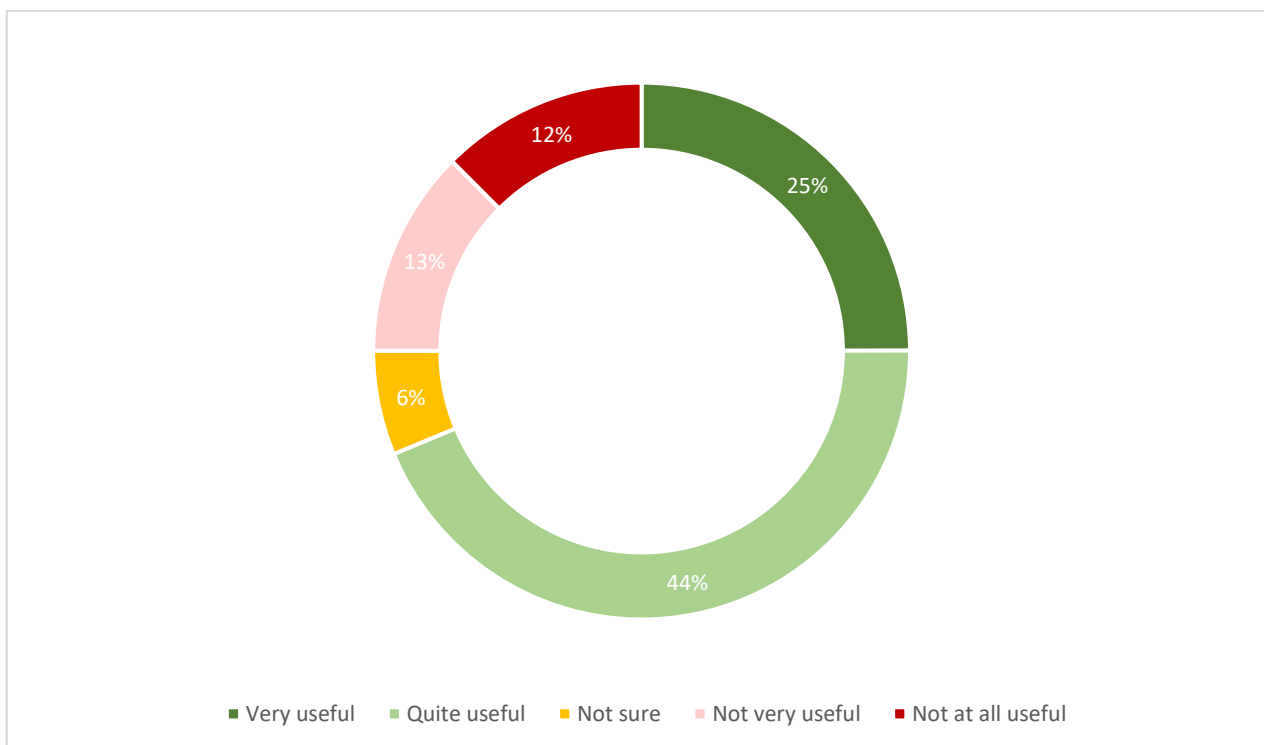


# Density of residential development: post consultation report

## Appendix 2: consultation feedback and response

1. Section 3 of the draft guidance describes what density is, why it matters, and how we measure it.

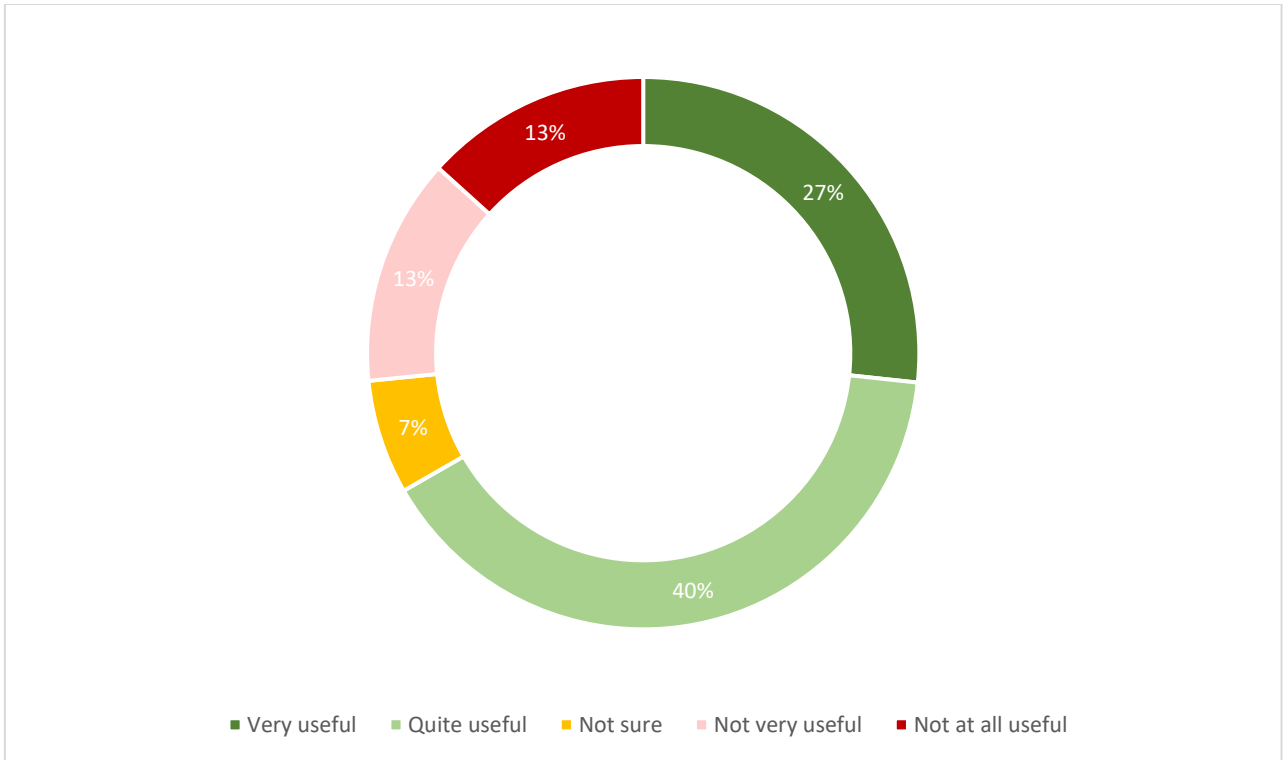
How useful do you think this section is?



Consultation feedback	Response
It provides a set standard of what developers are to comply with	Noted
Density is only really useful when it is applied consistently and across all sectors, the inconsistency currently prevailing is a major problem.	Noted. The adoption of minimum standards should help ensure a greater consistency of approach, although schemes may still vary in density within the same area, depending on the form of the development and the size of the homes provided.
Could use a diagram explaining different measurement methods to aid explanation, otherwise good.	Noted.
How do you define net site area: do you use the application line boundary?	Noted. A definition of net site area is already provided in the glossary.
What is the guidance/parameters for habitable rooms per hectare?	Noted. The guidance issued defines parameters for dwellings per hectare only. Measuring density using habitable rooms per hectare (hrh) can provide a greater understanding of the nature and impact of development but is more sensitive to a range of factors, such as size and type of home. Information about hrh should be provided as an integral part of a planning application but will not be considered and assessed relative to any specific parameters or standards.

- Section 4 of the draft guidance explains the bridging Island Plan’s spatial strategy and sets out why different parts of the island’s built-up area might be able to accommodate new residential development at different densities.

How useful do you think this section is?



Consultation feedback	Response
<p>It's a mistake to further develop Les Quennevais as a "secondary" center. It seems to have grown that way accidentally.</p> <p>There is too much traffic already in the area (especially around the Red Houses traffic lights) and the arteries to St H. are always busy with frequent hold ups all along the Beaumont to St Aubin stretch as well as Beaumont Hill.</p> <p>The shopping center referred to in the document is in desperate need of investment and its extremely misleading to refer to it as a retail site of any value.</p> <p>The redevelopment of the Les Q school site to support the hospital debacle will necessarily lead to more traffic already and though it's supposed to be "temporary" I suspect it will be in place for a longer period than anticipated.</p> <p>More thought should be given to investing in retail units in other areas as well better use of the places like the old B&amp;Q site (for example for a supermarket to serve the northern parishes. This could lead to a</p>	<p>Noted. The spatial strategy of the bridging Island Plan already identifies Les Quennevais as a secondary urban centre as it already operates as such.</p> <p>The bridging Island Plan provides a policy regime that enables the redevelopment of existing land and buildings within the island’s built-up area, including Les Quennevais, as a way of stimulating investment and regeneration.</p> <p>Many of the island’s roads are at capacity, particularly during peak hours. Les Quennevais provides a range of services and facilities that can reduce the need to travel; and it also benefits from dedicated cycling infrastructure and good public transport which provide more choice as to how people travel.</p>

Consultation feedback	Response
natural reduction of traffic to the already built up areas as well as building more community in those spaces.	
<p>The definition of the area of Les Quennevais is also very wide to include La Moye; Le Saut Falluet; La Petite Route des Mielles; Tabor Heights; and Park Estate, wider than locals might think, giving planners &amp; worse developers the maximum opportunity to expand urban spread.</p> <p>We think this wide area for Les Quennevais should be restricted to the area recognised as Les Quennevais by locals.</p> <p>As with the 2021 changes to the voting system radical changes were made in a rush in the Bridging Island Plan by the last Government, with the significance of the changes not appreciated by the electorate. They should be paired back.</p>	<p>Noted. The guidance explicitly acknowledges that density in itself is a crude tool and should not be the sole determinant of the yield of development on a site. Policy and guidance requires a design-led approach to be taken which should enable and allow the characteristics of different parts of the Les Quennevais BUA to be considered.</p> <p>The definition of the built-up area (BUA) is established in the bridging Island Plan: there has been no change to the extent of the BUA for Les Quennevais between the revised 2011 Island Plan and the bridging Island Plan. As a consequence, the policy regime provided by the plan presumes against 'urban spread.'</p> <p>To stand for election in Jersey you must, amongst other things, be (a) resident in Jersey for at least two years up to and including the day of the election, or (b) resident in Jersey for six months up to and including the day of the election, as well as a total period of five years previously. The States Assembly, which has approved the definition of the BUA for Les Quennevais in the BIP might, therefore, be deemed to be considered 'local'.</p> <p>There was a legal requirement to review the Revised 2011 Island Plan under the term of the last government. Whilst the original programme was adversely affected by the pandemic, the process of review satisfied all of the legally prescribed processes of public consultation, independent review and examination, and States debate.</p>
The problems with it are shown in the response to a planning appeal against refusal to build 11 homes on a site off Route Orange so within "greater Les Quennevais" & surely in line with the minimum number of dwellings proposed for that area.	Noted. The planning history of proposals to redevelop sites for more dense forms of development demonstrates that density is but one consideration in making planning decisions. A design-led approach is required which has regard to those other factors outlined in section 6 of the guidance.
<p>It would appear that the "style" of planning approval changes frequently with the political climate. Hence there has never been a followed master plan for St Helier, the main developed area. It is so poorly designed that there is no overall benefit to the Island of the wonderful seafront areas. Overcrowding, ultra-high density and poor design of residential accommodation units complete the total mess.</p> <p>It is time to develop a second Major Area, probably Red Houses expanding to include Les Quennevais</p>	<p>Noted. It is proposed to develop a west of island planning framework, which will include the Les Quennevais area (see: <a href="#">Strategic proposal 4 Bridging Island Plan.pdf (gov.je)</a>).</p> <p>Such work should explore the full range of land use considerations, including the appropriate role of this area in meeting the island's long-term residential and economic development needs; placemaking considerations; key opportunity sites; any infrastructure considerations; travel and transport matters; and the importance of developing Les Quennevais in a manner that supports and complements the role of St Helier as the island's primary urban area and core retail location.</p>
We consider the designation of the whole of the Quennevais area as one single area of a secondary area, to be anomalous and not well thought out. For example, the current map designates the whole of the Quennevais for the same recommended planning	Noted. It is evident that all parts of the island's built-up areas have a variety of character within them. This is evident from the work undertaken to assess the urban character of St Helier, for example, where ten different character areas are identified

Consultation feedback	Response
<p>density with no account of the various differences in character. For example, the Quennevais sports centre, Elephant Park and the cemetery are all shown as potential development areas. This is anomalous and would imply that little thought has really been put to this density plan.</p>	<p>and defined (see: <a href="#">St Helier Urban Character Appraisal Review 2021</a>)</p> <p>Policy H2 – Housing density of the bridging Island Plan, supported by this supplementary planning guidance, gives emphasis to the fact that a design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.</p> <p>The appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.</p> <p>This consideration enables the particular characteristics of different parts of the same built-up area to be taken into account and to be duly considered. An understanding of the site’s context, and the relationship of proposed development to it is of critical importance.</p>
<p>We believe there should be more granularity and understanding of the differences of character within different parts of the Quennevais area, not just a single designation.</p> <p>This density plan proposal needs reconsidering, in line within the Bridging Island Plan’s more overarching desire to keep the beauty and character on this Island, not giving a developers charter to ruin all that is good in Jersey.</p> <p>The Island Plan is very commendable in saying “once lost, then lost forever. We should uphold this whilst managing development.”.</p>	<p>Noted. See above</p>
<p>The area of La Moye has a different character to the built area characteristics of Red Houses and Les Quennevais: it is heavily influenced by the natural environment.</p> <p>Route Orange has different characteristics north and south</p>	<p>Noted. See above</p>
<p>The inclusion of place-making in the paper is to be welcomed, but the failure to recognise that in Jersey parishes are places is not. A clear example of the failure is in suggesting Les Quennevais as a “secondary urban centre”.</p> <p>In Jersey parish centres grew up around nine out of twelve parishes, where at a minimum the parish hall was next to the parish church.</p> <p>There is no parish centre in St Brelade as the parish church is on St Brelade’s Bay and the parish hall at St Aubin. At Les Quennevais there is neither, so at present it is not generally considered the parish centre.</p>	<p>Noted. The spatial strategy of the bridging Island Plan already identifies Les Quennevais as the island’s secondary urban centre as it already operates as such.</p> <p>Defining urban centres on the basis of the location of civic buildings is too simplistic an approach. The absence of a civic buildings, such as a parish hall or parish church, does not preclude either the definition or development of urban centres.</p> <p>In other parishes of the island, urban growth has occurred in different parts of the built-up area to those in which the parish church and parish hall are located e.g. the parishes of Grouville, St Lawrence, St Saviour and St Clement.</p>

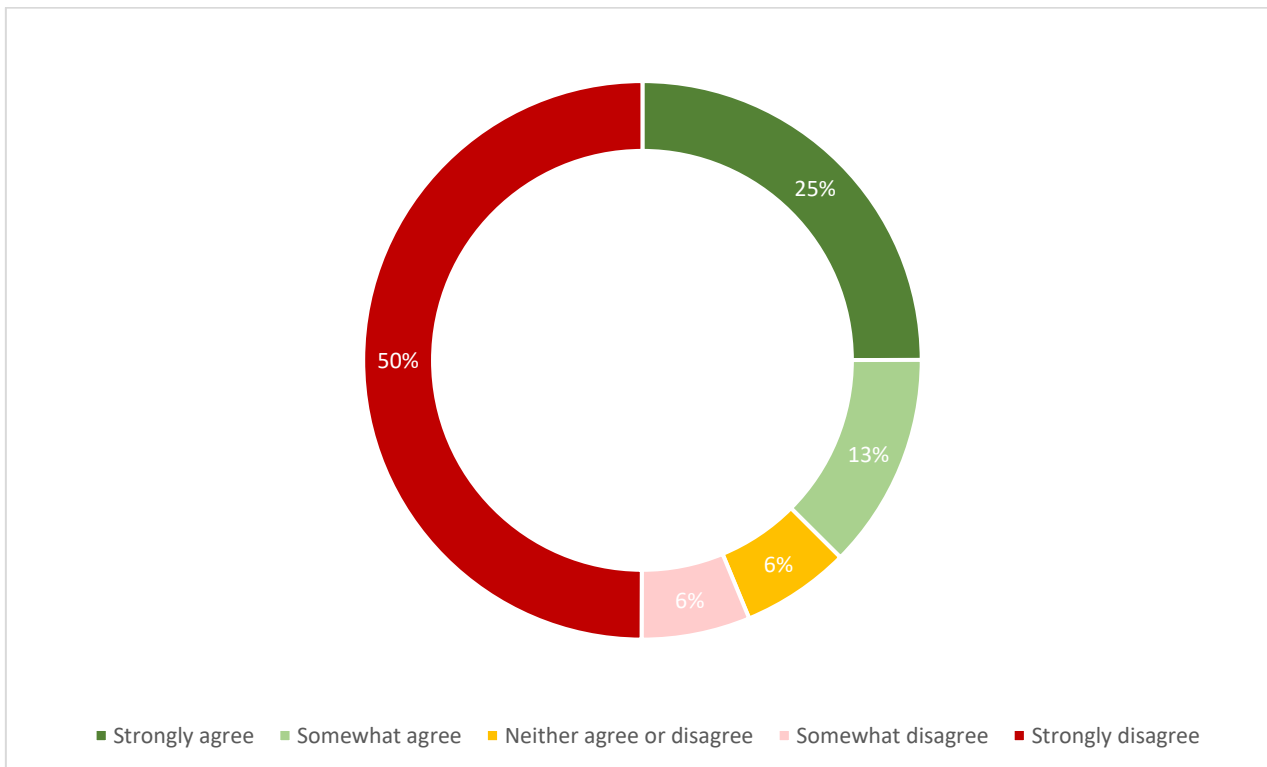
Consultation feedback	Response
<p>What it should be called is also uncertain as signposts point to Red Houses, not Les Quennevais. Again all this makes its recognition as the secondary urban centre inappropriate</p>	
<p>Community could fund a neighbourhood plan that provides more targeted plan and policies for the La Moye area</p>	<p>Noted. It is proposed to develop a west of island planning framework, which will include the Les Quennevais area (see: Strategic proposal 4 <a href="#">Bridging Island Plan.pdf (gov.je)</a>).</p> <p>It is already acknowledged that the framework may serve to identify the need for more focused masterplans or guidance that is specific to a place or an area.</p>
<p>In a small island of just 45 square miles, we cannot see the necessity for a second urban centre at Les Quennevais, and increasing the density of houses will be detrimental to many of the parishioners who will have chosen to make their home there.</p> <p>Developers have already been submitting applications for very high-density schemes which would result in overlooking/loss of privacy, parking issues, additional traffic, etc..</p>	<p>Noted. The spatial strategy of the bridging Island Plan already identifies Les Quennevais as a secondary urban centre as it already operates as such.</p> <p>Policy H2 – Housing density of the bridging Island Plan, supported by this supplementary planning guidance, gives emphasis to the fact that a design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.</p> <p>The appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.</p> <p>This consideration enables the particular characteristics of different parts of the same built-up area to be taken into account and to be duly considered, including those relating to overlooking/loss of privacy, parking issues, additional traffic etc..</p>
<p>Years ago it was acknowledged that housing development to the west of Beaumont should be restricted until the traffic issues at that bottleneck were resolved, but this never happened and development has continued unabated.</p> <p>Opening the floodgates to developers to build even more in the area will result in even more commuting chaos which, unfortunately, will not be resolved by getting people onto their bikes.</p>	<p>Noted. Many of the island’s roads are at capacity, particularly during peak hours. Les Quennevais provides a range of services and facilities that can reduce the need to travel; and it also benefits from dedicated cycling infrastructure and good public transport which provide more choice as to how people travel.</p>
<p>Whilst it is not at all unreasonable to assume that highest densities should be located in the most “sustainable” locations, the SPG continues the theme of the Bridging Island Plan (and, indeed, the previous Island Plan), that other locations outside of the Built-Up Area are necessarily unsustainable, due to the implied increase in the need to travel, and the lack of sustainable travel choices.</p> <p>The use of the words “sustainable” or “unsustainable” is frequently lazily applied and increasingly hackneyed.</p>	<p>Noted. The spatial strategy for the development of the island is set by the bridging Island Plan, and specifically Policy SP2 – Spatial strategy. In essence, this seeks to focus development activity in the island’s built-up areas in a way that is proportionate to the existing scale and character of the island’s hierarchy of settlements. This means that greater levels of development are proposed and enabled in the island’s primary, secondary and local centres, with less development envisaged and enabled in the smaller settlements and the countryside.</p>

Consultation feedback	Response
<p>There are many nuances to the concept of sustainability, yet the strategic section of the plan focusses almost entirely on the idea that areas outside of the Built-Up area are necessarily unsuitable for the development of increased densities (or indeed for any development) due to the increase in the need to travel, most prominently the need for increased journeys by private car.</p> <p>This is a very narrow consideration, and ultimately works against an intelligent approach to the redevelopment of already developed areas outside of the Built-up area, which could easily support additional homes with little or no additional visual impact.</p> <p>The use of the private car is assumed by the Department to be necessarily bad. It is not necessarily bad, and, indeed, the availability of private car or motorcycle use is one of the major factors that have increased standards of living. The issues are as follows:</p> <p>Cars are assumed to be polluting. This is not necessarily the case, particularly in light of the increased availability of electric vehicles, and the fact that Jersey's electricity is more or less entirely carbon free.</p> <p>Cars give significantly increased mobility to those who are less able than the majority of the population, particularly to the aged. Buses and cycles are not an option for many.</p> <p>The bus system as currently configured does not maximise its utility to those living outside of St Helier. Whilst services are reasonably frequent, there remain a considerable amount of bus stops that have no shelters, and that are quite often in dangerous locations on the side of narrow and busy roads. This does not encourage bus use.</p> <p>In addition, there is no circular bus route which means, (for example) that if you want to travel from St Mary to Trinity you have to travel via St Helier.</p> <p>Bus use would be much more viable if there were more government investment in the system, but investment would appear to be very limited, and usually bus shelters are provided on the back of development.</p> <p>There are significant numbers of people who work outside of the Built-up area and need to travel into the countryside for work. Employment in the countryside and smaller centres helps to maintain the viability and balance of these communities. If all housing development is to be based in the built-up areas, and particularly in town, then people who work in the</p>	<p>In all cases, however, the appropriate development of previously developed land and of under-utilised land and buildings will be supported. In particular, development which makes the most efficient use of land, and which optimises the density of development, will be encouraged.</p> <p>This supplementary planning guidance supports this policy framework and is designed to support its implementation.</p> <p>The appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.</p> <p>As part of its objective of reaching carbon neutrality, the States Assembly has approved the Sustainable Transport Policy (STP). This sets out a number of key objectives that are relevant to planning and which have been incorporated into the policy framework provided by the bridging Island Plan including the need to:</p> <ol style="list-style-type: none"> <li>1. recognise that fewer motor vehicle journeys will be good for Jersey</li> <li>2. conform with the Jersey mobility hierarchy</li> <li>3. improve transport options, including parking, for people with mobility impairments</li> <li>4. make walking and cycling more attractive, especially for travelling to school and commuting, by providing safer routes</li> <li>7. reduce the impact of vehicles on our landscape and create more space for people in St Helier</li> <li>8. create planning systems that reduce the need to travel</li> <li>9. encourage the use of zero emission vehicles to reduce pollution</li> <li>10. work with businesses that rely on road transport to support their efficient and safe use of the road network, their delivery and servicing needs.</li> </ol> <p>Implementation of the STP also includes a Bus Service Development Plan (see: <a href="#">Second Interim Report on the Sustainable Transport Policy 2021</a>).</p>

Consultation feedback	Response
countryside or outside of Town will need to travel by car to work.	
The reference to "historical harbour villages" also looks wrong. These places are not villages, as nucleated rural settlements, are usually understood	Noted. These are nucleated settlements around historic harbours of which Gorey and St Aubin are examples in Jersey.
<p>It boils down to the fact that we need more housing units ~ BUT not on my patch.</p> <p>This only makes already overpopulated areas more so and leaves Local and Smaller settlements, almost untouched.</p>	<p>Noted. The spatial strategy for the development of the island is set by the bridging Island Plan, and specifically Policy SP2 – Spatial strategy. In essence, this seeks to focus development activity in the island's built-up areas in a way that is proportionate to the existing scale and character of the island's hierarchy of settlements. This means that greater levels of development are proposed and enabled in the island's primary, secondary and local centres, with less development envisaged and enabled in the smaller settlements and the countryside.</p> <p>In all cases, however, the appropriate development of previously developed land and of under-utilised land and buildings will be supported. In particular, development which makes the most efficient use of land, and which optimises the density of development, will be encouraged.</p> <p>This supplementary planning guidance supports this policy framework and is designed to support its implementation.</p>
As indicated elsewhere - the zones should be reconsidered before any decision is made regarding the densities	Noted. See above.
It looks like the proposal is aiming to protect the northern parishes at the expense of the already built up areas (they're already "ruined" so we'll just make them worse). Rather than increasing the density in the country parishes, brown field sites (like the old glass houses - why was that debate "lost"?) etc.	<p>Noted. See above.</p> <p>Information about the debate around the use of glasshouses during the Island Plan review can be found here: <a href="https://statesassembly.gov.je/Pages/Votes.aspx?VotingId=6649">https://statesassembly.gov.je/Pages/Votes.aspx?VotingId=6649</a></p>

3. Section 5 of the draft guidance sets out minimum standards for the density of new residential development in different parts of the island’s built-up area.

Please state whether you agree or disagree with the proposed minimum density standards set out in section 5 (table 1: density matrix) of the draft guidance.



Consultation feedback	Response
Should be higher for primary settlement and local settlements but otherwise good	Noted
Although the SPG sets minimum density targets, these are relatively low, and the SPG appears to concentrate more on the need to respect a site’s context than the BIP’s stated aim of making better use of land.	Noted. The guidance explicitly acknowledges that density, in itself, is a crude tool: it is a measure of a proposed residential development but should not be a determinant of it.  Policy H2 – Housing density of the bridging Island Plan, supported by this supplementary planning guidance, gives emphasis to the fact that a design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.
The major failing of the consultation is that generally it is setting minimum numbers of dwellings in a given area where a development includes at least 5 dwellings. It should surely also set maximum numbers of dwellings in developments.	Noted. The guidance explicitly acknowledges that development of very tall residential towers and/or hyperdense development – at over 350 dph – is very unlikely to deliver good places to live. It is for this reason that the guidance explicitly states that development over this level of density will not generally be supported.



Consultation feedback	Response
<p>We suggest that if minimum &amp; we would argue maximum dph &amp; hph are set that future planning proposals are expressed in these terms.</p>	<p>Noted. See above comment about 'hyperdense' development.</p> <p>The guidance seeks to set parameters for dwellings per hectare against which proposals for residential development of five or more homes will be assessed, but all residential development proposals will need to provide information about the proposed density of the development expressed as both dwellings per hectare and habitable rooms per hectare.</p>
<p>There are specific concerns, in particular in the Les Quennevais area, which is described as the Island's "secondary urban centre" with "further work proposed to explore the potential to provide new, higher density development whilst enhancing the quality of the neighbourhood &amp; the local shopping centre".</p> <p>It needs it but it is difficult with flats above the present shops in private occupation and the impression that much of the area is a car park.</p> <p>Those participating in the St Brelade Community page were asked what they thought of all this. Their response was Les Quennevais isn't a town, If I wanted to live in a town I'd live in St Helier etc.</p> <p>So generally we object to the higher densities suggested specifically for Les Quennevais</p>	<p>Noted. The spatial strategy for the development of the island is set by the bridging Island Plan, and specifically Policy SP2 – Spatial strategy. In essence, this seeks to focus development activity in the island's built-up areas in a way that is proportionate to the existing scale and character of the island's hierarchy of settlements. This means that greater levels of development are proposed and enabled in the island's primary and secondary centres, which includes Les Quennevais.</p> <p>The proposed minimum level of density of development for Les Quennevais is less than that proposed for St Helier, and is considered proportionate.</p> <p>The guidance explicitly acknowledges, however, that density, in itself, is a crude tool: it is a measure of a proposed residential development but should not be a determinant of it.</p> <p>Policy H2 – Housing density of the bridging Island Plan, supported by this supplementary planning guidance, gives emphasis to the fact that a design-led approach for the provision of new homes will be encouraged at all sites in the island's built-up area to ensure optimum efficiency in the use of land. This enables the particular characteristics of a site and its context to be key factors in determining the level of density of any scheme.</p>
<p>Why develop St Helier even more.</p> <p>The town is already overcrowded and planning has many flats under consideration for this area. Allowing buildings to be smaller and higher just produces a row of sky scrapers with tiny apartments, or duplex units. Such properties can be found around London and they are too small to put normal size furniture in. Such an overall plan needs much more thought</p>	<p>Noted. The Town of St Helier has much of the necessary facilities and services required to support a more intensive use of land for a mix of uses. There are opportunities for the development of new homes on outworn urban sites, particularly in the north of town, where this needs to be balanced with the introduction of new community facilities, open spaces and green infrastructure. There is also considerable opportunity for the development of new vibrant, mixed-use quarters, with high-quality public realm on the St Helier Waterfront.</p> <p>The development of new, more dense forms of residential development in St Helier needs to be considered relative to the context and character of each site. As stated in the guidance, the <a href="#">St Helier Urban Character Appraisal Review 2021</a> will be used to inform decision-making about the development of new homes in St Helier.</p>

Consultation feedback	Response
	<p>There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives.</p> <p>Wherever new homes are provided, the creation of good quality residential accommodation is essential, regardless of their tenure, size and type.</p> <p>The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.</p> <p>Revised residential space standards have been issued for consultation.</p>
<p>This is nothing more than a developer's charter to maximize profit by providing less space for more money.</p>	<p>Noted. This guidance seeks to ensure that the new homes that are required to meet the island's housing needs can be delivered in a way which ensures optimum efficiency in the use of land.</p> <p>There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives.</p> <p>Wherever new homes are provided, the creation of good quality residential accommodation is essential, regardless of their tenure, size and type.</p> <p>The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.</p> <p>Revised residential space standards have been issued for consultation.</p>
<p>We should be aiming to provide people with more room, not less.</p> <p>Government policy should be focusing on reducing immigration and population growth and not encouraging property developers to build houses solely to accommodate population growth.</p>	<p>Noted. See above.</p> <p>Whilst population growth and migration are important factors in generating the need for homes, it is also the case that more housing is required in the coming years, regardless of migration, as people live longer, and household size continues to reduce.</p>
<p>A bit more context in regards to minimum size standards of HRH in relation to DPH would be useful. By this I mean, if you were to present a 1 bedroom flat to minimum standards per habitual room in relation to dwelling per hectare on ground level, it would demonstrate how many level may be required to meet minimum density requirements in a more visual way. This could be repeated for 2 &amp; 3 Bedroom flats, as well as house with 2, 3 &amp; 4 bedrooms.</p>	<p>Noted. The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards include internal and external spaces and will ensure that new homes are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.</p> <p>Revised residential space standards have been issued for consultation.</p>

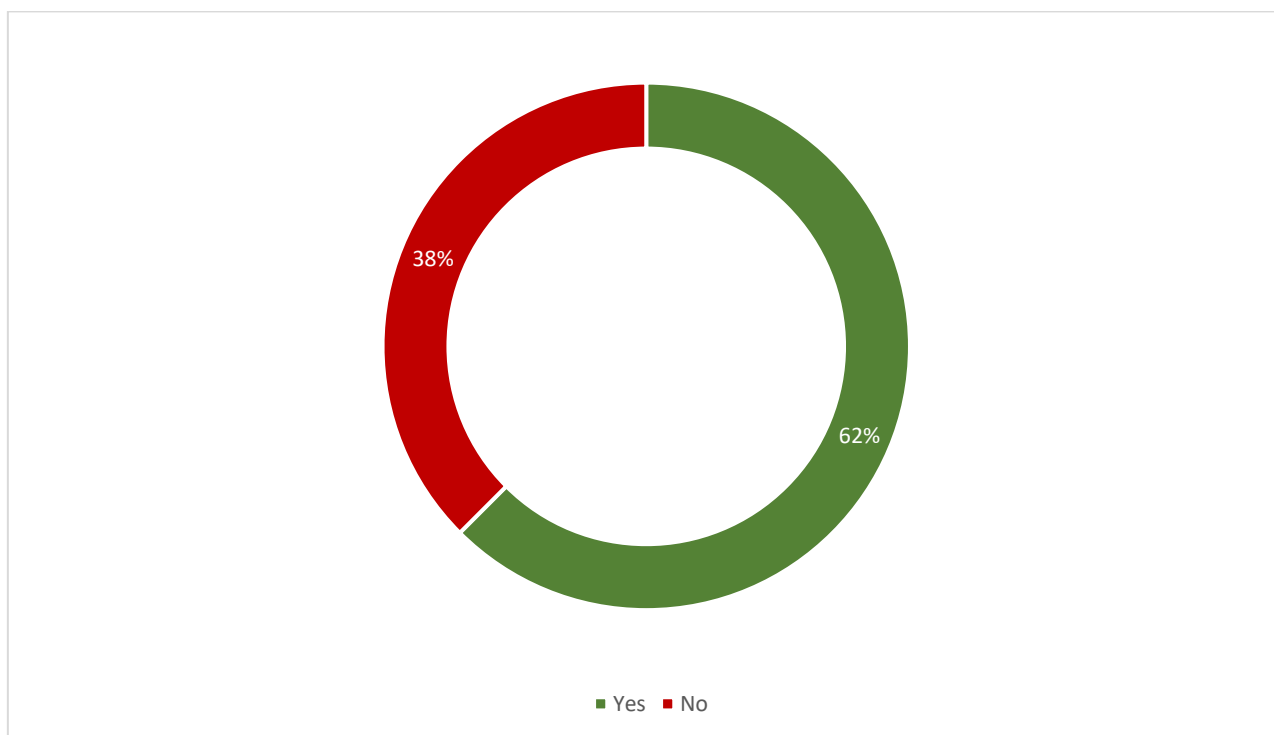
Consultation feedback	Response
<p>In relation to local centres and smaller settlements it is absolutely crucial that landscape character and historic patterns of development are given priority as opposed to arbitrary density standards. For example recent developments in Trinity, St John and St Mary have failed to reflect the historic settlement patterns resulting in blocks of dense development which sit uncomfortably within their rural context. Undoubtedly this has been density driven without an adequate master plan and design criteria being in place. As a result the character of these settlements has been undermined as opposed to being positively enhanced and enforced by new development. It is therefore feared that by setting definitive density standards in this way the current lack of long term planning for these settlement areas will be further exacerbated.</p>	<p>The guidance explicitly acknowledges, however, that density, in itself, is a crude tool: it is a measure of a proposed residential development but should not be a determinant of it.</p> <p>Policy H2 – Housing density of the bridging Island Plan, supported by this supplementary planning guidance, gives emphasis to the fact that a design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land. This enables the particular characteristics of a site and its context to be key factors in determining the level of density of any scheme.</p> <p>The development of new, more dense forms of residential development needs to be considered relative to the context and character of each site. As stated in the guidance, the <a href="#">Jersey Integrated Landscape and Seascape Character Assessment (ILSCA)</a> will be used to inform decision-making about the development of new homes in local centres and smaller settlements.</p>
<p>The third paragraph notes that the given ranges of proposed densities are “what might be appropriate”, yet in the table itself the densities are unconditionally noted as being “minimum” densities – i.e. implying that the densities given are non-negotiable.</p>	<p>Noted. As stated in the draft guidance, the density matrix at table 1 provides, in addition to the minimum density standards for each part of the BUA (emphasis added)...</p> <p><i>An indicative range of density which might be appropriate and delivered in different parts of the island’s built-up area is also provided as a guide. This is expressed as the number of homes (dph) and habitable rooms (hrh).</i></p> <p>This is an indicative range and an illustrative tool for different forms of development that might be delivered in different parts of the island: it is <u>neither</u> a set of minimum density standards, nor is it a set of targets or thresholds.</p> <p>POTENTIAL CHANGE:</p> <p>In order to promote clarity and to avoid misrepresentation and use of the guidance, Table 1 Density matrix should be reconfigured to remove the indicative range of densities.</p>
<p>The minimum density standards here should match those set out for the indicative range of densities in table 1: density matrix i.e. for flatted developments in Town and Les Quennevais, this should be set at 80 dph; and for local centres at 50 dph for houses and flats</p>	<p>Noted. See above.</p>
<p>The Density SPG sets out minimum standards of density which development will be expected to meet or exceed. For the town of St Helier, the range of density for habitable rooms for “mostly flats” is stated at p.6 to be 80-150 dwellings per hectare (“dph”), equivalent to 160-450 habitable rooms per hectare (“hrh”). The range set out in PN6 for central St Helier is “anything between 100-120 habitable rooms per acre” ie 247-289 hrh</p>	<p>Noted. See above.</p> <p><a href="#">Planning Policy Note 6: A Minimum Specification for New Housing Developments</a> (PPN6) was first published and adopted in 1994. Since that time, three island plans (in 2002; 2011 and 2022) have increasingly encouraged and enabled the development of land at higher density to promote optimum efficiency in the use of land as way of</p>

Consultation feedback	Response
<p>In the 13 years since PN6 was adopted, the top end of the range for hrh for flats has therefore increased by 161 (+55.7%). The Density SPG specifies these ranges but makes no attempt to justify the ranges given, or the increase since the last policy guidance. We believe that it would be helpful for it to do so. In particular, by giving a range any rational developer will seek to ignore the lower limit and seek to pursue proposals which exceed the higher limit so as to maximise the number of units to be built. Indeed, it can be seen from figure 6.14 on p.94 of the St Helier Urban Character Appraisal Review (“SHUCA”) that 15 out of the 18 developments listed had densities greater than 150 dph. In other words 15 schemes have already been built with density greater than the highest minimum envisaged by the Density SPG.</p> <p>On this basis, it seems unlikely that going forward developers will have any problem in meeting the minimum standards of density set by the Density SPG, which at the upper end of the range means that all new developments in St Helier are likely to be in the “superdense” bracket.</p>	<p>meeting the island’s housing needs, whilst seeking to safeguard and protect the countryside.</p>
<p>A resident’s experience will be influenced not just by their house, apartment or development, but also by their wider environment and access to public spaces, shops and other facilities. Not all sites can provide all of the BIP’s requirements, such as parking and amenity space on the site itself, but their residents may be able to enjoy facilities nearby. Large settlements are typically made up of dense development but with parks, car parking, public transport and services in close proximity.</p> <p>To encourage placemaking and achieve high densities, (both of which are BIP aims), the guidance should acknowledge that schemes should be viewed in this way, and that allowing several developments to use shared spaces and resources is both more space efficient and encourages social interaction to create stronger communities.</p> <p>Equally, whilst there is an island-wide demand for a mix of dwelling sizes, it is not always appropriate to require that this mix is reflected in each and every development, as there may be good reasons why a certain development may be better made up of solely one size of units. For example, houses with individual gardens and car parking do not make optimal use of land and are not realistic in the most densely developed areas of the Town.</p> <p>Conversely dwellings in town, close to a range of facilities, will often be more appropriate for single households. Andium Homes will seek to respond to actual known demand, which the BIP notes is mainly for smaller affordable units. It should also be recognised that constructing 1 and 2 bed units can help right sizing,</p>	<p>Noted. As stated in the guidance, new residential development in Jersey’s built-up areas is as much about creating better neighbourhoods as it is about delivering new homes. High quality residential amenity and sustainable communities will lie at the heart of achieving good places for people to live.</p> <p>When new homes are being proposed, there will be a requirement to consider the needs of existing and future residents in providing access to open space, green infrastructure and other community services and facilities, and the capacity of existing infrastructure to absorb more development.</p> <p>Development will need to provide or contribute to community facilities and infrastructure that will be impacted by the likely increase in the number of people living in the area.</p> <p>Similarly, the delivery of more dense forms of development should not be at the expense of the size and quality of the living accommodation provided. The Minister for the Environment is developing revised standards for residential space and parking standards which have been issued for consultation.</p> <p>There will also be a need to ensure that more dense forms of development are making a positive contribution to meeting the island’s housing needs and that they provide an appropriate mix of homes that help support and sustain mixed neighbourhoods and local communities. An over-provision of one form of dwelling type, such as one-bedroom flats, will not create vibrant local communities.</p>

Consultation feedback	Response
thereby releasing existing 3/4 bed units that are underoccupied.	<p>Residential development, particularly larger schemes of ten or more homes, should contain a balance of homes for families, the elderly and young people to help deliver more sustainable communities throughout the island.</p> <p>Any departure from this guidance, in terms of the mix of homes and housing types, will require appropriate and evidenced justification.</p>
How are the sites that have been rezoned for affordable housing to be treated in terms of this guidance: these are currently defined as green zone, and do not sit within the built-up area, to which these minimum density standards apply.	<p>Noted. As stated in the bridging Island Plan, all of the sites identified under Policy H5 – Provision of affordable homes, will be the subject of a housing development brief to be approved by the Minister for the Environment and issued as supplementary planning guidance.</p> <p>Minimum density standards will be identified for these sites in this guidance. It is envisaged that the level of minimum density of development for these sites will generally equate to the minimum density level for that part of the BUA that rezoned sites are related to.</p>
Why are these standards 'interim'? They should be in Policy H2.	<p>Noted. The Planning and Building (Jersey) Law provides the Minister for the Environment with powers to develop and publish supplementary planning guidance to support the use and implementation of the Island Plan (which is approved by the States Assembly). Once adopted, the content of supplementary planning guidance has to be taken into account in the process of determining planning applications.</p> <p>The law enables the Minister to develop policies, which can be issued as supplementary planning guidance. Supplementary planning guidance is designed to operate under the Island Plan and is subordinate to it. It is a matter of law that supplementary planning guidance cannot change Island Plan policy.</p> <p>Policy H2 – Housing density is a bridging Island Plan policy, which has been approved by the States Assembly. This guidance cannot alter that policy, but it can supplement and support it. Proposal 21 of the bridging Island Plan states that the Minister for the Environment will develop supplementary planning guidance to establish minimum density standards for the island's built-up areas to assist with the interpretation and application of Policy H2 - Housing density.</p> <p>The standards contained within this guidance will, upon adoption, remain in effect until such time that they are reviewed and changed by the Minister.</p> <p>The policy put forward in this draft guidance (which can be adopted by the Minister) has been defined as 'interim' policy to differentiate it from that policy (which is approved by the Assembly) in the island plan.</p>

Consultation feedback	Response
	<p>POTENTIAL CHANGE:</p> <p>In order to promote clarity and to clearly differentiate the status of SPG relative to bridging Island Plan policy, the guidance is to be revised to remove reference to 'interim policy' and to present the key contents and parameters of the guidance as 'standards' only.</p>
<p>Policy-making does not exist in isolation, it has obvious ramifications for the determination of planning applications. Both documents seek to establish these interim policies as "material considerations' but this cannot be the case as they presented as new primary tests.</p> <p>To continue in the current manner will simply cause a development control muddle, leading to challenges and Appeals, where the weight to be attributed to these "policies" will be argued.</p> <p>This is time-consuming and uncertain for everyone involved and will not achieve the goals that are currently sought. A correct, clear and well-established process is available and should be followed, for the benefit of everyone involved.</p>	<p>Noted. See above.</p>

4. Do you agree or disagree that minimum density standards are applied to developments of five or more homes?



Consultation feedback	Response
<p>Minimum density should be applied to all developments but special attention should be made to green zone and glass house developments and take into context access roads and transport links.</p> <p>I would suggest that a "Development area" be set up, so that if there are more than 1 development within a zoned area that minimum density standards be met across that area rather than site specific</p>	<p>Noted. It is proposed that the minimum density standards be applied to residential development proposals seeking to provide five or more homes.</p> <p>The optimum efficiency in the use of land will be encouraged in the development of all sites. The proposed introduction of a maximum size of new dwelling of 279 sqm (or 3,000 sqft) will help ensure the best use of land on all sites, including those of under five homes.</p> <p>As stated in island plan Policy H2 – Housing density, the appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development. This will require consideration of context access roads and transport links.</p> <p>The bridging Island Plan sets out a presumption against new development in the green zone and on redundant and derelict glasshouse sites (see <a href="#">Policy H9 – Housing outside the built-up area</a> and <a href="#">Policy ERE6 – Derelict and redundant glasshouses</a>).</p> <p>Minimum density standards will apply throughout each of the island’s built-up areas.</p>

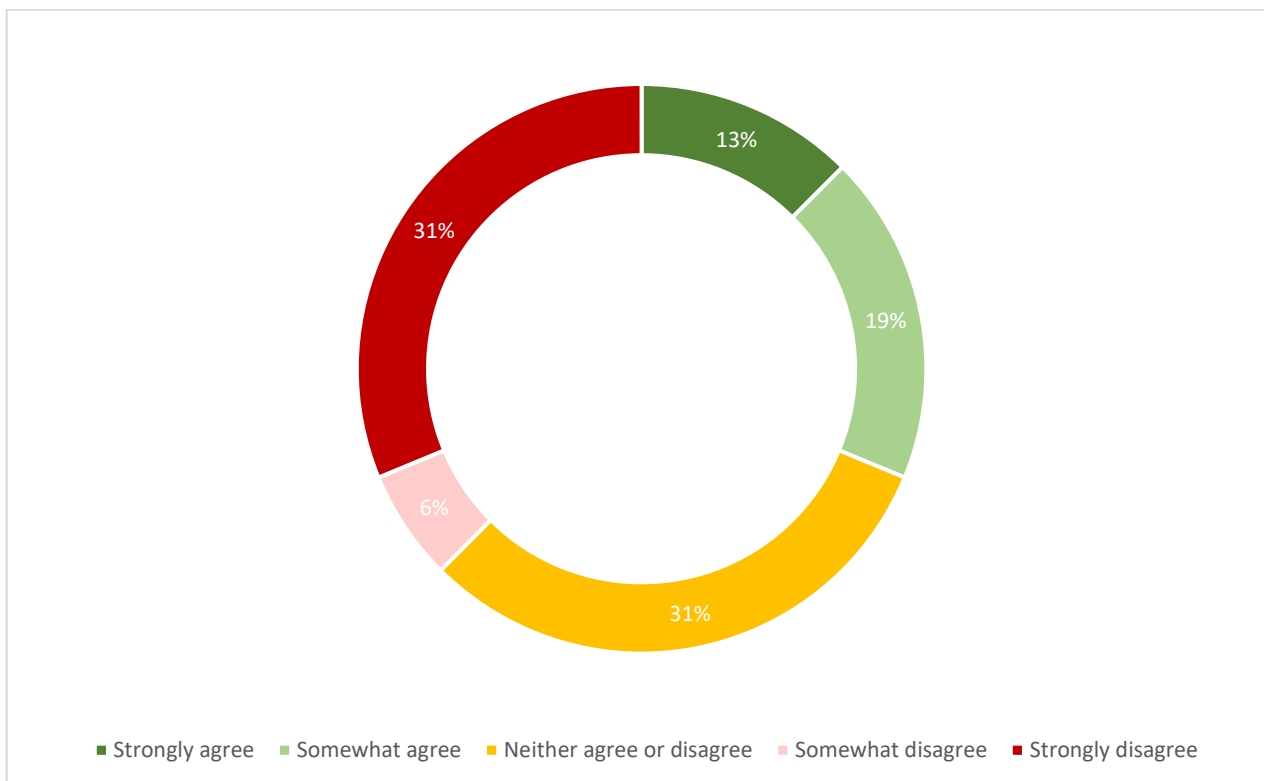
Consultation feedback	Response
<p>Agree - though it should be a guideline, rather than a blanket application. There are always likely to be reasons to deviate (in either way)</p>	<p>Noted. It is proposed that the minimum density standards be applied to residential development proposals seeking to provide five or more homes.</p> <p>The optimum efficiency in the use of land will be encouraged in the development of all sites. The proposed introduction of a maximum size of new dwelling of 279 sqm (or 3,000 sqft) will help ensure the best use of land on all sites, including those of under five homes.</p> <p>The application and use of the guidance will be monitored to determine whether the threshold for the application of minimum density standards should be reviewed.</p>
<p>The text states that development will be expected to meet or exceed the minimum standards included in Table 1. It is unclear whether development of under 5 homes is required to meet or exceed the guidelines. The first paragraph would seem to indicate that all development will be required to meet or exceed the development density recommended.</p>	<p>Noted. It is proposed that the minimum density standards be applied to residential development proposals seeking to provide five or more homes.</p> <p>POTENTIAL CHANGE:</p> <p>In order to promote clarity and provide consistency, amend the introductory text of section 5 to make clear that the minimum standards of density apply to developments of five or more homes.</p>
<p>Again this is not about quality housing but high density ghetto's.</p>	<p>Noted. There is a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives.</p> <p>Wherever new homes are provided, the creation of good quality residential accommodation is essential, regardless of their tenure, size and type.</p> <p>The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.</p> <p>Revised residential space standards have been issued for consultation.</p>
<p>Developments of fewer than five homes must pay more attention to setting and context, a small number of the wrong type of homes can adversely affect the local area..</p>	<p>Noted. It is proposed that the minimum density standards be applied to residential development proposals seeking to provide five or more homes.</p> <p>The optimum efficiency in the use of land will, however, be encouraged in the development of all sites. The proposed introduction of a maximum size of new dwelling of 279 sqm (or 3,000 sqft) will help ensure the best use of land on all sites, including those of under five homes.</p> <p>As stated in island plan Policy H2 – Housing density, the appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.</p>



Consultation feedback	Response
Some flexibility should be taken contextually but otherwise yes	Noted. See above.

- Section 5 of the draft guidance sets out a range of densities which might be used to guide development in different parts of the island’s built-up area. This is expressed as the number of homes (dph) and habitable rooms (hrh).

Please state whether you agree or disagree with the indicative range of density set out in section 5 (table 1: density matrix) of the draft guidance.



Consultation feedback	Response
<p>Table 1 of the proposed SPG sets out a range of densities that “might be appropriate” in different spatial situations. These include a range of 80 – 150 dph for the Town of St Helier. 21. However, if reference is made to the UCA, there is useful analysis of the range of densities delivered on “actual” recent projects. These include urban sites of a mix of housing types / tenure being delivered at 17 – 170 dph, and in Waterfront locations and apartment buildings the range is 173 – 437 dph. This latter set of actual completions is entirely beyond the appropriate density range in the proposed SPG for the town of St Helier.</p> <p>The UCA continues by rolling-forward the range of densities achieved in recent completions (its Figure 2.9) and considers that a lower range of 169 dph and upper range of 280 dph can be extrapolated as an “optimistic” scenario for the next plan period. Again, this scenario is entirely beyond the appropriate density range in the proposed SPG.</p> <p>The UCA next considers a “cautious” approach for St Helier of 115 dph to 178 dph, which is again primarily beyond the</p>	<p>Noted. As stated in the draft guidance, the density matrix at table 1 provides, in addition to the minimum density standards for each part of the BUA (emphasis added)...</p> <p><i>An indicative range of density which might be appropriate and delivered in different parts of the island’s built-up area is also provided as a guide. This is expressed as the number of homes (dph) and habitable rooms (hrh).</i></p> <p>This is an indicative range and an illustrative tool for different forms of development that might be delivered in different parts of the island: it is <u>neither</u> a set of minimum density standards, nor is it a set of targets or thresholds.</p> <p>POTENTIAL CHANGE:</p> <p>In order to promote clarity and to avoid misrepresentation and use of the guidance, Table 1 Density matrix should be reconfigured to remove the indicative range of densities.</p>

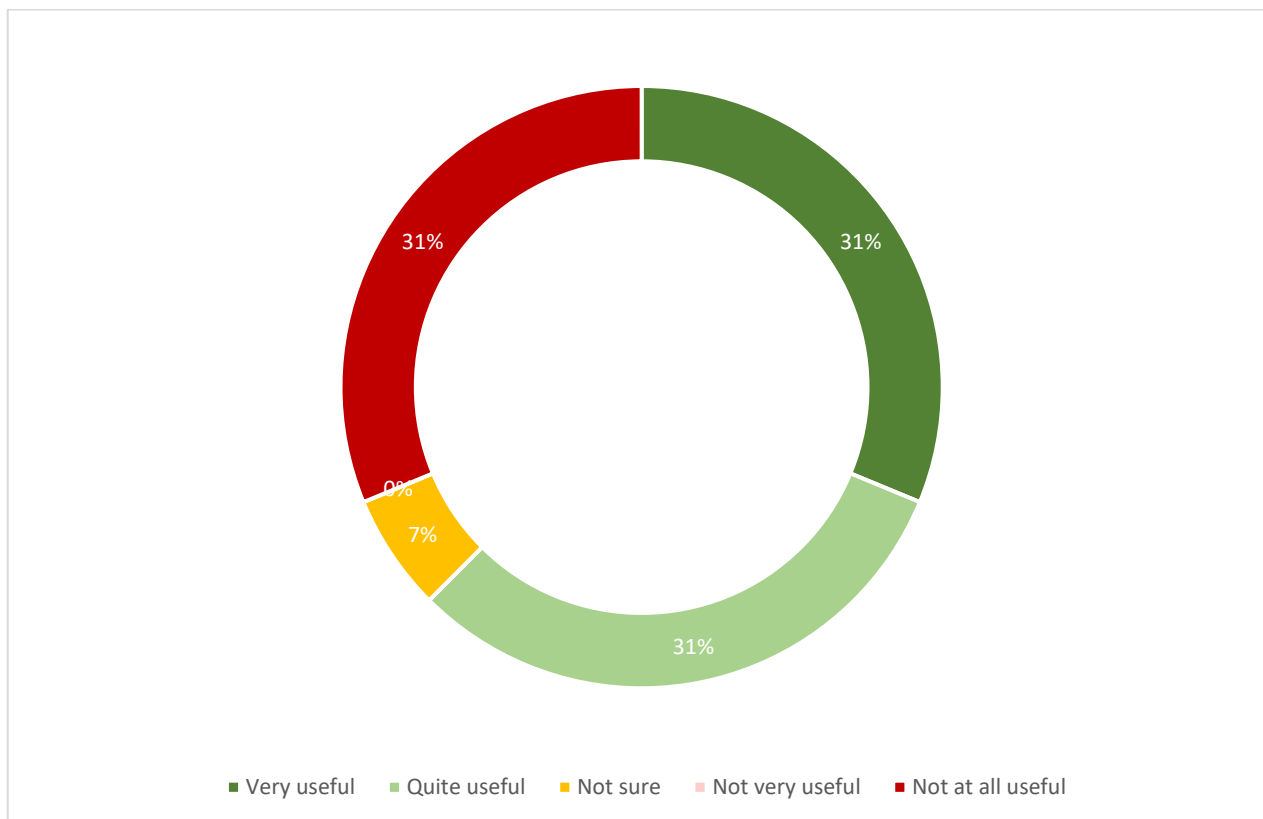
Consultation feedback	Response
<p>ranges in the draft SPG of 80 to 150 dph. This cautious range is also obviously low in comparison to recent completions (173 dph to 437 dph, as identified above) and must be seen in the context of an objective in the BIP for developments to do more as part of an almost-entire reliance on unidentified brownfield sites to meet the housebuilding targets, which themselves are a doubling of recent completion rates.</p> <p>Whilst the proposed Density SPG does establish a minimum density requirement, the figures used as “an indicative range of density which might be appropriate” are far too low. They indicate a dialling-down of objectives, and do not support the housing delivery challenges (of a considerable magnitude) that the BIP has to address and the fact that there is a finite number of brownfield sites within the existing urban areas. Furthermore, as previously referenced, the supply of new homes is endless and ensuring the best use of urban sites now will reduce pressure for future Island Plans to rezone green fields.</p>	
<p>the density ranges set out in <i>Table 1: Density Matrix</i> would not allow for several developments which have recently been approved, such as Ann Court, La Collette Low Rise, the Former BOA Warehouse, and The Limes, and could therefore discourage construction rather than encourage it.</p>	<p>Noted. See above</p>
<p>Table 2A is confusing: the indicative ranges of density should not include upper limits</p>	<p>Noted. See above</p>
<p>Upper limits should be much higher to allow for taller developments in areas of high demand/land value</p>	<p>Noted. See above</p>
<p>The areas detailed as future higher density are already overcrowded, and providing a poor standard of life.</p>	<p>Noted. As stated in the guidance, new residential development in Jersey’s built-up areas is as much about creating better neighbourhoods as it is about delivering new homes. High quality residential amenity and sustainable communities will lie at the heart of achieving good places for people to live.</p> <p>When new homes are being proposed, there will be a requirement to consider the needs of existing and future residents in providing access to open space, green infrastructure and other community services and facilities, and the capacity of existing infrastructure to absorb more development.</p>
<p>It is hard to agree or disagree with the table. The ranges presented would mean different things to different people, the lower end might mean larger rooms for people to live in but the higher end would mean larger profits for the developer making it more attractive.</p> <p>As the density increases the main habitual room or Living room (if you will) should increase in minimum size to allow for family and social interaction</p>	<p>Noted. There is a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives.</p> <p>Wherever new homes are provided, the creation of good quality residential accommodation is essential, regardless of their tenure, size and type.</p> <p>The Minister for the Environment is reviewing guidance about minimum space standards for residential</p>

Consultation feedback	Response
	<p>development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.</p> <p>Revised residential space standards have been issued for consultation.</p>
<p>This nothing more than the same failed policies that have been implemented across the world with disastrous consequences.</p>	<p>Noted. See above.</p>

6. Section 5 of the draft guidance provides examples of homes at different residential densities from existing developments throughout the island’s built-up areas.

This is designed to illustrate the different forms of development that the minimum density standards and potential range of density might deliver.

How useful do you think these examples are?



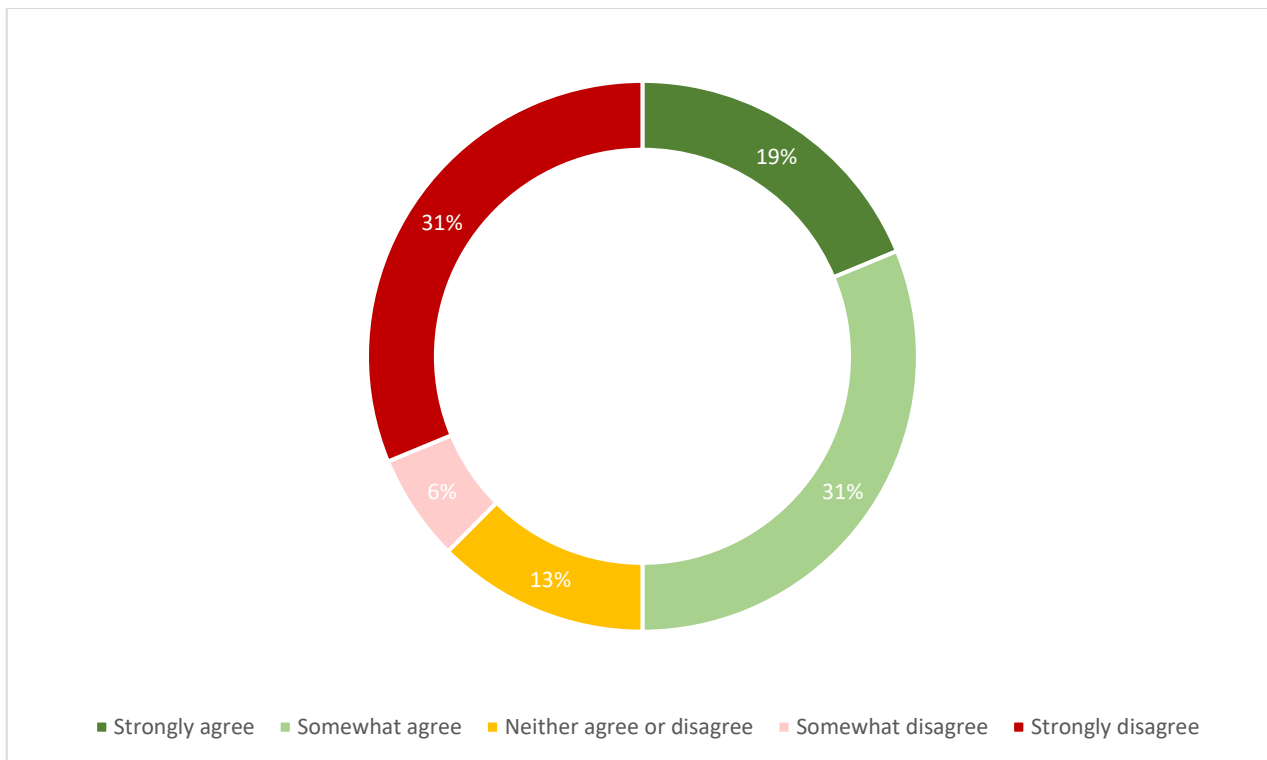
Consultation feedback	Response
niceley done	Noted.
This was useful, however average square metre/feet or habitual space would have also been useful for context. There is no way to tell if Le Close Couriard had a higher density but residents benefited from more habitual space than those at Langtry gardens that had a lower density.	Noted. All development should comply with minimum space standards.. The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time. Revised residential space standards have been issued for consultation.
Some of the examples shown on pages 7 and 8 of the SPG, such as Langtry Gardens, include a mix of (lower density) houses and (higher density) flats, and therefore give a combined overall density figure which may cause confusion. This should be noted, and a red line added to	Noted. It is clearly stated in the guidance that residential development, particularly larger schemes of ten or more homes, should contain a balance of homes for families, the elderly and young people to help deliver more sustainable communities throughout the island <sup>1</sup> . To cater better for

<sup>1</sup> See [Policy H4: meeting housing need](#)

Consultation feedback	Response
<p>the aerial photograph used to show the area which has been considered.</p>	<p>families, developments should include more homes with three or more bedrooms and provide a proportion of these as houses or duplexes..</p> <p>As a consequence, the guidance seeks to encourage mixed forms of development, with a variety of houses and flats. As with Langtry Gardens, this might provide an overall density of development averaged across the site, but with parts of the development providing more compact, dense forms of development than others.</p>
<p>It is not clear how the densities of these sites have been calculated: site areas and number of units should be provided.</p>	<p>Noted. The purpose of providing these examples was simply to illustrate that a range of development across the island's built-up areas have already delivered homes at levels of density that match or exceed the proposed minimum standards.</p>
<p>They also demonstrate an unfortunate variability in the quality of design and construction.</p>	<p>Noted. The purpose of providing these examples was simply to illustrate that a range of development across the island's built-up areas have already delivered homes at levels of density that match or exceed the proposed minimum standards.</p> <p>They are not designed to provide copybook or reference forms of development to be delivered in the future. Clearly, island plan Policy H2 – Housing density states that the appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.</p> <p><b>POTENTIAL CHANGE:</b></p> <p>The examples of development already delivered at or above minimum density standards has served to illustrate the potential implications of the proposed minimum standards of density. This has served its purpose as part of the consultation.</p> <p>To avoid these particular forms and designs of development being misused and misinterpreted as exemplars, it is considered that they might be removed from the adopted guidance.</p>
<p>All planning applications, when registered, should provide the number of dwellings per hectare</p>	<p>Noted. When assessing development proposals, the guidance makes clear that information about the number of habitable rooms to be provided in addition to information about the number of dwellings per hectare should be provided as an integral part of a planning application.</p>

7. Section 6 of the draft guidance sets out those factors that will be used to determine whether the density of a proposed residential development is acceptable. This includes the quality of design, relative to its context; the quality, type and mix of homes being created; and placemaking.

How useful do you think this section is?



Consultation feedback	Response
Quality is paramount.	Noted.
<p>We welcome the repetition of the wording set out in the preamble to Policy H2 - Housing density in the Bridging Island Plan ("BIP") which requires "a positive design-led approach [which] will require an imaginative and contextually sensitive approach to development to create sustainable communities in liveable neighbourhoods". However, this approach is not dissimilar to the policies set out in the Island Plan 2011 (as revised 2014), for example at Policy SP7 – Better by Design, which has governed the plethora of large-scale developments which have been approved in St Helier, particularly in the past two years.</p> <p>We would welcome an independent appraisal of such major developments by the Jersey Architecture Commission ("JAC") to see the extent to which design quality and placemaking have been put at the heart of recent development in St Helier and to evaluate the quality of the built designs. We fear that the Island's inability in recent years to enforce good design criteria does not bode well for the Planning system's ability to</p>	<p>Noted. As stated in Policy H2 – Housing density the appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development. This is a material consideration and is required to be explicitly addressed as part of any decision-making in relation to planning applications.</p> <p>The Jersey Architecture Commission continue to be increasingly engaged in the critical appraisal of major development proposals, including larger residential schemes. Their input is most usefully secured in the early stages of the design process at pre-application stage, which is non-statutory. Where any such contribution is made, it should form part of the planning history of any subsequent planning application and help decision-makers to consider how any resultant scheme has responded to the issues raised.</p>

Consultation feedback	Response
<p>reject applications which do not meet the new required standards.</p> <p>As we have stated on previous occasions, it is particularly disappointing when constructive comments in this area by the JAC are routinely ignored. We would hope that determination of any major pending residential development applications be deferred until such appraisal has been carried out.</p>	<p>The Jersey Design Awards, which is run by the Jersey Architecture Commission, provides an independent appraisal of a whole range of development undertaken in the island assessed against an international standard. This affords an opportunity to celebrate the best of local design and to highlight areas where standards should continue to be raised.</p>
<p>We wholly concur with the comments requiring the provision of an appropriate mix of homes, and also the commitment not to support applications which make an over-provision of one form of dwelling type such as one-bedroom flats.</p> <p>We have previously commented on the need for a system to be introduced such that both developers and the Planning Department can ensure that new applications deliver an appropriate mix driven by the current demand for different types of housing. We are aware of a number of current planning applications which should be rejected on the grounds of an inappropriate housing mix.</p>	<p>Noted. In order to ensure that developments are contributing to the island's housing needs, consultation with the newly established Housing and Regeneration team in the Cabinet Office may be introduced for larger housing developments.</p> <p>POTENTIAL CHANGE: Add reference to the establishment of a consultation mechanism with the Housing and Regeneration team for larger residential development schemes, in order to consider the proposed housing mix, relative to the island's housing needs.</p>
<p>There is a real problem here as developers will tend to pack in dwellings in 1 &amp; 2 bedroom flats, but these do not form the basis of family homes or stable communities, so there should be restrictions on the numbers of 1 and 2 bedroom flats, relative say to 3 &amp; 4 bed dwellings arguably prohibiting 1 bed flats altogether. This is probably the matter to which further consideration needs most to be given.</p>	<p>Noted. See above.</p> <p>Island Plan Policy H4 – Meeting housing needs already states that '<i>Development proposals which would result in an unacceptable over-concentration of any type, size or tenure of housing will not be supported, except where overriding justification is provided to justify the mix.</i>' This guidance acknowledges this and adds further weight to it.</p>
<p>in a situation where, due to overlooking or other such relevant considerations, the "minimum density cannot be achieved", objectors may well refer to the proposed SPG, stating that the carefully considered scheme that is submitted should not be approved because it does not reach the "minimum" density standard.</p>	<p>Noted. It is important to recognise that the parameters for planning decisions provided in the planning policy framework of the bridging Island Plan, and any supplementary planning guidance issued by the Minister for the Environment, are not absolute. Every development proposal will be different and will need to be considered relative to the merits and circumstances of each particular case.</p> <p>Sometimes policies can appear to pull in different directions, whereby satisfying one policy creates a tension with another. This is not a fault with the plan or guidance, but simply a product of a sophisticated planning policy framework, which seeks to control and influence a wide range of different aspects of proposed development, in the interests of the principles of sustainable development.</p>
<p>Concerned that setting minimum standards simply won't deliver.</p> <p>Once you've factored in highly sensitive areas, conservation areas, proximity to listed buildings, exceeding the height of an adjacent bldg. by more than two storeys, and the impacts on local character, there is very little scope to deliver denser schemes.</p>	<p>Noted. See above.</p> <p>In addition, the policy framework provided by the bridging Island Plan, at Policy SP2 – Spatial strategy, Policy SP7 – Planning for community needs and Policy H2 – Housing density provides clear support the efficient development and use of land at optimal densities.</p>



Consultation feedback	Response
<p>Whilst the SPG notes that other factors may affect density, there is scope for there to be sufficient confusion that unnecessary complications will arise during the application process.</p> <p>The SPG notes on Page 1 that “Once adopted, this guidance and the interim policy will become material considerations in the determination of planning applications relating to the creation of new homes in the built-up area.” Accordingly, we would suggest that the table should refer to “target” minimum density standards, with a caveat added to the table, in the form of a footnote, that states that the target may not be able to be reached in certain instances due to other pertinent planning policy factors, and that this will be taken into consideration when assessing proposed densities.</p>	<p>Noted. See above</p>
<p>In relation to the proposed SPG on Density, it can be immediately identified that the SPG places a disproportionate emphasis on a mathematical approach to density. The proposed guidance is supplementary to Policy H2 of the BIP which commences with a clear statement that: “A positive design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.” [my emphasis]</p> <p>Policy H2 continues by confirming an appropriate density will be informed by factors such as the quality of design, local context, site sensitivity, accessibility, connectivity and the quality / quantum of amenity space and parking. The proposed SPG is however primarily introducing a mathematical approach to density, which is overly simplistic, outdated by reference to other BIP objectives, and has very little connection to the ‘art’ of placemaking. Such commentary does not appear until section 6 of the proposed SPG, beyond half-way through its text. It is recommended that this emphasis should be corrected, to align with the clear direction of the actual policy, and make it clear that the primary considerations will be those relating to placemaking</p>	<p>Noted. It is quite clear, in the first line of this guidance, that Proposal 21 of the bridging Island Plan requires the Minister for the Environment to develop supplementary planning guidance to establish minimum density standards for the island’s built-up areas to assist with the interpretation and application of Policy H2 - Housing density.</p> <p>This is what this guidance does.</p> <p>The substance of the proposed guidance entirely supports and is consistent with the policy direction of the bridging Island Plan, and is clearly supplementary to it.</p>
<p>There are further concerns that a mathematical approach to residential density is attempting to secure an overly simplistic numerical output, and that this approach fails to recognise the increasingly dynamic objectives of urban placemaking (which the BIP promotes).</p> <p>Most large-scale developments in the urban area of St Helier will include a mix of uses and will not be entirely residential. Mixed-use will have benefits in terms of the vitality and viability of the town centre areas, making them more attractive places to live and work, and reducing the need to travel. This will include more than active ground floors, and will encompass live-work</p>	<p>Noted. Mixed-use development is the exception rather than the norm in Jersey.</p> <p>POTENTIAL CHANGE:</p> <p>Consider more flexibility in the application of minimum standards to mixed-use development schemes.</p>

Consultation feedback	Response
<p>accommodation, sports / leisure facilities, and other commercial activity.</p> <p>It is impossible to net-off such space from a residential density calculation in a three-dimensional development project. This is a further reason why a mathematical approach should be a secondary consideration when looking at density, and this should be stressed in the proposed SPG</p>	
<p>Consideration regarding appropriate density should include provision of parking - the explosion of roadside parking especially on some country lanes is alarming and will only grow if sufficient parking is not part of the design/plan. And assuming one car per residence is a sadly out of date concept it seems..</p>	<p>Noted. As stated in island plan Policy H2 – Housing density, the appropriate density for any individual site will be informed by, amongst other things, the quantity and quality of amenity space and parking, including visitor parking.</p> <p>The Minister for the Environment is reviewing guidance about residential parking standards.</p> <p>The parking requirements for any new development in the revised standards will reflect its accessibility, with maximum and lower minimum standards applying in those parts of the island where greater opportunity exists for travel on foot, by bike and by public transport.</p> <p>Revised residential parking standards have been issued for consultation.</p>
<p>The adopted BIP policy H2 (Housing Density) states that a <i>“positive design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.”</i> It then lists four factors which will inform what is the appropriate density for any individual site. No density figures are included in the policy.</p> <p>These factors are not scientific and therefore require the decision maker to reach a judgement. This creates uncertainty and therefore risk for a developer. The reasons for this site-specific assessment are understood, but the SPG could help minimise this uncertainty, thereby reducing risk, abortive work and delay, by providing additional clarity and objective criteria for designers, developers, and decision makers to use.</p> <p>Andium Homes’ suggestion is focused on supplementing the most subjective, (and therefore difficult) element of policy H2, which states that the appropriate density for any individual site will be informed by <i>“the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.”</i></p> <p>It would assist all parties, particularly the designer, if quantitative as opposed to qualitative criteria were set wherever possible. Section 6 of the SPG accepts that <i>“Density, in itself, is a crude tool:”</i> In practice the appropriate quantum of development will be dictated by addressing the site’s context and by providing high quality places to live.</p> <p>Therefore, the appropriate level of development will be substantially determined by factors such as how much of the site will be given over to car parking, internal space standards, external amenity standards and requirements for open space. These factors <i>are</i> largely</p>	<p>Noted. The Minister for the Environment is reviewing guidance about residential space and parking standards. These have been issued for consultation.</p> <p>The guidance explicitly acknowledges that the <a href="#">St Helier Urban Character Appraisal Review 2021</a> provides an objective assessment and guidance about that which contributes to the distinct character of different parts of the town. It clearly states that this should be used creatively by architects and developers to inform the design of their proposal, while ensuring that the essence of St Helier’s distinct and different urban character is maintained or enhanced.</p> <p>It is proposed that the design guidance of SHUCA is formally adopted and published as SPG in order that it might be required to be considered as a material consideration in decision-making.</p>

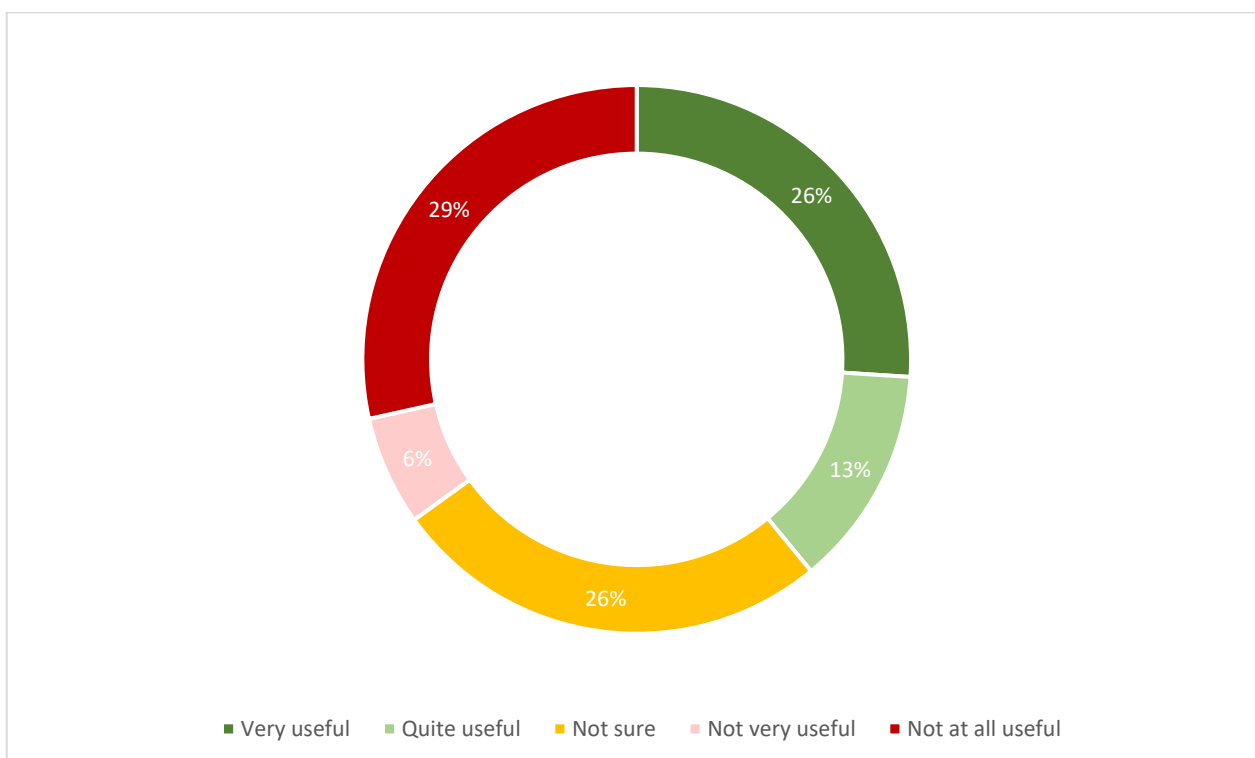
Consultation feedback	Response															
<p>quantitative and therefore easier for the designer to use. Additional SPG on these items is urgently needed.</p> <p>To supplement that however, the Density SPG could give clearer direction as regards building scale. The SPG refers to heights and to densities, but these references are not precise. For example, the SPG gives a single density figure for the entire "Town of St Helier" area, which does not reflect the variation in character within that large area, and the fact that there are opportunities for higher densities in some areas, but not in others.</p> <p>In addition, the SPG's comment that "carefully integrated taller buildings" may be acceptable and that "in St Helier these might take the form of medium-tall (4.5-6 storey) and taller (6-8 Storeys) apartment blocks" is too general.</p> <p>Instead, Andium Homes would suggest that the SPG should be more specific, and more strongly convey the BIP's push for more efficient use of land in the built-up area.</p> <p>This can be done by using existing resources such as the St Helier Urban Character Appraisal Review 2021 (SHUCA). The SHUCA identifies different character areas, and, on figure 6.11, areas which are more (and less) sensitive to higher densities and taller buildings. It would help designers greatly if the SPG amalgamated this currently dispersed information into one, easy to use guide. This could include the SHUCA's observations regarding densities, its advice on the appropriate height of development, (figure 6.13), and the guidance of BIP policies such as GD7 <i>Tall Buildings</i>, and be set out on a clear map base, to identify appropriate heights and densities for the Town of St Helier, area by area. This could also be repeated across the other built-up areas.</p> <p>This information could be set out in a simple form such as this:</p> <table border="1" data-bbox="209 1267 944 1704"> <thead> <tr> <th>Area</th> <th>Current Character and Typical Building Heights</th> <th>Ability to accommodate tall buildings (4+ storeys)</th> <th>Suitable density range</th> <th>Recommended building heights for future development</th> </tr> </thead> <tbody> <tr> <td>Number One</td> <td>Residential; 2 storeys</td> <td>Low</td> <td>50-80 dph</td> <td>2-3 storeys</td> </tr> <tr> <td>Number Two</td> <td>Residential; 3 storeys with some 4 storeys</td> <td>Medium</td> <td>80-100 dph</td> <td>3-5 stories</td> </tr> </tbody> </table> <p>Most of this information is already available within the SHUCA so little additional work is required other than to amalgamate the information into one clear reference point.</p> <p>However, the SHUCA predates the BIP and it is a character assessment rather than a housing policy document. It does not therefore take account of the final BIP policies and the BIP's expressed need to increase densities, so the Density SPG must add this. For example, the SPG's Figure 3, taken from the SHUCA, suggests that of the 10 character areas, 8 are assessed as having a High or Medium-High</p>	Area	Current Character and Typical Building Heights	Ability to accommodate tall buildings (4+ storeys)	Suitable density range	Recommended building heights for future development	Number One	Residential; 2 storeys	Low	50-80 dph	2-3 storeys	Number Two	Residential; 3 storeys with some 4 storeys	Medium	80-100 dph	3-5 stories	
Area	Current Character and Typical Building Heights	Ability to accommodate tall buildings (4+ storeys)	Suitable density range	Recommended building heights for future development												
Number One	Residential; 2 storeys	Low	50-80 dph	2-3 storeys												
Number Two	Residential; 3 storeys with some 4 storeys	Medium	80-100 dph	3-5 stories												

Consultation feedback	Response
<p>sensitivity to new development. This could be interpreted as discouraging new development in 80% of the Town area, which directly contradicts the stated aims of the BIP. On its own therefore the sensitivity map does not convey the full, subsequent, BIP policy position, and could cause confusion. This SPG offers an opportunity to address this.</p> <p>Design style is not something which can be calculated however, and so the scheme must still be “design-led” in producing a suitable style and ensuring that all the quantitative requirements are met. However, the design process would be made simpler, and considerable design time saved, if as many factors as possible were clarified in the manner we have suggested. It would therefore be less onerous to compile, and assess, subsequent planning applications, enabling developers to produce the homes that are needed more quickly, whilst still addressing BIP policy H2.</p>	
<p>How will the requirement for development to provide or contribute to community facilities and infrastructure that will be impacted by the likely increase in the number of people living in the area be measured/validated?</p>	<p>Noted. The adequacy of local infrastructure will be informed by consultation with a range of stakeholders responsible for various aspects of infrastructure provision. Their comments will be material to the determination of planning applications.</p> <p>With regard to community infrastructure, such as the provision of communal open space, the Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards include those relating to the provision of internal and external spaces, including private and communal open space.</p> <p>Revised residential space standards have been issued for consultation.</p>

8. Section 6.1 of the draft guidance is about the need to assess the impact of denser forms of housing development on the character of the local area.

It is proposed that the design guidance in the St Helier Urban Character Appraisal Review 2021 (UCA) is adopted, as supplementary planning guidance, to help inform the assessment of development proposals on the character of St Helier.

How useful do you think the UCA design guidance might be as a tool to inform decision-making in the Town of St Helier?



Consultation feedback	Response
<p>What dreadful mess St Helier looks.</p> <p>The lack of DECENT planning has enabled a piecemeal approach to developments, which over every decade have increased in height.</p> <p>The problem is those that live in the more expensive areas of the Island ( low density areas) want to keep it that way, and do not care about making St Helier an even worse place to live.</p>	<p>Noted. The <a href="#">St Helier Urban Character Appraisal Review 2021</a> provides an objective assessment and guidance about that which contributes to the distinct character of different parts of the town. Its adoption as design guidance, and the requirement for it to be considered as a material consideration in the planning process, should enable a more consistent and robust consideration of design issues relative to the character of the area in which proposed development is located. The SHUCA design guidance includes guidance about height: this is already integral part of bridging Island Plan <a href="#">Policy GD7 – Tall buildings</a>.</p>
<p>Castle Quay waterfront development just off Rue de L’Etau ~ reminds me of early London, where properties were so</p>	<p>Noted. Bridging Island Plan <a href="#">Policy GD7 – Tall buildings</a> no makes it an explicit requirement that the relationship of</p>

Consultation feedback	Response
<p>close together the whole development is doomed to failure given 50 years. There is NO REASON other than developers GREED that blocks of flats are built so close to their opposite block that balconies almost touch.</p>	<p>proposed tall buildings to other buildings is a key consideration in the planning process.</p> <p>Issues of privacy, overbearing and access to sunlight and daylight are matters that need to be taken into account under the auspices of <a href="#">Policy GD1 – Managing the health and wellbeing impact of new development</a></p>
<p>It should be acknowledged that Horizon is nearing completion and already reaches 10 residential storeys in height (including duplex levels) to an overall height of about 31m, and that IFC2 is a committed development of 7 office floors, plus plant, to a height of about 30m.</p> <p>These recent commitments are also in the context of other buildings that have long been finished and occupied, including (for example) Marina Court at 10 residential floors and 27 Esplanade at 7 office floors.</p> <p>The question must therefore be asked if, in the context of the obvious challenges of the BIP, 8 storeys is actually a reasonable height? (particularly given that the existing commitments and existing built context already exceed this parameter)</p>	<p>Noted. The issue of tall buildings in St Helier has already been considered as part of the recent island plan review, and the policy framework for such is provided by bridging Island Plan <a href="#">Policy GD7 – Tall buildings</a>, which has been approved, as amended, by the States Assembly.</p> <p>The SHUCA design guidance includes guidance about height and is already an integral part of the BIP policy.</p>
<p>Residential towers would destroy Jersey's skyline and local look. The vertical Le Marais flats could have been a modernised 'Plattenbau' or 'Miljonprogrammet' style horizontal housing, rather than the 4 ugly white spires that jut awkwardly on the horizon of St Clement.</p>	<p>Noted. See above.</p>
<p>The Revised 2011 Island Plan had a requirement of 430 new homes per annum, which was (on average) delivered. The BIP now has a requirement for 860 new homes to be delivered per annum (4,300 units over 5 years). Given the significant challenge of doubling the annual supply of new homes, the BIP should include positive mechanisms and initiatives to ensure that the Island is positioned to deliver a rolling pipeline of circa 860 new homes (if this is deemed the required number following any updated Housing Needs Assessment), year-on-year, with an almost total reliance on this being delivered from windfall urban sites. These sites are required to come forward at twice the rate that has been achieved in the last decade.</p> <p>It is within this context that Jersey Development Company welcome the commentary in relation to UCA Character Area 6, the New Waterfront, specifically the acknowledgement that “massing of up to 8 storeys throughout” is established in the Guidance.</p>	<p>Noted.</p>
<p>It should also be noted that the UCA was part of the evidence base for the Bridging Island Plan (BIP), and as with the Density Guidance, its place as part of the BIP should be understood and clearly explained</p>	<p>Noted. See above.</p>

Consultation feedback	Response
If maximum and minimum densities are set, so too should the maximum number of floors in specific areas. This is relevant for instance in St Helier where 6 out of 10 areas are analysed as having high sensitivity.	Noted. See above.
I do not agree with the proposal that such units should be so high and so over populated.	Noted. See above
In our view The Parade/ People's Park, Havre des Pas to Greve d'Azette and Town edges and slopes should also be rated highly sensitive. This would only leave the New Waterfront as of low sensitivity. Unsurprisingly this is being rapidly developed leading to accusations of overbuilding at inappropriate heights of an area that could have been an elegant gateway to town and the Island. Maybe a finer analysis is required so high sensitive Havre des Pas to Greve d'Azette is separated from medium low Georgetown.	Noted. As part of the analysis of sensitivity of key views to St Helier, a distinction is made between the relative sensitivity of different parts of the town (see Fig. 6.10, p. 89 <a href="#">St Helier Urban Character Appraisal Review 2021</a> )
I think Havre des Pas and Greve d'Azette should be separated out. Havre des Pas should be High sensitive area given its history are existing architecture. La Collette is a mix, with historic context and industrial site insight.	Noted. As part of the analysis of sensitivity of key views to St Helier, a distinction is made between the relative sensitivity of Havre des Pas and Greve D'Azette (see areas 8 and 10, Fig. 6.10, p. 89 <a href="#">St Helier Urban Character Appraisal Review 2021</a> ).
It is embarrassing that there is not a standing requirement for updates to the UCA every 3-5 years. In addition, I suggest there is a 'local area' update or review carried out for all developments of over 50-100 units, not sure what the criteria should be, it might need to vary depending upon the sensitivity of the area.	Noted. The 2005 Urban Character Appraisal identified ten distinct character areas in St Helier. As part of the evidence base for the latest island plan review, a review of the UCA was commissioned, and its spatial extent expanded, in 2019 to consider the changes that have occurred in the town, and the impact on its character, during that time. The need for further review of the UCA, relative to the rate of change and its impact on the character of the town, will be monitored. Further work will be commissioned as required, with regard to the plan-making cycle.
It should also be questioned whether the proposal to adopt just the Chapter 7 Design Guidance will actually result in sufficient understanding of what the brief commentary for each Character Area in Chapter 7 actually means, and why such Guidance is considered robust. In this regard, the proposed SPG would not encompass the commentary on "The Development Dilemma" section of the UCA which includes the commentary at paragraph 3.4 explaining why the New Waterfront area can act as a safety value for development.  There should also be an understanding that the adoption of the Design Guidance section of the UCA means that other SPG, specifically the South West St Helier Framework, will also need to be reviewed to ensure consistency.  On this same issue, the commentary for Character Area 4, Fort Regent, fails to acknowledge that there is adopted	Noted. Elements of Section 6: Development dilemma, where they provide relevant guidance, may be incorporated in the SPG to be adopted.  Other elements of SPG will be reviewed, as necessary, to ensure consistency.  Site-specific SPG may be prepared and issued by the Minister on a discretionary basis. Where any such SPG exists it is required, by law, to be taken into account as a material consideration, irrespective of whether it is referenced in any other guidance.

Consultation feedback	Response
<p>SPG providing a site-specific Development Brief for the South Hill site. This is not referenced in the UCA Guidance, and the plan associated with Character Area 4 does not appear to acknowledge its existence either. This element of the UCA should be clarified</p>	
<p>On initial administrative matters, the public notification of the consultation identifies that the element of the UCA to be adopted is the Design Guidance, at Section 7 from pages 77 to 140, when the Design Guidance pages actually run from page 99 to 140. Please can this be clarified.</p>	<p>Noted. See above</p>
<p>Le Masurier are concerned that the boundaries of the Character Areas are proposed to be re-drawn so that the land north of the Esplanade, between Castle Street and Conway Street becomes entirely within Character Area 8, Town Centre, whereas, in the current Design Guidance for St Helier (adopted in 2013, and based on the original UCA in 2005) the majority of this area is within Character Area 7, being the Parade and Esplanade.</p> <p>The consequence of this change is that this area is now proposed to be entirely within Character Area 8 where the 2021 UCA indicates that massing is "generally up to 4 or exceptionally 4.5 storeys", whereas the majority of the land was previously within Character Area 7 from the adopted SPG, where a massing parameter of "6 storeys" is set out.</p> <p>There appears to be no analysis or commentary in the new UCA as to why this change has occurred. The previous Character Areas are reviewed from page 62 of the 2021 UCA, looking at the recent evolution in character from the original 2005 work, including the interstitial areas. The only commentary (at page 68) identifies that in the former Character Area 7 the Esplanade now has more in common with the New Waterfront than with old St Helier, yet the change in boundaries has delivered the complete opposite, with a large element of the Esplanade being transferred into the guidance for the (old) Town Centre.</p> <p>The commentary in the UCA also does not acknowledge that in the period since 2005 there has been planning permission granted, renewed, revised and implemented on the Le Masurier site between Broad Street and Commercial Street for a building of 4 to 6 storeys of office accommodation, aligning exactly with the parameters in the St Helier Design Guidance SPG (which was adopted after the first permission was granted).</p> <p>It is also relevant that the entire block, between Castle Street and Conway Street is all now proposed to be incorporated into Character Area 8, with a reduced "4 or exceptionally 4.5 storey" massing parameter, but it already includes numerous other buildings, permissions and other development commitments (from the period since the</p>	<p>Noted. Justification for changes to the UCA boundaries between the 2005 and 2021 UCA are set out on pages 72-76 of the SHUCA. Expansion of CA8 Town Centre to the west and south is specifically addressed on p.73.</p> <p>The <a href="#">St Helier Urban Character Appraisal Review 2021</a> formed part of the evidence base for the bridging island Plan and was issued for consultation during that time. The new boundaries of St Helier's character areas are proposed to be adopted as set out in the SHUCA.</p>

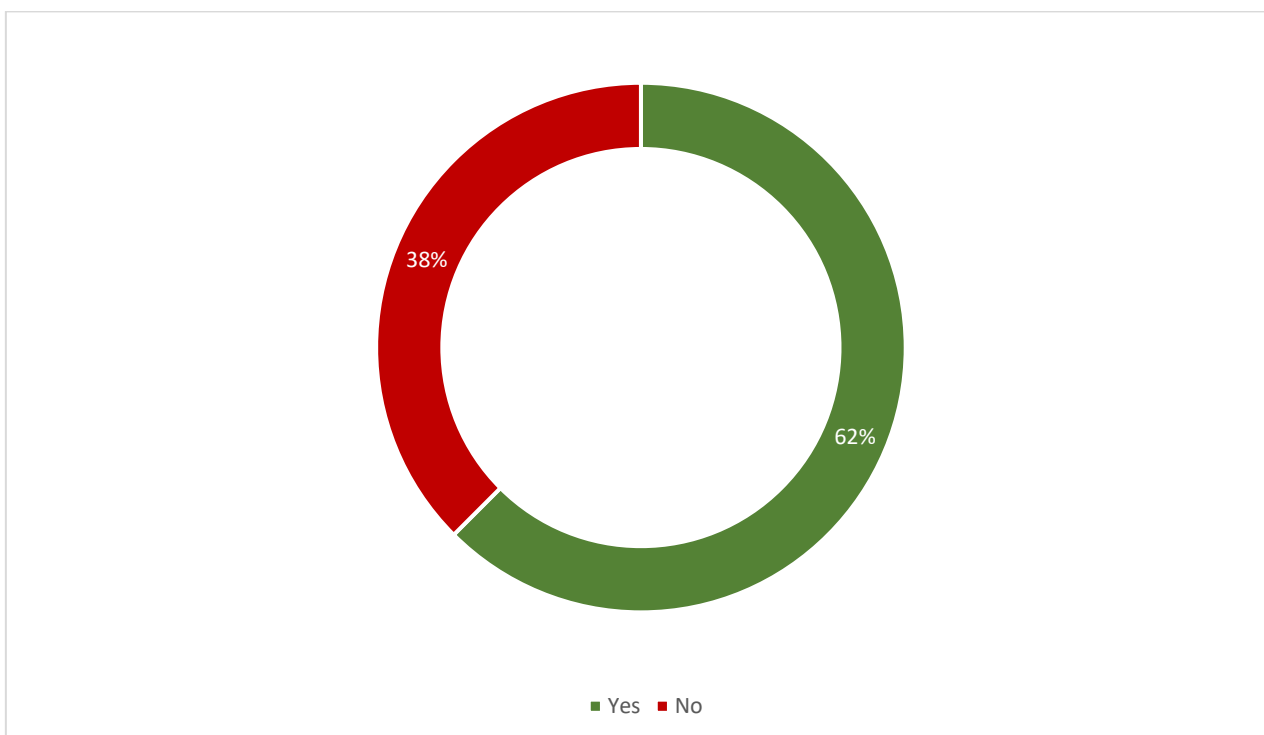


Consultation feedback	Response
<p>original 2005 UCA) which already significantly exceed the proposed massing parameter. For example:</p> <ul style="list-style-type: none"> <li>• Standard Chartered (junction of Commercial Street / Castle Street) is already 6 office storeys;</li> <li>• 5-6 Esplanade, running through to Commercial Street (P/2013/1144 and P/2017/0954) approved as 6 office floors plus roof plant, and has now been constructed, and occupied;</li> <li>• 8-9 Esplanade / 10-12 Commercial Street (P/2020/1778) approved for 5 floors of offices, now commenced and on-site;</li> <li>• 19-21 Esplanade, running through to 34 Commercial Street (P/2011/1201) approved for 6 storeys of office development;</li> <li>• 22-23 Esplanade, and 38-40 Commercial Street (P/2012/1344) approved for 6 storeys of office development;</li> <li>• 35 Commercial Street (P/2016/1216), approved for two office buildings, one of 4 storeys and one of 6 storeys.</li> </ul> <p>This real-world evidence shows that the change between the 2005 UCA and today has typically been an increase in scale (generally up, to six office floors, in accordance with the adopted Design Guidance). These are not one-off decisions, but a clear acceptance of this increased mass, through numerous determinations. This aligns with the commentary on page 68 of the UCA, confirming that this area now has more in common with the New Waterfront (where the UCA Guidance now sets out a height parameter of 8 storeys) yet the new UCA then inexplicably incorporates it into the amended Character Area 8, where the parameter is revised down to a “4 or exceptionally 4.5 storey” massing.</p> <p>This change in the envisaged parameter represents a significant constraint on the opportunities that might be yielded from sites in this area. This is therefore inconsistent with the overall strategy of the Island Plan, which is positive in seeking to optimise the potential from brownfield windfall sites, particularly in the heart of St Helier, reflecting the step-change required in the BIP strategy. This will, of course, still mean that any proposals will need to be assessed in the context of all the other applicable policies in the BIP.</p> <p>The draft UCA Guidance now actually proposes a significant ‘dialling-down’ of the potential which might be yielded from the whole block north of the Esplanade, between Conway Street and Castle Street, which is not justified by reference to the broader BIP strategy, neither is it reflected in the real-world situation on the ground, which has evolved between 2005 and today. The boundaries from Character Area 7 of the adopted Design Guidance SPG should quite clearly be reinstated, along with the</p>	

Consultation feedback	Response
associated 6 storey parameter, to support delivery of the full potential of the identified sites.	
<p>Both the proposed UCA and the proposed Density SPG are considered to be considerably out of step with the scale of the challenges identified in the new BIP. They will involve dialling-down the potential of windfall sites and they will both demonstrably reduce yields on urban brownfield sites when compared to what is currently being consented and delivered, with the BIP otherwise demanding that these sites must realise their full potential as part of the need to double the rate in which new housing is delivered.</p>	<p>Noted. The policy framework provided by the bridging Island Plan, at Policy SP2 – Spatial strategy, Policy SP7 – Planning for community needs and Policy H2 – Housing density provides clear support the efficient development and use of land at optimal densities.</p> <p>There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives. The development of new, more dense forms of residential development needs to be considered relative to the context and character of each site.</p> <p>Sometimes policies can appear to pull in different directions, whereby satisfying one policy creates a tension with another. This is not a fault with the plan, but simply a product of a sophisticated development plan, which seeks to control and influence a wide range of different aspects of proposed development, in the interests of the principles of sustainable development.</p>
<p>Figure 3, which is derived from the SHUCA, essentially identifies all areas of St Helier as highly sensitive.</p> <p>All areas are highly sensitive other than the 'new waterfront'.</p> <p>What if the Gateway requires high density of one bed units?</p>	<p>Noted. See above.</p>
<p>Ports of Jersey are concerned that the proposed UCA retains a 3½ storey massing parameter across the whole of Character Area 5. This is considered to be overly restrictive, and does not reflect the step change in the new BIP (reviewed earlier) and neither does it allow for a design-led approach to placemaking which the new BIP also strongly advocates.</p> <p>It is also noted that the Steam Clock Site, parts of New North Quay and parts of La Folie are also identified as locations for a "proposed design guide". Unfortunately, the BIP does not identify these design guides as a delivery workstream, and as such the need for such work to be prioritised and resourced (alongside all the other Guidance envisaged by the BIP) probably means that they are some years away. Whilst design guides are a worth objective, the need for their production is likely to delay these sites coming forward, which will conflict with the BIP strategy, where a strong emphasis is given to windfall sites coming forward at twice the pace that has been achieved in recent years (particularly in the Built-Up Area of St Helier, such as these three opportunities).</p> <p>This requirement should be reconsidered and an opportunity should be taken for a positive position to be</p>	<p>Noted. The guidance explicitly acknowledges that the <a href="#">St Helier Urban Character Appraisal Review 2021</a> provides an objective assessment and guidance about that which contributes to the distinct character of different parts of the town. It clearly states that this should be used creatively by architects and developers to inform the design of their proposal, while ensuring that the essence of St Helier's distinct and different urban character is maintained or enhanced. Any proposals which depart from the adopted guidance will need to be supported by the appropriate justification.</p> <p>Site-specific SPG may be prepared and issued by the Minister on a discretionary basis. The identification of the need for design guides in the guidance is advisory and does not impose a requirement upon the Minister to prepare a design brief, and neither should it prohibit the preparation of development proposals. On sites identified as being particularly sensitive, the Minister would encourage early engagement with IHE (Regulation) and the Jersey Architecture Commission through the pre-application process.</p> <p>It is relevant to note that the Steam Clock site has been designated as a protected open space in the bridging</p>

Consultation feedback	Response
established, to maximise the capacity of these sites through a design-led approach, as envisaged by the balance of the BIP policy framework and as would accord with the principles of “Placemaking”	Island Plan, under the auspices of Policy CI7 – Protected open space.
Why is the character assessment forming part of the density standards. This is not relevant and should be referred to in UCA	Noted. As stated in Policy H2 – Housing density the appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development. This is a material consideration and is required to be explicitly addressed as part of any decision-making in relation to planning applications. The <a href="#">St Helier Urban Character Appraisal Review 2021</a> can assist in this process for development proposals in Town. It should be used creatively by architects and developers to inform the design of their proposal, while ensuring that the essence of St Helier’s distinct and different urban character is maintained or enhanced.

9. Do you agree or disagree that the design guidance in the St Helier Urban Character Appraisal Review 2021 (UCA) is adopted as supplementary planning guidance?



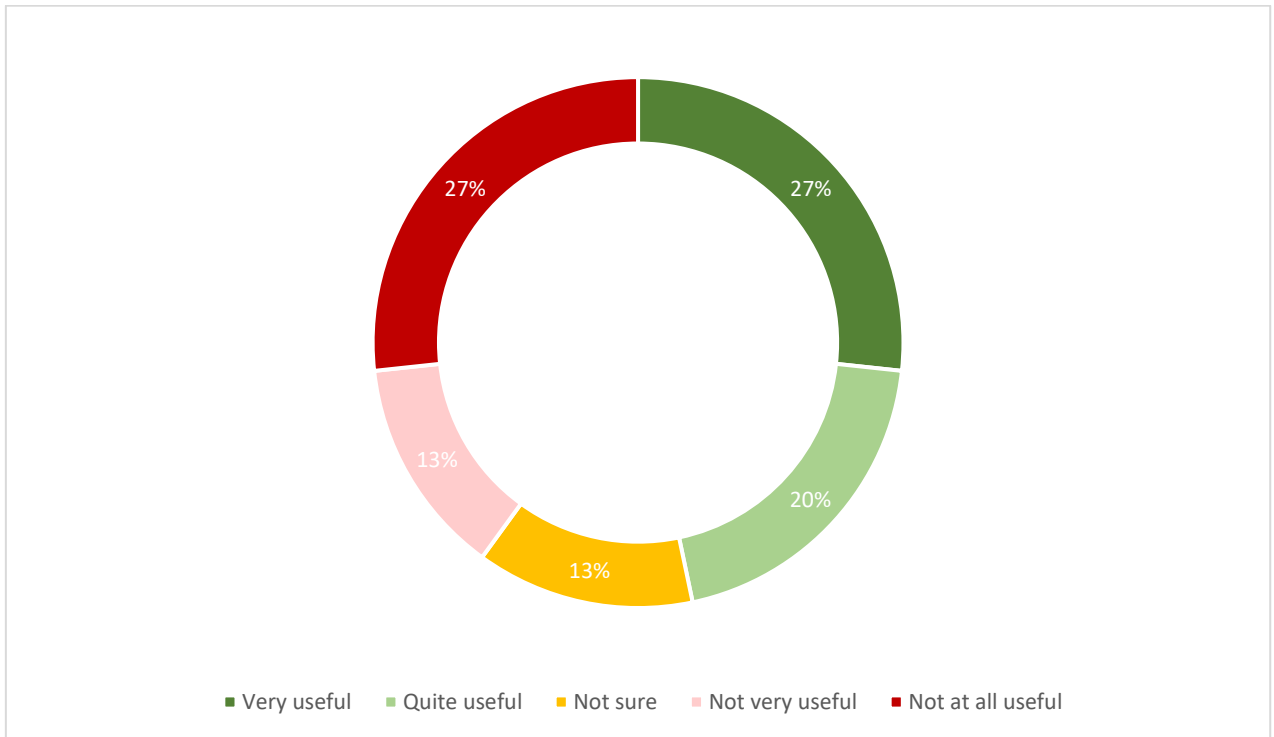
Consultation feedback	Response
As evidenced by recent decisions there is a clear requirement for this additional protection to the public realm.	Noted.
The UCA is very useful in reinforcing Jersey unique character and highlighting environmental concerns. It was a surprisingly good read and has given me a positive view of the direction of Jersey's urban planning.	Noted.
SHUCA as further SPG The gov.je page launching the consultation on the Design SPG notes that the Minister for the Environment proposes to adopt as further SPG the design guidance from SHUCA set out on pages 77-140. We welcome this approach but we regret that a number of substantial developments have been approved prior to the preparation of the SHUCA but before its adoption as SPG which were at clear variance to the character area guidance set out in the SHUCA. We fear that such breaches of SHUCA recommendations may be used as precedents to justify unsuitable future developments.	Noted.
"The restriction of development to small plot sizes and heights" (p157) in town centre core and north from 2005 is clearly a mistake given the severity of our housing crisis and should be reversed.	Noted. There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives. The development of new, more dense forms of residential

Consultation feedback	Response
	<p>development needs to be considered relative to the context and character of each site.</p> <p>Sometimes policies can appear to pull in different directions, whereby satisfying one policy creates a tension with another. This is not a fault with the plan, but simply a product of a sophisticated development plan, which seeks to control and influence a wide range of different aspects of proposed development, in the interests of the principles of sustainable development.</p>
<p>Though for the review conclude "Finding the best way to accommodate growth and its associated housing provision is a significant challenge" seems somewhat a statement of the obvious - surely the point of the consultation was to provide positive options not to say it will be difficult. (Though typical of the expensive consultations the island seems to love!)</p>	<p>Noted. See above.</p> <p>The UCA explicitly sets and considers the development dilemma. The resultant guidance seeks to enable the delivery of development whilst seeking to protect and enhance the character of town.</p>

10. Section 6.1 of the draft guidance is about the need to assess the impact of denser forms of housing development on the character of the local area.

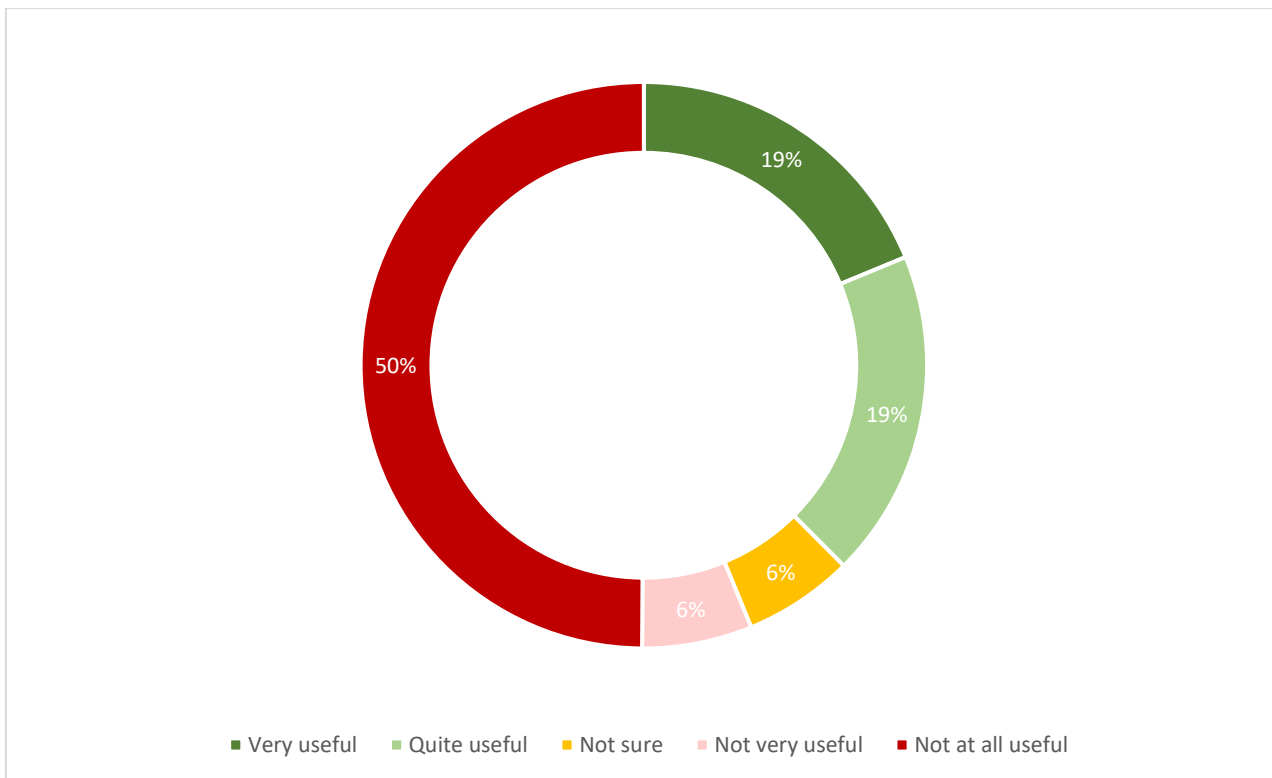
It is proposed that the design guidance in the [Jersey Integrated Landscape and Seascape Character Assessment \(ILSCA\)](#) might help inform the assessment of development proposals on the character of local centres and smaller settlements.

How useful do you think the ILSCA design guidance might be as a tool to inform decision-making in local centres and smaller settlements?



11. Section 6.1 of the draft guidance describes those circumstances where it might be acceptable for development to be below the minimum density to safeguard the character of the local area, where lower density is characteristic.

How useful do you think this section is?



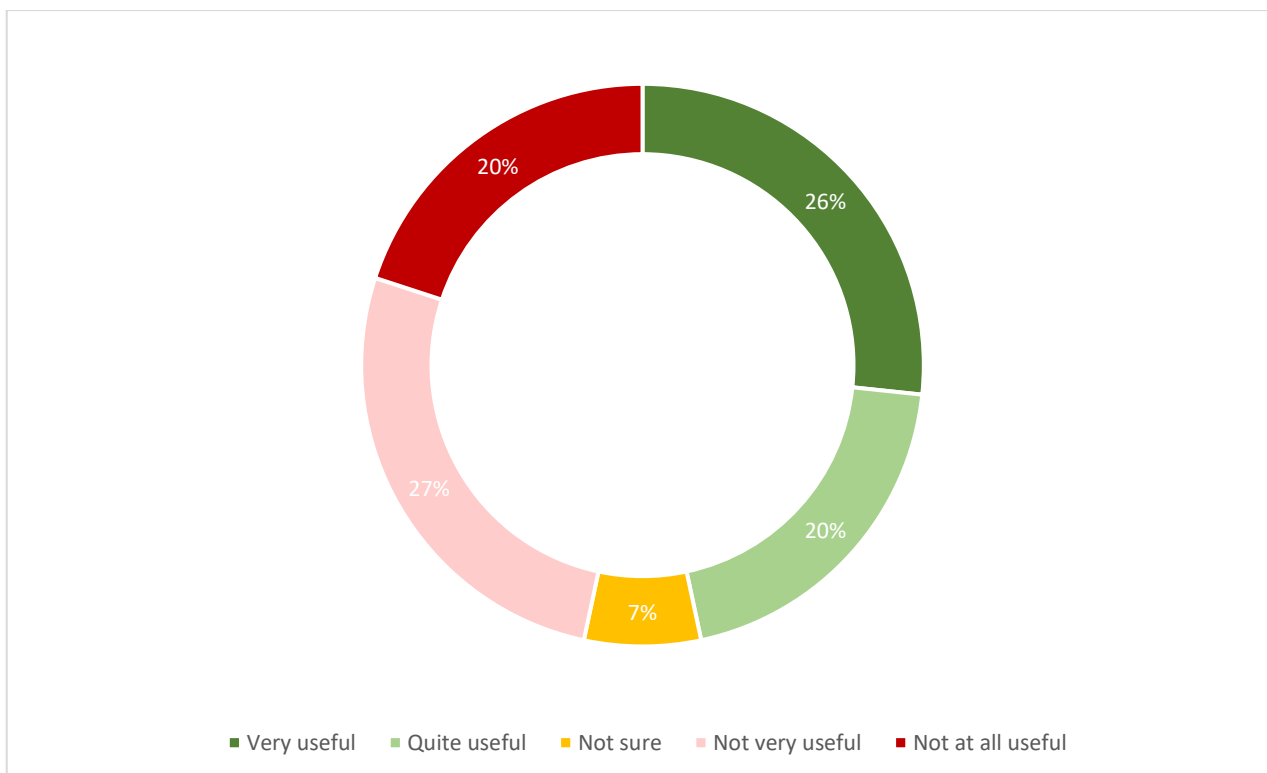
Consultation feedback	Response
<p>This a critical section needs to be much stronger, currently very weak and unclear. Lacks definition</p>	<p>Noted. The guidance makes reference to supporting material – such as the <a href="#">St Helier Urban Character Appraisal Review 2021</a> and the <a href="#">Jersey Integrated Landscape and Seascape Character Assessment (ILSCA)</a> - that might be used to assess how development relates to and impacts upon the local character of a site.</p> <p>It also provides examples of those exceptional circumstances where the density of development below minimum standards might be acceptable. Examples might be where it is essential to safeguard the special interest and character of the area such as development in a conservation area or other parts of the built-up area, where lower density development, smaller -scale or traditional building forms is characteristic.</p>
<p>Character is of lesser value than the benefits brought by higher density development - both in additional housing units brought to market but also the lower energy, water and car usage associated with higher density development.</p>	<p>Noted. There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives. The development of new, more dense forms of residential</p>

Consultation feedback	Response
	<p>development needs to be considered relative to the context and character of each site.</p> <p>Sometimes policies can appear to pull in different directions, whereby satisfying one policy creates a tension with another. This is not a fault with the plan, but simply a product of a sophisticated development plan, which seeks to control and influence a wide range of different aspects of proposed development, in the interests of the principles of sustainable development.</p>
Yes and no, this could restrict making better or full use of a site when something could be done to improve and only slightly change the character of an area	Noted. See above.
If a standard is created this must be met by developers. This is simply a clause so at beauty spots developers can do as they please	<p>Noted. Bridging Island Plan Policy H2 – Housing density, approved by the States Assembly, already provides flexibility such that residential development of five or more homes below the minimum density will only be supported where it is essential to protect the special interest and character of the area.</p> <p>The guidance seeks to provide further information setting out how this will be assessed.</p>
The scheme does not need "get out" clauses.	Noted. See above.
This is totally contradictory	Noted. See above.
<p>A current example is the development of the former Water's Edge Hotel in Bouley Bay, this is another example (after Greve De Lecq) of the near privatisation of a public beach.</p> <p>A higher density on this site could help to boost the local community and ensure services such as Liberty Bus to maintain service to the area.</p>	<p>Noted. The redevelopment of the former Water's Edge Hotel complex and Café Romany at Greve de Lecq have both received planning permission.</p> <p>Public access to the beach is unfettered by either proposal. Minimum density standards are proposed to apply to the development of five or more homes.</p>
<p>The example given (where exceptions to the required density standards might be considered is not very helpful, and does not include situations whereby a denser development might affect the amenity of neighbours. This is, in our experience the main objection raised to any proposal involving an increase in density, although others include increase in traffic, noise during construction, etc.</p> <p>The example given of the exception includes the note that such an example might include situations where "lower density development, smaller-scale or traditional building forms is characteristic." This includes areas within the Built-Up area.</p> <p>This wording would seem to immediately give ammunition to objectors arguing against increased density of development in exactly the areas where the Plan hopes to increase density – the Built-up area. This is because one of the caveats notes that reduced density might be appropriate where lower density or smaller scale buildings are characteristic.</p>	<p>Noted. The impact of any development upon the residential amenity of neighbouring property remains a material consideration under the auspices of bridging Island Plan <a href="#">Policy GD1 – Managing the health and wellbeing impact of new development</a>. The guidance, at 6.1, explicitly states that in all cases, the impact of new development upon neighbouring residential amenity will remain an important consideration.</p> <p>There is a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives. The development of new, more dense forms of residential development needs to be considered relative to the context and character of each site.</p>



12. Section 6.2 of the draft guidance describes those circumstances where it might be acceptable for development to be below the minimum density to enable the provision of a particular type of homes, such as houses; or where there is a need for a specific type of lower density accommodation, such as sheltered housing.

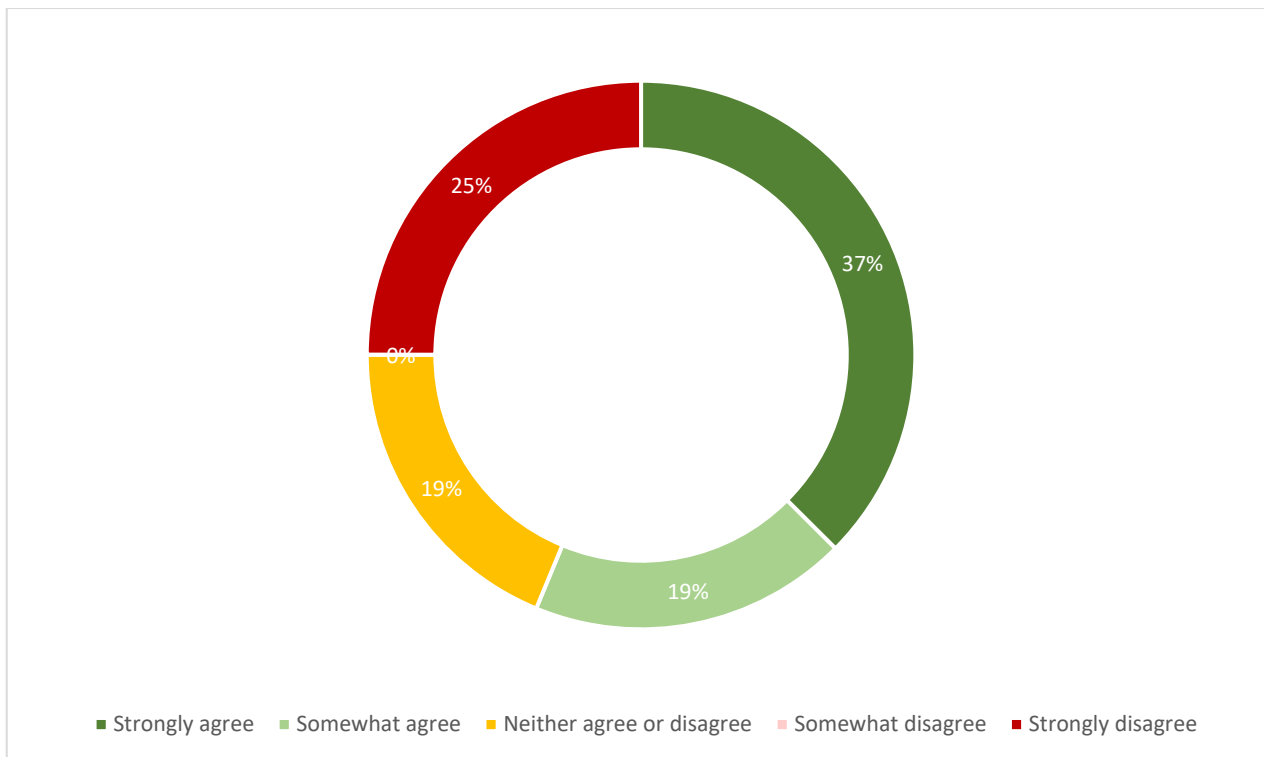
How useful do you think this section is?



Consultation feedback	Response
This a critical section needs to be much stronger, currently very weak and unclear.	Noted. The guidance provides examples of those exceptional circumstances where this provision may apply. This includes where there is an overriding need to provide a particular type of residential scheme to meet a specific housing need, such as the provision of a greater proportion of houses or sheltered accommodation.
Why set minimum densities then allow exceptions? I might be able to accept these exceptions if these were government only exceptions as private developers will attempt to use these exceptions as there would potentially be higher returns	Noted. The bridging Island Plan Policy H2 – Housing density, approved by the States Assembly, already provides flexibility such that residential development of five or more homes below the minimum density will only be supported where there is an overriding justification to provide a particular mix and type of homes. The guidance seeks to provide further information setting out how this will be assessed.
This is a sensible provision.	Noted. See above.

13. Section 6.5 of the draft guidance introduces a new interim policy which manages the size of new homes in the built-up area.

Please state whether you agree or disagree with the introduction of an interim policy to better manage the size of new homes in the built-up area.

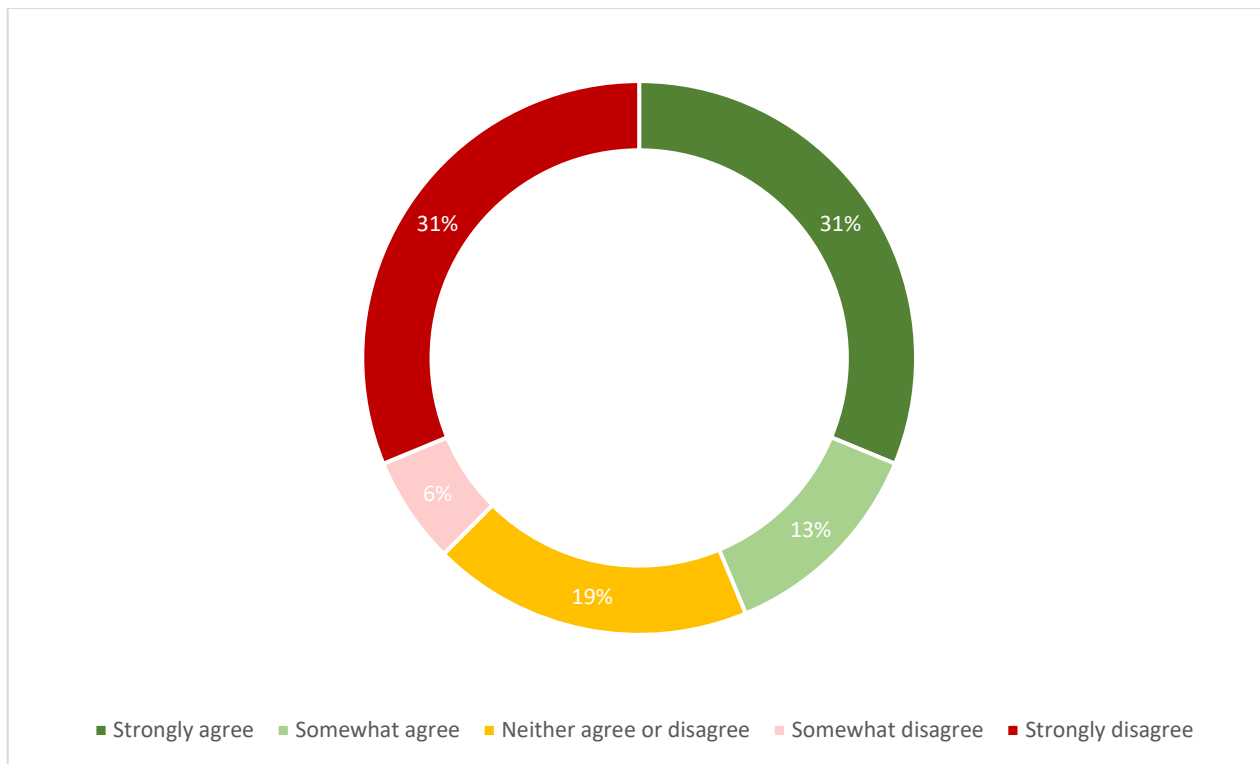


Consultation feedback	Response
<p>The inclusion of prohibitions on larger homes (whether new builds or conversions or extensions) is to be welcomed &amp; should be made permanent. The level of the prohibition 279 sq m or 3,000 sq ft as proposed would only cover very large houses indeed. It therefore should be reduced, say to begin with being halved. It also should be fixed as a maximum number of habitable rooms, perhaps 8.</p> <p>We also suggest there should be a presumption against development of new private swimming pools, billiard rooms, domestic cinemas etc</p>	<p>Noted. The introduction of this standard will be monitored to determine its impact and effect and reviewed as required.</p> <p>The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time in terms of providing a minimum standard of basic living accommodation.</p> <p>The provision of additional rooms, for purposes other than basic living accommodation, will require additional floor area above the minimum gross internal area specified in the guidance (relative to the number of people capable of occupying the dwelling) to avoid compromising the space and functionality of other parts of the home.</p> <p>Revised residential space standards have been issued for consultation.</p>

Consultation feedback	Response
Yes, this may stop developers only building 4/5 bedroom super homes, when the Island needs more modest properties.	Noted.
This is only sensible in the current population / housing crisis.	Noted.
<p>It states that property 3000sq feet (called luxury homes) are not feasible for most islanders. This will push the Indigenous population of the island into the built up area of st. Helier. Whilst allowing high net worth individuals (HNWI) to come to the island and redevelop in the country side.</p> <p>In the built up area the locals will have restricted access to vehicles and will have to travel to their native beaches via taxi/bus. Whereas the HNWI will have access to private vehicles to do with as they please and cause congestion in the built up area. This is elitism and must be stopped.</p>	<p>Noted. The spatial strategy for the development of the island is set by the bridging Island Plan, and specifically Policy SP2 – Spatial strategy. In essence, this seeks to focus development activity in the island’s built-up areas in a way that is proportionate to the existing scale and character of the island’s hierarchy of settlements. This means that greater levels of development are proposed and enabled in the island’s primary, secondary and local centres, with less development envisaged and enabled in the smaller settlements and the countryside.</p> <p>The Minister for the Environment is reviewing guidance about residential parking standards.</p> <p>The parking requirements for any new development in the revised standards will reflect its accessibility, with maximum and lower minimum standards applying in those parts of the island where greater opportunity exists for travel on foot, by bike and by public transport.</p> <p>Revised residential parking standards have been issued for consultation.</p>

14. It is proposed to limit the number of new large homes in the built-up area, where large homes are defined as those which are bigger than 279 sqm (3,000 sqft) gross internal floorspace.

Do you agree or disagree that 279 sqm (3,000 sqft) gross internal floorspace is an appropriate limit for the better management of large homes in the built-up area?



Consultation feedback	Response
the size of 3,000 st ft. must be reduced to an "average" size house, say 1,250 sq ft..	Noted. The introduction of this standard will be monitored to determine its impact and effect and reviewed as required.
far too large	Noted. See above
This should be reduced significantly	Noted. See above
The 279sqm homes in the built-up area are going to be penthouses, when considering the minimum density requirements, so would not be easily achievable or the majority of dwellings. Also developers and architects are clever people and making a 278sqm penthouse wouldn't be difficult if they choose to.	Noted. See above
There are already too many 'palaces' in Jersey, and with the additional problem of tree felling they are often visually intrusive in the landscape.	Noted.
Homes should be for the many, not the super rich. We have had far too many mansions and big houses built in Jersey that are not accessible to locals.	Noted.

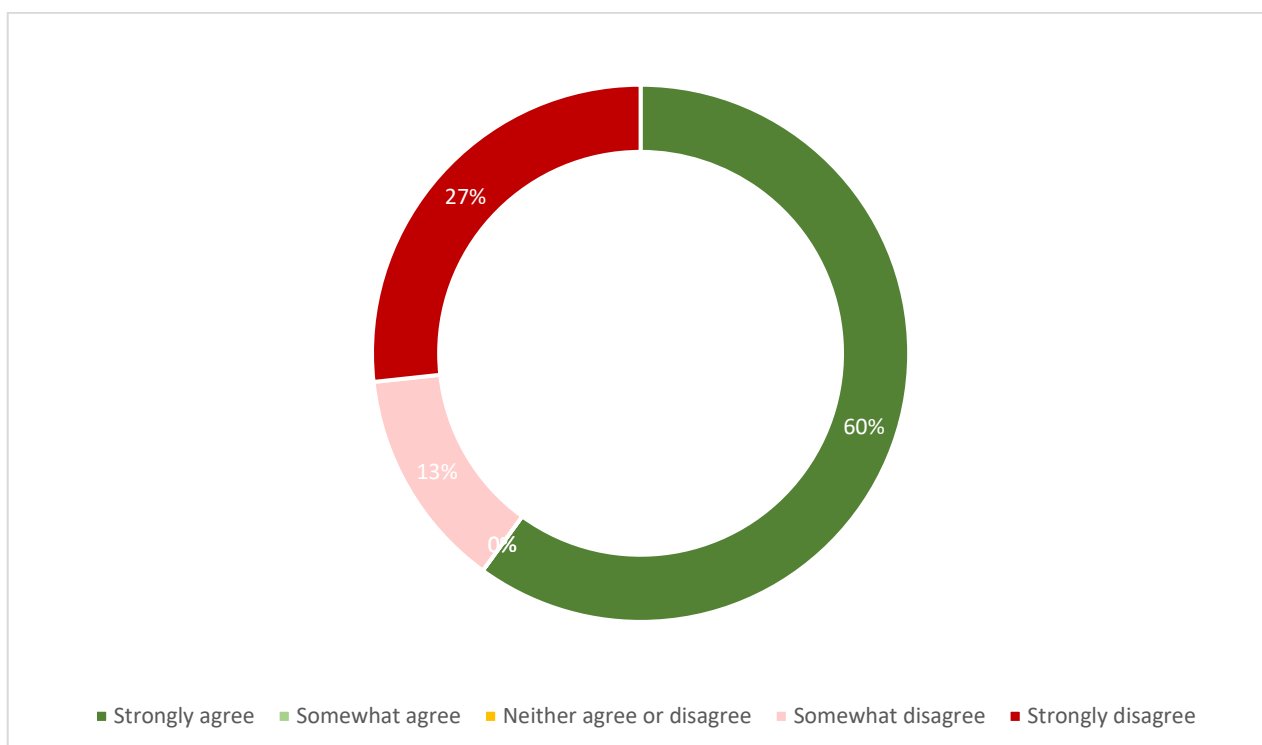
Consultation feedback	Response
We have no comment regarding the discouragement of large houses, other than this may make more materials and labour available to create smaller and more affordable units.	Noted.
Why are we targeting the wealthy when it is the influx of 10,000 people or more that have caused the housing crisis, not 25 rich people a year who pay for everything themselves. Your priorities are all wrong.	Noted. The purpose of the proposed standard is to better manage the size of new homes to ensure that they remain accessible to more islanders; and that they better meet local housing needs.
A 3 level building including a basement each of 1001sqft, would be much less intrusive than a single story of 3003 - so the limits need to be considered differently	Noted. The purpose of the proposed standard is to better manage the size of new homes to ensure that they remain accessible to more islanders; and that they better meet local housing needs.  Issues of design and the efficient use of land will material considerations in any event.
This will squeeze the other 99% of islanders into the built up area whilst providing the elite with the ability to travel to town in a car and cause congestion/greenhouse gases	Noted. The spatial strategy for the development of the island is set by the bridging Island Plan, and specifically Policy SP2 – Spatial strategy. In essence, this seeks to focus development activity in the island’s built-up areas in a way that is proportionate to the existing scale and character of the island’s hierarchy of settlements. This means that greater levels of development are proposed and enabled in the island’s primary, secondary and local centres, with less development envisaged and enabled in the smaller settlements and the countryside.
proposed Policy H2A contains no such exceptions criteria. What might be the situation, for example, if an existing dwelling in the Built-Up Area, already over 3,000 sq ft wants to add an extension? What happens is a house of 2,800 sq ft wants to add a 500 sq ft extension?	Noted. The purpose of the proposed standard is to better manage the size of new homes to ensure that they remain accessible to more islanders; and that they better meet local housing needs.  In the case of the extension of existing homes, it is considered reasonable to permit the improvement of an existing dwelling through its extension where that might result in the creation of a dwelling in excess of 279 sq m. The design and scale of any extension should, however, remain subservient to the existing dwelling and not disproportionately increase its size, in terms of gross floorspace, building footprint or visual impact.  In order to avoid the cumulative enlargement of existing dwellings a site’s planning history will be a material consideration.  The acceptability of an extension to a dwelling will be determined by its scale, design and impact on local character. Any extension of floorspace will need to ensure the availability of the minimum requirement for open space relative to the potential occupation of the extended home.  Each case should be assessed on its merits and regard given to the sensitivity of the site, relative to the capacity of the character area to accept change.

Consultation feedback	Response
	<p>POTENTIAL CHANGE:</p> <p>In order to provide clarity explicit reference to the treatment of extensions, resulting in the creation of a dwelling in excess of 279 sq m, should be added to the guidance.</p>
<p>There are no considerations for exceptions relating to architectural excellence, nor classleading approaches to sustainability / energy - both of which are worthy objectives of other BIP policies.</p> <p>There is also no acknowledgement that within the Built-Up Area there are often limitations on infrastructure (vehicular access, drainage etc) that would moderate the capacity of a site, and could often indicate that a single dwelling, potentially over 3,000 sq ft, is actually the best use of a site.</p>	<p>Noted. The bridging Island Plan seeks to ensure the delivery of design quality and to further reduce carbon emissions in new developments as a matter of course. Achieving excellence in relation to these considerations is not considered sufficient justification to warrant exceptional treatment that would permit the creation of new homes in excess of 279 sq m.</p> <p>Any departure from the proposed maximum standard of 279 sq m gross internal floorspace will require exceptional justification. Any such case will be assessed on its merits and determined accordingly.</p>
<p>There are no considerations in relation to the established character of an area, which is an issue in many other policies of the BIP, particularly in relation to the obvious desire for locally-relevant development and Placemaking objectives. For example, many areas of Jersey are characterised by large houses in their own grounds, including within the BuiltUp Area. In parts of St Brelade, such as Les Ruisseaux and the Park Estate, for example, the established and valued character would be considerably altered if the Policy H2A was adopted in its current form.</p> <p>Both Les Ruisseaux and Park Estate are also in the Green Backdrop Zone, where there is a presumption against detached buildings, or other forms of new development, except in limited circumstances – this seems to pull in the opposite direction of the intention of the proposed Policy H2A to deliver more, and smaller, dwellings to Built-Up Area sites.</p>	<p>Noted. Policy H2 – Housing density of the bridging Island Plan, supported by this supplementary planning guidance, gives emphasis to the fact that a design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.</p> <p>The appropriate density for any individual site will be informed by, amongst other things, the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development.</p> <p>A dwelling of 279 sqm (or 3,000 sqft), is a substantial structure; over double the floor area of a standard four-bed dwelling. Such dwellings are likely to be marketed in the ‘luxury homes’ bracket with a substantial market value.</p> <p>The policy objectives of the green backdrop policy are noted. Sometimes policies can appear to pull in different directions, whereby satisfying one policy creates a tension with another. This is not a fault with the plan, but simply a product of a sophisticated development plan, which seeks to control and influence a wide range of different aspects of proposed development, in the interests of the principles of sustainable development.</p>
<p>Replacing large homes with smaller units to maximise densities?</p>	<p>Noted. The objective of the introduction of this standard is to make the best use of valuable urban land and to deliver homes which better meet housing needs.</p>

15. Denser (and especially taller) development requires more management, for issues such as maintenance (lifts, landscaping, security and safety systems) and cleaning (communal areas and windows).

It is proposed to require that developers demonstrate how the management of new development that is over 150 dph will be sustained into the future (see section 6.4 Managing superdensity).

Do you agree or disagree that applicants should be required to demonstrate the sustainable long-term future management of development at or above 150 dph?

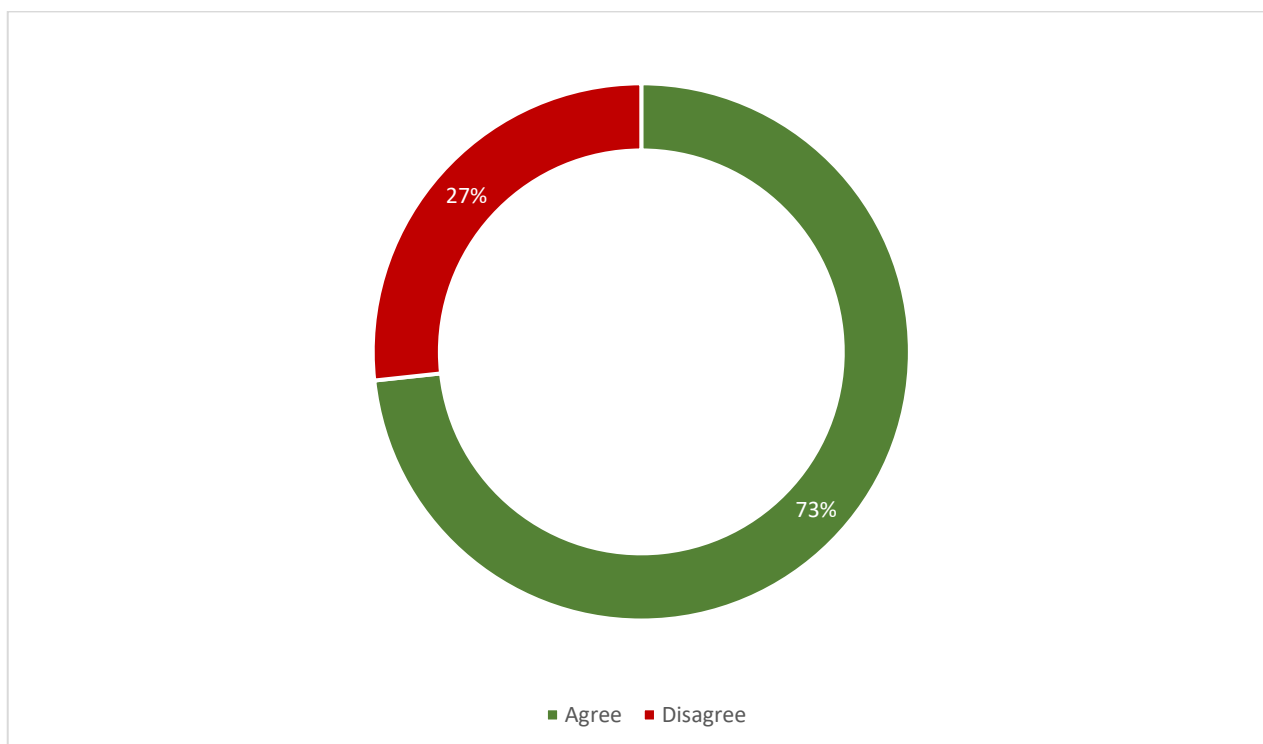


Consultation feedback	Response
The cost of maintenance payments are horrendous when buying a flat. They can range from £2,500 to anything up to £4,500 per annum. This is not affordable housing, especially when most of the management companies do not reside in Jersey. It is nothing but another scam.	Noted.
In addition, there should be provision for reporting and monitoring the management of such developments by the Housing Department (or other suitable department).	Noted. The guidance makes clear that details of long-term management are set out at the planning stage, and that this includes a mechanism which enables residents to discuss management and changes to procedures.
It's not satisfactory for the developer to do the build and walk away from any problems arising which need maintenance and management - so a correct policy needs to be in place ; possibly a fund contributed to by all residents (or owners) of the units should be independently managed by an appointed agent (possibly the states).	Noted. See above.

Consultation feedback	Response
<p>Though I agree with this requirement of management it is also a double edge sword, there is a need for the properties to be maintained but residents need to have control over who is involved in managing the maintenance. If the developer is responsible for setting up a management company then some form of protection needs to be in place should that company go out of business and also protect residence from being held to ransom by these companies.</p> <p>There is the mention of "freeholders", this would suggest that larger developments are being built as share-transfers or leasehold rather than flying freehold.</p>	<p>Noted. See above.</p>



16. Do you agree or disagree that the development of very tall residential towers and/or hyperdense development – at over 350 dph – will not generally be supported.

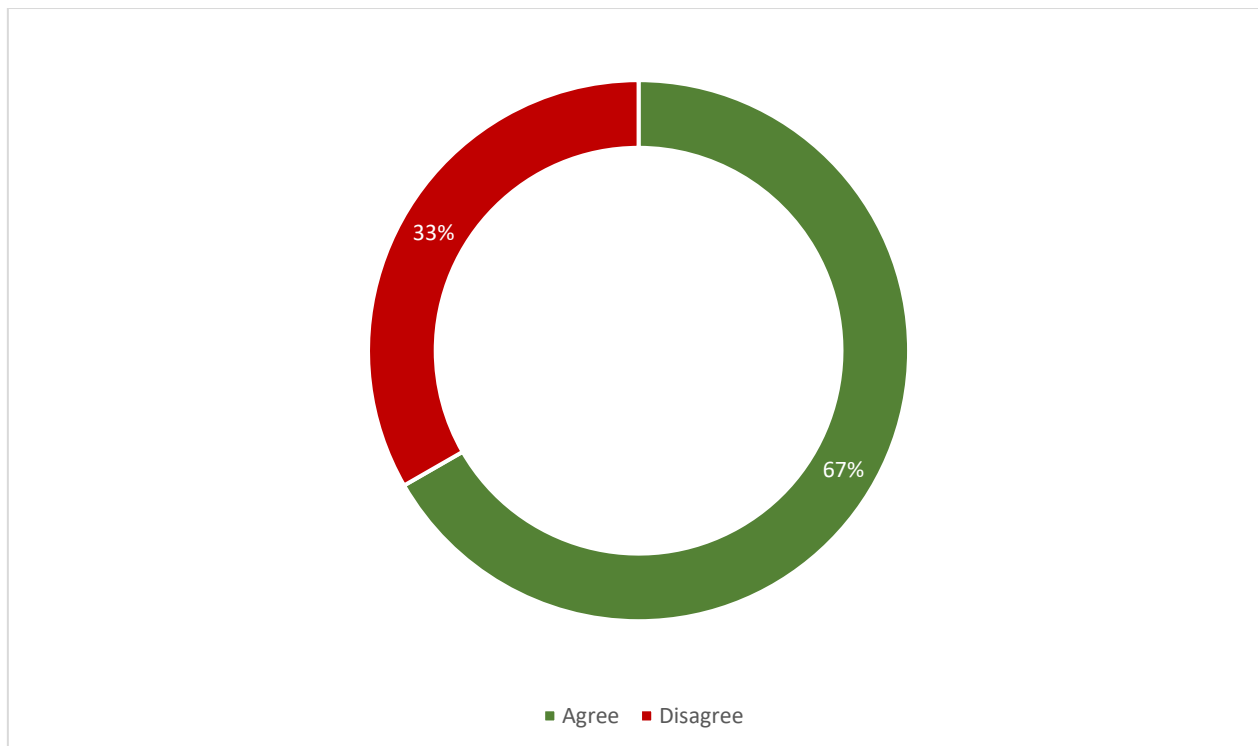


Consultation feedback	Response
Jersey is a desirable place to live and work, we should accommodate those who wish to do so. Moreover "hyperdense" development will have the potential to significantly impact our housing crisis and lessening the need for greenfield development.	Noted. This bridging Island Plan policy framework and this guidance seeks to ensure that the new homes that are required to meet the island's housing needs can be delivered in a way which ensures optimum efficiency in the use of land.  There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives.  At densities at over 350 dph, even with the best practice approach, evidence suggests that it is very difficult to create the conditions that allow the creation of good, sustainable places to live.
I would go further and say MUST NOT BE developed.	Noted.
We have had enough of over development on the island, which is exactly what this is proposing.	Noted.
Inappropriate for Jersey.	Noted. (this comment is taken to imply that hyperdense development is inappropriate for Jersey)
6.4 Managing superdensity The Density SPG states that "superdensity" is defined as 150 dph (around 450 hrh). Although the source is not stated, we believe that this is taken from the report Superdensity: the Sequel report (2015) (the "Superdensity Report") referred to in the BIP2 .	Noted.

Consultation feedback	Response
<p>This report also defines “hyperdensity” as development over 350 dph.</p> <p>It is interesting to note that two of the schemes referred to in the SHUCA exceeded this hyperdense limit. The Superdensity Report deals with housing in London and quotes examples of superdense developments in boroughs in London with density levels similar to those referred to in the SHUCA. These include Southwark (225 dph), Lambeth (240 dph) and Tower Hamlets (261 dph).</p> <p>We find it somewhat alarming to think of developments in St Helier having greater densities than inner city areas of London. We welcome the comment that “very dense and taller developments will only be justifiable in appropriate circumstances in some locations”. We would hope that consideration of such locations will be guided by the SHUCA character area analysis (set out in paragraph 6.1) and will only be permitted in areas which have low or medium-low sensitivity to accommodate new, denser and potentially taller forms of development.</p>	
<p>The parameters that are set out, in section 6.4, which will be used to determine whether very dense and taller development in St Helier will be justifiable needs defining. All areas in St Helier are considered highly sensitive.</p>	<p>Noted. The issue of tall buildings in St Helier has already been considered as part of the recent island plan review, and the policy framework for such is provided by bridging Island Plan <a href="#">Policy GD7 – Tall buildings</a>, which has been approved, as amended, by the States Assembly. This sets out clear parameters for the assessment of tall buildings, as follows:</p> <ol style="list-style-type: none"> <li>1. it is well-located and relates well to the form, proportion, composition, scale and character of surrounding buildings and its height is appropriate to the townscape character of the area. In Town this should be considered relative to the St Helier Urban Character Appraisal (2021) building height guidance;</li> <li>2. it does not unacceptably harm longer views and context at street level;</li> <li>3. it incorporates the highest standards of architecture and materials;</li> <li>4. it has ground floor activities that provide a positive relationship to the surrounding streets, and public realm;</li> <li>5. it does not adversely affect the locality in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, privacy and amenity of surrounding buildings;</li> <li>6. it contributes to improving the permeability of the site and wider area; and</li> <li>7. its height can be fully justified in a design statement.</li> </ol>

17. It is proposed to require the provision of a schedule of accommodation for all residential development leading to the creation of a new home.

Do you agree or disagree that applicants should be required to provide a schedule of accommodation where they are proposing to create a new home?

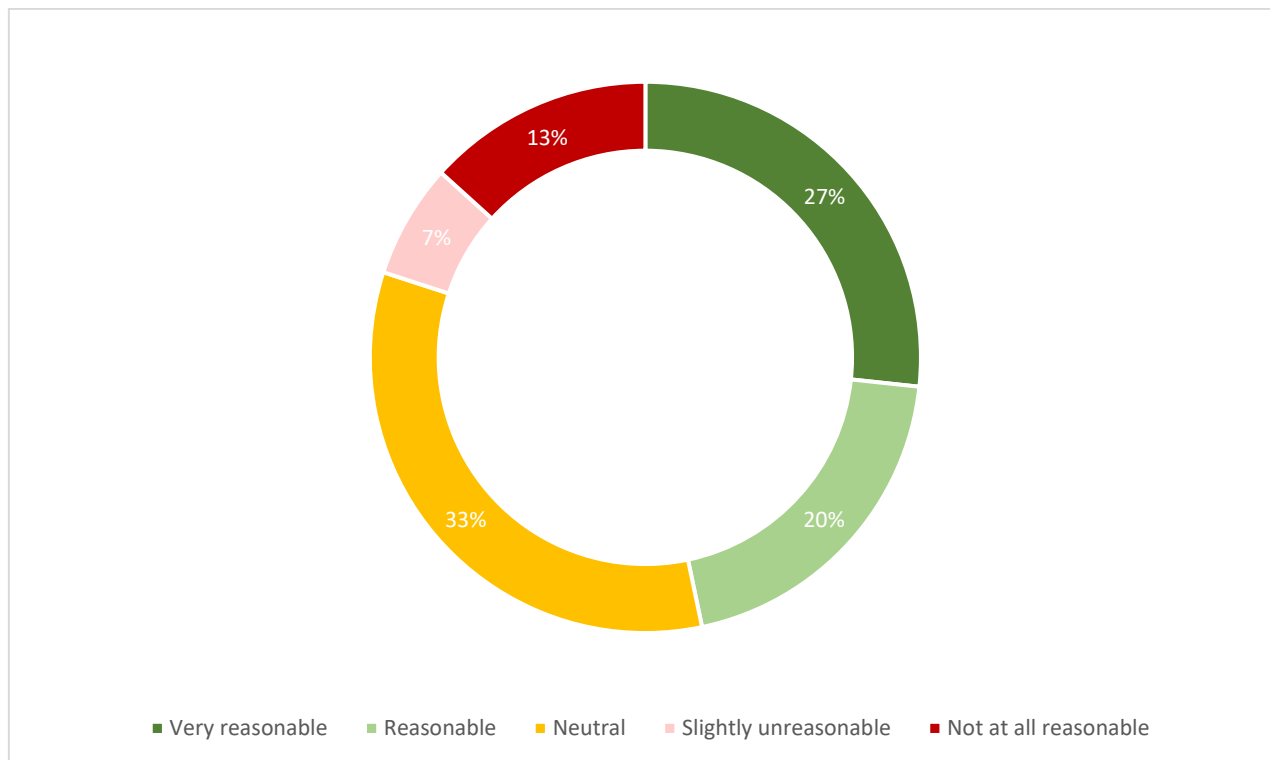


Consultation feedback	Response
Vital for future planning.	Noted.
A schedule for other aspects of the build should be included too. Energy management (provision of solar, heat pumps, insulation, heating method etc) as well as vehicular provision (too many cars are parked on roads and "white vans" are everywhere)	Noted. Under the auspices of bridging Island Plan <a href="#">Policy ME1 – 20% reduction in target energy rate for new development</a> , a reduction in target energy rate will be secured by planning condition and will be tested for compliance at the point of the building bye-laws application being made. The accommodation schedule at appendix 2 of the guidance requires information about the provision of all forms of parking provision.
On less fundamental matters, the proposed Density SPG also requires (at Appendix 2) that applications are accompanied by a "Schedule of Accommodation" which requires, amongst other factors, a breakdown of single and double bedrooms, living space, internal / external storage space, and vehicle / cycle parking. These elements align with SPG Policy Note 3 and Note 6, both of which are out-dated and cumbersome, with large elements of their content having very limited relevance to current development control decisions. Indeed, in a recent Appeal Report (with a recommendation endorsed by the Minister	Noted. Such data is required for the purposes of monitoring and review. The Minister for the Environment is reviewing guidance about residential space and parking standards. These have been issued for consultation.

Consultation feedback	Response
in MD-ENV-2022-704) the Inspector described SPG Note 3 as “woefully out of date”. It therefore must be questioned why the information set out in Appendix 2 is needed, and what is the purpose of gathering such data, given that there is limited relevance to present planning requirements.	

18. Appendix 2 of the draft guidance sets out the information to be provided by applicants for development involving the creation of a new home or more.

How reasonable to you consider the requirement to provide this level of information?



Consultation feedback	Response
Seems very reasonable..	Noted.
most information requested will be known and simple to provide. However, requirements relating to vehicular parking will further encourage car dependency which is bad for air quality, mobility and the climate.	Noted. The provision of information about parking provision includes both that for cycle, and car parking, together with motorcycle parking provision, where relevant. Information will also be required in relation to the provision of electric vehicle charge points.  The provision of such information does not, of itself encourage car dependency, but rather, enables an assessment of provision relative to published standards.  The Minister for the Environment is reviewing guidance about residential parking standards. These have been issued for consultation.
There should be a much higher requirement for sustainable development including carbon and embedded energy statements, cost in use, building design life (minimum standards to be set), and an overall environmental impact statement.	Noted. Under the auspices of bridging Island Plan <a href="#">Policy ME1 – 20% reduction in target energy rate for new development</a> , a reduction in target energy rate will be secured by planning condition and will be tested for compliance at the point of the building bye-laws application being made.

## 19. Would you like to add anything else?

Consultation feedback	Response
<p>Stop the immigration, and you stop the need for more housing..</p>	<p>Noted. Each Island Plan responds to an agreed planning assumption. A long-term planning assumption is used to inform (usually) ten-year requirements for homes, economic development and infrastructure along with other community needs, such as accommodating an ageing population and meeting education and health care requirements.</p> <p>A reasoned and justifiable planning assumption ensures that appropriate provision of land and development opportunities is made in the plan in order that a sustainable balance is struck overall.</p> <p>To inform the next island plan, the bridging Island Plan sets out a strategic proposal to develop a long-term planning assumption.</p> <p>Strategic Proposal 1 - Development of a long-term planning assumption Ministers will work together to develop a long-term planning assumption, with a clear and comprehensive methodology, for the next and future Island Plans, that reflects and responds to:</p> <ul style="list-style-type: none"> <li>• the migration control policy;</li> <li>• the forthcoming population policy;</li> <li>• the findings of the Future Economy Programme; and</li> <li>• the future development of wider relevant policies, including skills</li> </ul>
<p>Where is the population policy to stop the massive influx of people with families coming to live in Jersey? This government is blindly following the previous government failed policies, people want immigration control to stop this type of development, not more high rise high density rabbit hutches.</p>	<p>Noted. See above</p>
<p>The use is limited by the lack of population and other controls, an integrated strategic plan is essential.</p>	<p>Noted. See above</p>
<p>Managing population goes hand in hand with long term strategic economic planning.</p> <p>Without population management and control of development activity the character of the whole built environment is at risk and then by extension the natural environment.</p>	<p>Noted. See above</p>
<p>Nothing has been learnt from the building of high density housing and the social issues it brings. The UK is rife with antisocial behaviour from living in these modern day ghetto's. Where is the population policy to stop the massive influx of people with families coming to live in Jersey?</p>	<p>Noted. See above</p>
<p>I would like to finish by saying that the reason we are in this position is because of the failure of Jersey's government to stop immigration coming into the island. It</p>	<p>Noted. See above</p>

Consultation feedback	Response
<p>is now actively encouraging people from Africa and the Caribbean to come and live in Jersey which is adding to our local housing crisis. We do not have housing for locally born people let alone people from across the World.</p> <p>An immigration policy should be the first priority and the only policy that the government should be implementing. This is nothing more than a builder's charter and should not be allowed to happen.</p>	
<p>Without long term strategic planning of the population and economy we run the risk of becoming another Hong Kong.</p> <p>Without controls on development we will destroy what little remains of our urban heritage in the built environment and losing our natural environment to creeping urbanisation.</p>	<p>Noted. See above.</p> <p>For information, density in central Hong Kong ranges from 500-2,000 dph.</p>
<p>Planning seems to be allowing their hand to be forced to find additional areas for house building to fix the root problem - the consensus view being that it is population control that the States needs to address.</p> <p>There is a large number of empty properties in the island, many of which could be put back into use, and buildings suitable for change of use or redevelopment into dwellings. The proposals to increase housing density should be a last resort once other options have been exhausted. Continued building is not sustainable.</p>	<p>Noted. See above.</p> <p>The Minister for Housing and Communities is taking action to bring vacant homes back into use: see <a href="http://www.gov.je/EmptyHomesService">Empty Homes Service (gov.je)</a>.</p>
<p>I really have to wonder why the current government is proposing denser accommodation in St Helier. Instead of packing us into tins like sardines, why not just implement a robust population and immigration policy that would provide locals actually liveable and viable housing?</p>	<p>Noted. See above.</p>
<p>We have declared a climate emergency and trying to reduce the dependence on cars. Allowing the rich to build/redevelop outside of the built up area with multiple parking spaces will cause a negative effect on the climate. The rich will travel to town and cause emission fumes for those that can not afford to live In The country, whereas the average islander has to live in the built up area with a property to car park space ratio of 0.4. Allow andium to build/redevelop in the country.</p>	<p>Noted. The Minister for the Environment is reviewing guidance about residential parking standards.</p> <p>Ease of access to and choice about how we might get to the places that we need to go differs across the island. Accessibility is influenced by a range of factors such as what the journey is for; how far we need to travel; the availability of safe walking and cycling routes; the proximity of bus routes, stops and the frequency and extent of the bus service; access to a car and the availability of parking at either end of a journey.</p> <p>Variation in accessibility of development related to the availability of and opportunities for public transport and active travel (walking and cycling) provides a basis to establish a policy framework for the development of parking standards that differ across the island. The extent to which on-street parking provision is controlled is also a factor.</p> <p>The parking requirements for any new development in the revised standards will reflect its accessibility, with maximum and lower minimum standards applying in those</p>

Consultation feedback	Response
	<p>parts of the island where greater opportunity exists for travel on foot, by bike and by public transport.</p> <p>Revised residential parking standards have been issued for consultation.</p>
<p>Generally there needs to more, and more radical, moves away from car culture, so if Les Quennevais is to be redeveloped, car parking should be reduced and/or underground car parks built, as is done in Germany, with more homes built where before there were above ground car parks, providing a partial solution to the housing crisis.</p>	<p>Noted. See above.</p>
<p>Car parking provision Paragraph 5 of the Density SPG seeks to set car parking provision for each of the three types of accommodation, with "mostly flats" receiving a "low" parking provision. We are not sure what this means, or how it is in accordance with BIP Policy TT4: Provision of off-street parking. Policy TT4 states that "development that has the potential to generate vehicular movements and a requirement for car and other forms of parking will be supported only where it provides an appropriate level of accessible, secure and convenient off-street motor vehicle parking, that is well-integrated with the development, and which accords with adopted parking standards in terms of number, type, quality, security and accessibility..." We do not understand why residents in flats are deemed to have such a materially lower requirement for access to parking spaces than in other forms of dwelling. Furthermore, to the best of our knowledge the "adopted parking standards" are as set out in SPG Policy Note 3: Parking Guidelines ("PN 3"), which was issued in September 1998, which clearly need to be updated.<sup>3</sup></p>	<p>Noted. See above.</p>
<p>Exclude vehicular parking as Jersey already has too many cars and should reorient transportation to alternative modes.</p>	<p>Noted. See above.</p>
<p>I think it is very important to increase the minimum size requirements of habitual rooms as the density grows, especially to the shared habitual room called a living room. A 1-bedroom flat should have space for a sofa, plus a dining space for 6 people, 2 bed should have a dining space for 8 people and a 3 bedroom should have a large space again for children to play or carry out schoolwork.</p>	<p>Noted. The Minister for the Environment is reviewing guidance about minimum space standards for residential development. These revised standards will ensure that they are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.</p> <p>Revised residential space standards have been issued for consultation.</p>
<p>Permitting denser development is good but should also entail allowing for smaller homes ~10-20m<sup>2</sup> which are of particular utility to young and lower income people who are willing to trade floor space for a more central location</p>	<p>Noted. See above.</p>
<p>It is widely acknowledged that the island needs additional housing and that it needs it quickly. If this is to be addressed, the substantial risks faced by any developer need to be minimised. Moreover, clear parameters for development also enable interested parties such as</p>	<p>Noted. See above.</p>



Consultation feedback	Response
<p>neighbours to understand what sort of development is likely to be acceptable, and what is not, reducing anxiety, appeals and timescales.</p> <p>Regrettably Andium Homes' view is that this SPG, in its current form, and without other guidance on issues such as internal and external space standards and car parking, adds to the documents which need to be considered but does not yet provide the clarity or the certainty needed.</p>	
<p>We would request that the other anticipated SPGs on residential development be published as soon as possible, as on its own, guidance on density does not significantly assist developers in designing new schemes.</p>	<p>Noted. See above.</p>
<p>Page iii of the Density SPG sets out a brief description of SPG and includes a link to the gov.je website which summarizes current SPG. It should be noted that the link to "view the list of supplementary planning guidance" is to a page which could not be found.</p> <p>Of the Masterplans and frameworks listed, the development brief for Jersey Gas Site could also not be found: if this has been withdrawn it should be removed from the list. The Revised North of Town Masterplan issued in June 2011 is still shown but the developments which have taken place in this area, or are currently proposed, bear so little connection to this Masterplan that it too should be withdrawn.</p> <p>Of the 24 supplementary planning advice notes and supplementary planning policy notes, 8 predate the 2011 Island Plan. We would suggest that these are reviewed and obsolete material removed before issuing the Draft SPG, for the reason that having obsolete material showing as current debases the value of current SPG. In particular, SPG Policy Note 6: A Minimum Specification for New Housing Developments ("PN 6") sets out density guidelines which are not consistent with the Density SPG and we believe that this should be amended and reissued concurrently with the finalization of the Draft SPG.1</p>	<p>Noted. See above.</p> <p>Technical issues associated with the access to material on gov.je should be reported via the feedback tool on each page of the site.</p> <p>The essence of much SPG, even where it runs across successive island plan periods, remains valid.</p> <p>The Minister for the Environment will, however, review existing guidance relative to the new provisions of the BIP and the requirement to develop new guidance.</p> <p>A prioritised programme of work is published in Ministerial Plans (see: <a href="https://www.gov.je/SiteCollectionDocuments/Government%20and%20administration/R%20Proposed%20Ministerial%20Plans%202023.pdf">https://www.gov.je/SiteCollectionDocuments/Government and administration/R Proposed Ministerial Plans 2023.pdf</a>).</p>
<p>I would like to make a number of comments and observations on the Draft Supplementary Guidance ~ Density:-</p> <ol style="list-style-type: none"> <li>1. This document has been poorly advertised and is certainly hardly known about by residents on the Quennevais area. Why is the discussion period allowed not set at 12 weeks as is more normal.</li> <li>2. After discussion with other residents in the area, we would request an extension to the discussion period, to allow more consideration.</li> </ol>	<p>Noted. The Government of Jersey consultation code of practice states that significant public consultations should normally last for at least eight weeks. The adoption of supplementary planning guidance is not, however, considered to be a significant public consultation on the basis that it is supplementary to an established policy framework (the bridging Island Plan) which has already been through extensive public consultation and scrutiny. The six-week consultation period is thus considered to be proportionate to the matter under consideration, whilst also responding to the new government's priority, as expressed in the 100 Day Plan, to introduce controls over the development of large homes.</p>

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	<p>Consultation on this draft guidance was published on the government website; issued directly to key stakeholders; and notified to the local media.</p> <p>The consultation remained open for a further two weeks for 'late' comments: none were received.</p>
<p>The Planning and Building (Jersey) Law 2002 enables the Minister to publish guidelines and policies, under Article 6, but what is proposed here is actually an amendment to the Island Plan.</p> <p>New policies are proposed to be introduced, without following the prescribed process. This bypasses the established independent review and critique from Inspectors and side-steps the opportunity for debate and the lodging of Amendments by the elected Members of the States Assembly.</p> <p>It is established planning practice that Supplementary Planning Guidance should provide guidance on the primary policies from the development plan. SPG will be material considerations in the determination of applications, but does not form part of the development plan and cannot introduce new policies. However, this is exactly what both these documents seek to do, as the current Policies H2 and H9 contain no reference to restricting dwellings over 3000 sq ft, neither does any other element of the Island Plan. The SPG's therefore introduce new primary policies, which are not supplementary to anything.</p> <p>The gov.je website is quite clear that "supplementary planning guidance (SPG) provides assistance and information on policy considerations under the Island Plan as well as guidance on how to make planning applications." However, the scope of the current documents is significantly beyond that role.</p> <p>There is the opportunity for the new policies to be properly presented by the Minister as Amendments to the Bridging Island Plan (which is what H2A and H9A are) and to follow the established process for doing so. However, there is no commentary or justification given in either of the documents as to why this has not been progressed.</p> <p>Both documents should therefore be withdrawn and if the Minister wants to progress the adoption of new primary policies (which is what is being sought) then the route for doing so is as Amendments to the Bridging Island Plan.</p>	<p>Noted. It is a matter of law that supplementary planning guidance cannot change Island Plan policy. The substance of the proposed guidance entirely supports and is consistent with the policy direction of the bridging Island Plan, which has been approved by the States Assembly. It is clearly supplementary to it.</p> <p>This guidance does not introduce anything which might be construed as a new direction of policy (which would require Assembly approval as part of an Island Plan Review), and it therefore can be appropriately adopted as SPG.</p>
<p>There is a level of subjectivity afforded to some parts of this guidance which seems poorly considered in parts and with far-reaching implications. Concerns with the drafting of various sections of the SPG, mainly to do with clarification of 'minimum' density is of paramount concern.</p> <p>That there has been a lack of independent review by Planning Inspector, or debate by Government, is</p>	<p>Noted. See above.</p>

Consultation feedback	Response
<p>concerning as fundamental new limits on development have been included in the SPG; limits that have not been suitably debated in relation to the wider impacts these new limits may incur.</p> <p>Also, no time limit has been stated on how long these new limits will be imposed in the SPG. Suggestions in the local Press that the BIP may be extended beyond its intended and lawful lifespan, may result in this SPG having far reaching implications for a significant and extended period of time.</p>	
<p>Proposal 21 looks just at density standards within the Built-Up Area. But what the SPG actually now seeks to do is to introduce entirely new tests.</p>	<p>Noted. The note explicitly states that elements of the guidance complement the planning policy framework established by the bridging Island Plan and responds to the policy objectives of the government, specifically action eight of the 100 Day Plan , which seeks <i>'to introduce limits on the number of houses that can be built over 3,000 sq. ft. for a period of time in order to focus on tackling the housing crisis.'</i></p> <p>SPG may be prepared and issued by the Minister on a discretionary basis. Where any such SPG exists it is required, by law, to be taken into account as a material consideration.</p>
<p>These proposed new policies are absolute in too many regards. As newly incorporated policies they will be given significant weight in decision-making, which will not allow other planning considerations to be properly layered into an assessment, and ensure a balanced outcome is achieved.</p>	<p>Noted. It is important to recognise that the parameters for planning decisions provided in the planning policy framework of the bridging Island Plan, and any supplementary planning guidance issued by the Minister for the Environment, are not absolute. Every development proposal will be different and will need to be considered relative to the merits and circumstances of each particular case.</p> <p>Of course, Island Plan policy, carries considerable weight, as established in law, and supplementary planning guidance – such as minimum density standards – are required to be taken into account by decision-makers.</p> <p>Sometimes policies can appear to pull in different directions, whereby satisfying one policy creates a tension with another. This is not a fault with the plan, but simply a product of a sophisticated development plan, which seeks to control and influence a wide range of different aspects of proposed development, in the interests of the principles of sustainable development.</p>
<p>Houses adjacent to the Sports Centre, playing fields areas adjacent to the Sand Dunes across St Ouens's Bay, housing overlooking the Golf Course and to the south of La Route Orange all have views across parkland and to the sea. Surely these should be designated as part of the Green Backdrop zones as defined in GD6 and GD8.</p>	<p>Noted. The green backdrop zone is a policy designation that is defined in the bridging Island Plan: it cannot be altered by supplementary planning guidance.</p> <p>It comprises those parts of the built-up area that form part of the landscaped escarpment around the east, south and west of the island.</p> <p>This landscaped escarpment is an important feature of parts of the setting for much of St Helier, St Aubin, Gorey and St Brelade's Bay. This landscaped setting is important</p>

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	<p>for the character of these areas, and for the enjoyment of views from the sea, the beach, and along the coast and from within the built environment.. The purpose of the GBZ is to help protect the landscaped escarpment. Its purpose is not to protect the outlook or views enjoyed by home owners.</p> <p>La Moye does not form part of any landscaped escarpment in the built-up area of the island.</p> <p>The landscape to the north and west of La Moye is protected by various planning policies by virtue of designations including the green zone, the protected coastal area and the Coastal National Park.</p>
Parts of La Moye should be designated as GBZ	Noted. See above
That maximum developments should apply generally is shown by what has happened at Keppel Tower Grouville, where the site as approved by Planning is clearly overbuilt or was it that what was approved was then expanded & overbuilt by the developer in line with what he wanted & Planning then turned down?	<p>Noted. The planning history of Keppel Tower is complex. The resultant scheme P/2018/1250: <a href="#">Planning Application Documents (gov.je)</a>, which is presently under construction, will deliver a density of development of 40 dph and 60 hrh. These would meet the proposed adopted minimum standards and would not exceed the proposed maximum threshold.</p>
We need policiess,but currently not well set our for specific areas	<p>Noted. The guidance provides minimum density standards for each of the island's built-up areas. The development of homes outside the built-up area is addressed in SPG <a href="#">Consultation on draft planning guidance for the development of new homes in the countryside (gov.je)</a></p>
urban planning should not concern itself with plot by plot land use, rather broader strokes and infrastructure/amenities	Noted. It is one of the purposes of the Planning and Building (Jersey) Law to impose other necessary controls on the development and use of land in Jersey.
This sways to the elite top 1% who are not native to the island. Most of the comments are likely from people who have migrated to jersey.	Noted. There is no evidence to suggest that responses are from any particular cohort of islanders.