concerned parties to meet with various ministers at a meeting at St Johns Parish hall on 20<sup>th</sup> June and we personally raised the following points with Deputy Morel.</p> <p>1. Did he have a chance to look at the copy of the letter sent to Jonathan Renouf from [REDACTED]</p>	<p>Status of J236 and further consultation</p> <p>The planning status of the site is established and is not in doubt. This site has been rezoned for the development of affordable homes, as approved by the States Assembly, as part of the review of the island plan (see Process, above).</p> <p>The status of the site can only be changed within the context of an island plan review. Until such time that this is undertaken, the site will remain allocated for this purpose and the principle of its development for the provision of affordable homes is established.</p> <p>Policy in the plan seeks to ensure that those sites zoned for the provision of affordable homes are developed during the plan period to ensure that these homes are delivered.</p> <p>Once development briefs for the sites are finalised and published, there is a requirement for developers to (a) engage with the local community for development of ten or more homes in advance of a planning application and (b) to submit a planning application, which is an open and transparent process, and in which local residents can participate.</p> <p>Detail: type of housing development</p> <p>As stated in the brief and described above (see Process response) The site was originally proposed, through amendment of the draft Island Plan, as a site to provide 'affordable step-down properties to enable people to right size whilst still holding equity in a property.'</p> <p>The site has not, however, been specifically rezoned for the provision of right-sizing homes for purchase, but has been approved by the States Assembly and brought forward to contribute to the island's wider needs for affordable homes under Policy H5 (see: P.36-2021 Amd.(91)Amd.(5).pdf (gov.je)). On this basis, the site is required to deliver a mix of social-rented dwellings (45%), and affordable homes for purchase (55%).</p> <p>A departure from this tenure mix might be justified where provision might be made across more than one site, and where the development of the site(s) would be linked to deliver the overall requirement.</p>

<p>██████ and others and what are his thoughts.</p> <ol style="list-style-type: none"> <li>2. The Constable is proposing a site swap. We feel that this field should never have been rezoned from protected open space to building land.</li> <li>3. The process of rezoning was completely wrong due to a lack of transparency, incorrect facts and failure of due process in the decision making for rezoning.</li> <li>4. There is no culpability and a complete lack of accountability to address our concerns and grievances about the failure of due process. Nobody is taking any responsibility for what's happened.</li> <li>5. It was ill advisedly passed by The States on the understanding that it would be private step-down homes and now we're told it may be large family homes of mixed tenure .</li> </ol> <p>If a travesty of democracy is allowed to go ahead and something is built on the site we would expect it to be low density, low height, privately-owned step-down homes as were put forward by Constable Jehan for approval in the Island Plan debate and built in a local vernacular architectural style that is in keeping with the character of area.</p>	<p>It is considered that this site is best developed to provide predominantly 3- and 4-bed family homes, together with a limited number of smaller homes. There is, however, potential for a greater proportion of smaller homes to be delivered on the site to meet parish needs.</p> <p>Ministers will continue to work with the Parish of St John to determine what type of homes might be delivered on this site, relative to the policy position agreed by the States Assembly.</p>
<p>In any Appeal against the proposals contained in the Draft it is worthwhile to consider the existing problems encountered by the residents of La Rue du Cimetiere and the various issues they have had to deal with.</p> <p>The road is a Green Lane but has none of the characteristics outlined in the Jersey Highway Code. It is a complete "rat run" with HGV, white van men, tractors with extra wide trailers etc and motor vehicles, including those of parishioners, racing down the road, completely oblivious to the 15 mph restriction. Although we now have the best Connétable in 20 years, his predecessors refused to take any action and, indeed, said parishioners had a right to use the road. The fact that this was at odds with the Green Lane concept beggars belief and the expectation that the cemetery be a place of quiet contemplation completely passed them by.</p> <p>The projet lodged au Greffe by Deputy Ward on 15 June 2020 to effectively encompass in law the facts about Green Lanes contained in the Jersey Highway Code was watered down and has been completely subverted since by the Comité des Connétables.</p> <p>During the consideration of the Island Bridging Plan, attempts were made by the Parish of St John to change Field J236 from a protected open space to allow development of the site but ultimately withdrew such applications on the basis that La Rue du Cimetiere was a Parish by-road with limited capacity for increased vehicular traffic and the down stream drainage system had no spare capacity.</p> <p>Out of the blue the then, and fortunately former, Planning Minister decided to re-zone the field without any discussions with the residents.</p> <p>Field J236 used to be an asset to the residents as it was regularly maintained, apart from the owners</p>	<p>Process: the assertion that this site was rezoned by the former Minister for the Environment is incorrect on a number of grounds.</p> <ul style="list-style-type: none"> <li>• its inclusion in the plan for the development of homes was proposed by the Connétable of St John (see Process response above and 5<sup>th</sup> <a href="#">amendment</a> to the 91<sup>st</sup> amendment: to include Field J236, La Rue du Cimetière, St. John, in the list of sites to be zoned for affordable homes)</li> <li>• the rezoning of site in the plan is a matter for the States Assembly, not the Minister for the Environment. The States Assembly <a href="#">voted</a> to APPROVE the Connétable of St. John's 5<sup>th</sup> amendment to the 91<sup>st</sup> amendment. 36 States Members voted in favour; three voted against.</li> </ul> <p>Process: boundary amendment on proposals map</p> <p>The site of Field J236, in its entirety, is measured at 0.36 hectares on the Jersey GIS. It is clear, however, from the details of the Connétable's <a href="#">amendment</a> (at appendix 1), that it is not the whole of the site that was proposed for rezoning, and that it involves 0.27 hectares of land. This was the basis on which the States Assembly considered the Connétable's amendment. There is no error in process requiring the matter to be referred back as the original decision was made on the basis of the boundary set out in the Connétable's report.</p> <p>It is described in the brief as being approximately 0.3 hectares: this will be amended to approximately 0.27 hectares.</p>

and former residents using part of it as a vehicle and marine repair and maintenance area. It was then abandoned by the owners who did not maintain it and dumped hedge cuttings on the land. It is not now attractive and one can only guess at the motives, given that the owners have already built two large properties

It really is time the feelings and reservations of the residents were listened to and taken account off.

#### GROUNDINGS FOR APPEAL AGAINST THE CURRENT DRAFT PROPOSALS

The rezoning of Field J236 was based on incorrect information. The States Assembly were provided with plans of the Field which stated that the Field was of 0.4 hectares, capable of delivering 12-13 homes. The site is actually 0.27 hectares, a reduction of 30% and, using the States model of 35 homes per hectare, equates to just 8-9 homes.

Remarkably, after the residents pointed out this material discrepancy, this was acknowledged by the Planning Department and the plans amended without, we understand, reverting to the States Assembly who had made a decision based on incorrect information. In my years in local government I have never come across situations where information was altered after a decision was made without reference back to those who had made the decision.

Even taking this reduction in size into consideration, the fact that further tree planting, possible footpaths and possible play or amenity areas may be incorporated into the site, depending on what type of development is intended, makes a mockery of the further reduced area for construction and hardly warrants the loss of an agricultural field and protected open space.

There is a dis-connect between the types of housing referred to in the Draft and the types which the Parish, through the Connétable, have researched and wish to implement.

Interestingly, it appears that J236 is actually higher than the land base of Cedar Farm, a listed building, and both this property and Aurum will have their privacy affected to a material extent.

La Rue du Cimetiere provides the only direct access to Field J236 and if development were to proceed, a new entrance, with appropriate visibility splay, would be required and, according to the States own access requirements, would result in the loss of trees and of much of the rubble granite wall, both of which are at odds with the intentions to protect them clearly stated in the Draft.

The idea that future footpath and footway connections in respect of any future development and that the site is best developed to provide 3 and 4-bed homes with a number of smaller homes could complement the rural context and landscape and form a positive relationship with the lane is too nonsensical to contemplate and is pure "Planning speak".

Similarly, detailing a density that is too great with two storey buildings on a small site is at odds with with the statement in the Draft that the development should be responsive to the more rural character of the context, being a small outlier hamlet and should achieve a more subtle and discrete

A drafting error in the production of the approved island plan proposals map (which originally included all of Field J236) has been rectified, and is clearly noted in the published island plan (see frontispiece: [P Bridging Island Plan.pdf \(gov.je\)](#))

Change

- Change site area from approximately 0.3 ha to 0.27 ha. (and subsequent revision to yield: from 11-14, to 10-13 homes)

Detail: impact on residential amenity

The brief makes clear the need for development proposals to have regard to the residential amenity of the properties to both the north and the south of the site.

This will be a material factor in any subsequent planning application.

Planning status of J236 and potential for a land swap

The status of this site is set out above (see Status of J236 response).

<p>development.</p> <p>The statement that the development will need to have regard to the impact on the listed Cemetery wall and the “street scene” is easily dealt with as it can only be negative.</p> <p>The road itself, which narrows to between 3.5-3.7 m, is insufficient to cope with the increased traffic on a continuing basis and particularly with construction vehicles during the development phase.</p> <p>Additionally, the junction of the road with Grande Route de St John is dangerous now and would be that much more dangerous with increased future traffic. It is also doubtful that a splay or correct line of sight could be implemented at the junction if, as we believe, the cemetery wall is “listed”.</p> <p>Parking in the area is also a problem. Apart from residents parking on the road, the restricted parking for visitors to the cemetery is insufficient, especially when cemetery maintenance vehicles are, understandably, parked there and other non-cemetery visitors use the area despite notices to the contrary. This will be compounded if development takes place and particularly if construction vehicles and construction workers’ private vehicles use the space which we know will be the case because that is exactly what happened when the nearby La Carré and Carrefour Mews developments took place.</p> <p>The residents’ experience is that J236 is home to bats, birds, squirrels and other wildlife and this loss of habitat can surely not be justified.</p> <p>Finally, which highlights the dis-connect between central government and the Parish, the Connétable has agreed that the re-measured site and the road and drainage situations means that J236 is unsuitable for development and is, we believe, pursuing an alternative site which is larger than J236, has drainage infrastructure in place and does not suffer from the obvious problems highlighted above</p> <p>Overall, these proposals are misconceived and can only add a minimal number of units at a considerable unit cost whilst causing major problems and inconvenience for the existing residents whose quality of life is already affected. Clearly, no proper or exhaustive research has been carried out. How the authors of the Draft came to the conclusion that the sorts of development presented were viable is beyond belief because the Draft contains significant inconsistencies and contradictions when comparing statements of intent and the criteria appropriate for development of this site with the actuality of what is proposed.</p> <p>These proposals should be shelved immediately, the Connétable’s alternative site investigated. the re-zoning reversed and J236 be returned to a Protected Open Space. Any other action or attempt to proceed with any of the alternatives in the Consultation document is risible.</p>	
<p>We would like to object in the strongest terms to the proposed development of the above site. The field and area is totally inappropriate for the size and scale of the proposed development and an alternative should be found to this field. There has been a complete lack of consultation in respect of this development and therefore we object and we would like our concerns to be considered.</p>	<p>See Process response above</p>

I write to object to the proposal outlined in the Draft SPG to develop J236 for Affordable Housing and have attached a copy of a letter sent to the Minister for the Environment and copied to the Council of Ministers explaining my reasons for objecting.

In addition, and for the record, I must disagree with statements you made regarding the size of J236 in response to an objection made by a neighbour [REDACTED] recently.

You will be well aware that J236 had been put forward for rezoning a number of times over the years. It has always been presented as a site of 0.36 or 0.4 hectares capable of delivering 14 homes. You will also recall that it was rejected as a viable site a number of times and was not one of the fields listed for rezoning in the Draft Bridging Island Plan. On page 30 of the Draft Bridging Island Plan Post-examination response (copy attached), J236 is listed as a site with a potential yield of 14 dwellings at 35 dph. This equates to a site of 0.4 hectares.

On pages 2 and 3 of the Amendment lodged by the Connetable of St John (P36/2021) Thirty Fifth Amendment (copy attached) J236 is clearly referred to as field of 0.36 hectares. The true site area of 0.276 hectares, whilst noted on the site plan at Appendix C of the Amendment is, to all intents and purposes, illegible. Whilst this Amendments was not approved, when J236 was ultimately approved as an H5 site under [p.36-2021 amd.\(91\)amd.\(5\).pdf \(gov.je\)](#), the States Assembly would have had no reason to believe that J236 had shrunk to 0.276 hectares. The size and potential yield of J236 must have been a consideration for including it on the list of potential sites for rezoning. To be clear, this was not a mapping error that occurred after the States Assembly has approved the BiP.

Incidentally, the notation on the BiP interactive map is still incorrect, showing the area of J236 rezoned for H5 housing as 6,534 sqm (0.65 hectares).

See Process: boundary amendment on proposals map response above

We purchased [REDACTED] and was informed by the Estate Agent and our Solicitors that field J236 has a covenant on it as protected open space. We are quite shocked and dismayed to learn that the covenant has been removed and the field re-zone as affordable housing. It is my understanding that unless a covenant contains an expiry date it is for perpetuity. How was this removed, by whom, what was the reason and why weren't we and the other residents informed of it?

We were also advise by the Estate agent that the builder also applied to build a further two houses in what is now the bottom of our garden, but his application was denied on the grounds that there would be too many residential properties for such small green lane. The lane is well used by walkers, cyclists, horse riders, dog walkers and visitors to the cemetery. There are also several coaches who visit the cemetery daily to view Billy Butlin's tomb.

The field is a haven for squirrels, bats, woodpeckers, sparrow hawks and many other birds. The loss of this habitat would be catastrophic for the creatures that live there. It also contains many beautiful trees and a granite dry stone dry wall which should be protected.

With respect, the majority of the residents residing around field J236 are older retired people, including

Detail: protected open space planning policy

The site was previously designated as Protected open space in the Revised 2011 Island Plan. This planning policy regime was changed when the States Assembly approved the new island plan and decided to rezone this site for the provision of affordable homes.

Covenants are private matters and are matters for the landowner. As part of the 'call for sites' process owners were required to confirm that land being forward was capable of development.

See Process response above

See Process: boundary amendment on proposals map response above

<p>ourselves, and to build an estate of affordable housing right in the middle of the field would have a devastating effect of the quality of life for ourselves and the other people who have lived around field J236 for very long time. There is already an estate of affordable houses near completion behind St John' school. Furthermore, I believe that a very large field has recently been re-zoned in Sion for the purpose of building affordable houses.</p> <p>We have also learned that the plans viewed by the ministers was incorrect, as the actual field is 25% smaller than shown on the plans viewed by them at the time.</p> <p>We feel that this whole process has been misleading, inaccurate and confusing, due to the lack of transparency one would expect on something so important and could have such a drastic impact on the quality of life to the people who live in the area.</p> <p>We should therefore be most grateful if you would kindly accept this letter as our strong objection to the re-zoning of field J236 and that the covenant should be reinstated.</p>	
<p>We are writing on [REDACTED] field J236, part of which was rezoned for Affordable Housing under the Bridging Island Plan 2022-2025. We have had an opportunity to review the recently issued Draft Supplementary Planning Guidance Development Briefs Affordable Housing Sites and wish to register our strongest objection to the proposed development of J236.</p> <p>It was with dismay that we learned last year of the decision to re-zone this area of Protected Open Space. All of the signatories to this letter would be directly impacted by the proposals, [REDACTED]. [REDACTED] Field J236 is unique in the village, characterised as it is by high hedgerows, mature trees and raised drystone wall banks, a haven for bats, birds, squirrels and other wildlife.</p> <p>This re-zoning was pushed through at the 11th hour without any direct consultation with us, and with a complete disregard for those most affected.</p> <p>It will result in a significant loss of amenity for parishioners and homeowners in the immediate vicinity who have been left feeling genuinely bewildered as to how this has been allowed to happen. Following the decision to rezone part of J236 in March 2022, the signatories to this letter had a meeting with the Connetable, Mr Andy Jehan on 30th March 2022 during which we explained the reasons why J236 should not have been rezoned and should not be developed. We have since attended a number of susequent meeting with him. Mr Jehan now agrees with us that there are other, much more viable sites closer to the village centre that would better suit the Island's housing needs.</p> <p>He is seeking to arrange a land-swap with an alternative field that would see J236 revert back to Protected Open Space. He has our full and collective support in his endeavours to achieve this. Even a basic Feasibility Study prior to the proposal to rezone J236 would have ruled this site out. J236 should never have been rezoned for housing for the following reasons:</p>	<p>Noted See various response outlined above.</p>



• Field 236 is 25% smaller than claimed in the approved amendment P.36-2121amd(91)amd(5) where it is stated that the site is 0.36 hectares in size. The Proposals Map that accompanied the BiP after it was adopted included within the rezoned area the private driveway and garden belonging to [REDACTED] as well as a portion of the southern edge of J236 also belonging to [REDACTED] this was pointed out to Head of Place and Space Planning [REDACTED] whereupon the Bridging Island Plan and Proposal Map were hastily amended, without referral to the States Chamber, to reflect the true area of the field, being 0.276 hectares. The site is therefore not able to deliver the number of houses that the States Assembly was led to believe it could. On pages 203 and 341 of the Bridging Island Plan when first adopted, J236 was listed as site of 0.4 hectares (2.2 verges) capable of delivering 13 homes based on a density of 35 dwellings per hectare. The reality, though, is that this is a site of, at most, 0.276 hectares (the plan appended to Amendment 91 Amendment 5 shows this) which would equate to a maximum of 9 homes at a density of 35 units per hectare. This represents a substantial disparity.

• Mr Jehan was unaware until reading the Draft SPG that J236 had been allocated for larger homes as, indeed, were we. The amendment brought to the States Chamber by Mr Jehan in amendment P.36-2121amd(91)amd(5) was, as clearly stated on page 5 of the amendment, for 'affordable step down properties to enable people to right size whilst still holding equity in a property'. These would be single storey, one and two bedroom properties. This is at complete odds with what is stated in the Draft SPG document which refers to the site being rezoned for Affordable Housing comprising predominantly three and four bedroom homes.

These would, no doubt, be two storey properties.

The Draft SPG goes on to say that the site could deliver 11-14 such properties. This is totally unrealistic. 14 homes would result in a density of 50 dwellings per hectare, totally at odds with assertion in the Draft SPG that 'the design and layout of any new development should have regard to the need to avoid any prejudice to the residential amenity of property to the South and North of the site'.

• Rue du Cimetiere provides the only direct access to Field J236 and is a Green lane which carries a 15 mph speed restriction. It contains access to the Parish Cemetery which has a limited parking facility. The Jersey Highway Code refers to Green Lanes as being principally for the use of pedestrians, cyclists and horse riders and further states that motor vehicles should try to keep out of these lanes and only use them if absolutely necessary for access or sightseeing. Rue du Cimetiere is between 3.5m and 3.7m wide where it borders J236 (see photograph 1. on p.5 of the attached document). The Government of Jersey Access onto the Highway – Standards and Guidance requires new roads and driveways serving 5 to 12 dwellings to be of a minimum width of 4.8m. Rue du Cimetiere is simply too narrow a lane to support a housing development.

• La Route de St Jean carries a 30 mph speed restriction at the junction with Rue du Cimetiere. According to Access onto the Highway – Standards and Guidance, visibility splays of 43m should be provided to both nearside and offside. Nearside visibility is particularly bad when exiting Rue du

Cimetiere onto La Route de St Jean, being only 13.5m (see p.11 of the attached document). The junction with Rue de L'Etocquet at the northern end of La Rue du Cimetiere is also poor and fails to meet minimum visibility requirements.

- Various applications to re-zone J236 were made from 2010 onwards and had been rejected most recently by the previous Minister for the Environment Mr John Young and it remained Protected Open Space under the Draft Bridging Island Plan. The Minister gave the following valid reasons for not supporting the development of the site: - Access is via a parish by-road and therefore has limited capacity for increase in vehicular traffic. - the downstream drainage system does not have any spare capacity. Would need to consider pumping flows directly to Rue des Buttes pumping station which may need upgrading.

- J236 features a number of mature trees including the cedar trees to the East that frame the view from the Western entrance to St John's Church (see photograph on p.4 of the attached document). These trees should be protected. The Draft SPG states that 'as much of the existing/tree and hedgerow planting is retained', yet also correctly notes that an unobstructed visibility splay of 2.4 x 25m would need to be provided for a new vehicular access. This would result in the loss of the majority of the hedgerow and drystone walling to the edge of Rue du Cimetiere as well as, in all probability, two mature trees. It is a shameful statistic that there is not a single Protected Tree in the whole of the Parish of St John.

- Mr Jehan has previously explained to us that the Comité de la Commune Rurale de St Jean had carried out an assessment of viable sites before putting forward J236. The Comité also carried out the survey in 2020, and were due to present an overview of the findings at an open meeting on 21st March 2020 but this was cancelled due to the Covid19 outbreak so never took place. We have requested the minutes of the meetings of the Comité Commune Rurale de St Jean and clarification of the process by which they arrived at the decision to press for zoning of certain fields in the parish over others but have had no response to date. Why has this field been chosen over others with better access to the village amenities, better opportunities for creating a suitable and safe vehicular access, with no mature trees that would need to be felled and that would have significantly less impact on existing residents?

- The Connétable has stressed that his focus will be on strengthening communication, and the Comité Rurale was very critical that in the case of Sion there was a lack of communication with those most affected by the proposals yet in this case there has been no communication whatsoever with any of the residents near or adjacent to Field J236.

- The Parish state in their amendment that "the field in question has not been farmed for over 30 years and it lends itself to this development." This is a tenuous statement on which to recommend development of the land given that the majority of the field is still perfectly good and viable agricultural land which has been deliberately unused and neglected by the current owners,

to encourage support for development have been lobbying to have J236

rezoned for many years in order to capitalise on the enhanced value that would result. This has been a field of convenience for [REDACTED] having been used by them as a boatyard and a car park when they [REDACTED] and a lucrative housing site now they do not. None of these uses were ever challenged.

- Cedar Farm lies immediately to the south of field 236. Built in 1789, it is a Grade 3 Listed Building, retaining its original proportions and character and contributes to the roadside setting. The history of Cedar Farm goes as far as records exist. The Richmond Map often referred to in various heritage documents relating to Jersey vernacular architecture and character, clearly shows the building which is now Cedar Cottage with fields and orchards around. It is one of the most significant and substantial historic farmhouses in the village. When it was in the ownership of [REDACTED] the farmstead included Cedar Cottage to the West, the land now occupied by Cedar Lodge and Steepleside to the East, as well as Field 236 to the North. This is how the farmstead appeared on the 1775 Richmond Map and how it remained until the 1980's/1990's. The outbuildings are now long gone, but even as recently as 1980's the Planning Department allowed demolition of barns and pig styes. Field J236 is elevated some 1.2m higher than Cedar Farm. A housing development in J236, and particularly one comprising two storey dwellings, would adversely affect the setting of a Listed Building which is contrary to Planning Policy HE1 of the Island plan.

- Three properties bordering the field to the South, Cedar Farm, Cedar Lodge and Steepleside, have their soakaways located within J236 by way of a legal agreement with [REDACTED] who developed and [REDACTED]. These properties have right of access in perpetuity to inspect and maintain the soakaways. In addition, mains water supplies and electricity supplies to these properties traverse the field.

Furthermore, the South-Western edge of the field is under the [REDACTED] and not [REDACTED]. The circumstances surrounding the rezoning of J236 were far from transparent. The 35th Amendment had been lodged on 12th July 2021 and was not supported by the incumbent Minister Mr John Young. The Island Plan Approval 2022-2025 (P.36/2021) & Amendments: Comments & Position Statement: Sites Under Consideration for the Provision of Affordable Homes was uploaded to the States of Jersey website in March 2022. On 17th March in this uploaded document, the 35th Amendment was noted as having been 'withdrawn'. Understandably, we concluded that J236 was no longer being put forward so you can understand our confusion on hearing that it had subsequently been approved for housing the very same day. The explanation we received was that the Amendment had simply been 're-badged' under another Amendment, but there was no accompanying note next to the 'withdrawn' 35th Amendment to suggest this was the case. The entire process has been misleading and confusing and lacked the transparency you would reasonably expect of a public process. Many of the signatories to this letter were unaware that J236 had, in fact, been rezoned which represents a damning indictment of the consultation process. Why was this field considered important enough to

be zoned as Protected Open Space but is now entirely suitable for development? Protected Open Space should mean exactly that, that it is protected from development in perpetuity otherwise the concept is meaningless.

In summary we object in the strongest terms to the rezoning of J236 for development for the reasons stated above. If you have not visited the site, we would urge you to do so. Mr Jehan will provide you with details of an alternative, far more viable site closer to the village centre. The alternative site has no mature trees, has direct access onto a main road, would attract significantly less drainage infrastructure costs and would have minimal impact on neighbours. He is proposing a land-swap with the alternative site, with J236 reverting back to Protected Open Space. For the reasons outlined above we trust that you, like us, will provide him with your full and unconditional support.

SITE H5 (4): Field MN410, La Rue des Buttes, St Martin



Key issues identified in the brief:

- Securing connection of the site to La Grande Route de St Martin is a key element of this scheme: this will require the possible agreement of other landowners.
- Progression of the site is subject to the completion of public sewerage infrastructure works.

SITE H5 (4): Field MN410, La Rue des Buttes, St Martin	
COMMENT	RESPONSE
<p>Please find below our responses to the Draft Development Brief for the above mentioned site:-</p> <ol style="list-style-type: none"> <li>Under clause 2 - "Density, type, yield, and tenure of homes" it is stated that this site is best developed to provide predominantly 3 &amp; 4 bedroomed homes however no 4 bedroomed homes are mentioned in the suggested mix in the table below;</li> <li>On a relatively small site such as this a mixed development containing one and two bedroomed flats does not work well;</li> <li>Does the suggested housing mix comply with the latest findings as to housing needs in Jersey which has recently been published?</li> <li>This particular site has access onto La Rue des Buttes which is a narrow country lane unsuitable to serve additional vehicles from a new housing estate. It is possible that this could be resolved if the site entrance could be located on La Grande Route de St Martin but the land required to enable this to happen is not in the control of the owner of Field 410;</li> <li>The Planning obligations present a heavy financial burden on the owner and developer in conjunction with the requirements to sell the first time buyer units at 70% of market value and for the units to be in accord with the new minimum floor area requirements which increase the gross floor area by 5 – 10% - in effect this presents a triple penalty which will need to be borne by the developer and the site owner. Preliminary costings have indicated that this will result in a very low site value with little or no developer profit even allowing for construction using MMC;</li> <li>The development of this site is dependant on an upgrade of the four sewer network in the locality including and upgrade to the Maufant storage/pumping facility but this project has not yet been funded by the States so there must be an element of doubt as to whether this will actually proceed and without it this site cannot be developed;</li> <li>The financial contribution towards the proposed upgrade to the foul sewer network is not yet known. Given the financial burden of the Planning obligations mentioned in item 5 above this could result in the site not being financially viable;</li> <li>We would question whether higher density than that proposed may be acceptable given the location of this site on the outskirts of the village and this may go some way to help to avert the financial fears raised in items 5 and 7 above as well as providing a better yield for the benefit of all;</li> <li>We note that Planning Policy H5 contains a requirement that if development has not commenced within three years of the adoption of the Bridging Island Plan then the States reserve the right to compulsorily purchase to site. The Island Plan was adopted in March 2022 so it is already nearly</li> </ol>	<p>Housing mix (points 1, 2 and 3)</p> <p>As stated in the brief, the housing mixes shown are indicative only. It is matter for the applicant to set out a proposed form of development that responds to housing need. It is considered that this site might provide family accommodation, but there is also a need to ensure that a mix of housing size is provided to accord with Policy H4 of the Island Plan, which requires a proportion of smaller homes to be provided. This can assist with helping to meet the need for homes for smaller households: provision in the island's more rural parishes, of this form of accommodation, is generally more limited.</p> <p>It is not clear, on what basis, providing a mix of house sizes does not work well?</p> <p>The developer/ applicant is encouraged to liaise with the Minister for Housing and Communities in developing an appropriate housing mix at the time that any development proposal is brought forward.</p> <p>Obligations and viability (point2 4, 5, 7 and 11)</p> <p>This site was a field, where there was a presumption against its development, until it was rezoned by the States to provide affordable homes, as part of the island plan review. The effect of its rezoning is to significantly increase the value of the land.</p> <p>The development of the site, however, necessitates the provision of a range of obligations which are considered necessary and proportionate to enable the development to proceed. The purpose of this guidance is to identify the planning issues and obligations that developers should address and make provision for as part of the development of any scheme and associated planning application. The cost of any such obligations should be considered relative to the assessment of the value of the land.</p> <p>Where viability is considered to be problematic in terms of realising a development, viability assessments will be required to be undertaken and published and subject to independent review, as part of the planning application process.</p> <p>Funding and provision of drainage infrastructure (point 6)</p> <p>The work that is required to be undertaken to enable these sites to be released for development is provided in the briefs. The timelines for this work have been</p>

18 months old and the development brief for the site has only recently been published. Until such time as the contribution towards the foul sewer upgrade has been established and the development brief has been adopted then it is difficult to obtain any commitment to the site and the three years deadline looks increasingly unobtainable;

10. It is not clear who benefits from the 30% of the sale value which is to be secured as a charge on each property.
11. It is simply not correct to assume that all additional costs associated with the obligations mentioned above will be borne by the existing land owner as a reduced site value with no reduced costs for the developer. With this approach the site will need to have little or no value.

updated to reflect the current situation. The progression of these works is subject to the approval of funding sought from the Government Plan. States Members are aware of the need for infrastructure to be provided to enable the development of these sites to progress and for homes to be delivered. The proposal for funding of this work will be considered by the States Assembly in December 2023.

Density of development (points 5 and 8)

Bridging Island Plan Policy H2 – Housing density encourages a positive design-led approach for the provision of new homes to ensure optimum efficiency in the use of land, and the Minister for the Environment has published [minimum density standards](#) to guide development throughout the island's built-up area.

The Minister has also published revised guidance for [residential space](#) and [parking standards](#); whilst residential space standards have been the subject of limited increases; minimum parking standards have been reduced. When density, space and parking standards are considered together, it should be possible to deliver more and better homes throughout the island.

The minimum density standards expected to be delivered in local centres, such as St Martin's Village are set at 35 dph. Recent examples of successful development being delivered at this density can be found at Clos le Troquer, in St Martin's Village: a similar context to that of MN410.

Compulsory purchase timeline (point 9)

Policy H5 contains a discretionary provision for compulsory purchase proceedings to be invoked, subject to the approval of the States Assembly, where rezoned affordable housing sites are not being progressed. The purpose of this discretionary policy provision is to encourage the delivery of affordable homes.

It is acknowledged, and a source of some regret, that development briefs have not been progressed more quickly: it was, however, considered important that related guidance on density, residential space and parking standards were revised in advance of development briefs being brought forward, to ensure that homes are on rezoned sites were developed to meet current expectations and policy objectives.

The challenges of providing the necessary public infrastructure, to enable the development of these sites for the provision of new homes, is also clearly recognised in the briefs.

	<p>In such circumstances, it would be unreasonable to give effect to any discretionary compulsory purchase proceedings until three years after the publication of the development briefs; or the provision of the requisite public sewerage infrastructure, whichever is the latest.</p> <p>This will be explicitly acknowledged in the revised guidance.</p> <p>Change</p> <p>Add reference to state that discretionary compulsory purchase proceedings would not begin to be considered until at least three years after the publication of development briefs, or the provision of the requisite public sewerage infrastructure, whichever is the latest.</p> <p>Property charge (point 10)</p> <p>The beneficiary of the 30% property charge that is required to be secured on the homes to be delivered on these sites is matter to be determined by the landowner, developer and provider. The key planning policy objective is that the homes remain available as affordable homes in perpetuity, where they can be purchased at 30% below open market first time buyer market value.</p>
<p>The SPG notes that any scheme “Needs to pay particular regard to the rural character of its western boundary and La Rue des Buttes”, whilst noting that the site “Also has a sensitive eastern boundary with the adjacent cemetery.” In addition, landscape buffering is required on the north side to respect the setting of the church, and it is stated that hedges and trees on southern and western boundaries need to be retained and the development well set back.</p> <p>Together these requirements reduce the useable size of the site significantly.</p> <p>Achieving the highways requirements will be challenging. In addition to trying to retain and strengthen boundary planting, the SPG notes that “The challenge will be both to deliver access to the village...whilst managing the visual impact of the new entrance.” The use of the word “challenge” implies that there is no plan as yet of how this can done, nor any certainty that it can be.</p> <p>The guidance requires direct access onto the main road, which in turn requires realignment of the junction and changes to the church car park access, and adequate splays. The landowner to the north therefore needs to agree to the application and the works being undertaken. Parish agreement is also required.</p> <p>Enhanced pedestrian crossings and traffic calming are required but given the obvious “challenge” in addressing the highways issues, the detail of the government’s proposals must be shared with the developer.</p> <p>As on other sites, given the SPG’s alleged quest for higher densities on these sites, and the requirement</p>	<p>Landscape impact</p> <p>The purpose of this guidance is to identify the planning issues and obligations that developers should address and make provision for as part of the development of any scheme and associated planning application.</p> <p>The brief requires the existing tree and hedge lines to be protected and strengthened to protect the character of the rural edge of the site and the village; this is not considered to be duly onerous for such a sensitive location or unduly prejudicial to the development of the site.</p> <p>Highways</p> <p>As stated above, the purpose of this guidance is to identify the planning issues that developers should address and make provision for as part of the development of any scheme and associated planning application.</p> <p>It is considered that securing appropriate access to the site is achievable, as set out in the brief, and the developer should engage with I&amp;E (Transport and Operations) to set out and agree the detailed design and specification of access arrangements.</p> <p>Travel and transport obligations</p> <p>The Minister for the Environment has published revised <a href="#">parking standards</a></p>



for a substantial bus subsidy, the emerging car and cycle parking requirements could be reduced. It is noted that there are foul sewer capacity issues. The Maufant storage tank/pumping station project is programmed to commence Q1 2024, with completion in Q3 2025.

which are material to the development of this site. Car parking standards are reduced, when compared with existing and proposed draft standards: whilst standards have been introduced for cycle parking, these have also been reduced from those originally proposed. This should assist with the delivery of a more efficient form of development of this site, whilst still necessitating and justifying the contribution to the enhancement of the local bus service.

SITE H5 (5): Field MY563, La Rue de la Rosière, St. Mary



Key issues identified in the brief:

- It is preferable that vehicular access to this site is secured through the existing development to the south.

SITE H5 (5): Field MY563, La Rue de la Rosière, St. Mary	
COMMENT	RESPONSE
<p>As a resident of [REDACTED] the proposed developments on Field MY563, I have the following comments, centred principally on section f) Highways, active travel and parking:</p> <ol style="list-style-type: none"> <li>1. Provision of a 1.5m wide footpath on La Rue de la Vallée (<i>The section adjacent Rue de La Vallée should be provided behind the existing roadside granite wall, which should be retained, with a pedestrian access point at the northern and southern ends of the footway to/from the site.</i>). I would not want to see the existing pavement area (segregated from the road by lines, surface changes and bollards) removed. A sudden change in direction to dogleg behind the wall for walkers and cyclists would be potentially dangerous as sightlines are lost.</li> <li>2. Vehicular access. I support the statement "<i>No exit via La Rue de la Vallée would be supported</i>", however, I oppose the proposals for access via Jardin de Haut (<i>It is preferable for vehicular access to the site to be secured through the existing vehicular access that serves Jardin de Haut to the south</i>). La Rue de la Vallée is a narrow, 20 mph limit road with limited capacity for 2-way traffic on the southern section, and it can be problematic to exit onto the crossroads with Route de Sainte Mary opposite St Mary's Country Inn, particularly at peak traffic times. This is due mainly to the limited sight lines west past the church and traffic arriving from four different directions simultaneously, but also often vehicles travelling well in excess of the blanket 20 mph limit. It is often challenging to cross the junction on foot or by bike, particularly for school children, when there are cars waiting to enter the junction from any direction. Walking to school, we often have to wait a long time for a space to cross the road, relying on kind drivers to block other cars and provide a safe crossing.</li> </ol> <p>Rue de la Vallée is located on Cycle Network Route 4a and is extremely popular with cyclists arriving via the St Peter's Valley and La Dimerie route. I strongly oppose, on safety, public amenity and tourism grounds, adding more traffic to this part of the network when there is suitable alternative access via Rue de la Rosière.</p> <p>I suggest that the access point should be provided from the road with higher capacity, more space, and less potential conflict with vulnerable road users - Rue de la Rosière. Suitable traffic calming measures to drop traffic speed from cars leaving the 40mph section from St Peter's Valley would be welcomed (note that many cars entering La Rue de la Vallée also travel significantly faster than the 20 mph limit).</p>	<p>Footpath provision</p> <p>As stated in the brief, there is a requirement to provide a footpath at both the western and eastern ends of the site: to the west, this is required to be provided behind the existing granite wall.</p> <p>This provision is in addition to the traffic-calming that already exists along Rue de la Vallée, where no changes to existing arrangements are envisaged.</p> <p>Vehicular access via Jardin de Haut on to Rue de la Vallée</p> <p>Vehicular traffic from Jardin du Haut already exits both ways on Rue de la Vallée via an existing junction to highway standards, thus the impact of additional traffic on the northern section of this route will be limited. The road is already subject to traffic-calming measures as is the junction with La Route de Ste Mairie. A new access off La Rue de la Rosiere is difficult with road alignment and traffic speed. The addition of limited further traffic movements along this road is not thus considered to be unduly prejudicial to highway safety.</p>

We respond to your request for comments on the draft supplementary planning guidance, with respect to field MY563, Rue de la Rosiere, St Mary [REDACTED] adjacent to the southern boundary of the field in question.

Before we put forward our comments, we would like to address and remind you of a situation, which wasn't satisfactorily dealt with when the field was sold to [REDACTED]. Whilst we accept that it now seems a fait accompli, as to a development going ahead, it was well reported at the time, in the media, of the questionable way that the site was acquired ( see attached examples) and in particular, the price of £35,000 paid to an elderly lady, who originally owned the field. It is now obvious that the development value is way in excess of this (see attached J.E.P. column from Mr. Ben Shenton) Will this lady be justly compensated ? We will be interested to find out!

Our comments are as follows.

1) Re issue 3b

We would draw attention to the design and layout of Jardin de Haut, which resulted in a reasonably satisfactory outcome for all involved, particularly in the sensible positioning of the low-level houses, car parks/open areas. This has meant minimal intrusion of privacy, not being overlooked and no overbearing houses. We did not object to the development of the old, glasshouse site, so it was a win-win all round.

2) Re issue 3f

When Jardin de Haut was developed, a suggestion was put forward to have Rue de la Vallee one way north and Rue de la Rosiere one way south. This was rejected, resulting in much increased traffic activity on Rue de la Rosiere, with obvious danger to pedestrians and horse riders. A bollarded road would have dealt with both problems and provided a much safer exit onto Rue de la Rosiere.

3) Re issue 3d

It was heartening to see a proposal for supplementary planting of indigenous, native species along boundaries and protection of existing, mature specimens. One plea for the future would be for the correct use of trimmers etc. on vulnerable ground plants during maintenance. Many are killed soon after -expensive- planting due to poor training and supervision.

4) Re issue 3g

We would draw your attention to the fact that the mains water and sewage from [REDACTED] that of [REDACTED] runs along the southern edge of the field. Therefore, it would be necessary to fully protect these, or find a satisfactory alternative.

A roof rainwater storage tank built under the garage when [REDACTED] was constructed in 1961 holds 38,000 l and was originally the water supply for the house, but now provides water for garden/car washing etc. This results in the equivalent usage of a one person household for mains

Land purchase:

The sale of any land is a private matter the conditions of which are a matter for the vendor and purchaser

Access

There are no proposals to alter traffic management in the area. As stated in the brief, the proposed access arrangements are via Jardin de Haut.

Landscaping maintenance

The provision of additional landscaping is usually conditional such that any plants lost during the initial years of the development are required to be replaced. This should enable new planting to become established.

Drainage

Existing drainage infrastructure will need to be identified and considered as part of the design of any development scheme. This is the responsibility of the developer.

Sustainable development

Development of rezoned affordable housing sites is required to demonstrate how it incorporates the highest level of sustainability measures, including water conservation and improved energy performance.

Future consultation

Once development briefs for the sites are finalised and published, there is a requirement for developers to (a) engage with the local community for development of ten or more homes in advance of a planning application and (b) to submit a planning application, which is an open and transparent process, and in which local residents can participate.

water. A similar provision (individual, or communal) would future proof the development.  
Are solar panels proposed?  
In conclusion, we would hope that the design and layout of the development will have the same satisfactory outcome as Jardin de Haut and that we would be informed of intentions and consulted before concrete plans are laid down.

SITE H5 (6): Fields O594 and O595, Le Clos de la Fosse au Bois, St Ouen



Key issues identified in the brief:

- PoSO have specific aspirations to develop some age-restricted homes on this site. Whilst not specifically allocated for age-restricted rental homes, the site might still provide affordable homes to those people who need ongoing support to live independently when assessed through the Jersey Housing Gateway and fitting into the supported housing band. On this basis, the development of a mix of family homes and some smaller homes might be most appropriate for this site, providing a mix of social-rented dwellings (45%), and affordable homes for purchase (55%).
- The draft brief seeks to secure a pedestrian connection from the SW of the site across the Parish Yard to Rt de Vinchelez (plus a bus stop and ped crossing facility).
- The draft brief seeks to secure a pedestrian/cycle connection from the eastern corner of the site to Rue des Mares

SITE H5 (6): Fields O594 and O595, Le Clos de la Fosse au Bois, St Ouen	
COMMENT	RESPONSE
<p>I refer to the above and to a recent meeting held at St Ouen’s Parish Hall.</p> <p>At this meeting we considered the proposed pedestrian route through the Parish depot to be a bad idea as it is not practical and could be very dangerous:</p> <ul style="list-style-type: none"> <li>• There is an approximate 1.2m level difference from the Parish depot to the field</li> <li>• The depot is open from 06.30am with vehicular movements all day</li> <li>• There would be very little visibility to oncoming traffic from the north for pedestrians crossing the road which would be even more dangerous for anyone pushing a pram</li> <li>• The Parish could also be potentially liable for claims for anyone sustaining injury or worse by creating an access path</li> <li>• If a link was created, due to the lack of a continuous pavement on either side of the road pedestrians would have to cross La Route de Vinchelez 3 times in the 250 metres from the depot to the crossing at the shops</li> <li>• The preferred pedestrian solution is to have one link to the East via Route de Marettes</li> <li>• This road it is planned to become one way and is a lot safer route for pedestrians to access the village facilities</li> </ul> <p>The Development Brief states that “Access to cross the Parish depot would require agreement of the landowner” and in light of the above the Parish is unwilling to give it’s permission to create a path across it’s land.</p>	<p>Pedestrian access, and associated facilities, to the west</p> <p>In view of the Parish of St Ouen’s unwillingness to further explore this provision, it has been removed from the brief.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• Remove reference to provision of western pedestrian link to La Route des Vinchelez, along with the proposed relocation of a bus shelter; and the provision of a pedestrian facility across La Route des Vinchelez.</li> </ul>
<p>Further to issue of the Draft Development Briefs for the Affordable Housing Sites, please find below our comments for your consideration.</p> <p>1.1 Page 3, para 2. The text states the following. <i>“In terms of establishing the right housing mix, proposals should be guided through the application of Policy H4 – Meeting housing needs. This policy establishes that the development of new homes will only be supported where it can be demonstrated that it positively contributes to meeting identified housing needs of the local community or the island, in terms of housing types, size and tenure, having regard to the latest evidence of need.”</i></p> <p>Is there likely to be any further guidance provided as to what information will be required, and from where?</p> <p>1.2 Page 3, last para. The text states the following. <i>“The Minister for Housing and Communities has not yet released details of the right-sizing scheme that would need to be applied to activate right-sizing</i></p>	<p>Housing mix</p> <p>As stated in the brief, the housing mixes shown are indicative only. It is matter for the applicant to set out a proposed form of development that responds to housing need.</p> <p>The developer/ applicant is encouraged to liaise with the Minister for Housing and Communities in developing an appropriate housing mix at the time that any development proposal is brought forward.</p> <p>It is acknowledged that the Parish of St Ouen have a specific housing requirement and the ministers would be pleased to work with the parish to help achieve this objective within the policy framework agreed by the States in the Island Plan.</p>

*opportunities on the re-zoned housing sites."*

Is there any indication as to when details referred to will be released? Will determination of any application on these sites, if the scheme includes an element of down-sizing homes, be delayed until the details are released and approved?

1.3 Page 6, para 1. The text states the following. *"This will, by necessity and in accord with Policy H5, include those schemes where parishes might wish to play a role in the subsequent allocation of homes (up to 50% for affordable homes for purchase)."*

By virtue of the fact that social rented homes are not mentioned in the above, is one to assume that the consideration does not apply in that respect?

Page 2 cont'd. 1.4 Page 7 - Modern Methods of Construction The text states that MMC will be encouraged. For clarification, if MMC is not deemed to be the most economic form of delivery, would this prejudice the scheme? Will there be a requirement for costed analysis of alternatives, or is this simply a statement to the effect that the use of MMC, if selected, would be acceptable?

1.5 P7 First para of section of "Delivery and Compulsory Purchase". The text states. *"To ensure that progress is made to address the need for affordable homes over the plan period, Policy H5 of the bridging Island Plan states that where the development of affordable homes on sites allocated for this purpose has not commenced within three years of the approval of the plan, they may be purchased by the States of Jersey, using compulsory purchase provisions if required, and developed in accordance with this policy by transfer to an approved affordable housing provider."*

It is clear that there may be significant problems in connecting this and other sites to the public Foul Sewer system. Whilst it is hoped that the problem might be able to be addressed, there is a possibility that the issue may cause significant delay to delivery. Presumably this would not be a reason to invoke compulsory purchase powers?

1.6 P9 – First para of Climate Change: sustainable development. The text states. *"More than a third of the island's emissions arise from energy use in buildings."*

Could you clarify from where this statistic is derived?

1.7 P9 – second para of Climate Change: sustainable development. The text states. *"Consideration of measures including energy input, thermal performance, orientation and sustainable forms of electricity production will be expected to form part of the early design proposals to ensure such measures are embedded and not retrofitted."*

In regard to the text highlighted in bold – does this mean that the Department expects there to be sustainable forms of electricity production included in the schemes? Does this include air source heat pumps or hot water heat pump cylinders? The cost of such installations as PV arrays is not inconsiderable. Do we need to prove that such installations are not economic/affordable?

Policy H5 makes clear that up to 50% of affordable homes for purchase may be prioritised for those with links to the parish. The Minister for Housing and Communities would, however, be pleased to work with the Parish of St Ouen to discuss the allocation of homes for social rent, through the Housing Gateway, with the parish.

Modern methods of construction

As stated in the brief, MMC is encouraged, not required.

Compulsory purchase timeline

Policy H5 contains a discretionary provision for compulsory purchase proceedings to be invoked, subject to the approval of the States Assembly, where rezoned affordable housing sites are not being progressed. The purpose of this discretionary policy provision is to encourage the delivery of affordable homes.

It is acknowledged, and a source of some regret, that development briefs have not been progressed more quickly: it was, however, considered important that related guidance on density, residential space and parking standards were revised in advance of development briefs being brought forward, to ensure that homes are on rezoned sites were developed to meet current expectations and policy objectives.

The challenges of providing the necessary public infrastructure, to enable the development of these sites for the provision of new homes, is also clearly recognised in the briefs.

In such circumstances, it would be unreasonable to give effect to any discretionary compulsory purchase proceedings until three years after the publication of the development briefs; or the provision of the requisite public sewerage infrastructure, whichever is the latest.

This will be explicitly acknowledged in the revised guidance.

Change

- Add reference to state that discretionary compulsory purchase proceedings would not begin to be considered until at least three years after the publication of development briefs, or that provision of the requisite public sewerage infrastructure, whichever is the latest.



1.8 P10 – First para of Standards for Homes and parking. The text states. *“The Minister for the Environment has recently published revised draft supplementary planning guidance for both residential space standards and residential parking standards. These have been issued in draft, for consultation, before adoption. Once adopted, they will become material to decision-making.”* Page 3 cont'd. These standards are key to developing scheme designs, particularly in terms of minimum sizes for amenity space, minimum house floor areas, minimum parking standards, etc. When is formal adoption of the standards likely to occur?

1.9 P10 – Fourth para of Standards for Homes and parking. The text states the following. *“In helping to deliver more sustainable travel the development of these sites will need to ensure new homes allow for appropriate cycle storage and the provision electric vehicle charge points.”*

It is our view that the Draft parking standards are unduly onerous in terms of cycle parking provision. The requirements are affecting density due to the size of enclosure required.

1.10 P10 – First para of Space for Play. It is counterproductive, in our view, that the space for play is required in addition to the specified areas of shared open space. Historically there have been issues with provision of play spaces in terms of maintenance of equipment and insurances.

1.11 P12 – Drainage infrastructure This matter is addressed later in this document.

1.12 P43 – a. Site area According to our calculations, the site area is 9,492m<sup>2</sup> – just under 1 hectare. 1.13 P44. Density, type, yield and tenure of homes. Our current scheme indicates a total of 36 units, giving a density of just under 38 dph. We assume that this is an acceptable density for this site.

1.14 We are indicating a mix of accommodation and tenure as follows. DWELLING TYPE NUMBER OF UNITS SOCIAL RENTED NUMBER OF UNITS FIRST TIME BUYER NOTES 3B/5P House 20 First time buyer 3B/5P House 4 Ideally for Parish 2B/3P Flat 8 Ideally for Parish 2B/3P Bungalow 2 Ideally for Parish 1B/2P Flat 2 Ideally for Parish TOTAL 16 (44.4% of units) 20 (55.6% of units)

We assume that the above mix of tenure and type is acceptable within the terms of the brief. It is possible that due to the current draft space and parking standards, some of the 3B/5P units may have to be changed to 3B/4P units, which would affect the overall yield in terms of bed spaces.

1.15 P44. 3. Planning and Design Considerations. Last para. on p44. The text states the following. *“The northern boundary has a granite roadside wall that is characteristic of the area, and linked to the development of La Croix Farm. These features should be retained as fully as possible”.*

We would note that it will be necessary to breach this wall to gain access to the site.

1.16 P45. 3. Planning and Design Considerations. Fourth para. down. The text states the following. *“Pedestrian links to the east and west of the site will require specific schemes to overcome topographical and highway layout challenges. These elements will need to be subject to further discussions with the Parish. Works to connect to the local road and path network will need to meet I&E requirements, but the impacts will need to be considered early in the design process and visual impacts mitigated through care*

Sustainable development

Statistics cited in the draft guidance are derived from the [Carbon Neutral Roadmap](#): see para 7.17-7.19, p. 58.

The bridging Island Plan Policy ME1 – 20% reduction in target energy rate for new development requires development to outperforms the target energy rate by 20%: how this is achieved is a matter for the developer.

Revised parking standards

These have been adopted and published by the Minister for the Environment: see [Residential parking standards \(gov.je\)](#).

Standards for cycle parking have been introduced, but these have been reduced.

Play space

The requirement for the provision of play space is derived from bridging Island Plan Policy CI8 – Space for children and play.

Guidance is going to amended to highlight the need for management and maintenance arrangements to be established as part of the submission of a planning application; and required through the use of planning obligation agreements.

Density

The Minister for the Environment has recently published guidance on minimum density standards for the island’s built-up areas. The minimum density standards expected to be delivered in local centres, such as St Ouen’s Village are set at 35 dph.

Tenure mix

Policy H5 – Provision of affordable homes requires homes to be provided in the proportions of 45% for social rent and 55% for purchase, except where an alternative tenure split:

- (i) can be justified, having regard to latest evidence of need
- (ii) enables the ‘right-sizing’ of homes within the existing housing stock; or
- (iii) can be justified relative to any other overriding justification.

Access

It is acknowledged that the creation of a new, safe access on to La Rue de la Croix will require the site boundary to be breached, with the inevitable loss of

*in design, layout and materials."*

It should be noted that the Parish feel that the link to the West is unfeasible. The only way to achieve such a link is through the Parish Depot yard, and this is understandably thought to raise significant safety issues.

1.17 P46. 3d. Landscaping and Open Space. Fifth full para. down. The text states the following. *"Separate provision should also be made for children's play space. The extent of this will be dependent upon the housing mix and the number of family homes."*

Please refer to my comments in Section 1.10, above.

1.18 P47. 3f. Highways, active travel and parking. First para. The text states the following. *"This site is not connected to the public footpath network and provision should be made for a 3 m footway/ cycle route from the entrance to the site (on to La Rue de la Croix) to the junction with La Rue des Marettes, in order to facilitate access to the village."*

The 3m wide footway/cycle route is, in our view excessive, (particularly in light of the desire to preserve as many existing trees as possible) and will impact upon achievable densities. We would suggest 2.0m wide as a more pragmatic figure. 1.19 P47. 3f. Highways, active travel and parking. Second para. The text states the following. Page 5 cont'd. *"Pedestrian access should also be facilitated from the south-west corner of the site..."*

Please refer to my comments in section 1.16, above.

1.20 P47. 3f. Highways, active travel and parking. Fourth para. The text states the following. *"The design and layout of development on the site should ensure that pedestrian access can be secured across the site (east/west).*

Given comments made above regarding the problems with delivering an access via the Parish Depot, we do not believe that east/west pedestrian access will be able to be achieved. Can this requirement be amended to a requirement to investigate the options, rather than a definitive requirement to provide such a link? We would add that there will be adequate east west pedestrian connection within the site via the pavements currently indicated.

1.21 P47. 3f. Highways, active travel and parking. Fifth para. The text states the following. *"Bus stop 3432: La Croix S should be relocated on land at the Parish Depot and a bus shelter provided, through a planning obligation agreement, to the value of £14,000, subject to the agreement of the landowner."*

For reasons given earlier in this document, we do not believe that it will be possible to relocate the bus stop and provide a shelter as suggested. Can this requirement be amended to a requirement to investigate the feasibility of undertaking this work, rather than a definitive requirement to deliver it?

1.22 P47. 3f. Highways, active travel and parking. Last para. The text states the following. *"Space for the parking of bikes and cars should be provided on the site in accordance with the Minister for the*

some of the boundary wall and possibly some of the small hedgerow trees. For the avoidance of doubt, this will be acknowledged in the revised brief.

Change

- Make explicit acknowledgement that the creation of the access to the site will necessitate the loss of some of the boundary wall and possibly some associated trees.

Pedestrian access, and associated facilities

In view of the Parish of St Ouen's unwillingness to further explore the provision of a pedestrian access to west, and the associated facilities of a relocated bus top and shelter and crossing facilities, it has been removed from the brief.

The minimum specification of a shared pedestrian/cycle route is 3m, and should be provided (to ensure active travel access to La Rue des Marettes, to the east)

Change

- Remove reference to provision of western pedestrian link to La Route des Vinchelez, along with the proposed relocation of a bus shelter; and the provision of a pedestrian facility across La Route des Vinchelez.

Funding and provision of drainage infrastructure

The work that is required to be undertaken to enable these sites to be released for development is provided in the briefs. The timelines for this work have been updated to reflect the current situation. The progression of these works is subject to the approval of funding sought from the Government Plan. States Members are aware of the need for infrastructure to be provided to enable the development of these sites to progress and for homes to be delivered. The proposal for funding of this work will be considered by the States Assembly in December 2023.

<p><i>Environment's revised parking standards. In this respect, this site is located within the 'Other areas sustainable transport zone'."</i></p> <p>As noted elsewhere in this document, we believe that the cycle parking requirements as set out in the draft SPG for 3-bedroom houses are excessive and will impact upon achievable densities.</p> <p>1.23 P48. 3g. Drainage. We would note that the drainage issue is a serious one that may well impact upon the feasibility of development of the site as a whole. The option included in the Design Brief Document to connect to the St Ouen pumping station is not possible due to the installation cost (c. £1M) and we are informed by I&amp;E Drainage that this in itself will not necessarily provide a viable option. We would therefore suggest that the Government undertake the required network improvements as an urgent priority.</p> <p>I trust that the above comments are of assistance, and please feel free to get in touch should there be a requirement to discuss any of the topics raised.</p>	
<p>We are emailing you with regard to the development of affordable housing at the above site. while we have no objection to this field being to developed we do have the following concerns.</p> <p>1) We note that there is a possibility of flats being build and feel that this would encroach on our privacy.</p> <p>2) Our house is [REDACTED] and we have a number of large trees that will need to be removed so that a solid boundary wall can be build , this will ensure our privacy.</p> <p>Finally although not on the plans we would have thought that this field would have been better used for smaller dwellings for the Parish</p>	<p>Mix of homes and amenity</p> <p>The housing mix example provided in the brief is just an indicative model of the sorts of homes that might be provided on the site. In addition, the provision of flats does not imply those buildings will be any taller than houses, but just that smaller homes might be provided.</p> <p>The parish's desire to secure some smaller homes is noted, and is provided for in the brief.</p> <p>The impact of any form of residential development upon the residential amenity of neighbours is a factor that is considered throughout the planning process.</p> <p>Once development briefs for the sites are finalised and published, there is a requirement for developers to (a) engage with the local community for development of ten or more homes in advance of a planning application and (b) to submit a planning application, which is an open and transparent process, and in which local residents can participate.</p> <p>This will provide neighbours with an opportunity to view proposals and consider the impact upon their own properties, and to lodge comments, as appropriate.</p> <p>Boundary treatment</p> <p>The brief requires the retention of as many boundary trees as possible.</p> <p>Any other treatment of the boundary is a matter for the developer and will need to be the subject of engagement with neighbours, and a planning application.</p>

We are writing in response to the consultation which closes on 23.06.23 to lodge our concerns and comments with reference to the supplementary planning guidance, in the form of draft development briefs which includes field 0594, Le Clos de la Fosse au Bois, St. Ouen, the boundary of which is at the [REDACTED]

The hedgerow is not on the boundary line or on land belonging to the owners, [REDACTED]. However, the hedgerow was planted over 20 years ago by [REDACTED] with the permission of [REDACTED] (who owned the field) under their direction and instructions, that once it was planted the hedgerow belonged to them and that we were always to maintain it and at our cost. We have always carried this out as requested.

The reason for having the hedgerow and agreement with the landowner was for the following reasons:

- When the property was built a fence was erected at the rear of the property which complied with the law that required a space between [REDACTED] boundary and the garden of [REDACTED]. This space was to enable [REDACTED] to maintain their hedgerow.
- Over a period of time the hedgerow became overgrown, the bank started to subside, eventually damaging the fence which caused it to rot, become unstable and unsafe as it was falling down into the garden. We would consider that the hedgerow is now fully mature and as such supports a variety of wildlife. It is environmentally friendly and provides necessary shelter, protection, and privacy to the property.
- We would be very grateful if the hedgerow could remain. The Consultation draft notes, *'The boundary trees and hedgerow, including those between fields 0594 & 0595, are key ecological features where it is important to ensure that as much of the existing tree and hedgerow planting is retained and increased in scale, density and quality. This should be complemented by a landscaping plan for the retention of existing and provision of new planting, particularly along site boundaries'*. In addition, *'a biodiversity impact statement should be prepared. This should also include consideration of the protection of root zones as an integral part of the design and layout of buildings and hard landscaping, including roads and pavements; and during construction'*.
- We did ask [REDACTED] if it was possible to purchase the strip of land on which the hedgerow is situated at the rear of our property. He advised that this request would have to be discussed with the new owners of the field. We are not aware who the new owner of the field is or will be, but we would like to be given the opportunity to discuss this request.
- If it were to remain as a hedgerow boundary but replaced with a new planting, we wish to request that it is replaced with the same or similar variety of hedging that is in situ as [REDACTED] pine tree pollen which causes serious asthma.
- Another issue that we would like to bring to your attention as it has the potential to cause serious damage to the foundations of [REDACTED] is the sycamore tree and root network. This tree

#### Boundary treatment

The brief requires the retention of as many boundary trees and hedging as possible.

Any other treatment of the boundary is a matter for the developer and will need to be the subject of engagement with neighbours, and a planning application.

<p>(which has been reduced in height) with [REDACTED] permission was towering in height above the gutters causing them to block up with leaves and also blocking the daylight in the rooms at the rear of our property. When the property was extended over 20 years ago, and the land was excavated for the foundations the root network from this tree was extensive and had grown deep and far into the ground. Therefore, I was advised by the builder that as much as possible had been cut back but as the tree was alive there would be further growth.</p> <ul style="list-style-type: none"> <li>We are requesting that if it is decided to remove the hedgerow and the sycamore tree, we are informed ahead of this to discuss as we feel professional advice would certainly be needed on our behalf regarding whether the root network of the tree if disturbed/removed could compromise or damage the foundations [REDACTED]</li> </ul>	
<p>The guidance for this site includes the same standardised density table as the others. Unlike other sites however, the text does not refer to the site being used predominantly for family housing. Moreover, it says that "Whilst not specifically allocated for age-restricted rental homes, the site might still provide affordable homes to those who need ongoing support to live independently, and fitting into the supported housing band". The SPG therefore requires a mix of "family homes and some smaller homes".</p> <p>As previously noted, Supported Housing is addressed in BIP policy H7, whereas Affordable Housing is subject to a different policy – policy H5. For that reason, the sites designated for Supported Housing have not been included within this SPG. We would support a wider distribution of supported housing, but as this SPG only covers policy H5 and not H7, it does not allow for affordable homes to be located on supported housing sites. Therefore, to ensure that the number of affordable homes on greenfield sites, envisaged in the BIP, is not further denuded, the sites listed in policy H5 should be used for affordable homes.</p> <p>The guidance highlights that existing houses in the area are small in scale, implying that the new development should follow this pattern, which will make it difficult to achieve the optimum use of the site to provide for affordable housing.</p> <p>This is further complicated by the need to address several difficult and unresolved highways requirements. These include dealing with level changes, trying to stitch development into the village through safe routes across others' land, and retaining boundary planting whilst also providing a 43m visibility splay and a 3m wide footpath behind the trees at the eastern end of the site, which narrows to a point.</p> <p>Accommodating homes at that end of the site will be difficult, and the guidance also highlights the need to address constraints at the south-west and north-west corners of the site.</p> <p>Pedestrian access is required across the site, which is relatively narrow north to south, and it is noted that links to east and west require consultation with the parish and are therefore unresolved.</p>	<p>Affordable housing</p> <p>The provision of homes on sites developed under the auspices of Policy H5, will be required to deliver affordable homes, as specified in the terms of that policy.</p> <p>They should be developed in the proportions of 45% for social rent and 55% for purchase, except where an alternative tenure split: (i) can be justified, having regard to latest evidence of need (ii) enables the 'right-sizing' of homes within the existing housing stock; or (iii) can be justified relative to any other overriding justification.</p>

With a bus subsidy contribution of £85,500, and a stated desire to achieve higher densities, car and cycle parking requirements should be relaxed.

Like other sites, the timing and cost of developing this site will be dictated by the need to update the drainage system, the costs and dates of which are not yet fixed.

SITE H5 (7): Field O785, La Rue des Cosnets, St. Ouen



Key issues identified in the brief:

- Various transport-related obligations are identified to promote pedestrian safety and a safer route to school along La Rue des Cosnets.

SITE H5 (7): Field O785, La Rue des Cosnets, St. Ouen

COMMENT

No comments received.

RESPONSE

**SITE H5 (8, 9 and 10): Fields P558, P559 and P632, La Route du Manoir, St Peter**



Key issues identified in the brief:

- The brief requires that these three fields are developed together, to afford an opportunity to create a new access; together with new public open space that is accessible and of benefit to the wider community within the village.
- Various obligations are identified to promote pedestrian accessibility and integration with the village, and to calm traffic.



SITE H5 (8, 9 and 10): Fields P558, P559 and P632, La Route du Manoir, St Peter	
COMMENT	RESPONSE
<p>Having had the chance to read the Briefs now, I have the following points I would like to put on record. My interest is in the 5 fields in St Peter.</p> <p>I fully appreciate the need for affordable housing in the Island but have concerns that this development will put more pressure on the Parish and that this will impact my quality of life.</p> <p>I live [REDACTED]</p> <p>This road has heavy traffic as it is, and most do not stick to the speed limit. It is not only cars, but heavy vehicles causing noise and pollution.</p> <p>The development is for close to 200 properties, which will probably mean at least one extra car per 200 property attempting to access La Route De Beaumont. As it is it's difficult to get in and out off drive ways and side roads. It's an accident waiting to happen. This is not the first time I have raised this with the Parish and the Police.</p> <p>What about education, St Peter's is a small school.</p> <p>The number 9 bus is the only route providing a service and as a single decker is generally almost full at peak times.</p> <p>How will the shops and eating establishments and community centre cope with the extra residence?</p> <p>I would like to know what consideration has been given to the above points?</p> <p>What value will the development provide me as I look to retirement?</p> <p>I don't recall seeing any planning application for the development. Is this still to be made?</p> <p>I look forward to hearing from you.</p>	<p>Impact of development on existing infrastructure</p> <p>As part of the island plan review, those sites put forward for development were assessed against access to and provision of local services. In the case of the sites rezoned in St Peter there is primary school provision and good access to secondary school provision; retail services, the Parish Church and Hall; Community and Youth Club Centre; dentist; doctor's surgery; chemist and two public houses are located within 10-15 minutes' walk or cycle of the site.</p> <p>The site is served by bus route 9, which provides a regular service to the town of St. Helier. The development brief states that a planning obligation agreement will need to be entered in to with the developer to secure a contribution to enhance the bus service.</p> <p>The provision of further development here will help support local services.</p> <p>Highways and access</p> <p>As stated in the draft development brief, this new development will require the creation of new access arrangements to serve the development of all three fields; and affords an opportunity to deliver wider traffic calming and pedestrian crossing facilities.</p> <p>Future consultation</p> <p>Once development briefs for the sites are finalised and published, there is a requirement for developers to (a) engage with the local community for development of ten or more homes in advance of a planning application and (b) to submit a planning application, which is an open and transparent process, and in which local residents can participate.</p>
<p>Further to issue of the Draft Development Briefs for the Affordable Housing Sites, please find below our comments for your consideration.</p> <p>1.1 Page 3, para 2. The text states the following. <i>"In terms of establishing the right housing mix, proposals should be guided through the application of Policy H4 – Meeting housing needs. This policy establishes that the development of new homes will only be supported where it can be demonstrated that it positively contributes to meeting identified housing needs of the local community or the island, in terms of housing types, size and tenure, having regard to the latest evidence of need."</i> Is there likely to be any</p>	<p>Housing mix</p> <p>As stated in the brief, the housing mixes shown are indicative only. It is matter for the applicant to set out a proposed form of development that responds to housing need.</p> <p>The developer/ applicant is encouraged to liaise with the Minister for Housing and Communities in developing an appropriate housing mix at the time that any development proposal is brought forward, including the potential for right-</p>

further guidance provided as to what information will be required, and from where?

1.2 Page 3, last para. The text states the following. *"The Minister for Housing and Communities has not yet released details of the right-sizing scheme that would need to be applied to activate right-sizing opportunities on the re-zoned housing sites."*

Is there any indication as to when details referred to will be released? Will determination of any application on these sites, if the scheme includes an element of down-sizing homes, be delayed until the details are released and approved?

1.3 Page 6, para 1. The text states the following. *"This will, by necessity and in accord with Policy H5, include those schemes where parishes might wish to play a role in the subsequent allocation of homes (up to 50% for affordable homes for purchase)."* By virtue of the fact that social rented homes are not mentioned in the above, is one to assume that the consideration does not apply in that respect?

1.4 Page 7 - Modern Methods of Construction The text states that MMC will be encouraged. For clarification, if MMC is not deemed to be the most economic form of delivery, would this prejudice the scheme? Will there be a requirement for costed analysis of alternatives, or is this simply a statement to the effect that the use of MMC, if selected, would be acceptable?

1.5 P7 - First para of section of "Delivery and Compulsory Purchase". The text states. *"To ensure that progress is made to address the need for affordable homes over the plan period, Policy H5 of the bridging Island Plan states that where the development of affordable homes on sites allocated for this purpose has not commenced within three years of the approval of the plan, they may be purchased by the States of Jersey, using compulsory purchase provisions if required, and developed in accordance with this policy by transfer to an approved affordable housing provider."*

It is clear that there may be significant problems in connecting this and other sites to the public Foul Sewer system. Whilst it is hoped that the problem might be able to be addressed, there is a possibility that the issue may cause significant delay to delivery. Presumably this would not be a reason to invoke compulsory purchase powers?

1.6 P9 – First para of Climate Change: sustainable development. The text states. *"More than a third of the island's emissions arise from energy use in buildings."* Could you clarify from where this statistic is derived?

1.7 P9 – second para of Climate Change: sustainable development. The text states. *"Consideration of measures including energy input, thermal performance, orientation and sustainable forms of electricity production will be expected to form part of the early design proposals to ensure such measures are embedded and not retrofitted."*

In regard to the text highlighted in bold – does this mean that the Department expects there to be sustainable forms of electricity production included in the schemes? Does this include air source heat pumps or hot water heat pump cylinders? The cost of such installations as PV arrays is not

sizing..

Policy H5 makes clear that up to 50% of affordable homes for purchase may be prioritised for those with links to the parish. The Minister for Housing and Communities would, however, be pleased to work with the Parish of St Peter to discuss the allocation of homes for social rent, through the Housing Gateway, with the parish.

Modern methods of construction

As stated in the brief, MMC is encouraged, not required.

Compulsory purchase timeline

Policy H5 contains a discretionary provision for compulsory purchase proceedings to be invoked, subject to the approval of the States Assembly, where rezoned affordable housing sites are not being progressed. The purpose of this discretionary policy provision is to encourage the delivery of affordable homes.

It is acknowledged, and a source of some regret, that development briefs have not been progressed more quickly: it was, however, considered important that related guidance on density, residential space and parking standards were revised in advance of development briefs being brought forward, to ensure that homes are on rezoned sites were developed to meet current expectations and policy objectives.

The challenges of providing the necessary public infrastructure, to enable the development of these sites for the provision of new homes, is also clearly recognised in the briefs.

In such circumstances, it would be unreasonable to give effect to any discretionary compulsory purchase proceedings until three years after the publication of the development briefs; or the provision of the requisite public sewerage infrastructure, whichever is the latest.

This will be explicitly acknowledged in the revised guidance.

Change

Add reference to state that discretionary compulsory purchase proceedings would not begin to be considered until at least three years after the publication of development briefs, or that provision of the requisite public sewerage infrastructure, whichever is the latest.

Sustainable development

Statistics cited in the draft guidance are derived from the Carbon Neutral

<p>inconsiderable. Do we need to prove that such installations are not economic/affordable?</p> <p>1.8 P10 – First para of Standards for Homes and Parking. The text states. <i>“The Minister for the Environment has recently published revised draft supplementary planning guidance for both residential space standards and residential parking standards. These have been issued in draft, for consultation, before adoption. Once adopted, they will become material to decision-making.”</i></p> <p>These standards are key to developing scheme designs, particularly in terms of minimum sizes for amenity space, minimum house floor areas, minimum parking standards, etc. When is formal adoption of the standards likely to occur?</p> <p>1.9 P10 – Fourth para of Standards for Homes and Parking. The text states the following. <i>“In helping to deliver more sustainable travel the development of these sites will need to ensure new homes allow for appropriate cycle storage and the provision electric vehicle charge points.”</i> It is our view that the Draft parking standards are unduly onerous in terms of cycle parking provision. The requirements are affecting density due to the size of enclosure required.</p> <p>1.10 P10 – First para of Space for Play. It is counterproductive, in our view, that the space for play is required in addition to the specified areas of shared open space. However, later on in the specific guidance for this site, it is stated that the play space may be included within the specified areas of shared amenity space. Is a re-wording required to avoid confusion? Historically there have been issues with provision of play spaces in terms of maintenance of equipment and insurances. 1.11 P12 – Drainage infrastructure This matter is addressed later in this document.</p> <p>1.12 P55 – Site area: According to our calculations, the overall site area is 43,057m<sup>2</sup> – just over 4.3 hectares. The brief calls for 0.25% of the site area to be allocated to shared open space (which area would include play space). This would result in a developable area of 3.23 hectares.</p> <p>1.13 P57. Density, type, yield and tenure of homes. The intention is to build at least ten units of two-bedroom social-rented sheltered homes on Field 558, with the balance of units on this field potentially being three-bedroom houses. On Fields P632 and P559, the intention is to build mainly three-bedroom homes (possibly with a few four-bedroom units), both first time buyer (FTB) units and social rented. The developer is aiming for a yield of the equivalent (in terms of the number of bedrooms) of 130 three-bedroom units across all three fields. Given the 3.23 hectare developable site area, this would result in a density of c. 40 units per hectare. We assume that this is an acceptable density for this site.</p> <p>1.14 P58. 3. Planning and Design Considerations. Section a, third line on p48. Is it absolutely necessary for a landscape architect to be involved?</p> <p>1.15 P59. 3. Planning and Design Considerations. Section d, third para down. The brief states that efforts should be made to retain parts of the hedge that separates P632 and P559. We feel that this will not result in an efficient layout and will overly compromise the architectural design and site layout.</p> <p>1.16 P59. 3. Planning and Design Considerations. Penultimate para of section d. The brief states that “it</p>	<p>Roadmap: see para 7.17-7.19, p. 58.</p> <p>The bridging Island Plan Policy ME1 – 20% reduction in target energy rate for new development requires development to outperforms the target energy rate by 20%: how this is achieved is a matter for the developer.</p> <p>Revised parking standards</p> <p>These have been adopted and published by the Minister for the Environment: see <a href="#">Residential parking standards guidance.pdf (gov.je)</a>.</p> <p>Standards for cycle parking have been introduced, but these have been reduced.</p> <p>Play space</p> <p>The requirement for the provision of play space is derived from bridging Island Plan Policy CI8 – Space for children and play.</p> <p>Guidance is going to amended to highlight the need for management and maintenance arrangements to be established as part of the submission of a planning application; and required through the use of planning obligation agreements.</p> <p>Density</p> <p>The Minister for the Environment has recently published guidance on <a href="#">Density standards (gov.je)</a> for the island’s built-up areas. The minimum density standards expected to be delivered in local centres, such as St Peter’s Village are set at 35 dph.</p> <p>Design issues: landscaping</p> <p>The key issue is for the landscape design elements of the scheme to be considered at the outset, and that appropriately qualified professionals are engaged to deliver against the objectives set out in the brief.</p> <p>The brief encourages the retention of elements of the mature hedgerow between fields P632 and P559: this is not an absolute requirement, but any proposals to remove this element of existing tree and hedgerow planting should be fully justified and mitigation provided elsewhere in the scheme.</p> <p>Design issues: provision of open space</p> <p>There has been a clear expectation that the delivery of homes on fields to the east of St Peter’s Village would include open space provision for Parish community use in the form of a new public village green.</p> <p>The development brief does not set a definitive minimum requirement in terms of</p>
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*is envisaged that up to 25% of the site should be allocated for shared open space across the scheme."*

This statement does not clarify if there is a minimum percentage of the site to be given over to shared open space. Accordingly, if a scheme delivers, say, 18% of the site area for such uses, presumably this would be acceptable?

1.17 P59. 3. Planning and Design Considerations. Last para of section d. The current intention is to include landscape improvements to La Grande Piece. Would the area improved in this location be able to be directly reduced from the required amenity space provision for the housing sites?

1.18 P60. 3. Planning and Design Considerations – Highways, etc. Second para. down in Section f. The text states that the preferred option is to *"close La Verte Rue to motorised traffic at the junction with La Grande Route de St Pierre."*

We believe that the Parish authorities have serious concerns on this matter, and that they believe that further consideration needs to be given to any circulation alterations, in consultation with both the Parish and St Georges School.

1.19 P60. 3. Planning and Design Considerations – Highways, etc. Third para. down in Section f. The brief requires combined pedestrian and cycle paths of at least 3m wide on La Route du Manoir, La Verte Rue, and La Grande Route de St Pierre. The 3m wide footway/cycle route is, in our view excessive, (particularly in light of the desire to preserve as many existing trees as possible) and will impact upon achievable densities. We would suggest 2.0m wide as a more pragmatic figure.

1.20 P60. 3. Planning and Design Considerations – Highways, etc. Last para. in Section f. The brief also requires provision of combined pedestrian and cycle paths of at least 3m wide within the site. Again, we feel that this is an excessive requirement and one that will impact upon achievable densities. If pavements are to be included as required on the main access roads within the site, surely there is no need to provide additional footways, and cycling within the development is surely safe at the low traffic volumes and speeds that will be effective in these areas?

1.21 P61. 3f. Highways, etc. First second, third and fourth paragraphs. The developer is required to expend £250,000 for the pedestrian crossing facilities, a contribution of £1,600.00 per home to walking and cycling infrastructure (£208,000 if there are 130 homes), a contribution of £60,000 to traffic calming, approximately £250,000 towards enhancement of the bus service, and £14,000 towards the provision of a bus shelter. This adds up to £782,000.

We understand that there is a potential additional POA for "any local network enhancement" to the drains. Is it possible to advise when will this be confirmed? Isn't the idea that re-zoned sites should be used to provide affordable housing?

1.22 P61. 3f. Highways, active travel and parking. Last para of the section. The text states the following. *"Space for the parking of bikes and cars should be provided on the site in accordance with the Minister for the Environment's revised parking standards. In this respect, this site is located within the 'Other areas*

the space to be provided but, instead, set out an indication of the potential scale of this facility. What is most important is that the facility is well-designed and integral to the development of the site and the wider St Peter's Village. It is for this reason that the brief suggests that a suitably qualified landscape professional is engaged to support this, and other aspects of the development, to ensure that the design of open space and landscaping elements of the scheme are successful in meeting these objectives.

As stated in the brief, there is potential for some community open space provision to be delivered off-site, through the enhancement of other such provision elsewhere.

The extent, form and design of open space should be the subject of engagement and consultation with community stakeholders as part of pre-application discussion required under the auspices of Policy GD2 – Community participation in large-scale development proposals.

Access and active travel

The development brief does not prescribe how access to the site should be secured and the options available to do this should be the subject of more detailed discussions with I&E (Transport and Operations), together with the parish highway authority.


The minimum specification for a shared pedestrian/ cycle path is 3m and should be provided.

The development of the site necessitates the provision of a range of obligations which are considered necessary and proportionate to enable the development to proceed. The purpose of this guidance is to identify the planning issues and obligations that developers should address and make provision for as part of the development of any scheme and associated planning application. The cost of any such obligations should be considered relative to the assessment of the value of the land.

The level of planning obligations to support travel and transport infrastructure is considered to be proportionate to the nature and scale of the development proposed. Any proposal to vary from them should be the subject of further consideration, with supporting alternative mitigation/justification, with I&E (Transport and Operations).

Funding and provision of drainage infrastructure

The work that is required to be undertaken to enable these sites to be released

<p><i>sustainable transport zone."</i></p> <p>As noted elsewhere in this document, we believe that the cycle parking requirements as set out in the draft SPG for 3-bedroom houses are excessive and will impact upon achievable densities.</p> <p>1.23 P61. 3g. Drainage. We would note that the drainage issue is a serious one that may well impact upon the feasibility of development of the site as a whole. We understand from I&amp;E that the Northwest balance tank is the Department's 'number 1' priority. As stated within the draft Brief consultation document, this has a programmed commencement in 'Q3, 2023 with completion in Q2 2026'. Our Client is targeting to receive Planning approval for this scheme by Q4, 2024 with possibly a 1st phase of the development being available in Q2 2026. Accordingly, it must be stressed that state funding and resources need to be made available to achieve this balance tank as an urgent priority.</p> <p>I trust that the above comments are of assistance, and please feel free to get in touch should there be a requirement to discuss any of the topics raised.</p>	<p>for development is provided in the briefs. The timelines for this work have been updated to reflect the current situation. The progression of these works is subject to the approval of funding sought from the Government Plan. States Members are aware of the need for infrastructure to be provided to enable the development of these sites to progress and for homes to be delivered. The proposal for funding of this work will be considered by the States Assembly in December 2023.</p>
<p>Thank you for the opportunity to be able to comment on the Draft supplementary planning guidance.</p> <p></p> <p>We have the following comments with regard to the development brief:</p> <p>We think the speed limit on La Route Du Manoir should be reduced. It is currently 40mph and many people speed along this road. This road is not a Parish Road and so the speed limit is governed by the States.</p> <p>We think that by adding another 2 road crossings, as well as adding a road crossing for H5 (11 and 12), it will make the village very difficult and slow to negotiate. We already have 2 very good road crossings to the left and right of La Route Du Manoir and this should be taken into account. If there are good paths within the new development, then it makes sense for pedestrians to head to the existing crossings. Therefore we think that this provision looks excessive and should be reconsidered.</p>	<p>Speed limits</p> <p>Noted, but changes to speed limits are outwith the scope of planning and development briefs and are a matter for the Minister for Infrastructure, in consultation with the parish and the public.</p> <p>Traffic calming and pedestrian crossing facilities</p> <p>The addition of further pedestrian crossings is designed to ensure that pedestrians are able to benefit from more direct as to where they wish to go; and is designed to calm and further reduce the speed of traffic, to promote road safety of the most vulnerable road users.</p>

**SITE H5 (11 and 12): Fields P655 and P656, La Route de Beaumont, St. Peter**



Key issues identified in the brief:

- The brief requires that these three fields are developed together, to afford an opportunity to create a new access; together with new public open space that is accessible and of benefit to the wider community within the village.
- Various obligations are identified to promote pedestrian accessibility and integration with the village, and to calm traffic.

SITE H5 (11 and 12): Fields P655 and P656, La Route de Beaumont, St. Peter	
COMMENT	RESPONSE
<p>As on other sites, there is a requirement for retention and enhancement of landscaping to mitigate the impact of the new homes and address biodiversity. A key issue is said to be the creation of connections with the village and safe access routes to school and other amenities.</p> <p>To achieve this, and also to provide suitable visibility splays from what is described as an inadequate access, without removing the roadside granite wall, we would advocate a greater focus on traffic calming, as noted on Fields 558, 559 and 632. 69.</p> <p>In addition to traffic calming, a pedestrian crossing is required @ £130,000 (the text actually says £130,00), plus £1,626.34 per home for walking/cycling (which is different to the £1,600 per home on the other St Peter sites), a bus shelter @ £14,000, and a bus subsidy in excess of £68,900 for 29 units. The details of how this money will be used should be made available for the developer who will fund it and should show how this can assist in achieving visibility, as well as facilitating a reduction in parking requirements from those set out in the emerging SPG.</p> <p>Drainage delays and costs remain unclear.</p>	<p>Transport-related obligations</p> <p>The development of the site necessitates the provision of a range of obligations which are considered necessary and proportionate to enable the development to proceed, including traffic-calming and pedestrian enhancements. The purpose of this guidance is to identify the planning issues and obligations that developers should address and make provision for as part of the development of any scheme and associated planning application. The cost of any such obligations should be considered relative to the assessment of the value of the land.</p> <p>The design, detail and delivery of any transport-related obligations should be the subject of discussion between the developer and I&amp;E (Transport and Operations) in advance of any planning application.</p> <p>Funding and provision of drainage infrastructure</p> <p>The work that is required to be undertaken to enable these sites to be released for development is provided in the briefs. The timelines for this work have been updated to reflect the current situation. The progression of these works is subject to the approval of funding sought from the Government Plan. States Members are aware of the need for infrastructure to be provided to enable the development of these sites to progress and for homes to be delivered. The proposal for funding of this work will be considered by the States Assembly in December 2023.</p>

SITE H5 (13 and 14): Fields S415A and S470, Le Grande Route de St Martin, St Saviour



Key issues identified in the brief:

- The brief identified that the preferred access route to this site should be through Les Cinq Chenes.
- Various constraints render this site to be developed in two parts, with access to S415A from Les Rue des Friquettes.



SITE H5 (13 and 14): Fields S415A and S470, Le Grande Route de St Martin, St Saviour	
COMMENT	RESPONSE
<p>The constraints noted in the guidance make it difficult to develop this site for housing.</p> <p>The long thin shape of Field S470 does not lend it itself to an efficient layout, and the SPG notes sensitivity along the eastern part of the site which is an awkward triangle shape, as well as ownership and sewer route issues.</p> <p>The limited dimensions of the fields will be further reduced once existing landscaping is strengthened as required, and the pedestrian and cycle access across the site required, from La Rue des Friquettes to La Grande Route de St Martin, is provided.</p> <p>Although there are no listed buildings adjoining the site, a Heritage Impact Statement is required along with an Archaeological desk-based assessment. We would certainly question the need for the former.</p> <p>Despite the SPG's quest for higher densities, in addition to the issues noted immediately above, the guidance seems to suggest that any development should be similar in scale to that adjacent i.e., a maximum of 2 storeys, and pay particular regard to the character of La Rue des Friquettes. Although there is taller development at Belvedere, this appears to be dismissed as a one-off, hidden by trees.</p> <p>The guidance refers to the possibility of travel links through Les Cinq Chenes, and that the redevelopment of that site has been considered. If redevelopment was pursued it would take on board the BIP's objective of making best use of brownfield land in the built-up area to achieve additional homes without requiring further greenfield sites to be developed.</p> <p>If the affordable housing site is to be regarded as an extension of Les Cinq Chenes, the guidance should allow a form of development that is appropriate as an extension of a site in the built-up area, developed at the optimum level.</p> <p>We have previously made comments on the draft Residential Parking SPG, highlighting the wide range of facilities in the area and the logic of encouraging the use of public transport rather than encouraging the use of private cars by providing relatively high levels of car parking.</p> <p>Given the scale of the bus subsidy required in this case, car and cycle parking requirements, both of which consume valuable land, should be relaxed.</p> <p>A substantial contribution to the Eastern Cycle Route is also required but with no information on how this will be spent or therefore how the contribution will assist residents of this development or relate to this site.</p> <p>We would advocate that the money is instead diverted into a greater bus subsidy.</p> <p>As regards drainage, unusually there are no identified foul sewer capacity issues. Surface water requires</p>	<p>Site constraints</p> <p>The difficulties of developing this site are acknowledged. It was originally proposed to be zoned with fields S413 and S415, which would have provided a much more regular developable area and provided scope to address some of the issues now presented. These other fields were removed from the plan by the States Assembly: Deputy Kevin Lewis proposed the 2<sup>nd</sup> <a href="#">amendment</a>: to remove four fields (S413, S415, S530 and S729) in St. Saviour from the list of sites to be zoned for affordable homes.</p> <p>The States Assembly voted to APPROVE all parts (<a href="#">a i</a>), <a href="#">a ii</a>) and <a href="#">b and c</a>) of Deputy Lewis' 2<sup>nd</sup> amendment to the Bridging Island Plan.</p> <p>These challenges have been compounded by issues of land ownership (where land ownership cannot be established on part of the site) raised by the developer. This issue was not declared when the site was put forward as part of the 'call for sites'; and when the site was supposedly unconstrained and capable of development.</p> <p>Heritage impact assessment</p> <p>There are listed buildings to the north of the site but these are separated and screened from it by the insertion of new school-related development, including a large modern sports hall.</p> <p>This requirement will be removed from the brief.</p> <p>Change</p> <ul style="list-style-type: none"> <li>Remove requirement for a heritage impact statement</li> </ul> <p>Design: context</p> <p>The brief acknowledges that the fields may need to be developed as two separate land parcels, as a consequence of which the character of the development on them may differ, with that on S415A responding to its rural edge context.</p> <p>Rather than dismissing the three-storey development at the former Jersey Dairy</p>

<p>on-site attenuation however, and some local improvement is likely to be required.</p> <p>A Drainage Impact Assessment is required, and the cost of any works is unclear. As noted, a sewer runs across part of the site and a 5m safeguarded area is required..</p>	<p>site, the brief explicitly acknowledges this. In accord with Island Plan policy, and guidance issued by the Minister, there would be an expectation that the development of field S470 would seek to optimise its potential which would, of course, be better realised as part of a more comprehensive redevelopment and extension of Les Cinq Chenes. This would afford greater opportunity for buildings of varied and greater height and scale to be incorporated into any scheme, whilst having regard to local context.</p> <p>Transport-related obligations</p> <p>The Minister for the Environment has published revised <a href="#">parking standards</a> which are material to the development of this site. Car parking standards are reduced, when compared with existing and proposed draft standards: whilst standards have been introduced for cycle parking, these have also been reduced from those originally proposed. This should assist with the delivery of a more efficient form of development of this site, whilst still necessitating and justifying the contribution to the enhancement of the local bus service.</p> <p>Contributions to the eastern cycle route network are required as a consequence of approved Island Plan Policy TT2 – Active travel.</p>
<p>Housing mix</p> <p>The [REDACTED] have expressed a direct need for 3 and 4 bed family homes in this area. It is also important to consider that in the future Andium will be re-developing Les Cinq Chenes, which is expected to contain a large number of flats. a limited number of approximately 2-4no 2 bedroom houses could be provided to ensure a varied offering.</p> <p>Vehicular access</p> <p>It has become apparent that I&amp;E (Transport and Ops) would not support any vehicle entrance on La Grande Route de St Martin due to the alignment of the adjacent entrances including the recently developed Co-op site. This has the potential to undermine the entire foundation of the scheme and could risk the viability of the project as a whole.</p> <p>Provision of access through Les Cinq Chenes would pose a number of significant problems including:</p> <ul style="list-style-type: none"> <li>• The site is under separate ownership and owned by Andium.</li> <li>• There is no guarantee an agreement would be reached.</li> <li>• Les Cinq Chenes is marked for redevelopment, access could be cut off entirely and/or traffic will be routed through a large building site for many years.</li> </ul>	<p>Housing mix</p> <p>The guidance provides sufficient flexibility for variations in housing mix to be considered, where there is sufficient justification to so</p> <p>Access</p> <p>Access options for both fields are limited owing to the constraints of the site, and further work may be undertaken, by the developer in consultation with I&amp;E (Transport and Operations) to explore the best solution.</p> <p>Vehicular access to the development of field S470, together with access to S415A, would ideally be secured through the existing road network provide within Les Cinq Chenes. The viability of this would be dependent upon the agreement of another landowner.</p> <p>Access to Le Grande Route de St Martin from the NW boundary of S470 is constrained by the conflict that would arise with the junction directly opposite, which now serves the new Co-op store.</p> <p>In the event that vehicular access to Field S470 and Field S415A cannot be</p>

- The redevelopment timeframe of Les Cinq Chenes is not aligned with the primary purpose of rezoning sites which is to deliver affordable homes as soon as possible.

The only viable location of a new entrance would be on La Rue des Friquettes. It is however noted that there are pre-existing issues with the school traffic and I&E (Transport and Ops) will be seeking improvements to the junction with Princess Tower Road.

Pedestrian and cycle routes

Pedestrian and cycle routes could be incorporated in some form to Les Cinq Chenes

East – West cycle connectivity will need to be considered to allow access through the whole site. The internal road serving the site could be 4.8m wide with a single 1.8m walkway.

secured via Les Cinq Chenes or La Grande Route de St Martin, further discussion with I&E (Transport and Operations) will be required to explore options.

Securing direct vehicular access to La Rue des Friquettes is not ideal owing to its restricted width and capacity, and issues associated with school traffic accessing St Michael's School, but this may represent the only viable option remaining.

Change

- The guidance should allow for access options for both sites to be kept under review to explore and identify the best solution.

SITE H5 (15): Fields T1404, La Grande Route de St Jean, Trinity



Key issues identified in the brief:

- Need to ensure that the site can be served by a safe and adequate access.

SITE H5 (15): Fields T1404, La Grande Route de St Jean, Trinity	
COMMENT	RESPONSE
<p>██████████ please find enclosed a formal representation from ██████████ in response to the draft development brief for Field T1404.</p> <p>We welcome and accept the guidance provided on the whole, however ██████████ have expressed significant concerns regarding both the proposed tenure split and unit mix within the draft development brief.</p> <p>██████████ has confirmed a clear desire to have only social-rented dwellings on the site. An extract from the enclosed ██████████ representation states:</p> <p><i>'It is the considered view of ██████████ that managing mixed rental and affordable sites, particularly in smaller developments like Fields T1404, can lead to social conflicts and the formation of a divisive 'them and us culture'. Such divisions undermine the sense of community within the development. Common issues like car parking and the utilisation of shared spaces often become sources of conflict, and these tensions are further heightened within a small community. Our experience with similar sites has shown that effectively managing the diverse needs and expectations of different housing types becomes increasingly challenging in such contexts.</i></p> <p><i>To mitigate these potential issues, we urge that Field T1404 be exclusively designated for social rented dwellings. Given the relatively small size of the site, prioritising social-rented dwellings would foster a stronger sense of community and help minimise conflicts that often arise in mixed accommodation settings.'</i></p> <p>We note that there is a precedent for trading tenure provisions with other sites formalised via planning obligation agreements (POA). We would like to confirm that initial discussions have taken place with alternative sites with a view to obtaining an appropriate formal agreement on this basis.</p> <p>Regarding the proposed unit mix, we note a disparity in the guidance (section 2, p75) which states that 'this site is best developed to provide predominantly 3- and 4-bed family homes, together with a limited number of smaller homes', however, the table seemingly suggests a mix at odds with the opening statement. ██████████ strongly believes Field T1404 is most suited to cater for the needs of families and therefore recommends that the site should be predominantly developed to accommodate 3 bedroom houses with a smaller number of dwellings to allow for a varied mix.</p> <p>It is clear that a mix of this nature would positively align with the findings from the recently published Jersey's Future Housing Statistics report which notes a shortfall of 2 bed units and also a continuing high demand for 3 bedroom units.</p> <p>Separate to the above, we can confirm that traffic consultants Paul Basham Associates are actively speaking to ██████████ regarding the design of the vehicle entrance and access road.</p>	<p>Tenure split</p> <p>The tenure split provision set out in the guidance is derived from Island Plan Policy H5, which has been approved by the States Assembly.</p> <p>The guidance, however, explicitly acknowledges that this split might be the subject of variation and sets out extensive detail on the circumstances where this might be considered favourably, including where the applicant is proposing to re-distribute tenures across more than one housing site, where the delivery of these sites will be linked.</p> <p>In this respect, the proposals to explore this for T1404 and another site, are noted.</p> <p>Housing unit mix</p> <p>As stated in the guidance, the modelling of density and housing mixes is indicative and is designed to give an indication of the potential yield and mix of housing types that might be provided on a site: they are not prescriptive.</p> <p>In these circumstances, a mix of family and smaller units of accommodation to be provided on this site would likely fulfil the requirements of the development brief.</p>

<p>Moving forward, we would kindly request to be kept informed of any updates or decisions regarding the site brief. We trust that the department will take account the representations made by concerned stakeholders and make an informed decision based on the interest of the community.</p>	
<p>Northbound bus stops. The north bus stop to the south of the site exits onto the road with no pavements, and in the design brief and combined with T 1404 this needs sorting out, with a proper length of pavement waiting area. The north side of the site is served by the existing Sion Chapel stop, which only requires proper access onto the north end of this development and a pedestrian Island at this end of the site to help cross the road.</p>	<p>Pedestrian crossing The brief requires for provision to be made for some form of crossing facility to enable the bus stop to be reached more safely.</p>

## Appendix 1

### Development briefs: consultation feedback and responses

#### PART 2: GENERAL ISSUES

COMMENT	RESPONSE
<p>Whilst the plan is full of praiseworthy objectives, and detail studies, it is largely unworkable.</p> <p>1. The MMC report is outdated and flawed, as are its predecessors. For the past 2 years we have been the only indigenous MMC builder, yet are excluded from consultations.</p> <p>2. When you take the cost of a plot and add the build, none of the Jersey born youngsters can afford to return to Jersey, post University, as even if they can afford the cost of living, they can't afford even a basic home as there are none at a lower price range.</p> <p>We could solve this with the lower cost of our MMC buildings; true net-zero living buildings that can run off-grid and exceed the highest UK standard - DCLG Para 80 Code 6. - however a real difference will only be made if the space standards for starter homes are reduced to what a young couple starting out can afford, or indeed suit an older couple who wish to downsize.</p>	<p>MMC</p> <p>This guidance does not prescribe specific forms of MMC.</p> <p>Developers are encouraged to engage with those with knowledge and experience of MMC in order that this might be deployed in the island.</p> <p>Housing affordability and standards</p> <p>Housing affordability is a key focus of the Government. The assisted purchase pathway has been released to assist islanders with access to homes: <a href="https://www.gov.uk/assisted-purchase">Assisted purchase home ownership schemes (gov.uk)</a>.</p> <p>The rezoning of this land the subject of these development briefs also seeks to increase the affordability of homes for purchase for those who are unable to do so in the open market.</p> <p>In terms of space standards, the Minister for the Environment has recently published revised residential space standards, for all sizes of home: <a href="https://www.gov.uk/residential-space-standards">Residential space standards (gov.uk)</a></p>
<p>It is great news that the maximum household income threshold to qualify for an affordable 3-bedroom house has been raised to a more realistic £125,000. This will certainly let more people qualify for an affordable house including key workers.</p> <p>The whole financial climate has dramatically changed for everyone in the past 12-18 months. Re-reading the draft SPG for the Development Briefs for the Affordable housing sites I can see a potential issue with the proposed discount structure for the FTB houses for sale.</p> <p>The proposed discount is 30% and indeed I suggested this was an appropriate percentage in my letter to David Warr some 10 months ago. This was however based on the continually rising house prices which at the time they had been. Unexpectedly prices have now started to fall and the market view is that currently they have fallen by around 10% from their peak and could possibly fall a further 10%.</p> <p>Last Autumn some open market first time buyer houses were selling for an average of around £830,000 and with a 30% discount this would be an Affordable price of £581,000. At today's prices this figure works and gives the landowner a reasonable price for his land, enables the developer to provide a good quality development and covers the cost of the professional design fees and loan interest etc.</p>	<p>It is accepted that the island's development industry and the housing market is facing an unusual and difficult set of circumstances currently: the stagnant housing market; the cost of borrowing; and the costs of construction are all acknowledged and understood.</p> <p>It is considered, however, that first-time buyers are also facing a difficult set of circumstances, as a consequence of the increased cost of servicing a mortgage and require assistance in order to be able to access the housing market.</p> <p>Clearly, all of the rezoned sites were located where there was a presumption against their development, until they were rezoned by the States to provide affordable homes, as part of the island plan review. The effect of this rezoning is to significantly increase the value of the land.</p> <p>The development of these sites for the provision of affordable homes places some conditions upon their development. There are also, as with any development, a range of potential obligations which are considered necessary</p>

COMMENT	RESPONSE
<p>The concern is that with the change in the economic climate that a 30% discount with a falling market is probably now too high for developments to stack up:-</p> <ul style="list-style-type: none"> <li>• House value £830,000 less 30% = £581,000 – ok.</li> <li>• House value was £830,000 now less 10 % drop in the market value = £747,000 less 30% = £522,000. Difference less £59,000.</li> <li>• House value was £830,000 possibly less 15% drop in the market value = £705,000 less 30% = £493,000. Difference less £88,000.</li> <li>• House value was £830,000 now less 10 % drop in the market value = £747,000 less 22% = £582,000. – ok.</li> </ul> <p>To add to this whilst the cost of mortgages has increased the cost of commercial development finance has also significantly increased. Some 18 months ago base rate was at 0.10% with a borrowing rate at 3.50% over base = 3.60% interest to pay. The current base rate at 5.25% (likely to increase) with borrowing at 3.50% over base = 8.75% interest to pay.</p> <p>A development loan of say 80% of an Affordable house value of £581,000 would be £464,000. A £464,000 loan over an 18-month period at 3.60% would cost in the region of £25,000 and increases to around £61,000 at 8.75% an increase of £36,000.</p> <p>Build costs are also increasing by 7% - 8% per year and there are Planning Obligation contributions to be made for each site for Highways and travel improvements and local network enhancement to drainage systems.</p> <p>So, with house prices falling, interest rates and build costs etc rising along with the requirement to contribute to Planning Obligations a 30% discount off a falling market value is unlikely to stack up.</p> <p>A more appropriate discount in the current climate would be 25% which would be in line with Andiums maximum discount on their Homebuy scheme which the draft SPG refers too. Everybody wants Affordable homes to be delivered as quickly as possible but it has to work commercially for all concerned.</p>	<p>and proportionate to enable the development to proceed. The purpose of this guidance is to identify the planning issues and obligations that developers should address and make provision for as part of the development of any scheme and associated planning application.</p> <p>The cost of any such conditionality and obligations should be considered relative to the assessment of the value of the land.</p> <p>Where viability is considered to be problematic in terms of realising a development, viability assessments will be required to be undertaken and published and subject to independent review, as part of the planning application process.</p>
<p>Part 1 – Applicable to more than one site</p> <p>1. The need for additional affordable housing is very clear. Regrettably in the now 15 months since the adoption of the BIP, the economic environment has changed significantly, making it more difficult for islanders to buy properties, and making project viability for developers increasingly challenging.</p> <p>The draft SPG has been eagerly anticipated and is welcomed, however, it raises a number of issues which we consider must be addressed before the SPG is finalised.</p> <p>3. We note that the purpose of the SPG is stated on page 1 as being “to support the positive</p>	<p>Development brief timeline</p> <p>It is acknowledged, and a source of some regret, that development briefs have not been progressed more quickly: it was, however, considered important that related guidance on density, residential space and parking standards were revised in advance of development briefs being brought forward, to ensure that homes are on rezoned sites were developed to meet current expectations and policy objectives.</p> <p>Tenure split</p>



COMMENT	RESPONSE
<p>development of sites rezoned for the provision of affordable homes” (emphases added).</p> <p>4. A key factor in the high cost of housing is the limited supply of homes, and whilst development should always be of a high quality, developers and designers are often critical of the complexity of the planning system, and the lack of certainty for anyone seeking to undertake development. That lack of certainty often causes delays and additional costs, which push up prices, and can also prevent schemes coming forward, or being pursued to completion.</p> <p>5. The BIP’s designation of these sites was specifically aimed at providing new homes, and as quickly as possible with, for the first time, a threat of Compulsory Purchase. If the aim of the SPG is to support the development of these sites, the SPG should make the planning application and building process as easy as possible, and provide as much certainty as it can.</p> <p>6. Whilst the SPG includes a great deal of useful information, we have identified several areas where there is either substantial uncertainty, or so many constraints or additional requirements, that there is a significant risk that some sites cannot be developed to the extent which the BIP Appendix 1 suggested, and that some will not be developed at all. This means that the number of homes that can be created will be significantly less than the numbers which were presented to, and approved by, the States Assembly.</p> <p>7. . Our objective is to provide high quality affordable homes. To assist us, and other providers, to do that, we offer the following comments and proposals.</p> <p>TENURE SPLIT</p> <p>8. The SPG requires that 55% of properties are made available for purchase, and 45% for rental. In the current financial climate, with rising interest rates, assisted purchase is increasingly challenging. The current maximum eligible household income of £85,000 for a three bedroom house, would potentially support a mortgage of £425,000 at 5x income, (although monthly payments may prove unaffordable given increased interest costs). With the average price of a 3 bedroom house being around £800,000, even with a 70% ceiling, this would result in an assisted purchase price of £560,000. That is £135,000 more than a potential buyer could borrow, even if they earn the maximum allowed.</p> <p>9. To provide a simple example of mortgage costs v rental costs for a three bedroom home, a £560,000 mortgage @ 5.5% over 25 years would cost approximately £3,438 per month – around £700 per month (or £8,400 per year), more than renting.</p> <p>10. It is understood that the maximum eligible household income may be increased. This could, in theory, allow for larger loans for home buyers, but the monthly payments may prove untenable. Increasing the eligible income does not of course lower property prices. In this market with those constraints, developers may not have the confidence that there will be a ready market for their homes, and so they may not be built. Or worse still, homes may get built, but those allocated for assisted</p>	<p>The tenure split provision set out in the guidance is derived from Island Plan Policy H5, which has been approved by the States Assembly.</p> <p>The guidance, however, explicitly acknowledges that this split might be the subject of variation and sets out extensive detail on the circumstances where this might be considered favourably.</p> <p>The sale of an enhanced proportion of existing social rented stock is a housing policy matter for the consideration of MHC.</p> <p>Site area/ yield changes</p> <p>The potential yield of development on all of the rezoned sites has consistently been presented as an indicative one based on simple site areas. As a consequence, variation from modelled yields is inevitable, as details of site constraints and opportunities are identified.</p> <p>The primary objective of rezoning sites for the development of affordable is, of course, the development of homes, however, the two sites referred to at St Peter and St John, were rezoned on the clear understanding that their development would also provide an opportunity for the provision of public open space that would be of benefit to the wider community. This is part of delivering homes, but also delivering good place to live.</p> <p>The development briefs for these two sites do not specifically prescribe a definitive minimum requirement in terms of the space to be provided but, instead, set out an indication of the potential scale of these facilities. What is most important is that the facilities are well-designed and integral to the development of the site and the wider settlements.</p> <p>The extent, form and design of open space should be the subject of engagement and consultation with community stakeholders as part of pre-application discussion required under the auspices of Policy GD2 – Community participation in large-scale development proposals.</p> <p>Density</p> <p>It is quite clear that the modelling of density is indicative and is designed to give an indication of the potential yield and mix of housing types that might be provided on a site: they are not prescriptive.</p> <p>The Minister for the Environment has recently adopted minimum density standards for the island’s built-up areas. These are new and are designed to encourage and enable more efficient use of land, particularly where existing</p>

COMMENT	RESPONSE
<p>purchase would sit unoccupied.</p> <p>11. The SPG states that there may be flexibility in the ratio, but this should not be left to the already complex planning application process to resolve on an ad hoc, risk basis. Instead the SPG, which will guide the application process, should establish clear and realistic requirements.</p> <p>12. As an affordable housing landlord Andium would be able to offer some of our existing properties for sale to those seeking an assisted purchase. This would enable us to sell properties on existing sites across the island, offering a greater range of locations and properties, at more affordable prices and without delay. This would also allow some tenants to buy their existing homes. The sites allocated in the BIP could then be focused more on providing homes for affordable rental.</p> <p>13. At the very least we would suggest considerable flexibility in the current 55/45 split, and an overt statement in the guidance to allow a significantly higher proportion of social rented properties, with allowance for an equivalent number of homes for sale to be provided from within existing stock. If considered necessary, this could be embedded in any Planning Obligation Agreements.</p> <p>SITE AREA/YIELD CHANGES</p> <p>14. The SPG sets out numerous additional requirements of any development on these sites, thereby reducing the useable area of the sites for affordable homes.</p> <p>15. This includes the retention and enhancement of boundary features, wildlife corridors, play areas and footpaths. On two sites however, (Fields 558, 559 and 632 in St Peter and Field 1109 in St John), the SPG also looks to create new public places. Although this desire is understood, the sites were presented in the BIP as housing sites, as opposed to village improvement sites, and the loss of a total of 1.51 hectares, means a loss of at least 46 homes, at the minimum density of 35 dwellings per hectare (dph). We would urge the Minister to consider whether the areas of land in question are properly justified in the current circumstances and whether they could be reduced.</p> <p>16. As an example the annotated photograph below illustrates the impact of the requirements set out within the text of the SPG, on Field J1109. The most onerous of these is the combined public open space, listed building buffer and wildlife corridor, outlined in lime green below. The remaining useable area will also be effected by the requirements for boundary planting, footpaths and road improvements.</p> <p>17. 18. This reduction in the useable areas will require additional sites to be allocated, and/or higher densities to be achieved on the areas of land which can accommodate homes – see DENSITY below.</p> <p>DENSITY</p> <p>19. Both the BIP and the draft SPG on Density refer to a “design-led approach” to development, that will ultimately dictate the appropriate level of development for a site. Indeed, the draft Density SPG reiterates its predecessor in stating that “Density, in itself, is a crude tool”. We would question therefore</p>	<p>densities may be low. As stated in the guidance, however, any resultant density of development will be informed by a positive design-led approach having regard to have regard to: the quality of design, relative to its context; the quality, type and mix of homes being created; and placemaking.</p> <p>Other yields and mixes may, therefore, be appropriate, depending on the circumstances of each site, and may be higher or lower than the indicative modelling.</p> <p>It is not, however, accepted that where a site is constrained by particular circumstances that that should, by necessity, lead to denser forms of development on the remaining site area. This does not represent a design-led approach.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• The guidance will be amended to state explicitly that the ultimate housing yield from a site will be dictated by a design-led approach and the particular circumstances of a site, which may be higher or lower than the indicative yield.</li> </ul> <p>Housing mix and right-sizing</p> <p>As stated in the briefs, the housing mix of any emergent proposal can respond to the latest evidence of need.</p> <p>Rezoned sites in the past have been used to generally provide a very limited range of housing, often 100% three-bed homes which, whilst providing family homes, has not encouraged or enabled the provision of smaller homes. Island Plan Policy H4 promotes the creation of sustainable, balanced communities, by requiring development to positively contribute to meeting identified housing needs of the local community or the island, in terms of housing types, size and tenure, having regard to the latest evidence of need. Development proposals which would result in an unacceptable over-concentration of any type, size or tenure of housing will not be supported, except where overriding justification is provided to justify the mix.</p> <p>It is the function of the planning system to make provision for the new homes that the island needs, and this is what the island plan seeks to do. Planning law enables homes to be developed for persons who would otherwise have</p>

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<p>why specific yields based on standardised densities are referred to repeatedly throughout the SPG.</p> <p>20. Given the suggested design-led approach, which considers the specific characteristics of a site, and the wealth of other, very detailed, guidance in both this SPG and in the emerging SPGs on parking and residential space standards, the standardised, non-site specific densities in this SPG potentially give a false indication of what might be achieved. In addition, in some cases the make-up of the higher density mix referred to, contradicts the mix of units specified for that site.</p> <p>21. Page 2 of the SPG states that the figures “might be used to determine the appropriate density” (emphasis added), but it also states that “These figures should not be regarded as a definitive number”. We would therefore question the use of the word determine, which implies that the density figures in the SPG will actually dictate what is deemed appropriate when a scheme is considered by the planning applications team.</p> <p>22. Our understanding is that the density figures quoted merely indicate how many homes may be achieved if 2 standardised density figures are used, but these are purely indicative and the number of homes that is appropriate for any site will be dictated by a design-led approach. If this is correct this should be clarified for every site in the SPG.</p> <p>23. We also note that the SPG refers to these sites “providing an opportunity to develop homes at higher densities”, but this opportunity has been missed. It is appreciated that the 35dph figure is a minimum, but it is a low figure. It is no higher than that stated in the draft Density SPG for any Local Centre, and if these sites are to be used to achieve “higher densities”, as stated, then the 35dph indicative guide should be raised.</p> <p>24. This is particularly important on the 2 sites where it is proposed to significantly reduce the useable area. On these sites the density figures should either be applied to the whole site, as is normal, or a higher figure should be set for the useable areas to recognise that open space will be provided immediately adjacent.</p> <p>24. This is particularly important on the 2 sites where it is proposed to significantly reduce the useable area. On these sites the density figures should either be applied to the whole site, as is normal, or a higher figure should be set for the useable areas to recognise that open space will be provided immediately adjacent.</p> <p>25. Each site specific brief describes the character of the area, but there is little comment on building styles, forms and heights. It is assumed that this is intentional to allow for the design-led approach. There is however a strong possibility that the SPG can be read as implying that the existing character must be repeated in the new development. Given the SPG’s stated desire for higher densities, and that in the island’s more rural areas, densities are low and the layout is often dominated by on-plot car parking, this could introduce additional uncertainty and lower eventual yields.</p>	<p>financial difficulties renting or acquiring residential accommodation in the general market for residential accommodation prevailing in Jersey. The development and operation of a right-sizing policy, and its application to the development of new homes, is a matter for the Minister for Housing and Communities and this remains to be developed.</p> <p>The Minister for the Environment will seek to assist in the development and application of this housing policy, as it affects the planning process, as and when policy is developed and implemented.</p> <p>Funding and provision of drainage infrastructure</p> <p>The work that is required to be undertaken to enable these sites to be released for development is provided in the briefs. The timelines for this work have been updated to reflect the current situation. The progression of these works is subject to the approval of funding sought from the Government Plan. States Members are aware of the need for infrastructure to be provided to enable the development of these sites to progress and for homes to be delivered. The proposal for funding of this work will be considered by the States Assembly in December 2023.</p> <p>Developers are encouraged to engage with I&amp;E (drainage) to discuss details of any local enhancements to drainage infrastructure to ensue potential cost implications, where this is required.</p> <p>Revised residential parking and space standards</p> <p>The Minister has recently published revised guidance for <a href="#">residential space</a> and <a href="#">parking standards</a>: these have been revised in response to consultation feedback.</p> <p>Boundary tensions</p> <p>The purpose of this guidance is to identify the planning issues that developers should address as part of the development of any scheme and associated planning application.</p> <p>Whilst the delivery of affordable homes is the principal purpose of this policy and guidance there are other material factors that have to be considered, by law, as part of the determination of any planning application.</p> <p>The purpose of development briefs is to provide greater certainty about those issues that are required to be considered. They cannot and should not deliberate on the balance that will be arrived at in the detailed consideration of</p>

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<p>26. Although not necessarily predominant in the areas surrounding the sites, terraces of houses use land more efficiently and so create more affordable homes, and this could be encouraged in the SPG.</p> <p>MIX AND RIGHT-SIZING</p> <p>27. The SPG says that the mix must be justified but sets a focus on family housing and right sizing.</p> <p>28. Page 4 suggests that the population is lower than anticipated and alongside the shift towards smaller household sizes this has increased demand. This appears to be contradictory.</p> <p>29. The use of the sites predominantly for family housing is accepted, and expected, not least given the low densities set out in the BIP. The SPG, like the BIP uses a density of 35dph, and says that this is based on 100% 3-bed houses. However, it then goes on to refer to a different, higher density mix. This is then applied across all the sites despite the fact that on many sites the SPG refers to a further different mix of sizes. This is confusing.</p> <p>30. The SPG frequently refers to providing predominantly family houses plus “a limited number of smaller homes.” The phrase “limited number” suggests very few however, but the standardised “Higher Density Mix” then sets out a very specific mix, where 40% of the homes are smaller. A figure of 40% is not very few. The SPG should acknowledge current Gateway and Purchase Pathway demand, which highlights a need for 3 and 4 bedroom family homes, as well as studio and 1 bedroom homes. Smaller units can be more readily and efficiently created in existing urban areas, whereas these specially designated greenfield sites offer a unique opportunity to build 3 and also 4 bedroom homes, both of which are in demand. We would therefore advocate that a minimum percentage of 3+ bedroom units, (well above the 60% suggested in the Higher Density Mix), is specified for each site.</p> <p>31. Although we support right-sizing in principle, we are not clear how this will be achieved or enforced, and question how the planning system can deal with this. As far as we know, a right sizing property does not look any different to any other property, nor do its requirements for space or parking differ from any other property. We are not clear how the planning authority will, (either once the property is completed or in perpetuity), require that a resident must move from a larger property, or require that the new occupiers of the property which the downsizer vacates, will not, (at any time in the future), under occupy it. It is also not yet clear whether the vacated property would be sold at open market value or to a First Time Buyer.</p> <p>32. We note from the SPG that Housing policy control is awaited, and this would appear to be the appropriate way to address this issue rather than it be handled by the planning authority.</p> <p>33. A firm policy to reduce under-occupation of the current stock of affordable rental properties would free-up a significant number of 3 bedroom homes and reduce the need to build new 3 bedroom homes. The absence of that policy currently generates a requirement for additional land for new homes.</p>	<p>these issues as they can only be determined through the preparation, assessment and determination of a detailed planning application. Failure to have regard to the guidance, and the other material factors highlighted in it, poses greater risk that planning permission may not be secured.</p> <p>There is a policy requirement that existing boundary features should be retained as far as possible but, where there is appropriate justification for their removal – to secure access or a visibility splay – this is acknowledged in the briefs. Mitigation should, as a matter of course, be implemented to retain any remaining trees, to ensure that they are protected during the course of development.</p> <p>Supporting information</p> <p>The purpose of this guidance is to identify the planning issues that developers should address as part of the development of any scheme and associated planning application.</p> <p>Whilst the delivery of affordable homes is the principal purpose of this policy and guidance there are other material factors that have to be considered, by law, as part of the determination of any planning application.</p> <p>The purpose of development briefs is to provide greater certainty about those issues that are required to be considered and to identify the supporting information that is required to enable proposals to be considered, assessed and determined. Failure to have regard to the guidance, and the other material factors highlighted in it, poses greater risk that planning permission may not be secured.</p> <p>The nature and level of information required to be provided is considered to be proportionate to the matters that are required to be considered.</p> <p>There is a range of information provided online about the type of information required to provided to support larger planning applications: see <a href="#">Validation Checklist Planning Applications.pdf (gov.je)</a>.</p> <p>Guidance on the use and applications of planning obligation agreements is programmed to be revised.</p> <p>Compulsory purchase</p> <p>Policy H5 contains a discretionary provision for compulsory purchase proceedings to be invoked, subject to the approval of the States Assembly, where rezoned affordable housing sites are not being progressed. The purpose</p>

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<p><b>DRAINAGE</b></p> <p>34. The SPG notes significant drainage concerns on several sites. In most cases it is stated that work will be undertaken by the Government, but it is a significant concern to developers that the works referred to will either not be approved or will not be undertaken within the time periods referred to. This could leave homes built but not occupied, with inevitable consequences for both potential occupiers and developers. The Government must understand that if there are major risks in building out a scheme, developers and contractors may not be able to undertake a development at all.</p> <p>35. In many cases it is stated that localised works will be required, and it is assumed that these costs will be passed on to the developer. Unlike the highways costs however, the sums involved are not clear. This lack of clarity around figures and around proposed Government work, is a significant worry which threatens the development of many of the sites.</p> <p><b>PARKING AND RESIDENTIAL STANDARDS</b></p> <p>36. The SPG requires that the developments accord with these recently published draft SPGs. We made detailed comments on those documents, which apply equally to the development of these greenfield sites. We trust that our previous comments will be taken into account.</p> <p>37. We would highlight our view that greater weight should be given to public transport provision and less reliance placed on cycling, which for many people will not always be an appropriate or safe mode of transport, and for many may be a seasonal choice. The potential for car clubs to allow for car journeys when necessary but without the need for everyone to own and accommodate a car, should also be recognised.</p> <p>38. Car and cycle parking are land-hungry uses, so cycle parking requirements should be realistic, and car parking should be minimised in line with the Sustainable Transport policy. Where housing sites are on bus routes and near to a range of local facilities, we suggest that requiring a minimum of 2 car parking spaces per unit for 3 bedroom units is out of step with the government's objectives of addressing climate change and encouraging modal shift.</p> <p>39. Again, rather than having to negotiate appropriate levels of parking on a site by site basis with the allocated planning officer, we would advocate that the briefs set out a required package of lower parking standards, car club vehicles and bus subsidies.</p> <p>40. As regards Residential Space Standards, we previously noted that increasing unit sizes inevitably increases build costs and therefore rental and sales values. An increase in unit size does not always mean an increase in quality or usability. The Residential Space Standards SPG's requirements will increase the price of homes, when the aim of designating these sites was to provide affordable homes, and so any increase in space standards needs to be carefully thought out and justified.</p> <p><b>NON-HOUSING REQUIREMENTS</b></p>	<p>of this discretionary policy provision is to encourage the delivery of affordable homes.</p> <p>It is acknowledged, and a source of some regret, that development briefs have not been progressed more quickly: it was, however, considered important that related guidance on density, residential space and parking standards were revised in advance of development briefs being brought forward, to ensure that homes are on rezoned sites were developed to meet current expectations and policy objectives.</p> <p>The challenges of providing the necessary public infrastructure, to enable the development of these sites for the provision of new homes, is also clearly recognised in the briefs.</p> <p>In such circumstances, it would be unreasonable to give effect to any discretionary compulsory purchase proceedings until three years after the publication of the development briefs; or the provision of the requisite public sewerage infrastructure, whichever is the latest.</p> <p>This will be explicitly acknowledged in the revised guidance.</p> <p>Securing affordable homes in perpetuity</p> <p>There is a need to develop a more rigorous mechanism to ensure that that affordable homes are subject to the necessary legal provisions that ensures that they remain available and affordable for those who would otherwise have financial difficulties renting or acquiring residential accommodation in the general market for residential accommodation prevailing in Jersey. It is clear that the provisions used over time of rezoned housing sites need to be strengthened in a way that is both more rigorous and proportionate, to ensure that this objective is achieved.</p> <p>Change</p> <ul style="list-style-type: none"> <li>• The guidance will be amended to require the submission of a scheme for the provision of affordable homes which shall include, amongst other things; details of the arrangements to ensure that assisted purchase housing provision is affordable for both first and subsequent occupiers of the affordable housing.</li> </ul>

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<p>41. Although the SPG aims “to support the positive development of sites rezoned for the provision of affordable homes” the site briefs set out several impediments, constraints and additional requirements. In some cases, these require financial contributions of £100,000s, plus unspecified drainage costs, and in some the requirements will significantly reduce the useable area of a site. We would ask whether the size, and the shape, of the useable areas of the sites has been drawn and calculated, prior to the publication of this draft, to fully appreciate the impact of these additional requirements and constraints.</p> <p>CONFLICT BETWEEN HIGHWAYS REQUIREMENTS AND BOUNDARY RETENTION</p> <p>42. In many cases the highways requirements, in terms of financial contributions and physical works are onerous, and in some cases, they conflict with other listed objectives. At MN410 and J1109 for example, significant highway works are required whilst the SPG also requires that existing vegetation is retained and strengthened. At P655 and P656, long visibility splays are required which may require removing a granite wall along the side of a listed building.</p> <p>43. It is appreciated that BIP policies may often pull in different directions and so the decision maker must balance the various factors, but in these cases, where a site specific brief is in place, the author of the brief should resolve these conflicts in advance, within the SPG.</p> <p>SUPPORTING STATEMENTS AND POAs</p> <p>44. The SPG requires the submission of a number of studies and reports, and the completion of complex Planning Obligation Agreements. The number, (and cost), of supporting reports, within a planning process which offers little certainty, is a major concern for developers, and a significant risk to development. Despite the Government’s acceptance of the housing crisis and a stated aim to address it, the planning process does not take this into account, and has not been tailored to address this issue and genuinely support developers in providing the homes that the Government itself is seeking.</p> <p>45. It is noted for example, that in accordance with Appendix 2, bat hibernation surveys cannot be undertaken until November.</p> <p>46. It must be appreciated that the delay in the adoption of this SPG, and the requirement for surveys, especially those which can only be undertaken at certain times of the year, will have an impact upon the ability to develop the sites, especially as building and borrowing costs have increased dramatically in the months between the adoption of the BIP and the publication of this draft SPG. Wherever possible therefore, we would ask the Minister to re-assess the need for surveys and studies as part of the planning application, and whether instead certain issues can be dealt with by appropriate planning conditions, enabling developments to be programmed with greater certainty. If it is considered that reports are required, guidance could be given on what should be included within these reports to minimise delays and cost.</p> <p>47. The SPG states that POAs are required to deal with various issues. It would assist if the SPG</p>	

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<p>provided standard POA wording to reduce delays and duplication of work.</p> <p>COMPULSORY PURCHASE</p> <p>48. BIP policy H5 states that where the development on these sites has not commenced within three years of the approval of the BIP they may be subject to compulsory purchase by the Government. The SPG, at page 7, effectively changes this policy to start the 3 year period from the date of the adoption of this SPG, which is disappointing.</p> <p>DEEDS OF SALE</p> <p>49. Page 6 of the SPG states that draft deeds should be submitted to and approved by the planning authority. It is widely accepted that planning applications should not seek to deal with matters which are covered by other legislation. In addition, in the recent review of Development Control, Mr. McKinnon commented that planning officers are often unable to deal with matters which are beyond their levels of expertise. Whilst it has been common for occupancy to be restricted by condition or POA, the additional requirement to submit deeds is inappropriate and strongly resisted.</p> <p>50. The processing of a planning application is already complex. Rather than require a document to be drafted and submitted for each site separately, it would be more appropriate for the SPG to set out a standard POA wording to be used for every house sale.</p> <p>As noted at the outset, the stated aim of the SPG is to support the development of these specially designated sites to accommodate desperately needed affordable homes.</p> <p>92. To support developers in creating these homes, the guidance needs to be clear and as simple as possible, to maximise opportunities for new homes, and minimise constraints, impediments, risks and uncertainty.</p> <p>93. The comments herein aim to do exactly that so that developers can reciprocate by supporting the government in achieving the homes that it says are needed. We hope therefore they will be incorporated into the final guidance so that these homes can be realised without further delay.</p> <p>94. This is of course a draft. The reader of the draft could however be forgiven for missing any reference to the urgency on the part of the government to provide certainty for developers to provide these affordable housing. Instead that reader would see a complex layer of "shopping lists" to which the developers must adhere, which constrain rather than support the creation of these homes. The opportunity to galvanise the currently vulnerable construction industry, has been diluted by an apparent wish to demand, confine and control.</p> <p>95. Our key concerns include:-</p> <ul style="list-style-type: none"> <li>• Failure to appreciate the economic realities of development.</li> <li>• Unviable tenure split</li> </ul>	

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<ul style="list-style-type: none"> <li>• An unnecessary and unreasonable desire to intervene in contractual matters between buyer and seller which may cause delays and introduce uncertainty and therefore risk.</li> <li>• Additional requirements for Supported Housing (for which other sites are allocated)</li> <li>• Reduction in usable areas and therefore reduced yields</li> <li>• Confusing density guidance and low density aspirations</li> <li>• Lack of clarity around right sizing</li> <li>• Unknown drainage costs and potential delays which may prevent development altogether.</li> <li>• High car and cycle parking requirements</li> </ul> <p>Huge financial contributions required</p> <ul style="list-style-type: none"> <li>• Conflicts between some of the requirements such as highways and biodiversity.</li> <li>• Extent of additional supporting documents required for planning applications.</li> </ul> <p>96. Although developers are expected to create the homes, the process of waiting for government guidance and then inviting comments, many of which will express contrary views, concern or disappointment, is somewhat adversarial. We would reiterate that our aim is not to criticize but to help the government produce guidance which will genuinely support, and expedite, the provision of these new homes. To do this, we would encourage, and be happy to contribute to, a more collaborative approach to discuss the concerns raised.</p>	
<p>this should be put on hold.</p> <p>1 the island main drains cannot cope at the moment, pumping stations are struggling. Once again this had been kept away from the public.</p> <p>2 j.e.c are also struggling to keep up with demand. Once again the public are being kept in the dark.</p> <p>Perhaps the minister would like to tell all islanders what really is going on ie. The truth. I know for sure the island is struggling. Our island cannot cope to many people our island is over populated. So I suggest the states sort out the 2 above problems. I feel sorry for the youngsters every thing is to expensive and the way things are going is not good. There are more builders going to go shortly.</p> <p>The government has failed to look after our younger people.</p> <p>1. They should have stopped outsiders buying up properties for renting plus holiday homes.</p> <p>2.They should look into the size of some of these houses, because some are so small inside yet planning are passing them.</p> <p>3 Youngsters want 2 to 3 bedrooms at a reasonable price, because some builders are charging over the odds.</p>	<p>Short-term holiday lets</p> <p>The Minister for the Environment is working to ensure that these are better regulated to ensure that homes are not inappropriately lost to the local housing market.</p> <p>Revised residential space standards</p> <p>The Minister has recently published revised guidance for <a href="#">residential space</a>, which sets out revised standards for the minimum sizes of rooms and external spaces for homes.</p>



COMMENT	RESPONSE
<p>4 Some of the flat's well you couldn't swing a cat inside.</p> <p>5 some of these architect's designs they should be looked into closely.</p>	
<p>I am writing to you as a concerned resident of Sion and Islander, regarding the planning and design of affordable housing in rezoned green field sites. It is my belief that addressing key issues in this regard is crucial to ensuring the success of the Jersey Island Bridging Plan and meeting the objectives outlined therein.</p> <p>As you are well aware, affordable housing is an essential component of any thriving community. It not only addresses the needs of individuals and families with limited financial resources, but it also contributes to the social and economic well-being of the entire community. Therefore, it is imperative that we approach the planning and design of affordable housing with careful consideration and a long-term perspective. To that end, I would like to bring the following key issues to your attention:</p> <ol style="list-style-type: none"> <li>1. Sustainability and Environmental Impact: In rezoning green field sites for affordable housing, we must prioritize sustainability and minimize the environmental impact. Encouraging energy-efficient design, incorporating renewable energy sources, and implementing green infrastructure will not only reduce carbon emissions but also contribute to the overall quality of life for residents.</li> <li>2. Access to Amenities and Services: Affordable housing developments should be situated in locations that offer convenient access to amenities and services such as public transportation, healthcare facilities, educational institutions, and recreational spaces. Access to these vital resources is crucial for the well-being and inclusivity of residents. Cycle access, school and work commute all require a permanent independent cycle path solution.</li> <li>3. Community Engagement and Collaboration: Engaging with the local community throughout the planning and design process is vital to ensure that their needs and concerns are taken into account. Meaningful community participation, including public consultations, can help build trust, foster a sense of ownership, and ensure that affordable housing developments align with the community's vision and values.</li> <li>4. Design Quality and Aesthetics: Affordable housing should not be synonymous with uninspiring architecture or substandard design. Well-designed developments, incorporating high-quality materials and aesthetics, will create an attractive living environment that promotes social cohesion and pride in the community.</li> <li>5. Mixed-Income Communities: Striving for mixed-income communities rather than isolating affordable housing units will contribute to social integration and avoid stigmatization. Promoting diversity and inclusivity within neighborhoods helps foster social harmony and equal opportunities for all residents.</li> <li>6. Adequate Infrastructure and Utilities: Proper infrastructure, including reliable water and electricity</li> </ol>	<p>Sustainable forms of development</p> <p>The development of homes on this site will be required to outperform the target energy rate by 20% in order to satisfy Policy ME1 of the bridging Island Plan.</p> <p>Other Island Plan policies require development to address issues of minimising water use, waste reduction and the use of sustainable drainage systems. The guidance will be revised to ensure that these policy references are made explicit.</p> <p>Access to amenities and services</p> <p>As part of the island plan review, those sites put forward for development were assessed against access to and provision of local services in order to support the spatial strategy adopted in the island plan (see: <a href="#">Policy SP2 – Spatial strategy</a>).</p> <p>Further engagement and consultation.</p> <p>Once development briefs for the sites are finalised and published, there is a requirement for developers to (a) engage with the local community for development of ten or more homes in advance of a planning application and (b) to submit a planning application, which is an open and transparent process, and in which local residents can participate.</p> <p>Design quality</p> <p>As stated in the guidance, the development of the rezoned housing sites is not just about the delivery of homes but it is about creating good places to live. Developers and architects are encouraged to consider those key factors that can help ensure the better planning of new development. Building for Life 12 is a UK government-endorsed industry standard for well-designed homes and neighbourhoods. Using this guidance, in a Jersey context, can help deliver new homes and places that are responsive to their context, attractive, functional and sustainable.</p> <p>Sustainable communities</p> <p>The sites the subject of this guidance will be expected to deliver affordable homes for persons who would otherwise have financial difficulties renting or</p>

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<p>supply, sewage systems, and transportation networks, is essential to support the development of affordable housing. Ensuring that these services are adequately planned and provided is crucial to avoid placing an undue burden on existing infrastructure or compromising the well-being of residents.</p> <p>7. Long-Term Affordability and Maintenance: Affordable housing should not be a short-term solution; it should aim to provide lasting affordability. Implementing mechanisms such as long-term affordability covenants and maintenance plans will safeguard the intended purpose of these developments and ensure they continue to serve the community effectively in the years to come.</p> <p>I urge you to consider these key issues in your decision-making processes and actively advocate for their inclusion in the planning and design of affordable housing in rezoned green field sites. By doing so, we can work together to create sustainable, inclusive, and vibrant communities that align with the objectives of the Jersey's Island Plan.</p> <p>Thank you for your attention to these important matters. I would greatly appreciate the opportunity to discuss these issues with you further and offer any assistance I can in supporting the successful implementation of affordable housing plans.</p>	<p>acquiring residential accommodation in the general market for residential accommodation prevailing in Jersey. The development briefs seek to secure their appropriate integration in to existing settlements in order to contribute to the development of more sustainable communities.</p> <p>Infrastructure and utilities</p> <p>The development briefs have sought to assess the capacity of local infrastructure to be able to accommodate new development; and where this is deficient, to set out the requisite enhancements that need to be made. Some of these will be expected to be provided by the developer, in association with the development of these sites; others, such as major drainage infrastructure, will need to be funded and delivered by government.</p> <p>Securing affordable homes in perpetuity</p> <p>A 30% property charge is required to be secured on the homes to be delivered on these sites to ensure that the homes remain available as affordable homes in perpetuity.</p>
<p>We write in regard to the above draft Supplementary Planning Guidance (SPG) dated May 2023.</p> <p>Le Comité de la Commune Rurale de St Jean ("Comité Rurale") is an elected Parish body originally set up in 2008, and specifically charged with acting as a key stakeholder group in planning and other community matters affecting St John. Comité Rurale consulted with the Parish and parishioners of St John directly and via a survey and public meetings to then make submissions to the Bridging Island Plan process ("BIP") and the Enquiry in Public. These investigations and consultations indicated large majority support and significant demand for the following;</p> <ol style="list-style-type: none"> <li>1. Dedicated sheltered housing development administered by the Parish (an extension to Maison Le Vesconte)</li> <li>2. Dedicated right-sizing housing to allow current residents to downsize but stay within the Parish</li> <li>3. Affordable homes available via the Housing Gateway with 100% nomination rights for the Parish (later amended to 50%)</li> </ol> <p>This information was relayed directly to the Minister, the Head of Place and Spacial Design and other Officers of Planning on multiple occasions as well as to the Enquiry in Public. The Comité Rurale were dismayed when re-zoning of sites for sheltered housing and right-sizing developments, in particular, were not originally included in the BIP.</p> <p>The Constable of St John then lodged amendments to the BIP specifically to provide the dedicated sheltered housing and right-sizing developments, those amendments relied crucially on guidance</p>	<p>The Minister is grateful for the efforts of Le Comité de la Commune Rurale de St Jean to engage with the island plan review process.</p> <p>In considering sites for inclusion in the draft island plan, the Minister has a requirement to have regard to key planning considerations and the provision of housing across the island. This was clearly articulated and set out in the Minister's assessment of sites proposed for the development of homes; and in response to those amendments for the provision of further housing sites sponsored by States Members. All proposals sponsored by Le Comité de la Commune Rurale de St Jean were rigorously considered by the Minister, along with independent planning inspectors: they, and the evidence upon which they were based, was not ignored.</p> <p>The decision of the Connétable of St John to alter the amendments proposed to the draft plan were made in full knowledge of the implications of so doing and were based on discussion with the Minister for the Environment. As stated above, ministers remain cognisant of the Parish of St John's objectives, and will seek to work constructively with the Connétable, in order that they might be achieved within the policy framework that has been approved by the States Assembly, in response to the Connétable's own amendments.</p>

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<p>provided by the Head of Place and Spacial Design.</p> <p>Overall, the Comité Rurale are extremely disappointed that the considerable efforts made to engage with the BIP process and present valid evidence in support of the proposed developments in St John were ignored. The subsequent amendments lodged by the Constable of St John and agreed by the Assembly have also been bypassed, and the draft SPG does not accurately reflect those decisions.</p>	