



Draft Bridging Island Plan

Post-consultation report

Corrigendum (October 2021)





ISLAND PLAN
REVIEW



Government of
JERSEY

Response ID	Selected policies	Comments	Published response link	Minister’s detailed response
Corrigendum: Part 4: Summary of consultation responses				
BHLF-ZZ1R-2K1X-W	H5 – Provision of affordable homes	<p>Please see attached document in relation to fields C127 and C128</p> <p>I believe that the case put forward in the call for sites should be re-examined in the case of field C127 and C128. This because these fields are totally overgrown, derelict and despite being classified as “agricultural use” and not suitable for growing a crop. This view is supported by [REDACTED TEXT] he believes these two fields are not suitable for agriculture. I include an email from [REDACTED TEXT] in which he states that field “C127 and C128 from an agricultural point of view are significantly less value than most of the sites proposed in the Island Plan.”</p> <p>It is both my view and not of [REDACTED TEXT] that a similar sized field chosen for change of use and is currently a growing field should be replaced by icefields C127/128.</p> <p>Please say photographs of fields see C127/128 in their current state.</p> <p>Other than the “current use” these fields score highly in other categories.</p> <ul style="list-style-type: none">• They have good access• Both fields have been partly developed• They are bounded on two sides by residential properties• They are five minutes’ walk to nursery, primary and secondary schools, and to Le Rocquier School playing fields• They are five minutes’ walk to no 1 bus stops, the most frequent service in the island• They are five to 15 minutes’ walk to the community centre pub and restaurant and the beach• A small supermarket is 1.5km east and local shops 1km west <p>It does not make economic or environmental sense to allow housing development on a productive growing field when totally unproductive fields such as these which have been so for 25 years or more, are available.</p>	View response	<p>Rezoning request: C127 and C128 (IP-177608077)</p> <p>This site was submitted and assessed as part of the call-for-sites process where an initial high level suitability analysis was undertaken, relative to established planning criteria, as set out in the Housing land availability assessment of sites report, where only the ‘best scoring’ sites were selected. This site scored as follows in the initial suitability analysis:</p> <ul style="list-style-type: none">• Spatial score (1-4): 3• Suitability Score (1-5): 4• Landscape Score (1-7): 5• Existing use Score (1-5): 2 <p>Based upon the initial suitability analysis, the site scored reasonably well when compared to other sites. The assessment included consideration of the current use of the land and it is noted that this site is not in productive agricultural use and that, given its condition, it may be of limited value to the industry.</p> <p>Fields C127 and C128 are not, however, dissimilar to other sites in St Clement where there is currently agricultural land that is not in productive use, and which have also not been brought forward in the draft plan.</p> <p>In bringing forward sites for affordable housing, and in seeking to deliver the most sustainable pattern of development, the Minister has had regard to the overall spatial distribution and relative proportion of homes being provided in different parts of the island. In this respect, other sites are considered more suitable even where they are in productive agricultural use.</p> <p>More information is provided in relation to this matter in the Minister’s SR26: Policy H5: provision of affordable homes (see Part 3 of the Minister’s response to consultation)</p>
BHLF-ZZ1R-2KAM-2	H5 – Provision of affordable homes	<p>I submitted three fields G403A, G403C, G403D and half of field G432A for consideration as part of the Island Plan process. I submitted them via the Parish of Grouville for either FTB, Rightsizing or open market considerations.</p> <p>I notice that the only field which has been put forward in Grouville in this process so far is G392A, which is one field east of my fields. I also notice that the site assessments are virtually identical the only difference is on the suitability score (1-5) where G392A scored 5 and my fields 4.</p> <p>One issue I would like to make which might have affected the one point differential in the score; is the access point which at the moment my fields are accessed via a farm lane from Route des Sablons – which is a 30mph road. There are other points which could be created to form addition-al or alternative access routes to and from the fields.</p> <p>However the site offers many attributes as your scoring revealed. It is next to the main road where the pavement was created using my land some years ago, it is on a regular bus route, it is a walk-able distance to the school, beach, shops and medical centre. There is immediate access to main drains and water. It also makes use of the land affronted by the dreadful ribbon development.</p> <p>I would therefore like you to please re-consider my submission to enable much needed homes to be created with little to no loss to agriculture. If there are any issues I can assist with please let me know.</p>	View response	<p>Rezoning request: G403A, G403C, G403D and half of field G432A (IP-175845789)</p> <p>This site was submitted and assessed as part of the call-for-sites process where an initial high level suitability analysis was undertaken, relative to established planning criteria, as set out in the Housing land availability assessment of sites report, where only the ‘best scoring’ sites were selected. This site scored as follows in the initial suitability analysis:</p> <ul style="list-style-type: none">• Spatial score (1-4): 3• Suitability Score (1-5): 4• Landscape Score (1-7): 5• Existing use Score (1-5): 2 <p>Based upon the initial suitability analysis, the site scored reasonably well when compared to other sites, and further detailed site assessment was undertaken.</p> <p>This revealed that the site, comprising of four fields, has a varied sensitivity to housing development (high-medium) which had the potential to impact adversely on the landscape character of the area. Whilst abutting the built-up area of the coastal strip, there are long rural views across the site from the coast road to the escarpment and it contributes to the visual buffer between the coastal strip and agricultural land beyond: its development for housing would serve to erode this. It also forms part of the context and setting for the isolated farm group at Le Pre au Portier (Listed building: grade 2) to the north.</p> <p>A number of these fields are also prone to and at risk of flooding; the strategic flood-risk assessment identifying them as at medium-risk of inland flooding. Given that housing is classified as a ‘highly vulnerable’ form of development, relative to flood risk, the approach adopted by the plan seeks to avoid placing such forms of development in such flood-risk zones.</p>

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				<p>Potentially problematic access to the site was also noted, however, it is acknowledged that there may be scope to address this.</p> <p>On the basis of the above, other sites have been considered more suitable for the development of affordable homes. More information is provided in relation to this matter in the Minister’s SR26: Policy H5: provision of affordable homes (see Part 3 of the Minister’s response to consultation)</p>
BHLF-ZZ1R-2KE8-H	SP2 - Spatial strategy	<p>Re La Providence, Bel Royal</p> <p>I write on behalf of [Redacted text], the owner of the freehold of the children’s nursery at La providence (run by Busy Bees) and associated car parks, plus adjoining land. In respect of the draft plan there are a couple of issues but I will send a separate email for each point to make things simple.</p> <p>The first issue I have, having seen the draft island plan map, is that I believe the built-up zone is inappropriate as drawn for the following reasons;</p> <p>1] the built up zone - Plan A attached - for some reason excludes the existing tarmaced car parks (part of which is owned by the La Providence common area) and the children’s nursery- a building that has been in existence for something like 15 years. They are clearly part of the built up zone.</p> <p>2] the above land and properties are intimately linked and part of La Providence - they share the same roads, same drainage, foul sewers etc</p> <p>3] they are also managed by the same agents and pay towards the service charge of the whole of la providence.</p> <p>Conclusion - it is not logical to include one side of a road and exclude the other. Include some buildings, but not others.</p> <p>I propose a new built up zone - Plan B- to reflect the reality. I will by separate email suggest a further widening of the built up zone, but for now this seems sensible.</p> <p>Please let me know if you wish to meet on site (I would recommend an inspection) or have any queries.</p> <p>Re La Providence, Bel Royal</p> <p>I write regarding the draft island plan and in particular the land around the Busy Bees Nursery at La Providence, Bel Royal.</p> <p>I act on behalf of [redacted text] which owns the freehold of Busy Bees and adjoining land.</p> <p>I have written separately about the need to adjust the built-up zone to reflect the reality of the land, roads and buildings at la Providence.</p> <p>In this email I wish to request a change to the Protected One Space. I attach plans C and D showing the area involved.</p> <p>The area in question is not appropriate for a protected one space for the following reasons;</p> <p>1] it doesn’t form part of the la providence parkland, or la providence for that matter - there is a boundary between them.</p> <p>2] it is private, no public access</p> <p>3] it has existing commercial uses such as builders yard, parking, storage, driveways</p> <p>4] it is likely to be an extension to the nursery garden and potentially parking TBC</p> <p>5] indeed it adjoins commercial buildings, and driveways with utility connections, such as sewers running through it.</p> <p>Accordingly, whilst it is a bit over grown at the moment, it should not form part of the protected one land, especially when the fields alongside haven’t been included. That doesn’t make too much sense.</p>	<p>View response</p>	<p>The La Providence site was re-zoned for ‘Category A affordable housing’ in the 2002 Island Plan (fields 848, 851, 853 and 854, Bel Royal, St Lawrence). This development led to the redefining of the built-up area boundary, which has been maintained through both the 2011 Island Plan and now the draft Bridging Island Plan. Similarly, the designation of protected open space has existed for the same period.</p> <p>The land in question was developed as part of a comprehensive scheme at La Providence to include a community facility (now occupied as a nursery) and landscaped and parking areas. It is clear that the built-up area boundary encompasses the housing development to the west of the site and excludes the non-residential and landscaped areas to the east.</p> 

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				<div></div> <p>Part 3 of the Minister for the Environment’s Post Consultation report (SR 67 - Proposals map changes) addresses those representations relating to mapping anomalies of the built-up area boundary, and this representation falls within the same category. This statement response makes it clear, however, that the scope of this Island Plan Review has not included a systematic review of the built-up area boundary and the only revisions proposed to the BUA boundary arise in the light of the review of the Coastal National Park boundary; and mapping anomalies. This specific issue at La Providence is not considered to fall into either of these categories, as set out below.</p> <p>The spatial designations of the Island Plan not only take into consideration the form and nature of development that already exists, but also has regard to the level of change and intensification that could take place on the site (relative to its spatial designation), and the impact that such development could have on the surrounding area.</p> <p>The residential area of the site is clearly a dense form of housing development, with area of land subject to this representation being different, in-so-far as it is a single building in use as a nursery, sited at the entrance to the development and flanked by an access road, parking and landscaping. The landscaped/scrub areas add value to the landscape character and the protected open space designation reflects this. It’s present condition, public accessibility and relationship (in ownership terms) to the La Providence development is not adequate to justify removing the POS designation.</p> <p>Due to the size and layout of the land in question, its re-designation to built-up area could unlock significant development potential, which could equally give rise to a significant intensification of both built mass and use, to the detriment of the residential development within which is sited, and also to the character and nature of the land to east and further beyond. The designation of the land as green zone essentially helps to ensure that this potential remains more moderated than it would otherwise be as built-up area.</p>

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				The Minister cannot, therefore, support the request to designate the land as built-up area or the proposal to remove the protected open space designation, and is not minded to amend the proposals map.
BHLF-ZZ1R-2KTK-K		<p>1.3 Opinion</p> <p>The approval of the Plan in its present intended content will eventually cause major dissatisfaction by Island residents since the Plan appears to focus on restrictions on private travel by car, whereas commercial traffic generated by businesses is fostered all over the Island.</p> <p>Likewise, the latent sympathy by the general population for farming will undoubtedly be eroded since Island residents will realise that every farm is in fact also used for unrelated business use.</p> <p>The existing strategy for housing development to be located in St. Helier, and will continue to, generate the main demand for goods and services in the Island. Imported goods in the main arrive at the harbour. It is therefore entirely logical for businesses serving in St. Helier area to be located as close as possible near the area.</p>	View response	<p>The spatial strategy (at Policy SP2) of the plan is clear in that it seeks to concentrate development within the island’s built-up area, including economic development, except where there is a clear justification for economic development in a coastal or rural location; or where it is in the form of an appropriate development of already developed land and buildings. The plan does not focus restrictions on the private car but seeks to enable a sustainable pattern of development across the island which also embraces economic activity and its associated transport requirements.</p> <p>The draft plan seeks to provide support for the island’s agricultural industry and seeks to ensure that both agricultural land and buildings are safeguarded, as set out in policies ERE1: Protection of agricultural land; ERE3: Conversion or re-use of traditional farm buildings; and ERE4: Re-use of modern farm buildings. In accord with the principles of supporting the wider rural economy; and making best use of already developed land and buildings, the draft plan enables the re-use of buildings where it can be demonstrated that they are no longer required for agricultural use; and where their alternative use is acceptable, having regard to matters such as the impact on neighbouring uses and the capacity of the local infrastructure.</p> <p>In accord with the spatial strategy of the plan, there is clear recognition of the benefits of locating business activity close to urban centres. The draft plan sets out a clear hierarchy for both the assessment of proposals for new light industrial development proposals outside the built-up area; and also the potential opportunity for the provision of new light industrial space, as follows:</p> <p><i>Development proposals for light industrial development outside the built-up area, will need to be supported with evidence of the following:</i></p> <ul style="list-style-type: none">• <i>that they have considered the suitability and availability of sites within the built-up area through a site selection exercise;</i>• <i>that the format and/or scale of the proposal has been considered in relation to suitable and available sites within the built-up area;</i>• <i>where there are no suitable and/or available sites within the built-up area, an assessment of sites outside of it has taken place with preference given to those sites that are accessible and well connected to the built-up area; and</i>• <i>any other relevant information, which has informed the identification and selection of the proposed development site.</i> <p><i>It is anticipated that the following potential sources of land may provide opportunity for the provision of new light industrial floorspace over the plan period. In some cases, such as the use of land at the port and airport, any such potential would need to be explored and examined relative to the operational requirements of the existing facilities.</i></p> <ul style="list-style-type: none">• <i>La Collette and surrounding harbour areas;</i>• <i>non-operational land at the airport;</i>• <i>other States-owned land;</i>• <i>existing light industrial sites; and</i>• <i>the use of existing agricultural premises.</i>

Reference	Chapter	Page	Preamble / Proposal / Policy / Proposals map	Proposed change	Reason	Relevant statement response	Substantive or minor modification?
Corrigendum: Post-consultation report: Part 6: Minister’s modification schedule							
	Appendix 1 affordable housing sites	326	Site assessment	Title to site assessment to be altered as follows: “Field G392A, Le Clos La Sente des Fonds, Grouville	Typo correction	None	Minor