

APPENDIX D

PRE-APPLICATION CORRESPONDENCE AND ADVICE

Department of the Environment
Planning and Building Services

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31/03/2015

Barry Freeman Esq
Principal Architect
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Maritime House
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Pre-Application Number PA/2015/0029

Dear Barry,

Pre Application Advice

Application Address: Les Quennevais School, Les Quennevais Park, St. Brelade, JE3 8JW.

Description of Work: Redevelopment of Les Quennevais School

Thank you for your recent enquiry regarding the above matter. As promised, John Nicholson and I have reviewed the options pack which you left with us following our meeting in January. We have considered the various points and would comment as follows.

Summary of Options

There were ten options in your pack, which we have understood to be as follows:

1. New build on Airport Playing Fields
2. New build on Les Quennevais Sports fields (2a south west, 2b south east)
3. New build on existing school site
4. Refurbish and extend on existing site
5. Refurbish and extend site onto Les Quennevais Sports fields
6. Refurbish and extend into Les Blanches Banques
7. New build on Mont Nicolle Primary school site
8. New build on Les Quennevais Precinct
9. Refurbish and extend on existing site only
10. New build on new site (Fields 77, 80, 84 – 88A & 90)

Assessment criteria and methodology

Much as we would when assessing a planning application, we decided to approach these sites based on our view of their performance against key planning principles set out within the 2011 Island Plan policies. We have excluded, for the time being, many detailed items, such as drainage and parking requirements, because we believe that all of the sites will be able to resolve these in one way or another. This has allowed us to focus on the key criteria which affect the *location* of the proposed school. These are:

- planning policy implications,
- planning history of the site (which may affect future use),
- on site impact,
- off-site visual impact (in the wider landscape),
- impact on neighbouring uses (particularly residents),
- ease of vehicular access,
- ease of connectivity for non-vehicular access (walking, bikes and buses),
- environmental concerns (such as impact on biodiversity).

We assessed whether each option has a positive, negative or neutral impact against each criteria.

We have also confined our assessment to planning criteria, so you will see no opinion here as to whether one educational outcome is superior to another for students, or whether one is cheaper than another, or whether any options are quicker to build, or how the various options will affect students during the development. We feel that there are others who are better qualified than us to make those judgements.

Finally, we listed other issues which may crop up for each option, which are relevant to planning and may have implications for timescale and process. I will comment on these separately at the end.

To avoid duplication, we took the view that options 2a and 2b were broadly the same for planning purposes, as were options 3, 4 and 9 – so we considered them together as two distinct groups. This is because they raise very similar issues, albeit that we fully understand that they would have very different outcomes (in terms of product) and have significantly different operational and financial implications.

Outcomes

It may surprise you to discover that, based on planning criteria alone, the best options are 3, 4 & 9 (all existing site options), and the Precinct site (8). This is largely because they are all within the existing built up area and all score very well on access and connectivity criteria. We fully understand that options 3, 4 & 9 would be highly challenging in terms of practicality of build and the potential impact on students during construction. However, as noted above, that is not our call to make. We can say, however, that we have discounted option 8 from further consideration because we cannot see any feasible way in which the site could be assembled and, of course, this option would decimate the existing shops and facilities at Red Houses to the detriment of the community as a whole.

The lowest scoring options were 6 & 7 (Les Blanchés Banques and Mont Nicolle). Not only did they rate very badly on planning policy grounds (either extending into the Green Zone or the Coastal National Park) but of course the Mont Nicolle option requires the relocation of a perfectly sound primary school, which brings with it a raft of other problems. So we discounted these from further consideration.

That initial cull then leaves us with 4 options which we feel are worthy of more detailed commentary. These are, in order of (planning) preference:

Option 5 - Refurbish and extend site onto Les Quennevais Sports fields

Option 2 – New build on Les Quennevais Sports fields (2a south west, 2b south east)

Option 1 – New build on Airport Playing Fields

Option 10 – New build on new site (Fields 77, 80, 84 – 88A & 90)

Taking these in turn:

Option 5 - Refurbish and extend site onto Les Quennevais Sports fields

We consider that this option has merit and requires further exploration. The existing site lies within the built up area and current access and connectivity are all good. The provision of a new building on Protected Open Space is not without its problems from a planning policy perspective, but the incursion is limited in scale. The provision of this 'decant' space, whilst redeveloping the main school site, may also reduce the impact on students. However, we feel that ESC may be concerned with the resulting 'split site' scenario. Certainly any proposal to close off part of the Railway Walk to members of the public would be strongly resisted, and so ongoing maintenance and security implications will remain.

Option 2 – New build on Les Quennevais Sports fields (2a south west, 2b south east)

Again, we feel that this option is strong contender and requires more detailed work. Of course, this option has a more severe impact on existing users of the Sports Centre fields, but this cuts both ways. We consider that there is a strong synergy between the school and the Sports Centre which is not realised in other options. With States budgets as they are, the efficiencies to be gained by site sharing cannot be dismissed. Other sports activities, being relatively low impact in nature, should be able to be relocated elsewhere, if the community as a whole requires a new secondary school. We understand that the loss of Protected Open Space (within the Built Up Area) requires the granting of a considerable planning concession, but then there are no easy options in this exercise, so we believe that serious consideration should be given to this option.

In terms of connectivity, the site is perfectly placed at the heart of the community and may be safely accessed in a number of ways. We simply do not agree that concerns previously raised about vehicular cannot be overcome. There is ample land (in States ownership) with which to improve the traffic flow to the site, whilst avoiding undue impact on residents.

Option 1 – New build on Airport Playing Fields

This option presents more difficulties from a planning perspective and is generally not favoured. The site lies in the Green Zone and is on an area of Protected Open Space, so has two policy hurdles to overcome. The site is also some distance from the centre of the community and whilst it would not present major difficulties for bus, car and bicycle access, it would be a discouraging distance for walkers. The site is also more remote from complementary community facilities. We also feel that the visual impact of the development on this prominent corner could be harmful to the general amenity of the area.

Incidentally, the Island Plan shows a 'hazard area' touching the north-west corner of the site, which is the airport fuel farm. This may raise pupil safety concerns in the minds of ESC and parents.

Option 10 – New build on new site (Fields 77, 80, 84 – 88A & 90)

Finally, we come to the option which we understand is favoured by JPH and ESC. We regret that we do not share this view. The site, as you know, lies on open Green Zone countryside which is currently usable agricultural land. The Island Plan strongly presumes against the loss of such land and development within the Green Zone in general. The Spatial Strategy, which underpins the whole Island Plan, seeks to direct development to the existing built up areas. We are also seriously concerned at the potential visual impact of a large development on such a prominent site, closing off an important rural vista from public view. We regard the area between Belle Vue and the airport as an important gap between these two urban areas, where views of the countryside currently give relief from the surrounding built environment.

It is acknowledged that there is a policy allowance, written into paragraph 14 of policy NE7, which would allow for significant public infrastructure (such as a new secondary school) within the Green Zone, but this is only where its "environmental implications are properly identified, avoided and/or mitigated". We consider that this would require the submission of an Environmental Impact Assessment which, as you know, would necessarily contain a justification for the selection of this site option, set against other available sites in the built up area. As you will have seen from our comments above we consider, from a planning perspective at least, that viable alternatives exist within the built up area, in particular Option 2. **The Green Zone must be seen as an option of last resort, when all other options have failed.**

As noted in the comments for option 1 (above), this site is also more remote from the centre of the community, albeit that bus, cycle and car access can all be achieved in a satisfactory manner.

Other matters

I noted early on that there are other planning matters which should be raised at this stage for the sake of completeness. These will have varying impacts upon the selection criteria of a school site and are, in no particular order:

Options 1, 2, 5 and 7 would result in the loss of some playing field or sports facilities, which may need to be replaced.

Options 1, 2, 7, 8 and 10 would all release the existing school site, which lies within the built up area, and would presumably be redeveloped to the benefit of the public.

Options 1, 7, 8 and 10 all require the acquisition of land, which might need to be by compulsory powers held by the Minister. As you know, these are only ever used in conjunction with States agreement.

Options 1, 6 and 10 could not, in our view, be determined without a Public Inquiry, because they contain elements which are contrary to the direction of Island Plan policy.

All options which exceed 10,000 sq. m. (gross) will require an Environmental Impact Assessment.

Summary and Conclusion

You will see from the foregoing that the planning criteria we have used in comparing various sites strongly favour those which lie within the built up area. Although some of the options which you have put to us will naturally fall away through practical difficulties, we feel that options 5 and 2, in particular, merit further consideration. Additionally, options 3, 4 and 9 (if they could achieve an acceptable solution for ESC) could be supported from a planning perspective. Options 6, 7 and 8 are all, in our view, non-starters. Options 1 and 10, for the reasons we have expressed, would result in the highest environmental impacts and are not, on the face of it, proposals that we could support at this stage. We have not received any information to date which would lead us to believe that a solid case could be made for building on a greenfield site, when other options exist within the Built Up Area.

No doubt you will wish to consider this advice and revert to us in due course. We remain open to discussion, or clarification, on all options and would be more than happy to meet with you and the client department if that would assist. Your attention is drawn to the disclaimer at the foot of the following page.

Yours sincerely

Peter Le Gresley
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The content of this correspondence and any other advice from an Officer or the Department is given in good faith, but **without prejudice** to the formal consideration of planning matters and any future decision. These decisions include, but are not limited to, formal planning applications. In all cases, formal decisions are subject to the full planning process, which may include public and statutory consultation. Consequently, the final decision on any planning matter may not reflect the initial advice given. The purchaser and/or vendor of a property transaction should not rely upon any such informal advice.

Treasury and Resources Department

Jersey Property Holdings
Maritime House
St Helier, Jersey, JE2 3NW



Mr A Scate
Chief Officer
Department of the Environment,
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25 September 2015

Dear Mr Scate

Les Quennevais School replacement

As you are no doubt aware Education, Sport and Culture have recently commenced a period of public consultation over the alternative sites that have been identified for the replacement of Les Quennevais School. I have enclosed a copy of the consultation document for your information.

The three Options that form the consultation were identified following a significant amount of work to explore potential sites that can accommodate the scale of school required to meet future needs for secondary education in the west of the island. The school will also accommodate pupils from all over the island with particular needs regarding physical accessibility to facilities as is currently the case.

Following the public consultation process the Minister for Education Sport and Culture will make a decision over the preferred Option for the new school. In making the decision the Minister will take into account the comments made as a result of the public consultation along with the other material issues regarding the three alternatives. These will include the quality of the accommodation that will be provided, the relative costs of each Option and what the implications of each proposal will be in relation the relevant provisions of the revised Island Plan 2011. The decision the Minister makes will then inform an application for planning permission for the preferred site.

In anticipation of making the application it would be useful to confirm with you the tests that will be applied to each of the sites in relation to the relevant policies of the Island Plan. The ability of each of the respective Options to address the tests will help inform the choice of the preferred site. Identifying the tests will also clarify the information that will be required to accompany any application for planning permission.

Before setting out the particular Island Plan policies which are relevant to each respective Option it will be useful to set out those policies which are common to all of the Options.

Policy SC01 of the Island Plan considers education facilities and indicates in the pre-ambble that when originally adopted (in 2011) it was not anticipated there would be any requirement for a new secondary school. The Policy itself then refers to additional educational facilities and extensions/alteration to existing educational facilities.

The situation has changed since the adoption of the Island Plan and whichever Option is selected any application for planning permission will have to explain why the situation had changed and why a replacement school was now required.

Policy GD1 sets out policy tests for general development principles and considers proposed developments in terms of;

- **Sustainable development:** how does the proposed development contribute towards a more sustainable form and pattern of development in Jersey?
Consideration of this issue might range from; an assessment of where it is located relative to the existing pattern of development in the Island, and in particular, the location of services and infrastructure; to what it is made from and how energy efficient it is;
- **Impact on the environment:** what impact does the proposed development have for the surrounding area, neighbouring land and buildings and the site itself, particularly where the location is sensitive because of the quality of the local landscape, or its heritage or wildlife value?;
- **Impact on neighbouring land and users:** how will the proposed development affect people who will use it or live and work next to it?
- **Value of the development:** there will be a need for the Minister for Planning and Environment to consider the value of the development to the Island, relative to its stated needs and objectives, and in particular, to the local economy.
- **Travel and transport:** the transport implications of new development are often based around the adequacy of car parking provision and access and egress to and from a site. The Minister will increasingly need to consider the traffic and transport implications of development as part of reducing the need to travel and encouraging more sustainable transport modes.
- **Design quality:** the design and architecture of new development is a critical consideration and, in particular, attention must be paid to new development within its local context.

Any application for planning permission will address each of these issues as appropriate and demonstrate how the proposal will seek to accord with the principles.

The application will set out how alternative sites were considered and how a conclusion was reached on the Option that forms the application in relation to the principles in GD1. In considering the alternative sites the principles that underlie Policy GD1 may well have an influence on the final choice of site. If this is the case it will be clearly explained with the submission.

All of the Options involve a school building of around 14,000sqm. – on a site some 58,000sqm. – and as such any application for planning permission will be the subject of an Environmental Impact Assessment (EIA). The EIA will consider aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors. The EIA process will assist in exploring all of the above principles in relation to the proposal and to the alternative sites that were considered to accommodate the school.

Turning now to each of the Options that have been identified and their specific considerations as regards the Island Plan.

Option 1- South-east corner of Les Quennevais sports field

This site is within the Built Up Area and is identified as Protected Open Space (POS) in the Island Plan. The Island Plan explains that it is important that the existing level of provision, across all types of open space, is protected from inappropriate development and loss. The Island Plan also indicates that the protection of open space is particularly important in the Built-up Area where competing development pressures are greatest and its retention and enhancement is important to support the regeneration of the Island's urban environment to promote urban living.

Policy SCO 4 of the Island Plan states that

The Minister for Planning and Environment will protect existing open space provision (which includes Public Open Space) (my brackets) and the loss of open space will not be permitted except where it can be demonstrated that:

- 1. its loss will have no serious impact on the adequacy, quality and accessibility of provision of the type of open space affected by the proposal; or*
- 2. alternative replacement provision of the same or better extent, quality and accessibility of open space can be provided; or,*
- 3. the proposal will be of greater community or Island benefit than the existing open space resource; or*
- 4. its loss would not seriously harm the character and appearance of the locality.*

In the context of SC04 any application for planning permission for Option 1 must show that one of the provisos of the policy can be demonstrated.

Option 2 – Fields South of Rue Carree

The site lies wholly within the Green Zone as identified in the Island Plan. The purpose of the Green Zone is to retain the quality and distinctiveness of the Island's countryside but there is not an absolute moratorium against development within the Green Zone. Strategic development proposals such as a new secondary school may be acceptable in the Green Zone. Any such development would need to demonstrate that the need is proven; alternatives have been properly identified and considered; and that environmental implications for the Green Zone are properly identified, avoided and/or mitigated as far as possible. If the need is proven and alternatives discounted the key test is the capacity of the site and its context to accommodate development without serious harm to landscape character.

Policy NE7 of the Island Plan states that

(edited extract)

The Green Zone, as designated on the Proposals Map, will be given a high level of protection from development and there will be a general presumption against all forms of development

Only the following exceptions may be permissible, and only where they do not cause serious harm to landscape character.....

- 14. Where it is demonstrated to satisfy a proven Island need, relative to the proper assessment of alternative Options, strategic development related to renewable energy production; extraction of minerals or other elements of significant public infrastructure, such as a new secondary school, but only where:*

- a. *its environmental implications are properly identified, avoided and/or mitigated as far as possible*

In order to accord with Policy NE7 any application for planning permission for Option 3 must demonstrate that there is a proven Island need for the school and that there has been a proper assessment of alternative options and those options cannot satisfy the needs of the development. The application should also demonstrate that the environmental implications of the proposal have been identified and that any harmful impacts are avoided or mitigated. One of these impacts may be on the character of the landscape and any such impact must not amount to serious harm to that character.

Option 3 – Fields south of Rue Carree plus St Brelade football pitch

The site lies partly within the Built Up Area and partly in the Green Zone as identified by the Island Plan. That part of the site within the Built Up Area is identified as Protected Open Space

As regards the Protected Open Space the Island Plan explains that it is important that the existing level of provision, across all types of open space, is protected from inappropriate development and loss. The Island Plan also indicates that the protection of open space is particularly important in the Built-up Area where competing development pressures are greatest and its retention and enhancement is important to support the regeneration of the Island's urban environment to promote urban living.

Policy SCO 4 of the Island Plan states that

The Minister for Planning and Environment will protect existing open space provision (which includes Public Open Space) (my brackets) and the loss of open space will not be permitted except where it can be demonstrated that:

1. *its loss will have no serious impact on the adequacy, quality and accessibility of provision of the type of open space affected by the proposal; or*
2. *alternative replacement provision of the same or better extent, quality and accessibility of open space can be provided; or,*
3. *the proposal will be of greater community or Island benefit than the existing open space resource; or*
4. *its loss would not seriously harm the character and appearance of the locality.*

In the context of SC04 any application for planning permission for Option 3 must show that one of the provisos of the policy can be demonstrated.

In terms of the element of the site falling within the Green Zone the Island Plan indicates that purpose of the Green Zone is to retain the quality and distinctiveness of the Island's countryside but there is not an absolute moratorium against development within the Green Zone. Strategic development proposals such as a new secondary school may be acceptable in the Green Zone. Any such development would need to demonstrate that the need is proven; alternatives have been properly identified and considered; and that environmental implications for the Green Zone are properly identified, avoided and/or mitigated as far as possible. If the need is proven and alternatives discounted the key test is the capacity of the site and its context to accommodate development without serious harm to landscape character.

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a. its environmental implications are properly identified, avoided and/or mitigated as far as possible

In order to accord with Policy NE7 any application for planning permission for Option 3 must demonstrate that there is a proven Island need for the school and that there has been a proper assessment of alternative options and those options cannot satisfy the needs of the development. The application should also demonstrate that the environmental implications of the proposal have been identified and that any harmful impacts are avoided or mitigated. One of these impacts may be on the character of the landscape and any such impact must not amount to serious harm to that character.

I am fully aware that any advice you give will not prejudice the consideration and processing of an application for planning permission. However I am sure you appreciate that an ability to understand the requirements of any submission will help everyone who will have an interest in the application in providing effective and relevant information to assist in selecting and pursuing the most appropriate Option.

I look forward to your comments but in the meantime if you have any queries please do not hesitate to contact me

Yours Sincerely

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Richard Glover
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20 October 2015

Dear Richard,

Les Quennevais School replacement: policy tests

I refer to your letter of 25 September seeking advice about the planning policy tests that will be applied in relation to the development options for a replacement Les Quennevais School, as described in the public consultation document (Autumn 2015) as:

- Option 1: SE corner of Les Quennevais Playing Fields
- Option 2: fields south of Rue Carrée
- Option 3: fields south of Rue Carrée plus St. Brelade's football pitch

Your letter makes specific reference to those tests considered to be common to all three options, namely Policy SCO1 and Policy GD1 and goes on to make reference to the need for an EIA. All of these issues will need to be addressed as part of any planning application and, in the case of Policy SCO1 and the EIA respectively, set out a clear justification as to why a replacement school is needed; and those alternative development options that have been considered, and dismissed, in favour of the site for which any application is made. In referring to this, some more detailed explanation might be provided as to the requirement for a school building and associated facilities of the size proposed, together with an assessment as to the efficiency of the use of land involved in each of the options given that they would appear to occupy different site areas, notwithstanding assertions that they are the same.

You may also wish to give some consideration as to whether the future use of the existing school site should be an integral part of any submission, in relation to the consideration of option 1 in particular, where there is a net loss of sports and open space provision and where some compensatory provision might be expected: this is further highlighted below relative to the comments about SCO4 for this particular option.

As you will be aware Policy GD1 deals with a wide range of issues that are common to most development applications: it is underpinned by a set of strategic policies that set the general policy direction for the Island Plan and I would expect those strategic policies of relevance to this application, to be

explicitly addressed given the nature, scale and significance of this development proposal representing as it does, a major element of public infrastructure.

Specific reference should, therefore be made to the spatial strategy of the plan, at Policy SP1, and the relationship of the proposed development to the settlement pattern and built-up area boundaries in this part of the Island. This should also include the implications of site selection for travel and transport and seeking to reduce dependence on the car, as set out in Policy SP6.

Linked to the spatial strategy, of course, is the need to make the most efficient and effective use of land and resources, set out at SP2. Related to this is the extent to which and what consideration has been given for potential dual use of facilities of each of the options: some options appear to offer a greater level of dual use whilst others don't, citing safeguarding as an issue, and a clear and consistent rationale should be offered in this respect and relative to the objectives of Policy SP2.

The impact of each of the options for the natural and historic environment will need to be considered under the auspices of Policy SP4, as will the impact of development on the local character and sense of place, at SP7.

In addition to those strategic policies referenced above, there are other policies that are common to all three development options to which you have not referred and which should be considered as part of any submission, namely;

- Policy GD7 design quality will be need to be addressed and a clear design statement provided, addressing all of the parameters of this policy. Related to this is the relationship of the new development to its local context, where the considerations of GD5 relating to views and vistas, given the scale of the new building, will be relevant;
- As the sponsoring department is currently responsible for the administration of the Island's public art strategy, a percent for art contribution would be expected under the auspices of Policy GD8: the nature of any such contribution can take many forms but, importantly, should involve some artistic input at the outset.
- Policies NE1, relating to biodiversity; NE4, trees and boundary features; and HE1; heritage assets, including archaeology,
- Policies TT5; TT8; and TT9 dealing with road safety, public transport and travel plans respectively. The requirements for parking will need to be addressed under the auspices of GD1 and TT9 and, in the case of Option 1 in particular, the relationship and level of parking provision made for the school and for the existing sports centre, clearly set out and justified;
- Policy NR7, and the requirement to offset carbon emissions; and
- Policies WM1; LWM2 and LWM3 relating to the management of waste and drainage.

Turning to the specific options themselves, the following policy tests need to be considered:

Option 1 affects areas designated as Protected Open Space and Coastal National Park, and will, therefore, need to address the policy tests set out in Policy SCO4 and NE6 respectively.

You suggest that reliance might be placed on satisfying one of the tests to secure compliance with SCO4 under the auspices of criteria 3, relating to community benefit. Whilst undoubtedly correct as a literal interpretation of the policy, I would respectfully suggest that there may be some expectation that consideration ought to have been given as to how this might be deemed to be acceptable having regard to the current function of the existing facility as one of the Island's premier sports venues for a range of sports relative to an assessment of the use, demand and supply, and the aspiration of the Sports Strategy to provide sports services that attract more users, as well as its function as a local amenity space. And in this respect, therefore, I would suggest that there would be an expectation as to what mitigation or compensatory measures have been considered as an integral part of the assessment of this site option.

This would also need to be supported with information as to how any new sports facilities being provided in relation to the school might be accessible and available to community use, having regard to the principles of best use of resources, as set out in Policy SP2, and the objectives of the Sports Strategy which seek to enable more community use of school facilities.

Options 2 and 3 raise similar policy issues given their proximity to each other and their location, to varying degrees, within the Green Zone. You rehearse the policy issues relating to Policy NE7 in your letter.

Policy SCO4, relating to the protection of open space manifest by the St. Brelade's football pitch, is correctly identified as an additional policy consideration in relation to Option 3. As stated above, should reliance be placed on the 'community benefit' criteria relative to the potential loss of this protected open space, I would suggest that this would need to clearly set out how this might be deemed to be acceptable having regard to the current function of the existing facility relative to an assessment of its use and other local demand and supply, and the aspiration of the Sports Strategy to 'take sport to the people' by providing more opportunities for physical activities in parishes. This might be addressed by providing more information as to how any new school sports facilities might be accessible and available for community use.

Generic policy considerations already referred to above are perhaps deserving of greater emphasis in relation to Options 2 and 3, having specific regard to:

- the existing settlement pattern and context of these two sites in a 'strategic gap' between the existing built-up area of Les Quennevais and Jersey Airport, where Policies SP1; SP2; SP7 and GD5 and GD7 are particularly germane;
- the potential for a greater impact upon biodiversity and landscape character, under the auspices of NE1; NE4 and NE7.

In addition to these considerations, Policy ERE1 relating to the safeguarding of agricultural land needs to be considered in relation to Options 2 and 3.

I trust that this provides an initial review of the policy considerations that ought to be addressed as part of any submission: clearly this is offered without prejudice to the identification of any other issues which might emerge as material considerations during the progression of this project and any subsequent planning application(s).

If you wish to discuss any of the issues raised above, please do not hesitate to contact me.

Yours sincerely

Kevin Pilley

Director: Policy, Projects and the Historic Environment

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email: k.pilley@gov.je

enc



John Nicholson

From: Kevin Pilley
Sent: 12 November 2015 10:05
To: Richard Glover
Cc: John Nicholson
Subject: RE: Les Q school Policy query

Hello Richard

Your letter of 25 September 2015 sought advice about the planning policy tests that we would expect to apply to an assessment of the various site options under consideration relative to the proposal to provide a new Les Quennevais School, and our qualified response to this request was provided on 20 October 2015. Your subsequent letter, of 09 November, questions the relevance of Policy GD5 to any assessment of Options 2 and 3, on the basis that the work undertaken thus far by the Project Team has not shown this to be a relevant consideration, and you have sought some further clarification.

The first thing to say is that there is no supplementary planning guidance related to the application of Policy GD5, and its use and interpretation is based on the pre-amble and policy set out in the Revised 2011 Island Plan. The purpose of the policy is to ensure that the visual impact of development is given explicit consideration in the assessment of planning applications where it affects skyline, strategic views and important vistas: the policy does not identify specific skyline, views or vistas and neither does it provide a specific definition for each, but serves to identify a range of perspectives where the visual impact of development might be a material consideration. On the basis of the detail provided in the policy and its pre-amble, the potential impact of the proposed development for *'views across open countryside, particularly to and from the inland ridges of the central plateau separating the Island's main valleys'* would appear to be the most relevant criterion for the development of a new Les Quennevais School in respect of options 2 and 3. The Countryside Character Appraisal (CCA) is also identified as providing potential guidance to help assess impact on skyline, views and vistas.

The CCA identifies Options 2 and 3 as sitting within the Western Plateau (E8) character area where it is acknowledged that the extensive areas of development around Les Quennevais, Jersey Airport and St. Peter's Village have served to erode much of the rural character of part of this area. Options 2 and 3 clearly impact upon a remaining part of this area which retains a vestige of rural character, where loss of fields from agriculture to development and; visual impact of (small) blocks of new development and suburban edge development are deemed to be threats to that character. The CCA also suggest that further linear infill should not occur along the main roads that cut across the plateau and makes reference to the need to maintain gaps and views across rural hinterland: whilst explicitly referencing these considerations for the area of the Western Plateau north of the airport, the principles behind them may be considered relevant to the assessment of visual impact of development upon local character in other parts of this character area and thus of relevance to the assessment of options 2 and 3.

Both Options 2 and 3 comprise sites in visually prominent positions on the edge of the BUA bounded by the La Route des Quennevais from where there are public views across open countryside to the west. The development of land in site options 2 and 3 would also have the potential to redefine the entry point for the BUA of Les Quennevais and, of themselves, have the potential to provide a new landmark building within the local context. Similarly, both of these options involve the development of land which, from any cursory assessment of the settlement pattern, currently provides a visual buffer of green and open land between the southern edge of Jersey Airport and the northern edge of the Les Quennevais BUA, which is of significance in the local context, and it is in this respect that the potential impact of options 2 and 3 upon a 'strategic gap' is identified.

Your request for advice about policy tests was based on one-dimensional site plans and contained no details about the height or massing of any new school buildings, and our response sought only to identify the policy tests that, on the basis of this information, we might expect to be of relevance. Should the more detailed work of the Project Team conclude, in light of this and previous informal advice, that Policy GD5 is not of relevance to any of the options, we would expect a reasoned justification to support any such assertion where a new 14,000sq.m building is proposed to be developed on the edge of the BUA/in the countryside.

I hope that this provides the further clarification that you seek: if you have any further queries, please do not hesitate to contact me.

Regards

Kevin

From: Richard Glover
Sent: 09 November 2015 14:42
To: Kevin Pilley
Subject: Les Q school Policy query

Kevin

Thanks for your letter last week.

An immediate query has arisen regarding your comments in connection with Policy GD5 – Skyline, Views and Vistas.

The issue is explained in the attached letter and also included is the reason for the need for speedy clarification. Landscape experts are preparing a Landscape and Visual Impact Assessment (LVIA) for imminent completion and at the moment GD5 is not as pertinent in considerations as you seem to indicate.

I'd welcome a quick response (end of the week?) so that the LVIA is certain that it has taken all material considerations into account

I have tried calling to discuss but with no luck

Thanks

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