

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 out public engagement evening held on the 14th June 2023 and the feed back received. For clarity this event was also attended by Constable Andy Jehan, Deputy Hilary Jeune, Deputy Andy Howell & 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 constructions 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>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>
<p>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 he 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 as 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>

<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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>on the establishment of planning parameters for the development of sites.</p> <p>The issuing of guidance, to support the interpretation and use of Policy GD2, is being programmed relative to other Ministerial work priorities.</p> <p>Process: performance framework</p> <p>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.</p> <p>Process: housing supply</p> <p>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.</p> <p>Detail: amount of open space</p> <p>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.</p> <p>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.</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>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.</p> <p>Detail: future management of communal spaces</p> <p>The issue of future management and maintenance of communal spaces and</p>
--	--

<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 Plan.</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"> • 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.
<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 & 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"> • 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. <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&E (Regulation), working with I&E (Transport and Operations), through the assessment of respective planning applications, to deliver comprehensive improvement.</p> <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>Change</p> <ul style="list-style-type: none"> • Add explicit policy references to island plan policy requirements to deliver sustainable forms of housing.
<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 91st amendment 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.</p> <p>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&E (Transport and Operations) in advance of any planning application being made.</p> <p>The Minister for the Environment has published revised parking standards 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>Process</p>
<p>This field is prime agricultural land and with sustainability at the forefront should never have been put</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>, "...the development should establish a positive relationship with La Grande Route de St Jean" 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"> Clarify treatment of eastern boundary. <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&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&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 StJohn, Sion.</p> <ol style="list-style-type: none"> 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. 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. 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. 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 	<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"> • 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

<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"> 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 overflow 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. 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. 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. 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 Stion 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. 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. 10. Traffic calming. It is noted in section f) traffic calming is talked about. The whole of the 20mph Sloan zone is in need of traffic calming. The bottom near Ruette 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. 11. Northbound bus stops. The north bus stop to the south of the site exits onto the road with no 	<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.</p> <p>The draft development brief for J1109 and T1404, both in Stion, 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&E (Transport and Operations).</p> <p>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>
--	---

<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"> 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. We live at [REDACTED] We wouldn't want the view from our front to be of a play area. 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. 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. 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. 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. 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. 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. 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. If a pavement is to run the length of the eastern boundary then there should be an exit point to be 	<p>Sion Methodist Church (IN0075)</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 existing wall 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"> Clarify treatment of eastern boundary.

able to cross the main road at either end or else there is no point in the pavement.

- Maintenance of the communal areas /community space /children's play area needs to be clarified. 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.

Bus shelters

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.

The development brief for T1404 requires the potential for crossing facilities to the northbound bus top to be enhanced.

Site access and highway improvements

The siting and specification of any site access will need to be the subject of consideration and assessment with I&E (Transport and Operations) to ensure optimal safety for all road users.

Similarly, the provision of new facilities for pedestrians and traffic-calming, should also be discussed with I&E (Transport and Operations), and should deliver comprehensive highway improvements to Sion Village.

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

Future management and maintenance

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.

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.

Change

- 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.