

Respondents	Comments	Officer Response	Recommendation
<p>Questionnaires</p> <p>(Anonymous)</p> <p>Five representations received</p>	<ul style="list-style-type: none"> <li>• The Tall Building Policy is not clear enough. It puts the onus on schemes which claim to be of exceptional merit which is a difficult judgement to make.</li> <li>• Poor quality buildings should not be protected on the basis of their age or character as this may have an adverse impact upon the quality of living accommodation.</li> <li>• Tall buildings have a substantial imposition on the urban grain of the town and are not appropriate to Jersey. Scattered tall buildings through parts of St Helier could blight otherwise homogenous areas of the town. Grouping of tall buildings may work better than individual landmark buildings.</li> </ul>	<ul style="list-style-type: none"> <li>• It is important that when tall buildings are considered they display the highest design quality and respect their context. The design statement submitted alongside applications for tall buildings must be explicit in demonstrating their quality.</li> <li>• The guidelines are not put in place to defend poor quality in design or appearance, nor to reduce the quality of living accommodation. It is possible to deliver new good quality residential accommodation within buildings that have both a traditional or contemporary appearance.</li> <li>• The guidelines in relation to tall buildings suggest that where they are allowed they are likely to be in close proximity to other tall structures.</li> </ul>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

	<ul style="list-style-type: none"> <li>Character Area 10 needs further analysis and may need to be split further.</li> </ul>	<ul style="list-style-type: none"> <li>Character Area 10 as defined is much more as a result of its topographical form as a "collar" to the town.</li> </ul>	Review this and other character areas on a regular basis.
Association of Jersey Architects	<ul style="list-style-type: none"> <li>More thought should be given to the boundaries between the character areas.</li> <li>In future other Development Briefs should recognise and refer to this work.</li> <li>Certain parts of some character areas have a weaker "sense of place" which might in turn</li> </ul>	<ul style="list-style-type: none"> <li>It is correct that the boundaries are often areas of transition that in some cases are lacking distinctive character. The use of the guidelines in conjunction with a clear description of context will be required. Because of the nature of the town 'clean breaks' between character areas are not always possible. In cases where a boundary adjoins another a clear statement within a Design Statement will be needed to justify the approach taken.</li> <li>Agreed.</li> <li>Agreed. The guidelines are not intended to override any</li> </ul>	<p>Review boundary areas on a regular basis.</p> <p>Provide for inclusion of this work in subsequent Development Briefs .</p> <p>No action.</p>

	encourage bigger changes and innovation. Areas of strong character require more protection.	contextual evaluation of a site but they can contribute to the debate surrounding development proposals by providing a set of simple principles to protect and enhance genuinely significant urban character sites.	
Peter Thorne	<ul style="list-style-type: none"> <li>• Guidance should not be prescriptive but context led.</li> <li>• Some of the boundaries lack sophistication. (Follow roads).</li> <li>• The criteria is not appropriate for the town centre and the Waterfront.</li> <li>• The Tall Buildings Policy is too prescriptive - 7, 8, 10 storey buildings exist.</li> <li>• The objectives with character areas 7A and 7B are illogical as taller buildings are already in place.</li> </ul>	<ul style="list-style-type: none"> <li>• The guidance is not intended to be prescriptive. It is intended to identify, protect and enhance existing character and assist the designer in creating successful places.</li> <li>• The boundaries of the different character areas will change over time and should be reviewed every 5 years.</li> <li>• The criteria for these areas has been carefully considered in the light of recent completions and schemes which have been approved but not yet built.</li> <li>• The guidelines allow for tall buildings (Buildings in excess of 18m: Island Plan 2011) within the frameworks</li> </ul>	<p>No change.</p> <p>Write a regular review into document.</p> <p>No change.</p>

	<ul style="list-style-type: none"> <li>No absolute height restriction should be placed on tall buildings. The 5 criteria within the Island Plan Policy BE5 is sufficient.</li> </ul>	<p>set out within Character Area 7. The guidelines are also obliged to respect Policy BE5 (Tall Buildings).</p> <ul style="list-style-type: none"> <li>The criteria within Policy BE5 and the definition of 'immediate vicinity' are useful guides in identifying and assessing tall buildings. The height limits suggested within the guidance is a key component, by way of setting a 'starting point' for the assessment of tall buildings.</li> </ul>	
Jersey Construction Council	<ul style="list-style-type: none"> <li>This guidance should be used as an aid to reviewing projects within their particular context.</li> <li>The guidance appears to be constraint orientated and does not encourage development enough.</li> <li>Tall buildings should be assessed within the broader urban context.</li> </ul>	<ul style="list-style-type: none"> <li>All the points are acknowledged. The guidance is intended to inform developers and architects and are written to provide flexibility.</li> <li>Tall buildings will be assessed within their character area not merely in comparison to their immediate neighbour.</li> </ul>	No change.
David Dodge	<ul style="list-style-type: none"> <li>Some of the objectives have wider implications on the economic and community life of the town. These need to be understood and addressed alongside design guidance.</li> </ul>	<ul style="list-style-type: none"> <li>It is accepted that the commercial and economic vitality is important but none of the design principles</li> </ul>	No change.

		proposed mitigate against that.	
Rev B Slatter	<ul style="list-style-type: none"> <li>Guidelines are useful but should not be allowed to stifle innovation. Modern design is important to avoid blandness and to introduce excitement and variety.</li> </ul>	<ul style="list-style-type: none"> <li>The guidelines provide latitude for innovation and variety.</li> </ul>	No change.
SoJDC	<ul style="list-style-type: none"> <li>This Design Guidance needs to recognise other documents which gave design advice: <ul style="list-style-type: none"> <li>Esplanade Quarter Masterplan</li> <li>Waterfront Design Codes</li> <li>North of Town Masterplan</li> </ul> </li> <li>It should also acknowledge existing consents: <ul style="list-style-type: none"> <li>Zephyrus</li> <li>Westwater</li> <li>Castle Quay II</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Agreed. The Guidance needs to acknowledge and provide context for the other policy documents in the public realm.</li> </ul>	Amend introduction to provide context.
Anonymous (Chris Clifford)	<ul style="list-style-type: none"> <li>A public art strategy is required within each of the different character areas.</li> <li>In regard to tall buildings quality is a key issue.</li> </ul>	<ul style="list-style-type: none"> <li>The SPG on Public Art will continue to be a relevant policy document in determining applications.</li> <li>Agreed.</li> </ul>	No change.
Montague Evans	<ul style="list-style-type: none"> <li>The Design Guidance should stipulate what should be included within Design Statements especially in relation to important views and final conclusions must be evidence based.</li> <li>Building height restraints should be indicative only with the final decision justified by a design statement.</li> </ul>	<ul style="list-style-type: none"> <li>Planning Advice Note 4 already stipulates what should be included within Design Statements.</li> <li>The guidance offers advice only. Tall buildings will have to address the criteria within Policy BE5 if they are to be successful.</li> </ul>	No change.

	<ul style="list-style-type: none"> <li>• There should be some flexibility applied within character areas so as not to preclude innovative design approaches and so as not to restrain the Island's economic focus.</li> <li>• The Design Guidance is important but should be used in evidence based design statements as a means of encouraging quality in design and architecture. The design statement should also focus on key views, historic fabric finishes, use and function.</li> <li>• There appears to be inconsistency in the document in relation to tall buildings and their definition in relation to their neighbours.</li> </ul>	<ul style="list-style-type: none"> <li>• The guidelines do not preclude innovation and give a significant amount of discretion to designers.</li> <li>• Agreed. The guidelines will be interpreted in conjunction with evidence based arguments within design statements. The guidance makes it clear it is not intended to be a "straight jacket" to inhibit development.</li> <li>• The guidance has offered a clearer definition of "immediate vicinity" which will assist the application of Policy BE5 Tall Buildings.</li> </ul>	<p>No change.</p> <p>Amend guidance to make definition explicit.</p>
Jersey Chamber of Commerce	<ul style="list-style-type: none"> <li>• Notwithstanding the guidance St Helier will have to accommodate most new development both commercial and residential and the guidance must respect that.</li> <li>• The guidance needs to provide for both "prominent" and "non prominent" buildings within the urban framework of the town.</li> <li>• The guidance needs to take into account the commercial and economic aspects of how the town functions and should also include traffic</li> </ul>	<ul style="list-style-type: none"> <li>• It is recognised that St Helier will take the bulk of new development and the guidance is being put in place to facilitate that.</li> <li>• There is significant flexibility in the guidance to allow this to take place.</li> <li>• It is recognised that traffic management is key to the economic and commercial life</li> </ul>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>management.</p> <ul style="list-style-type: none"> <li>• The guidance suggests a traditional approach to new development whilst high density commercial or residential floorspace might require a different more contemporary approach.</li> <li>• Tall buildings policy might restrict opportunities.</li> <li>• The Development Briefs for JCG, Summerland/Ambulance, the Gas Works and the North of Town and Esplanade Quarter Masterplans need to be put in context with the present guidance.</li> <li>• An open forum would be welcomed.</li> </ul>	<p>of the town but the guidance does not prejudice nor impose any strategy.</p> <ul style="list-style-type: none"> <li>• The guidance asks that new development recognises and respects existing character but is flexible enough to provide for innovation.</li> <li>• Provision is made to allow tall buildings subject to meeting a number of important criteria.</li> <li>• Agreed. The relationship between these documents and the new guidance needs to be clearly set out.</li> <li>• This may be useful.</li> </ul>	<p>No change.</p> <p>No change.</p> <p>Amend introduction.</p> <p>Hold open forum upon first review of the character areas.</p>
Dandara	<ul style="list-style-type: none"> <li>• The guidance is out of date.</li> <li>• A number of developments have been approved and built since it was first prepared.</li> <li>• No reference is made to the more recently approved development briefs, nor the North of Town or Esplanade Quarter Masterplans.</li> </ul>	<ul style="list-style-type: none"> <li>• The guidance was completed in 2005 but has been reviewed. New development has taken place but this has not discounted the appropriateness of the present guidelines.</li> <li>• Agreed, the relationship between these documents and the new guidance needs</li> </ul>	<p>No change.</p> <p>Amend introduction.</p>

	<ul style="list-style-type: none"> <li>• The revision to the Esplanade Quarter Masterplan was carried out in a design policy vacuum.</li> <li>• The character areas for the Esplanade are flawed in that a number of consents have been granted: <ul style="list-style-type: none"> <li>• Multi-storey car park, Kensington Place</li> <li>• 72 Esplanade</li> <li>• Extra 2 floors Patriotic Street car park</li> <li>• 14 Gloucester Street</li> <li>• Ogiers</li> <li>• Simpsons</li> <li>• AIB Capita</li> <li>• New developments north of Liberation Station</li> <li>• Development above Liberation Station</li> </ul> </li> <li>• It is inappropriate to limit height on north side of Esplanade to 6 floors. The better solution is to work from the maximum height already in place between Kensington Place and Castle Street.</li> <li>• It is inequitable for the States to restrict building mass on one site but not on their own. (Esplanade Quarter).</li> </ul>	<p>to be clearly set out.</p> <ul style="list-style-type: none"> <li>• The revision to the Esplanade Quarter Masterplan was carried out in the light of the approved Masterplan and the design codes approved for the Waterfront.</li> <li>• The guidance for those different sub areas respect and respond to consents and has been prepared on evidence based criteria, and in the knowledge of those consents which have been granted but not yet implemented.</li> <li>• The guidance in sub character areas 7A and 7B carries a broad limit of 6 floors. Any increase in height beyond that would need to be justified under the criteria within Policy BE5.</li> <li>• The States agreed the Esplanade Quarter Masterplan in 2008 which made provision for some</li> </ul>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<ul style="list-style-type: none"> <li>The Esplanade Quarter is best kept for strategic purposes such as Police Station, hospital or new school. Leave the Esplanade between Kensington Place and Castle Street with no restrictions. Scale of any new building to be determined by an analysis of the present context.</li> </ul>	<p>buildings in excess of 6 floors to form a new finance centre separate but adjacent to St Helier. This new Quarter has and sets its own context and does not have the same constraints as provided by existing development alongside and behind the Esplanade. Its context is different and thus the guidelines controlling new development are similarly different.</p> <ul style="list-style-type: none"> <li>The States have approved the Esplanade Quarter Masterplan and it remains the current defining policy document.</li> </ul>	No change.
Mike Waddington	<ul style="list-style-type: none"> <li>A considerable number of detailed points are made but the principal issues raised in connection with the proposed SPG are :</li> <li>Notwithstanding claims that the proposed SPG will be used only as guidance its use is likely to be prescriptive, restrictive and prejudicial to the delivery of good original, innovative architecture. The restrictions in height are inappropriate within the context of an expanding urban environment where the expectation is that it will</li> </ul>	<ul style="list-style-type: none"> <li>It is accepted that the interpretation of the guidance will be important. The Planning department will ensure that the guidance is implemented in the manner described within the document. It will be used in conjunction with Design Statements and contextual</li> </ul>	No change to guidance but commit to a clear briefing to development control staff as to the interpretation of the SPG.

	<p>accommodate substantial new development and will be obliged to become denser in character. Building height should not therefore be prescribed but justified by a clear analysis of context and a clear demonstration of design quality.</p>	<p>analysis. The guidance is not intended to replace those studies but to operate in conjunction with them to deliver better architecture and urban design.</p> <ul style="list-style-type: none"> <li>• The reference to height is set out as guidance only. The restrictions in relation to tall buildings is laid down within the Island Plan. (Policy BE 5 Tall Buildings.) This states that new buildings should be no taller than existing buildings within the “immediate vicinity.” The SPG looks to give guidance as to what is meant by “immediate vicinity” and does so by defining that as the individual character area. The guidance can not go beyond the policy approved within the Island Plan. Within character area 7b the new offices built at 36 Esplanade already exceeds the height suggested of 22.8m within the guidance. Policy BE 5</li> </ul>	<p>Amend paragraph 1.61 within the SPG as it goes beyond Island Plan policy BE 5.</p>
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		<p>states that no new buildings should exceed this height of 26.5m. The guidance, notwithstanding the above, suggests a lower height is more appropriate within the context of this character area. This does not preclude a building taller than 22.8 but does mean that such a building would need to provide a clear and rational justification for doing so.</p>	
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