

APPENDIX ONE




South Hill Development and Design Brief: Response to Public Consultation

October 2020

Introduction






This report sets out the responses received as a series of graphs showing the strength of reaction to specific questions in the online survey and to other forms of response. It assesses what amendments may be made to the Development and Design Brief to take account of the comments received.

Respondents

			Response Percent	Response Total
1	I agree that my comments may be made public and attributed to me		17.72%	14
2	I agree that my comments may be made public but not attributed (i.e. anonymous)		64.56%	51
3	I don't want my comments made public		17.72%	14

There were 79 online comments of which 65 people (82%) agreed could be made public. Specific organisations included Jersey Action Group, the Regulation Directorate of GHE, Jersey Chamber of Commerce (by e-mail) with the remaining people identifying as individuals. One letter was received in the post and one other individual e-mailed a response.

1. Proposed land use – open market housing

			Response Percent	Response Total
1	Strongly Disagree		25.00%	19
2	Disagree		15.79%	12
3	Neutral		14.47%	11
4	Agree		15.79%	12
5	Strongly Agree		28.95%	22

There was a balanced response with 34 people agreeing that open market housing was the best use with 31 disagreeing with the statement, suggesting that other uses should, in their opinion, be considered.

Reviewing other responses there was a recognition the site had a high value for housing which could bring much needed funding to the Government. However, the need for social

housing, especially first-time buyer homes, was considered to be a better use by many. Some saw value in cross subsidy of this site to deliver social housing on other sites. Others believed that the site should remain in commercial use, some seeing this as a tourism use, such as a hotel and casino, others a more iconic, cultural, education or sports use, the latter linked to Fort Regent. Some saw value in retaining the site in public ownership.






The Jersey Construction Council were discontent with the survey. They believed that the proposed use of the site does not meet Island Plan Policy E1 requiring the protection of employment sites and others which would require the refurbishment and reuse of the building. As Policy E1 does not apply to office use, the use of as housing does meet the Island Plan and South West St Helier Planning Framework policy frameworks as set out at page 6 of the guidance.

Minister's response

Page 7 of the Brief sets out the reasons why the Minister considers this site is best used for open market homes as opposed to affordable housing – “The Minister for the Environment, therefore, considers that this is a premium, high value site where the potential to secure maximum return in the release of this public asset should be secured. There are other public sites planned to be released for redevelopment which will better contribute to the provision of affordable homes.”

In light of the balanced response to this question, **no change to the guidance is proposed.**

2. Land Use: visitor accommodation

			Response Percent	Response Total
1	Strongly Disagree		27.27%	21
2	Disagree		23.38%	18
3	Neutral		20.78%	16
4	Agree		16.88%	13
5	Strongly Agree		11.69%	9

The support for a new hotel on the site was limited to 22 people (29%) with 39, or over 50% not supporting this use. The value of the site with great views out from principal rooms was seen as an advantage for a hotel on the site and a preferable option to housing. This was tempered by some wanting the site to be allocated for social housing or other housing. Others saw open market housing generating more value back into Government as a cross subsidy option and questioning whether Government should be providing land for hotels. As an iconic building a high-end hotel, or linked to Fort Regent's cultural use, was seen by some as an exciting option with Island wide significance, balanced by others who saw no locational value for a hotel here.

Respondents also wished to see mixed uses, hotel, sports and culture with links to Fort Regent. The opportunity for Jersey communities such as the Fisheries and Industrial

industries, and recreational communities whose use of public land don't generate "the greatest financial return" was seen as needing greater consideration. Others hoped the site could be landscaped and retained for public enjoyment.

One respondent made specific suggestions for the use of the site, which run contrary to the Brief. As an innovative approach, the site could be used for start-up zero carbon business with the open area of the car park used as an area for prototype testing, events space and a science play zone. The proposed changes of use have not been fully considered in the proximity to the "risk zone".

Minister's response

The aims of the development, together with sections at page 7 and 8 already recognise that the site offers the potential for use as either residential development or a tourism/cultural use. This offers flexibility in the site's use; is supportive of the tourism industry; and recognises the site's locational advantages.






In light of the response to consultation; and also in recognition of the potential impact of the pandemic on the island's tourism industry; and the potential for this site to complement proposals to regenerate Fort Regent, the Minister considers that greater weight should be afforded to the potential use of the site for tourism accommodation/cultural uses in the development brief for the site.

The aims of the brief (at page 2) are amended to give equal weight to the potential use of the site for tourism or cultural uses, relative to its use for residential development.

A further amendment is to be made (at page 8) to recognise the value of development options which may complement proposals for the regeneration of Fort Regent.

Further minor consequential amendments, recognising the potential of the site to be used for tourism/cultural uses, are also made on page 20 (parking); and page 21 (amenity space).

3. Development Height: respect the existing height of the land to the rear

			Response Percent	Response Total
1	Strongly Disagree		11.69%	9
2	Disagree		7.79%	6
3	Neutral		12.99%	10
4	Agree		25.97%	20
5	Strongly Agree		41.56%	32

There was a strong support from the 77 respondents, with 52 (67%) agreeing or strongly agreeing new development should sit into the hill side setting. The value of the skyline, sensitivity in design and respecting the natural landform was supported. Some saw value in iconic uses adding height, others saw extra land value being derived from greater height.

Some respondents sought the improvement of the site by removal of the modern buildings. Others . Thought the opportunity to create a stunning landmark building needs to be seized. GHE Regulation wanted assurance that the assessment of heights would be clearly

understood as this is relative to where the view is taken. Others wanted heritage to be respected.

Minister’s response

The sensitivity to location should be retained but greater clarity provided about how the assessment of height, relative to the landform, should be undertaken.

Minor change to the guidance to set out how a dynamic assessment of height should be made has been made at page 12

4. High environmental performance

			Response Percent	Response Total
1	Strongly Disagree		7.89%	6
2	Disagree		0.00%	0
3	Neutral		11.84%	9
4	Agree		28.95%	22
5	Strongly Agree		51.32%	39

Whilst a strong support from 76 respondents clearly supporting higher environmental performance 8% disagreed. Those disagreeing thought this would fetter development value and future profit. Most wanted to ensure development remained viable with environmental performance being carefully measured. However, the overriding view was this was important and minimum standards had to be exceeded.

Minister’s response

Noted

No amendment proposed.

5. Improving pedestrian links through the site

			Response Percent	Response Total
1	Strongly Disagree		1.32%	1
2	Disagree		3.95%	3
3	Neutral		21.05%	16
4	Agree		26.32%	20
5	Strongly Agree		47.37%	36

There were 76 respondents who convincingly supported better pedestrian links. 56 (76%) people agreed or strongly agreed this would be a positive. As one person put it “enhanced pedestrian access should be a priority. The site's close proximity to town should encourage people to walk and cycle to their destination and this will only be possible when these links

are safe, segregated and the most convenience option.” Some saw the need for this needed to be tempered by the final design of the development.

Minister’s response

Noted.

No amendment proposed.

6. Ensuring public access through the site

			Response Percent	Response Total
1	Strongly Disagree		6.58%	5
2	Disagree		13.16%	10
3	Neutral		25.00%	19
4	Agree		28.95%	22
5	Strongly Agree		26.32%	20

The respondents were more balanced in this area, many offered no specific opinion. Of those who did 42 (55%) of the 76 agreed or strongly agreed with only 15 or just under 20% disagreeing or strongly disagreeing. The comments help understand these viewpoints balancing the privacy of future residents with use of formerly public land. If used for hotel or commercial use the greater permeability was seen as a positive. In many cases the final layout and design was seen to have the most influence.

Minister’s response

The consultation response is supportive of the need to maintain the permeability of the site, but in so doing, it is important to ensure that regard is given to the privacy of future users or residents of the site.

Minor change to the guidance to require that public access across the site is designed having regard to privacy of site users/residents on page 19.

7. Limiting the parking on site

			Response Percent	Response Total
1	Strongly Disagree		14.29%	11
2	Disagree		18.18%	14
3	Neutral		23.38%	18
4	Agree		24.68%	19
5	Strongly Agree		19.48%	15

77 people offered a range of views with 25 disagreeing or strongly disagreeing and 34 agreeing or strongly agreeing. The need to plan for Climate Change and the emerging

requirements to meet the 2030 carbon neutral target was regarded as a reason to reduce parking and promote active travel. Others saw the need for parking as a key driver of site value; an essential requirement for residential development; and so as not to 'clog up' the shopper parking on Pier Road or displace a parking problem through under provision. GHE Regulation shared concerns above the parking standards. "Simply not providing car parking does not ensure that occupiers do not have or use cars. If space is not provided on site vehicles are often parked elsewhere, in public car parks or in surrounding roads, causing inconvenience to other residents." They proposed a more generous standards of parking and cycle parking. "a standard of 1 car parking space Per unit, but a greater number of cycle spaces (1 per resident rather than 1 per unit) and the provision of electric points for both cars and bikes.

Minister's response

The site offers a good opportunity to promote more sustainable and active travel choices. The level of on-site parking provision should be determined and justified through a comprehensive Transport Assessment and Travel Plan. This should include and address issues associated with trip generation and the implications of such for local infrastructure, to include nearby parking facilities.

Minor change to the guidance to reference the Climate Emergency declaration on page 19 and to require that the Transport Assessment considers the implications for local infrastructure, to include nearby parking facilities at page 21.

8: Improvement to adjacent public space in lieu of on-site space

			Response Percent	Response Total
1	Strongly Disagree		15.58%	12
2	Disagree		3.90%	3
3	Neutral		12.99%	10
4	Agree		41.56%	32
5	Strongly Agree		25.97%	20






This question sought a view of on site or off-site provision. 77 people offered a view, most of whom saw the value in contributing to off-site provision, nearly 68%. Many saw the opportunity to enhance the local public spaces with links to the development as a positive. Those who disagreed saw the provision of public space as a Governmental responsibility which should be reflected in the land value agreed for the site.

Minister's response

The requirement set out in the brief, to mitigate the impact of development upon public facilities through support for off-site public and amenity space is largely supported by the consultation response.

No change to the guidance is proposed.

9. Architectural expression and character

			Response Percent	Response Total
1	Strongly Disagree		9.21%	7
2	Disagree		6.58%	5
3	Neutral		38.16%	29
4	Agree		21.05%	16
5	Strongly Agree		25.00%	19






There were 76 respondents, with clear support for a development that had its own character and sense of place with 35 people (46%) supporting this approach. The comments saw a dichotomy between a 'Jersey' style approach and a more bold cutting-edge design as a contrast to the context. Those who disagreed saw this as a decision for the architect or designers. The end use also had a bearing: for residential or hotel uses, blending in was seen as key; if iconic cultural uses were pursued, then standing out was considered to be important. This tension was evidenced between those who wanted bold, modern architecture and those who wanted a vernacular, almost hill-side town approach, but perhaps most saw response to context as key.

Minister's response

The Brief sets out the need to balance a modern architectural approach with context.

No change proposed.

10. Architectural context

			Response Percent	Response Total
1	Strongly Disagree		10.53%	8
2	Disagree		5.26%	4
3	Neutral		27.63%	21
4	Agree		23.68%	18
5	Strongly Agree		32.89%	25

69% of the 76 respondents were largely agreed that **the architecture of any new development on this site should respect and complement the local architectural character of the area** was a positive or offered no view. Many referred to their response to section 9 above. The definition of what forms 'local architecture' was questioned, as was the value of the local context. Most saw the need for good quality architecture to give a positive enhancement to the area.

Minister's response

The Brief sets out the need to respond to context and provide a high quality architectural response.

No change is proposed.

Respondents Final Comments:

43 respondents offered final views. This provided a wide range of comments and views which are incorporated above. A number of international examples of good practice were offered in the further comments.

- on the Faroe island, Nordic House This is a low lying structure, which is not imposing, while letting in lots of a light. A structure such as this could have views across St Aubin's bay. The Nordic House is a cultural institution built in harmony with the local environment which is used for music events, conferences and art exhibitions.
- "a small 'village' of hillside cottages which would sit beautifully nestled in the hillside. Examples of this can be seen in Cobh, Ireland, and many towns in Devon and Cornwall."
- "many towns and villages in Switzerland as examples of how traditional, historic and modern can coexist. We should build for now and the future and not to emulate the past."
- "sometimes an extreme juxtaposition creates a sensational and positive image, for example: the modern glass pyramids of the Louvre within a courtyard surrounded by classic architecture."
- "...making SW St Helier a highly desirable place to live. An area similar to the waterfronts of Sydney, Capetown and Vancouver with their blend of housing, hotels, restaurants, shops and bars."

Conclusion

Following the public consultation, it is suggested that amendment to the brief is made in accordance with the schedule above.