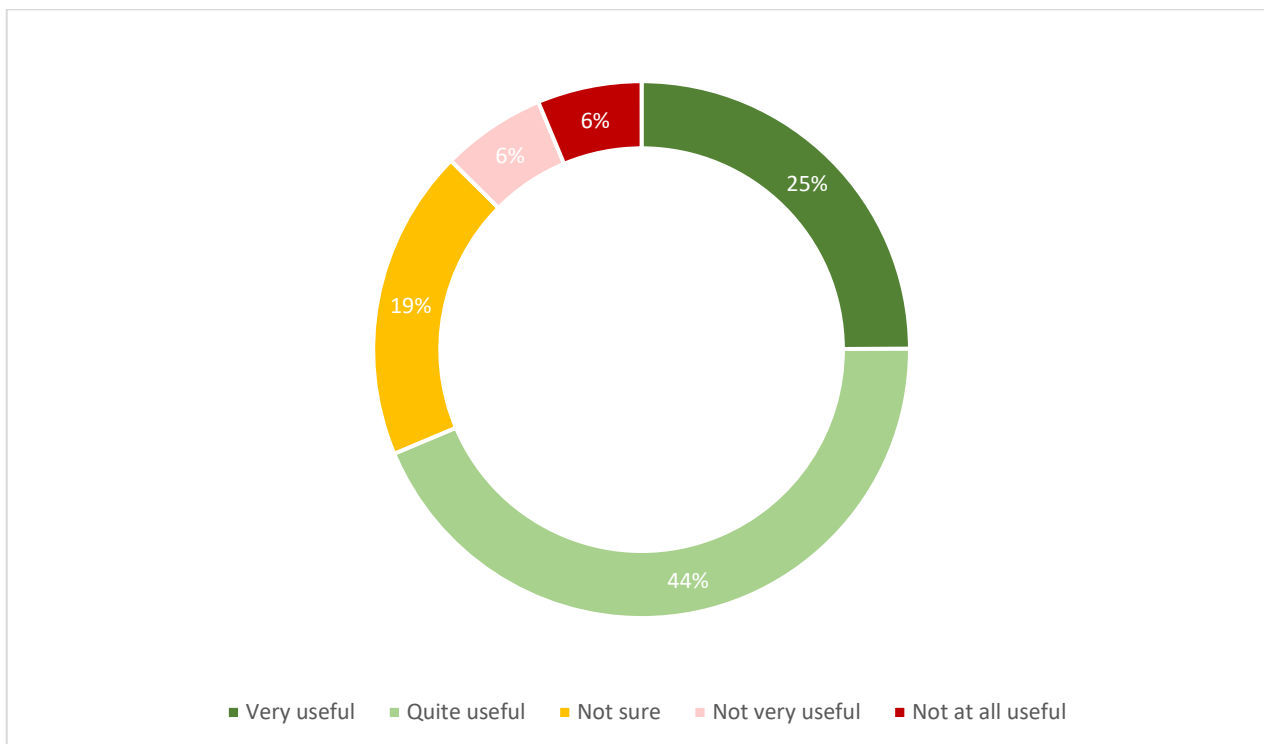


# Housing outside built-up area: post consultation report

## Appendix 2: consultation feedback and response

- Section 3 of the draft guidance explains the words and phrases - such as built-up area, buildings and gross floorspace - which are used throughout the document to explain how planning policy will be used to guide the development of new homes outside the built-up area.

How useful do you think this section is?



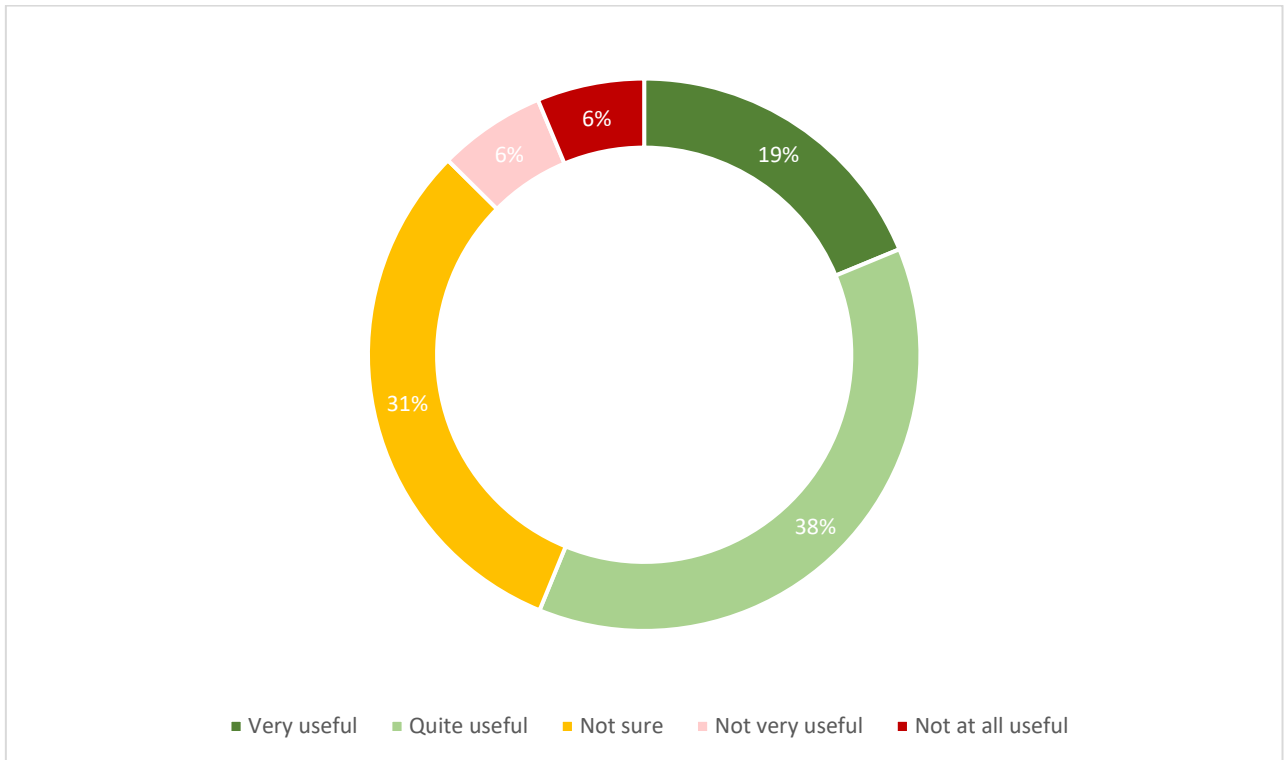
Consultation feedback	Response
The interactive GIS map, in tandem with the used words and phrases, are very useful in understand and contextualising the rest of the document.	Noted.
The information provided in section 3 is informative and the links are useful.	Noted.
While gross floorspace is of interest when looking at what is currently on a site, an allowance should be made for permitted development and any consented development where schemes to redevelop are being considered. To ignore consented development negates the very principles and profession of Planning. It is common practice and appropriate to compare what can be done with a site without further recourse to Planning, with the potential for a site under current planning policies.	Noted. One of the objectives of Policy H9 is to ensure that any extensions remain, individually and cumulatively, subservient to the existing dwelling. This is explicitly stated on the face of the policy.  There is no justification to include floorspace which is not built, or which might be built, in the calculation of existing gross floorspace. To do otherwise may undermine the objective.
Lack of clarity in the measurement of gross floorspace, with various items categorized as 'may be included' in total floor space calculations. This needs full definition to inform design exercises. This is to ensure design developed for planning approval are submitted in full compliance of limits set within the gross floorspace and	Noted. The definition is quite clear that basement areas can be included in the gross floor area calculation, where they meet specified conditions.  It is also clear that open-sided areas covered by a roof can also be included in the calculations.

Consultation feedback	Response
will not be refused simply on subjective interpretation of proposed development areas by the TSO or Planning Officer	The use of 'may be included' in these contexts is considered to be entirely clear.
A description of what constitutes a 'traditional' agricultural building (pre 1960) should also be added.	Noted. Consideration will be given to addition of a definition. <b>POTENTIAL CHANGE:</b> In order to promote clarity the definition of a 'traditional' agricultural building will be added to section 3 of the guidance.
<p>Within the "Buildings" section of the SPG, (page 5) the following is noted. We have added sections of particular interest in bold type. It states that "buildings" to which the policy for potential conversion to new units of accommodation relates –</p> <p><i>"does not include detached ancillary or incidental residential buildings that are in, or were originally designed for, some form of domestic use. It is not the intention of this policy to permit the conversion of detached ancillary or incidental buildings such as home offices, gyms, pool houses or party/games rooms to provide residential accommodation: its intent is to make better use of existing dwellings in the countryside.</i></p> <p><i>"The only circumstances where an ancillary or incidental building might be developed to provide new residential accommodation outside the built-up area under the auspices of this policy is where it is attached to or immediately adjacent to an existing dwelling and is capable of conversion or redevelopment as part of an extension to that dwelling."</i></p> <p>The two paragraphs above appear somewhat contradictory, and this will cause confusion in implementation.</p>	<p>Noted. The two paragraphs are not considered to be contradictory.</p> <p>The guidance clarifies that the only circumstances where detached ancillary or incidental buildings might be used for residential accommodation is where they are encompassed as part of a proposal to extend a dwelling.</p> <p>This is presented as an exception to the general presumption: this is a standard form of presentation.</p>
<p>Why doesn't the policy apply to detached ancillary or incidental buildings?</p> <p>Why can't previous consents constitute development, therefore, used to allow future development.</p> <p>This needs to more flexible, we want to be making best use of our domestic curtilage.</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p> <p>The policy seeks to enable greater flexibility in the creation of new households in the countryside to encourage the better use and occupation of existing dwellings to provide new homes, whether by sub-division or extension. It does not embrace detached ancillary or incidental buildings.</p> <p>One of the objectives of Policy H9 is to ensure that any extensions remain, individually and cumulatively, subservient to the existing dwelling. This is explicitly stated on the face of the policy.</p>

Consultation feedback	Response
	<p>There is no justification to include floorspace which is not built, or which might be built, in the calculation of existing gross floorspace. To do otherwise may undermine the objective.</p> <p>The effect of the policy will be monitored during the plan period to assess the number of new homes delivered by it.</p>
<p>Verandas, basement areas but not garages may be included in the calculation of gross floor area calculation: why?</p>	<p>Noted. The guidance clearly states that attached structures that are incidental to the enjoyment of the dwelling, such as garages, are excluded when calculating total gross floor area where it is clear that they are unlikely to be incorporated into the habitable space of the dwelling.</p>

2. Section 4 of the draft guidance is about the need to assess the impact of new housing development on the character of coast and countryside. It is proposed that the [Integrated Landscape and Seascape Character Assessment](#) (ILSCA) is adopted, as supplementary planning guidance, to help guide the assessment of development proposals on the local character of an area.

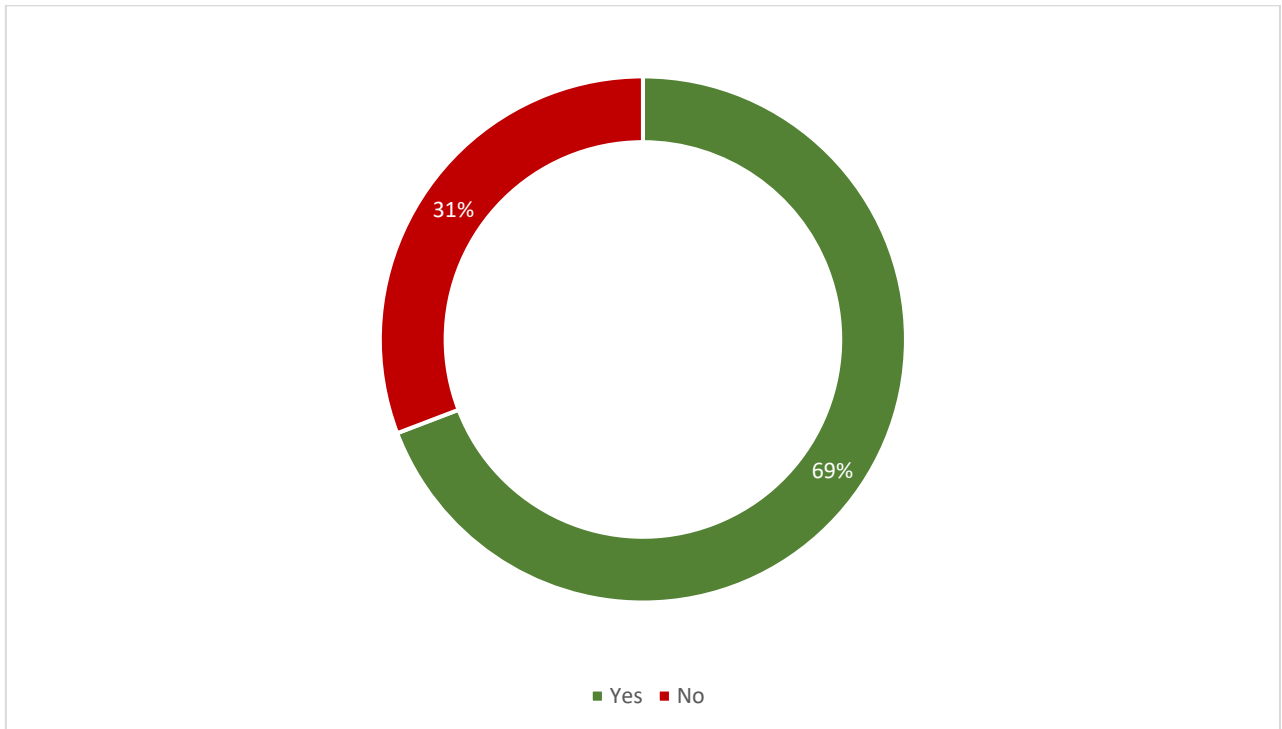
How useful do you think the ILSCA might be as a tool to inform decision-making?



Consultation feedback	Response
Categorising each zone I think really helps any planning in these areas by highlighting the unique characteristics of each area, so that any decisions made with respects to any given area can take into account how best to work with the environment or history of the site.	Noted.
The ILSCA is important in that it describes landscape character. However, in practical terms it does not set out how to "demonstrate that features of landscape and seascape character will be protected" apart from stating they are to "avoid and minimise impact through good design and outlining any mitigation measures". A set of criteria or worked examples would be helpful.	Noted. For each character type, the ILSCA sets out strategy and guidelines to help maintain and enhance the characteristics of that particular character type. Part five of the ILSCA provides basic landscape design guidance on accommodating new development, enhancing rural character, and consideration of views and visibility.
Whilst wide-reaching the ILSCA does not allow provision for all requirements	Noted.
ILSCA is a blunt planning tool, and comes with the danger of being used in far too prescriptive a way. It seems strangely obsessed with Jersey as an island,	Noted. ILSCA provides an objective analysis of Jersey's landscape and seascape character types, using best practice

Consultation feedback	Response
<p>without understanding what makes Jersey tick. Use of the word 'natural' to describe a variety of man-made and man-affected landscapes is telling. If adopted it will be interesting to see how creative proposals fare under its gaze.</p>	<p>methodology. It is to be used as a tool to inform planning decisions.</p> <p>The characteristics of much of Jersey's landscape is shaped by the fact that it is a small island where the proximity and influence of the marine environment is a key factor.</p> <p>The assessment uses the word 'natural' to describe those features which are shaped by natural forces, such as cliffs, headlands, valleys, rocky shores and bays; and clearly acknowledges where the landscape is influenced by other human forces for change.</p>
<p>This needs to be more positive to encourage landowners to test their land against an application and to make it viable.</p>	<p>Noted. ILSCA provides a framework against which proposals can be assessed to determine their positive contribution to landscape character, as well as their impact upon it.</p>

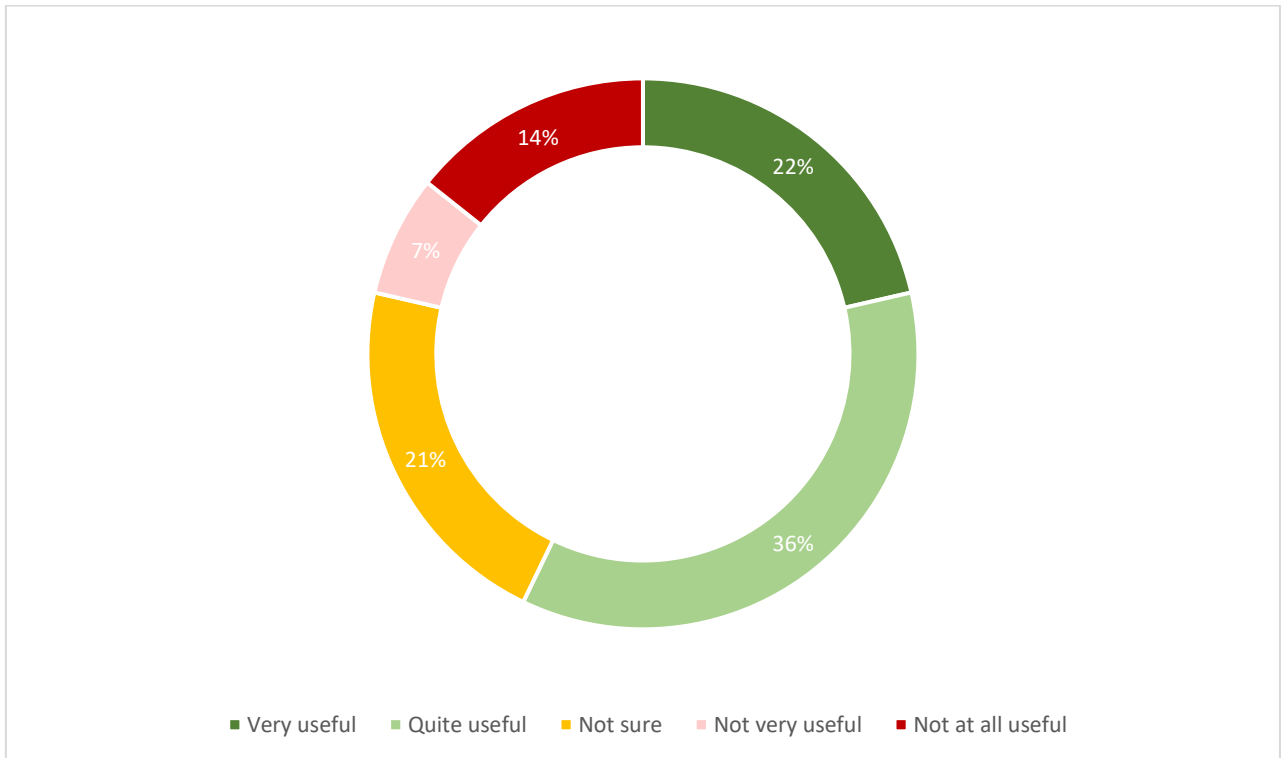
3. Do you agree or disagree that the ILSCA is adopted as supplementary planning guidance?



Consultation feedback	Response
It needs to go further.	Noted. ILSCA provides an objective analysis of Jersey's landscape and seascape character types, using best practice methodology. It is to be used as a tool to inform planning decisions.
As guidance it is a good report and useful, but should not be used as a definitive addendum	Noted. See above
It does not give practical guidance.	Noted. For each character type, the ILSCA sets out strategy and guidelines to help maintain and enhance the characteristics of that particular character type. Part five of the ILSCA provides basic landscape design guidance on accommodating new development, enhancing rural character, and consideration of views and visibility
Many of our 'poorly sited buildings' are national landmarks ...	Noted.

4. Section 5 of the draft guidance explains those circumstances where residential development, leading to the creation of new homes outside the built-up area, may be supported.

How useful do you think this section is?



Consultation feedback	Response
<p>First and foremost, the government ought to be prioritising immigration control and dealing with the housing crisis seriously instead of developing framework for house-building. That being said, the framework with regard to rural development is very useful and particularly needed in Jersey, especially in relation to size. The reuse and preservation of vernacular buildings is very welcome and something I support.</p>	<p>Noted.</p>
<p>Section 5 is essential as it lays out in practical terms what is possible.</p> <ul style="list-style-type: none"> <li>- In terms of proving redundancy of a building for agricultural or employment use, more guidance should be provided about how to prove redundancy - note the SPG of Protection of Employment Land.</li> <li>- There is an issue with providing evidence of the date of traditional agricultural building as pre 1960. Normally OS maps can provide that evidence, but there is no Jersey OS map published between 1935 and 1965.</li> <li>- Conversion of traditional agricultural buildings. Access/parking/amenity space is not mentioned. By virtue</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• Consideration will be given to adding reference to that supplementary planning guidance dealing with the assessment of redundancy.</li> <li>• The dating of farm buildings can generally be linked to the method of construction. Farm buildings that were constructed between 1960 and 2000 tend to be smaller units built of blockwork and / or steel cladding. Post 2000 saw the development of larger agricultural sheds.</li> <li>• The guidance note is focused on the interpretation and application of Policy H9. Other policy considerations will apply, and the guidance makes</li> </ul>

Consultation feedback	Response
<p>of their being redundant agricultural buildings, some of these will be in locations served by farm tracks which will require upgrading to allow for residential traffic, parking and gardens. The upgrading/inclusion of these could have an impact on rural character. Advice should be given as to what will be acceptable, e.g. hoggin, gravel etc?</p>	<p>clear that development proposals need to be considered and assessed against the plan as a whole. Section 4 of the guidance gives emphasis to the need to consider the impact of development upon landscape and seascape character, which will be a key consideration relative to the acceptability of proposals, assessed and considered under the auspices of Policy NE3. Design statements should be used to consider, assess and mitigate landscape impact.</p>
<p>It's useful but does not cover all eventualities</p>	<p>Noted. The guidance in this section relates to the provisions in the policy where residential development outside the built-up area may be permissible. If forms of development are not covered in this section, it is unlikely that they will be acceptable under the terms of the policy.</p>
<p>If you live in the countryside and would like to extend your home as long as it meets planning requirements for landscape and building you should be allowed to do this. Everyone's circumstances are different and it feels wrong that a planning policy can be put in place that's actually takes away your 'freedom of choice/human rights' choices. If you were to be restricted by a planning policy that you were not able to extend your house in the countryside by more than one bedroom for example, that would be wrong in my opinion.</p> <p>For example what if you needed to extend your home in the countryside from 3 bedrooms to an additional 2 bedrooms and make it 5 bedrooms to accommodate your grown up children and their own families, because the housing market has become so out of reach for 1st time buyers to get on the property market. You would be restricting families and home owners in the county-side from being able to make their own decisions on their own properties and also their lives, as this could have a major impact on their lives! In fact it would be taking away their human rights, to make their own decisions.</p> <p>There are lots more examples, but the main point I am making is, everyone's circumstances are different and the SPG should not be allowed to control people's lives with their own houses on a basis of how many bedrooms or square footage they can extend by with their own houses in the countryside, if it is in accordance with the planning and building policy.</p> <p>If you are suggesting this new policy as a blanket policy for all houses in Jersey, which is still wrong in my opinion then at least you would be, being fair.</p> <p>Please can you re-look at this policy.</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p> <p>The policy does not preclude the extension of a dwelling outside the built-up area. The guidance clearly states that the acceptability of an extension to a dwelling will be determined by its scale, design and impact on landscape character. Each case should be assessed on its merits and regard given to the sensitivity of the site and its context, relative to the capacity of the landscape character area to accept change. The policy and the guidance set out and explain some of the parameters that are used to manage and mitigate the impact of proposed extensions upon landscape character.</p> <p>The effect of the policy will be monitored during the plan period to assess the number of new homes delivered by it.</p>
<p>The SPG's aim to optimise the use of existing buildings is noted, and in line with this, the subdivision of existing dwellings is accepted as a reasonable exception to the</p>	<p>Noted. See above.</p> <p>Evidence from the census suggests that over 40% of owner-occupied homes in the island were under occupied</p>



Consultation feedback	Response
<p>normal and longstanding presumption against the creation of additional homes in the countryside. This can be justified notwithstanding the BIP's clear objectives of addressing climate change and therefore focussing development in areas where there is a range of existing services, and the greatest likelihood of journeys being made by means other than the private car.</p> <p>Subdivision can also contribute to right sizing, making better use of existing large houses, and creating additional homes, without any increase in the scale and impact of the building concerned.</p> <p>Allowing the creation of additional homes by the <i>extension</i> of existing dwellings, (in other words building a new house in the countryside), is more difficult to reconcile however. It does not accord with the BIP's objectives of addressing climate change and reducing vehicle movements, and it does not make the optimal use of <i>existing</i> dwellings, as it involves the construction of a new building as opposed to adaptation of an existing building. It will also increase the size of the building, potentially failing to protect or improve the character of the countryside as required by BIP policy PL5.</p>	<p>where households had two or more bedrooms above the standard required relative to the number of people living in the house. This suggests that a large proportion of existing large homes in the island are not being put to optimal or best use.</p> <p>The policy seeks to enable greater flexibility in the creation of new households in the countryside to encourage the better use and occupation of existing dwellings to provide new homes, whether by sub-division or extension.</p>
<p>It is noted that there is no allowance to build new dwellings within the grounds of existing dwellings. This is accepted as it accords with the BIP's strategic objectives. However, the only difference between that and the dwellings that the SPG <i>does</i> appear to accommodate, is whether the new dwelling would be physically attached to the existing house or not. Being physically attached does not mean that the dwelling would address climate change, nor does it make better use of an existing building. In our view it does not therefore justify an exception to the normal presumption against the creation of additional homes in the countryside.</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p> <p>Evidence from the census suggests that over 40% of owner-occupied homes in the island were under occupied where households had two or more bedrooms above the standard required relative to the number of people living in the house. This suggests that a large proportion of existing large homes in the island are not being put to optimal or best use.</p> <p>The policy seeks to enable greater flexibility in the creation of new households in the countryside to encourage the better use and occupation of existing dwellings to provide new homes, whether by sub-division or extension.</p> <p>The effect of the policy will be monitored during the plan period to assess the number of new homes delivered by it.</p>
<p>The blanket presumption against building new houses in the countryside is well established and understood, and in line with BIP policies SP1 and SP2. The draft guidance appears to permit those fortunate enough to own a large house on a good-sized plot, to build a new house in the countryside. However, unless these units are all to be for affordable housing, this will not benefit most islanders, nor</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p>

Consultation feedback	Response
<p>will it assist Andium Homes in providing additional affordable housing for those who are less fortunate.</p> <p>Given the stated objective of this draft SPG, and that on Density, to discourage larger houses, we would support the subdivision of existing dwellings outside the built-up area. We are not however able to support the principle of allowing large dwellings to be retained and then extended to provide additional dwellings, unless these are to be affordable dwellings as defined by the relevant Minister.</p>	<p>The policy sets out the framework within which extensions to existing homes in the countryside might be considered, and the guidance seeks to add further information in the assessment of proposals which seek to do this. This is principally focused around the criteria set out in Policy H9 (1.).</p> <p>The bridging Island Plan makes provision for the supply of up to 4,300 homes (up to the end 2025) to provide up to 1,650 affordable homes; and up to 2,650 open market homes. The plan seeks to provide for, and deliver, a mix of housing types, including family and right-sizing homes, to meet the different housing needs of different parts of the island, and to facilitate the better use of the existing housing stock. The effect of the policy will be monitored during the plan period to assess the number and type of new homes delivered by it.</p>
<p>Thank-you for the opportunity to comment on the draft SPG for the development of new homes in the countryside. The need to meet all island housing needs is a given and finding a policy blend that addresses the needs of all islanders is a challenging task.</p> <p>The introduction to Interim Policy H9A says:</p> <p>To make better use of existing buildings in the countryside – where those buildings include existing dwellings; traditional farm or listed buildings; and some employment buildings – the Bridging Island Plan introduces greater flexibility about the creation of new homes. There is, however, concern to ensure that the new homes that are created <u>are the right homes that help to meet the community's specific housing needs.</u></p> <p>A question for every planning application involving a house in the countryside – who makes the decision about what are the right homes to meet the community's specific housing needs?</p> <p>It appears that the policy direction of H9 and H9A is very prescriptive and does not appear to consider the needs or aspirations of existing property owners and occupiers, who already own homes in the countryside. There may also be occasions where the footprint and floor area of existing large dwellings could be reduced, but more bedrooms proposed as part of redevelopment proposals.</p> <p>Some examples:</p> <ol style="list-style-type: none"> <li>a. A family buying a house in the countryside with two bedrooms and seeking to refurbish and extend to create four + bedrooms.</li> <li>b. A household buying a one bedroom house in the countryside and seeking to extend to create three bedrooms.</li> <li>c. An existing large dwelling to be replaced with two smaller dwellings, but include more bedrooms.</li> </ol>	<p>Noted. The policy sets out the framework within which extensions to existing homes in the countryside might be considered, and the guidance seeks to add further information in the assessment of proposals which seek to do this. This is principally focused around the criteria set out in Policy H9 (1.).</p> <p><i>The acceptability of an extension to a dwelling will be determined by its scale, design and impact on landscape character. Each case should be assessed on its merits and regard given to the sensitivity of the site and its context, relative to the capacity of the landscape character area to accept change.</i></p> <p><i>The scale of any extension must remain subservient to the existing dwelling. The design of any extension should seek to ensure that the principal building remains the dominant building element and does not subsume or overwhelm it by virtue of mass, scale, size or visual impact. Any extension should not disproportionately increase the size of residential accommodation to be provided and should always be smaller, in terms of gross floorspace, building footprint and visual impact, than the principal dwelling.</i></p> <p>The issue of increased occupancy is an additional policy test related to the creation of new households where existing homes are extended, as set out in Policy H9 (2).. Section 5.2 and 5.3 of the guidance sets out more detail as to how this factor will be assessed.</p>

Consultation feedback	Response
<p>Under Section 5.3 the policy test limiting 'significant increase' in potential occupancy is explained. It is not clear how 'significant' is defined. Decisions made following appeal decisions under the 2011 (Revised 2014) Island Plan suggest that Inspectors consider two additional bedrooms to result in a significant increase. The inference being that if you own a house in the countryside you can only extend your home by one bedroom (perhaps) – an increase from one bedroom to two bedrooms remains untested as far as I know.</p> <p>All scenarios could be achieved and meet all other policy considerations.</p> <p>A clearer explanation of terms and thresholds is needed so that those using the policy and advising Applicants can explain what the policy considerations are.</p>	
<p>It is noted that the guidance does seek to limit the scale of dwellings which may be created by an extension, and the number of occasions where this allowance could be used. For example, the dwellings must be subservient, not significantly increase occupancy, and the potential impacts of the additional gardens, parking and fences required are noted. The unit must also be capable of integration into the main house and not sold independently of the main house. The guidance therefore appears to be suggesting that only a small ancillary dwelling such as a traditional dower scale unit may be acceptable, in which case this could be clearly stated.</p>	<p>Noted. The policy sets out the framework within which extensions to existing homes in the countryside might be considered, and the guidance seeks to add further information in the assessment of proposals which seek to do this. This is principally focused around the criteria set out in Policy H9 (1).</p> <p>The policy explicitly references the need to consider the site's planning history and the potential impact of cumulative extensions.</p> <p>Consideration will be given to the addition of reference to a dower-type extension, to assist with interpretation and clarity in relation to the issue of scale.</p> <p>POTENTIAL CHANGE:</p> <p>In order to provide more guidance about the scale of extensions that might be supported, reference to dower-scale accommodation could be added to section 5.</p>
<p>The phrase "not significantly increase occupancy" should be defined, and be an absolute, (e.g., 1 additional bedroom maximum), as opposed to say a percentage of the existing dwelling. It could also be a requirement that no separate garden or parking area is created, to minimise landscape impact and increase the likelihood that the accommodation is integrated into the main building at a later date.</p>	<p>Noted. The use of an absolute number is not considered to be entirely appropriate, and it is considered that proposals should be considered on their merits having regard to factors of potential occupancy along with those others identified in Policy H9 (1) and (2).</p> <p>The creation of a separate household would be required to comply with the minimum standards of residential space (internal and external); in addition to parking, as set out in other guidance. These provisions would apply to both the existing homes and that which is created anew.</p> <p>The impact of any such development upon local landscape character would be a material factor also.</p>
<p>5.1 Extensions to existing homes: scale and size</p> <p>We see a tension in the wording of this paragraph between the requirement for the scale of any extension to remain "subservient" to the existing dwelling, and the requirement for the extension only to be "smaller, in terms of gross floorspace, building footprint and visual impact"</p>	<p>Noted. The wording reflects that within the approved policy.</p> <p>The guidance makes clear that each case should be assessed on its merits and regard given to the sensitivity of the site and its context, relative to the capacity of the landscape character area to accept change. The</p>

Consultation feedback	Response
<p>than the principal dwelling. This permits approval an extension which is only slightly smaller than the existing building, which would have the effect of nearly doubling the size of the original building. We would suggest inserting the word “materially” before “smaller” to clarify this point.</p>	<p>acceptability of an extension to a dwelling will be determined by its scale, design and impact on landscape character.</p>
<p>5.6 Conversion of other redundant employment buildings We note that it is proposed to exclude hotels from the requirement to prove the redundancy of employment use. We think that this is regrettable, because it could be seen to encourage hoteliers to prematurely close their hotels to the detriment of the visitor economy.</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p> <p>The policy position regarding the treatment of hotels was thoroughly considered and assessed at the examination in public (Day 6 on 29 November 2021; see <a href="#">inspectors’ report</a> section 7.11-7.14) and was the subject of debate by the States Assembly (see <a href="#">. p.36-2021 amd.(85).pdf (gov.je)</a>).</p>
<p>5.7 Redevelopment of existing dwellings We believe that it would be helpful to clarify what is to be included in “gross floorspace” and “building footprint”. We have seen recent applications which seek to include a wide variety of outbuildings, sheds and similar to arrive at the gross floorspace calculations, which get reflected in proposals for a much larger principal dwelling than existing.</p>	<p>Noted. Gross floorspace is defined at section 3.3 of the guidance. The guidance makes clear that structures that attached structures that are incidental to the enjoyment of the dwelling, such as garages, are excluded when calculating total gross floor area where it is clear that they are unlikely to be incorporated into the habitable space of the dwelling.</p> <p>The guidance also makes clear that: <i>Detached outbuildings which have not been designed or built for habitable use as part of the main dwelling will not be included in the calculation of gross floorspace. Examples include log stores, sheds, carports, detached garages and greenhouses.</i></p>
<p>Within the “5.1 Extensions to existing homes: scale and size” section of the SPG, (page 7) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>The plan makes provision for the creation of new homes outside the built-up area where they might be delivered through the extension of existing dwellings. The acceptability of an extension to a dwelling will be determined by its scale, design and impact on landscape character. Each case should be assessed on its merits and regard given to the sensitivity of the site and its context, relative to the capacity of the landscape character area to accept change.</i></p> <p>Why does the first line of this section include a reference to “new homes” achieved through extension? Is this section not entirely to do with extensions where an additional unit of accommodation is not sought?</p>	<p>Noted. This section embraces proposals to simply extend existing dwellings as well as proposals to create new home, by extension of existing dwellings.</p> <p>Consideration will be given to the addition of a reference in this paragraph to both forms of residential development.</p> <p>POTENTIAL CHANGE:</p> <p>Clarity that the provisions of section 5.1 apply to both simple extensions to existing homes to improve an existing dwelling; and also to extensions of an existing dwelling to create a new home.</p>
<p>Within the “5.1 Extensions to existing homes: scale and size” section of the SPG, (page 7) the following is noted. We have added sections of particular interest in bold type.</p>	<p>Noted. The policy objective is to make better use of existing dwellings whilst, at the same time, seeking to better manage the size of new dwellings to ensure that</p>

Consultation feedback	Response
<p><i>The scale of any extension must remain subservient to the existing dwelling. The design of any extension should seek to ensure that the principal building remains the dominant building element and does not subsume or overwhelm it by virtue of mass, scale, size or visual impact.</i></p> <p><i>Any extension should not disproportionately increase the size of residential accommodation to be provided and should always be smaller, in terms of gross floorspace, building footprint and visual impact, than the principal dwelling.</i></p> <p><i>The cumulative enlargement of existing dwellings can undermine an area's character as much as new homes. A site's planning history – including the addition of any previous extensions – will, therefore, be a material consideration"</i></p> <p>The reference to the "principal dwelling" in the second highlighted paragraph is confusing.</p> <p>There may be (and often are) circumstances where an extension can validly be larger than the "principal" dwelling. We would suggest that rather than saying "always" it would be more sensible to use the word "normally".</p>	<p>they better meet islanders needs, and minimising the impact of new development on the character of the countryside. This is difficult balance to achieve, and the policy seeks to ensure that extensions to dwellings outside the built-up area are not disproportionately large or adversely impactful.</p>
<p>Within the "5.2 Extension or subdivision" section of the SPG, (page 7) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>"It is recognised that specific circumstances may arise where the creation of a new household in an existing dwelling outside the built-up area might be justified to enable the provision of personal support and care. This provision was already established in the previous Island Plan and this explicit provision is carried through to the bridging Island Plan and might be brought about by sub-division or extension of an existing dwelling. Where a case is put forward that independent accommodation is required for someone who requires a high degree of care and/or support for their personal wellbeing and health, the personal circumstances of an applicant or beneficiary should not be the sole determinative of an application."</i></p> <p>What is the purpose of the text included in bold type? Surely the reason for such applications is entirely to do with the personal circumstances of the applicant. If this means that any application needs to take into account other relevant policies of the BIP, this would make more sense.</p>	<p>Noted. The guidance simply seeks to make clear that the personal circumstances of an applicant or beneficiary should not be the sole determinant of an application, and that all proposals should be considered relative to the plan as a whole.</p>
<p>Within the "5.3 Significant increase in potential occupancy" section of the SPG, (page 8) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>"In the case of sub-division and/or extension, the creation of new homes outside the built-up area should not lead to a significant increase in potential occupancy and should not</i></p>	<p>Noted. This provision is established by the Island Plan policy and cannot be changed by supplementary planning guidance.</p> <p>Evidence from the census suggests that over 40% of owner-occupied homes in the island were under occupied where households had two or more bedrooms above the</p>

Consultation feedback	Response
<p><i>disproportionately increase the number of people who might reside at a property relative to the nature and size of the accommodation being sub-divided and/or extended.</i></p> <p><i>The objective of this provision is to manage the number of people living in locations that are less sustainable – where people have relatively less access to goods, services and infrastructure and will likely need to travel more, with less choice about how they travel. It also seeks to manage the pressure for more development outside the built-up area and to mitigate the ‘urbanising’ effect of new development on the character and appearance of the countryside. The creation of new households inevitably leads to the introduction of features associated with residential use such as the subdivision and enclosure of gardens with fences; together with ancillary and incidental structures such as sheds, washing lines and hard surfacing, all of which serve to erode the character of the countryside.</i></p> <p><i>The objective of the policy is to secure the optimal use of existing dwellings in the countryside and to ensure better use of existing homes, particularly where they may currently be underoccupied. For example, an existing four-bed family home, with a potential occupancy of six people (based on two double bedrooms; and two single bedrooms) might be sub-divided and/or extended to provide two two-bed homes (based on accommodation in each home offering one double bedroom; and one single room) with a similar level of potential occupancy."</i></p> <p>The section states that the creation of new homes outside the built-up area should not lead to a significant increase in potential occupancy. The final highlighted example results in exactly the same occupancy, so gives no greater clarity whatsoever in terms of what might constitute a significant increase in occupancy. Indeed, the example explicitly suggests that any increase in occupancy is a significant increase.</p> <p>Under what circumstances does the Department consider that the worked example might occur? In our experience the worked example would almost never happen, due to the development and property purchase price costs incurred. Accordingly, if this represents the scenario by which creation of new units might be permissible outside the Built-Up area, the proposed policy will have virtually zero effect in delivering additional affordable homes, or securing the stated objective of securing optimal use of existing dwellings.</p>	<p>standard required relative to the number of people living in the house. This suggests that a large proportion of existing large homes in the island are not being put to optimal or best use.</p> <p>The policy seeks to enable greater flexibility in the creation of new households in the countryside to encourage the better use and occupation of existing dwellings to provide new homes, whether by sub-division or extension.</p> <p>The effect of the policy will be monitored during the plan period to assess the number of new homes delivered by it.</p>
<p>Within the "5.4 Flexibility" section of the SPG, (page 9) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>'To maintain flexibility in the island's housing stock, the creation of new separate living accommodation should be capable of re-integration into the main dwelling.</i></p>	<p>Noted. This provision is established by the Island Plan policy and cannot be changed by supplementary planning guidance.</p> <p>The degree to which this aspect of the policy can be successfully implemented will be monitored during the</p>

Consultation feedback	Response
<p><i>Any exception to this will need to be carefully regulated to ensure that the separate unit(s) of accommodation is tied to the principal dwelling (and cannot be sold separately); and to enable the ultimate re-integration of the accommodation into the principal dwelling. This will likely be regulated through the use of planning obligation agreements."</i></p> <p>How does this requirement secure the best use of residential accommodation in terms of the number and size of units? Surely this has been taken verbatim from the scenario where a unit for a dependent relative is approved, whereas the purpose behind this policy is to secure best use of the existing stock in terms of securing additional units of accommodation. What if the reunited units of accommodation amount to more than 3,000sq ft of floor area?</p>	<p>plan period to assess its relevance and effectiveness, relative to the policy objective set.</p> <p>Proposals for re-integration, relative to the standard proposed to be introduced relating to the management of large homes, will need to be considered on their merits. Clearly, these would not be new homes.</p>
<p>You won't see any homes coming forward if homes cannot be independently split.</p>	<p>Noted. See above.</p>
<p>This policy and guidance relates to the residential development of redundant employment uses. How would proposals for care homes be dealt with?</p>	<p>Noted. Proposals for care homes would fall to be considered under the terms of Policy H7: Supported housing.</p>
<p>Within the "5.5 Re-using Historic buildings" section of the SPG, (page 9) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>"Retaining historic buildings – such as buildings that are listed for their special architectural and/or historical interest; or 'traditional' (pre-1960) farm buildings - in a viable use is key to their retention and maintenance. Traditional vernacular ancillary farm buildings and listed buildings, such as churches, mills, forts and towers, add character to the countryside and their conversion and re-use for residential use can provide them with a viable future. Proposals to re-use and adapt these types of buildings will be encouraged where, in the case of traditional agricultural buildings, their redundancy to agriculture and other employment uses is proven; and in all cases, where the character of the building and its landscape setting can be protected and enhanced</i></p> <p><i>Older farm buildings that were constructed prior to 1960 are increasingly unable to meet the needs of modern farming. Their development for the provision of new homes can help to reuse these buildings and help to retain the farmstead vernacular where they are no longer of value to the agricultural industry. ....</i></p> <p><i>This policy is applicable to traditional farm buildings that are of a permanent and sound construction: the conversion of modern and/or temporary agricultural buildings to residential use will not be supported. Information will also need to be provided about the basis of its redundancy to the farm holding and the agricultural industry."</i></p>	<p>Noted. The tests required to establish redundancy of use to agriculture are set out in other supplementary planning guidance: see <a href="#">Protection of employment land (gov.je)</a>.</p> <p>This requires that in addition to redundancy to agriculture, evidence is required to be provided demonstrating that the site has also been marketed as a refurbishment and/or redevelopment opportunity, for all and part of the site for alternative employment uses also, before use for residential development might be considered.</p> <p>The policy regime for the re-use of modern farm buildings is set by <a href="#">Policy ERE4 – Re-use of modern farm buildings</a>, as set out in the BIP, which has been approved by the States Assembly.</p> <p>Where it can be demonstrated that an established agricultural building in the countryside is no longer required for its original purpose its re-use for other employment uses will be supported. The re-use of these buildings for employment uses that support rural diversification, particularly where their use necessitates a countryside location, will be encouraged. Where proven to be the only viable option, the re-use of these buildings for other employment uses will be supported, but only when any such use, and the implications of that use, are compatible with a countryside location in terms of its impact upon the local landscape character and the amenity of nearby residents. The use of modern agricultural buildings for any form of residential use will be strongly resisted.</p>

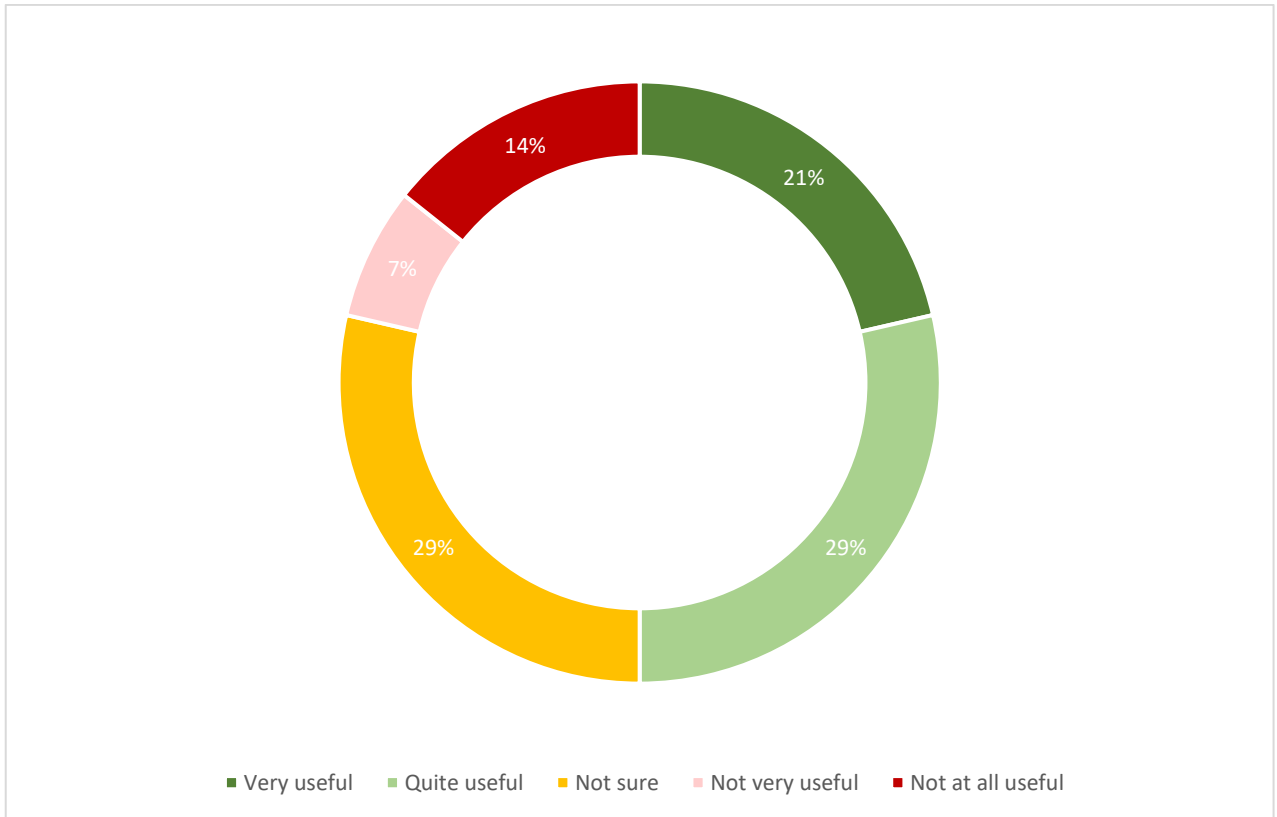
Consultation feedback	Response
<p>When it is absolutely clear that a building is redundant to agriculture due to size, location, form, etc, cannot common sense be applied as to the degree of proof of redundancy required. Marketing exercises (particular when futile) are expensive and unnecessary.</p> <p>The last highlighted section in 4.12 above, notes that conversion of “modern” farm buildings to residential use will not be supported. As noted in 1.2 of this document, this would seem to be an inefficient and unsustainable approach, as certain modern agricultural buildings are well built and perfectly capable of sensitive energy- and land-efficient conversion.</p>	
<p>Within the “5.6 Conversion of other redundant employment buildings” section of the SPG, (page 10) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>“Conversion of other employment buildings in the countryside to residential use will only be supported by exception where, save for visitor accommodation and offices, the redundancy of employment use is proven; and, for all conversions, where its re-use and adaptation delivers demonstrable environmental benefits through reduced intensity of use and visual improvement to the building and its setting. Agricultural buildings (post 1960) and glasshouses are excluded from this provision and their conversion to other non-employment uses will not be supported. ....</i></p> <p><i>Sustainability at a strategic level will be a material consideration and require evidence of how this has been assessed and mitigated as part of any application. This could indicate a comparative reduction of reliance on public infrastructure, or say, trip generation. Careful regard will be given to the visual impacts of any required external space, in particular car parking and amenity areas, on landscape character.”</i></p> <p>Why is the cut off point for the age of agricultural buildings set at post-1960? What is the logic behind this stipulation? Surely if a proposal makes sense in land use and sustainability terms then it would be counter-productive to disallow it because the building in question was originally built in 1961 rather than 1959.</p>	<p>Noted. The buildings required to support agricultural activity in the island have changed in response to changes in agricultural practices. Those buildings which pre-date 1960 are regarded as ‘traditional’ farm buildings.</p> <p>To provide greater clarification, consideration will be given to adding a definition of traditional farm buildings, to assist with interpretation and application of policy.</p> <p><b>POTENTIAL CHANGE:</b></p> <p>In order to promote clarity the definition of a ‘traditional’ agricultural building will be added to section 3 of the guidance.</p>
<p>In section 5.1 confirmation is required that dwellings can increase in size.</p>	<p>Noted. The policy and the guidance make it clear that dwellings can increase in size by extension but that any extension should not disproportionately increase the size of residential accommodation to be provided.</p>
<p>Right-sizing. Why can’t landowners test their curtilage to deliver smaller homes to suit their circumstances, remaining in their parish and community, and freeing up their principal home for younger families. This is what’s called for the BIP. You have to incentivise property owners.</p>	<p>Noted. The policy and the guidance make it clear that new homes can be created by sub-division and/or extension. This can encourage and enable right-sizing.</p> <p>Evidence from the census suggests that over 40% of owner-occupied homes in the island were under occupied</p>



Consultation feedback	Response
	where households had two or more bedrooms above the standard required relative to the number of people living in the house. This suggests that a large proportion of existing large homes in the island are not being put to optimal or best use.

5. Section 5.9 of the draft guidance explains why the extension of residential boundaries in the countryside will not be supported.

How useful do you think this section is?

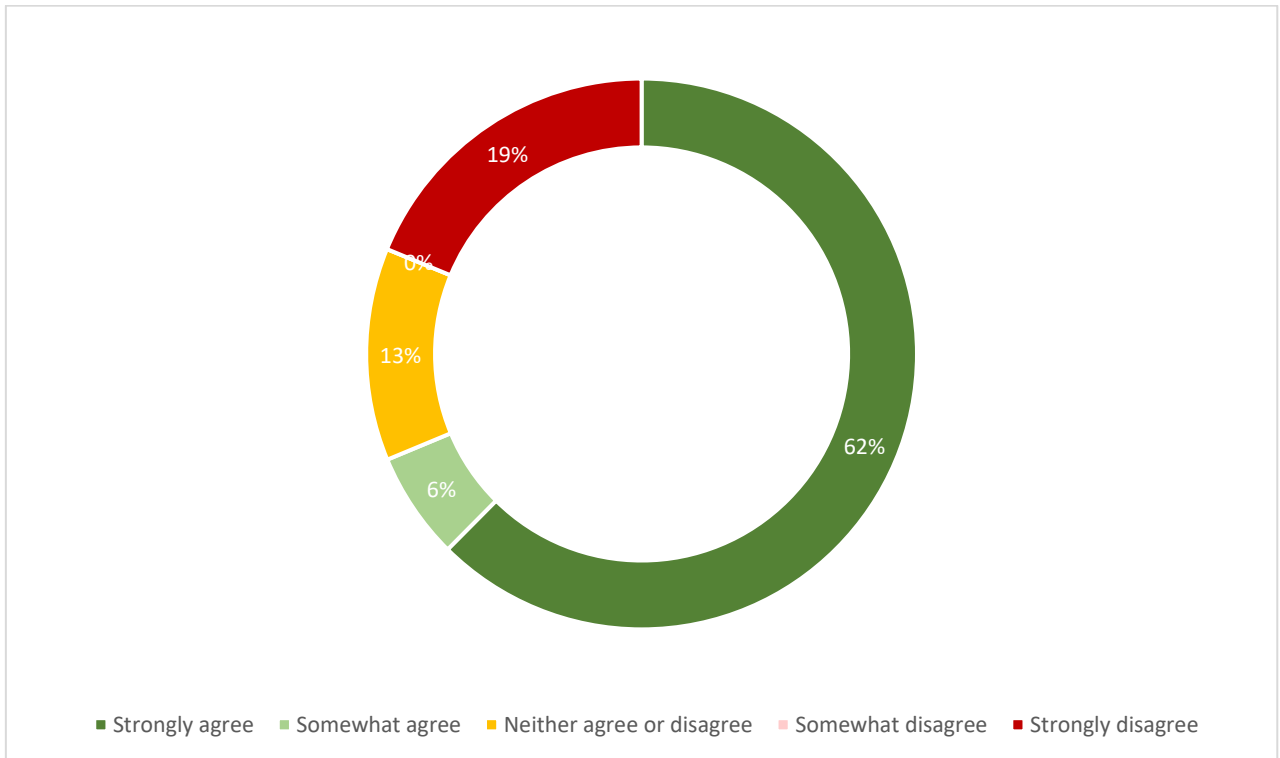


Consultation feedback	Response
This will go a long way to protect Jersey's fragile agriculture industry. The points highlighted are very sound and valid	Noted.
<p>There are a number of comments here that do not cover some eventualities.</p> <p>"can bring with it pressures to extend site boundaries to encroach into agricultural or other open or undeveloped land"</p> <p>Little concern is given to the young of the island being able to work in onsite businesses or own a home in the curtilage of an existing property.</p> <p>Yard space with no landscape character would be an example.</p> <p>If the area had sufficient infrastructure and a small sympathetic building could enhance the area with a sensitive and sympathetic siting, design and use of materials this would surely be preferable to an area devoid of character, landscaping and countryside appeal.</p>	<p>Noted. The principle of providing incidental or ancillary buildings in the 'yard space' of a home is supported, subject to consideration of their impact upon landscape character (where planning permission is required).</p> <p>The objective of this aspect of the policy is to prevent the encroachment of residential development in to the open countryside, where that countryside will already display some landscape characteristic of the area in which it is located.</p>

Consultation feedback	Response
Don't see that any changes to current policies are being proposed.	Noted. Guidance cannot change policy; supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.

6. Section 6 of the draft guidance introduces a new interim policy which manages the size of new homes in the countryside.

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



Consultation feedback	Response
<p>The problem with concentrating on size is that there is no alternative policy. Perhaps smaller dwelling on a hillside in a cluster would be more attractive but harder to get planning permission for.</p> <p>Would Santorini be the most photographed island if there hadn't been a forward planning decision to limit size, colour, style and type of build. Does this detract from the island's ambiance?</p> <p>Planning perhaps need to be more forward thinking and revolutionary to ensure that what is built develops a "Jersey" style that is reminiscent of this era and not a carbon copy of what came before.</p>	<p>Noted. There is a general presumption against the development of new homes in the countryside except where a development proposal satisfies one of the tests set out in Policy H9.</p> <p>The proposed introduction of a new consideration related to the size of new homes in the countryside, where they are permissible, adds another factor to be taken into account: it is not the only factor.</p> <p>Any new development should protect or improve landscape and seascape character under the terms of Island Policy NE3; and also make a positive contribution to the local context in terms of its design, under the terms of Policy GD6. This is not just about recreating what came before, but about considering and applying the principles of good design: see <a href="#">JerseyDesignGuide2008</a>. ILSCA provides a framework against which proposals can be assessed to determine their positive contribution to landscape character, as well as their impact upon it.</p>
<p>Jersey is quickly losing its national identity through the extinction of our agriculture and the privatisation of our countryside to the super wealthy.</p>	<p>Noted.</p>

Consultation feedback	Response
This plan is a small step towards reclaiming our island, but more thorough action is desperately needed in other aspects of governmental policy.	
Too many large sites for one family occupancy-not enough housing for normal Jersey families	Noted.
I am very much against our country side being built-up and dominated by the super wealthy	Noted.
The draft planning guidance demonstrates an acute level of wishful thinking as regards the housing market in Jersey. No research has been offered to support the gross levels of interference and why it might result in more affordable smaller homes being built.	Noted. See above.
This attempt to manage the size of new homes in the countryside is an interference with the market. Has any research been carried out to support this or is this just wishful thinking?	Noted. See above.
<p>The SPG fundamentally lacks full and robust evidence to support a 279sqm limit on new dwellings. How has this size limit been derived and where is the independent supporting context for limiting dwelling size?</p> <p>Why should a blanket limit on size be established when the controls established throughout the BIP are in place to allow a fair assessment of scale within a particular site and its context? This is a poorly considered limit on dwelling size which precludes a potential approval of a development which may in all other cases be suitable in its context and appropriate in scale, mass, visual impact and size.</p> <p>It does not fulfil the intention of the BIP to which this SPG supports; it is an adaptation of Policy which is not in a position to be independently debated by the sitting Government or an independent Planning Inspector.</p>	<p>Noted. See above for evidence.</p> <p>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 that is far-reaching, or 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>The second concern is significant, and goes to the heart of what might be produced as Supplementary Planning Guidance. 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. 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</p>	<p>Noted. There is already policy provision in the plan which seeks to limit the size of new homes in the countryside: this is clearly set out at Policy H9. 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 that is far-reaching, or 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>As acknowledged, Article 6 of the law enables the Minister to publish policy in between reviews of the Island Plan. In order to promote clarity and to clearly differentiate the status of SPG relative to bridging Island Plan policy, however, consideration will be given to a revision of the</p>

Consultation feedback	Response
<p>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>The proposed SPG's seek to use Proposal 21 and Proposal 25 in the BIP as the justification for their scope. However, Proposal 25 is relevant only to land outside the Built-Up Area, and Proposal 21 looks just at density standards within the Built-Up Area. When read separately, or together, they do not encompass the scope of what is now envisaged. Notably Proposal 25 confirms the scope of the envisaged SPG is simply to "assist with the interpretation and application of Policy H9." But what the SPG actually now seeks to do is to introduce entirely new tests.</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>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. 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. 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>guidance to remove reference to 'interim policy' and to present the key contents and parameters of the guidance as 'standards' only.</p>
<p>Within the Introduction section of the SPG, (page 2) the following is noted. We have added sections of particular interest in bold type. "The note also provides guidance</p>	<p>Noted. See above.</p>

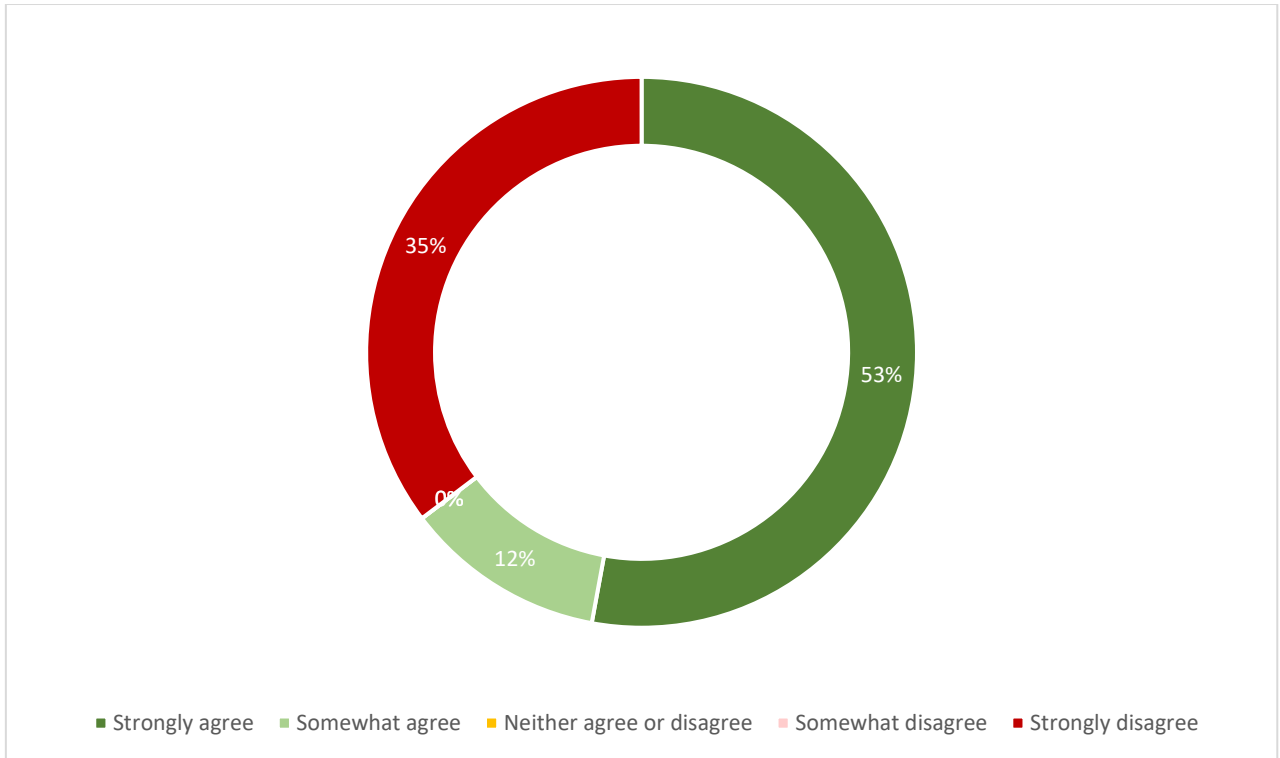
Consultation feedback	Response
<p>and introduces an interim policy about the development of larger homes in the countryside where they are in excess of 279 square metres (sq.m.) or 3,000 square feet (sq.ft.) gross internal floorspace: interim Policy H9A – Large houses outside the built-up area. This element of interim policy and guidance complements 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 ‘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.’</p> <p>It is unclear how the limit on property size suggested by the 100 Day Plan has much to do with the policies included within the BIP, specifically how it will address the housing crisis. This would appear to be a fundamentally new policy that is being inserted into the BIP, and which will greatly affect the shape of development in the Island without the need for debate within the States Chamber.</p>	
<p>As regards the discouragement of large houses, this may make more materials and labour available to create smaller and more affordable units, which is welcomed.</p> <p>It is assumed that although policy H9A says that where a large dwelling is to be replaced, if the existing exceeds 279sqm, the new building may also exceed 279sqm, the requirement of paragraph 5 of policy H9 must <i>also</i> be met i.e., the new dwelling must be no larger than that which it replaces. To avoid confusion, it may be helpful if this was noted in policy H9A.</p>	<p>Noted. It is already explicitly stated on the face of Policy H9 (5) <i>in the case of the redevelopment of existing dwellings, involving demolition and replacement, the replacement dwelling: (a). is not larger than that being replaced in terms of gross floorspace, building footprint and visual impact.</i></p> <p>This guidance should be read in conjunction with Policy H9, and not in isolation.</p>
<p>Planning need a more-adaptable policy on this whole issue.</p> <p>They should make provision for countryside employment. The only mention in the document is of redundant employment buildings, there needs to be a chink of light for new or established employment businesses without redundant buildings on site.</p> <p>If a business can prove the necessity/ value/ enhancement/ reduced traffic of an area - there should be a way of assisting.</p> <p>No mention in this document of:</p> <ul style="list-style-type: none"> <li>Accommodation for a new build where a material and enhancement benefit could be provided</li> <li>Where there is no environmental impact</li> <li>Where services are available</li> <li>Reduction in vehicle movements</li> <li>Support of existing communities</li> <li>Shared trips/ services</li> </ul>	<p>Noted. This guidance is specifically focused on the development of housing outside the built-up area.</p> <p>The bridging Island Plan sets out a comprehensive planning policy framework for economic development in the countryside: see the Economy chapter of the <a href="#">P Bridging Island Plan.pdf (gov.je)</a>.</p>
<p>There are no considerations for exceptions relating to architectural excellence, nor classleading approaches to</p>	<p>Noted. The bridging Island Plan seeks to ensure the delivery of design quality and to further reduce carbon emissions in</p>

Consultation feedback	Response
sustainability / energy - both of which are worthy objectives of other BIP policies.	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.



7. It is proposed to limit the number of new large homes in the countryside, 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 countryside?



Consultation feedback	Response
This is disgusting how I'd you can afford a large home you get multipul parking spaces and the best of living in the country whilst only being a 20 minute drive to a finance center	Noted.
Restrictions on new large homes throughout the Island The inclusion of prohibitions on larger homes (whether new builds or conversions or extensions) is to be welcomed & 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. We also suggest there should be a presumption against development of new private swimming pools, billiard rooms, domestic cinemas etc.	Noted. A dwelling of 279 sqm (or 3,000 sq. ft.), is a substantial structure; over double the floor area of a standard four-bed dwelling. The effect of introducing this standard will be monitored during the plan period with potential for subsequent review. The number of habitable rooms provided in a dwelling is only a material planning consideration relative to compliance with minimum residential space standards and the potential occupancy of the dwelling. The provision of additional rooms - including utility rooms, studies, playrooms, home cinemas, gyms and en-suite bathrooms or shower rooms - is generally permissible in principle but will require additional floor area above the minimum gross internal floor area to avoid compromising the space and functionality of other parts of the home.

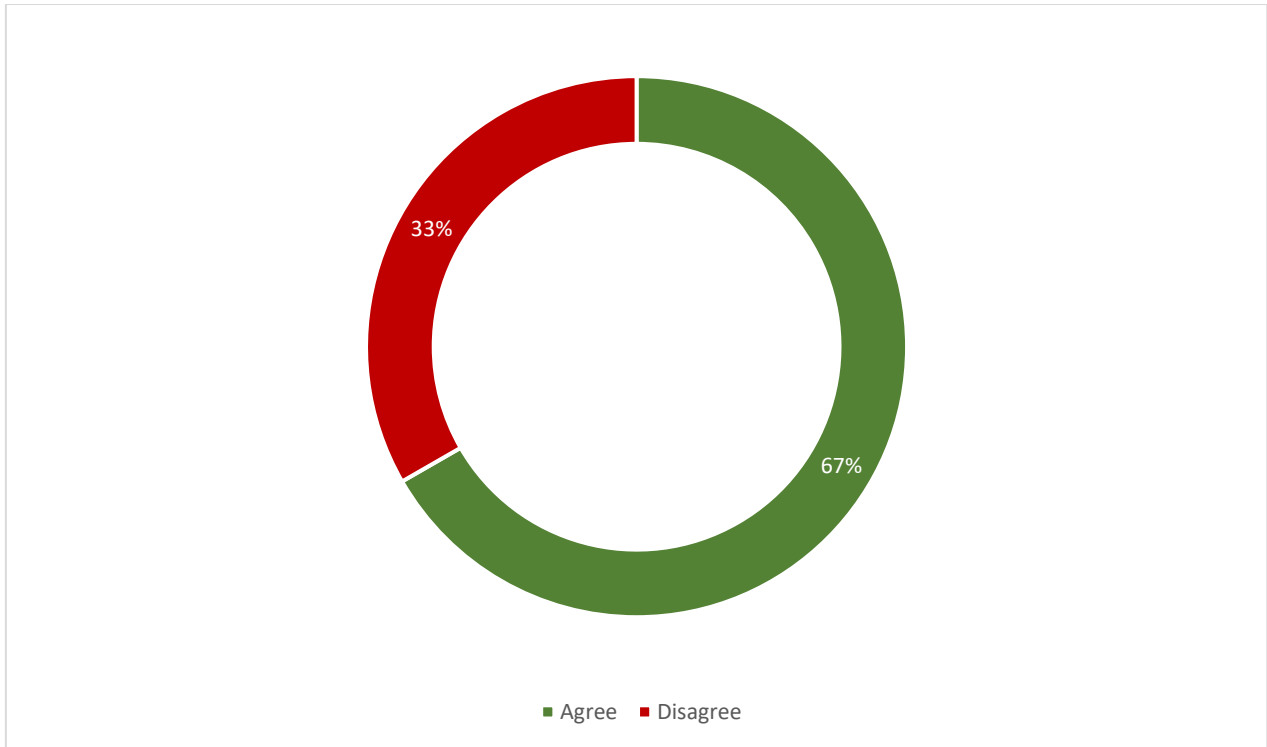
Consultation feedback	Response
	Home offices and rooms other than standard living spaces that exceed 8 sq m must be counted as a bedroom.
I believe that preventing HVR from coming into the island would be a better solution to this issue, but this solution also very much works.	Noted.
Considering the current housing shortage, new buildings should be limited to 4 bedroom, 2 bathroom homes, and this can easily be achieved at 2500ft <sup>2</sup> . It would be better to set a limit in stages, ie maximum of 30 homes larger than 2000ft <sup>2</sup> to 2499ft <sup>2</sup> , 6 homes 2500ft <sup>2</sup> to 2999ft <sup>2</sup> and 1 larger than 3000ft <sup>2</sup> per year for the next 4 years.	Noted.
Existing wide ranging policies throughout the BIP have been established to ensure proposed dwellings in the countryside are suitable for the context within which they are sited; why is an over-riding limit to the size of new dwellings to be imposed and why is this limit more appropriate that the robust testing mechanisms already in place within the BIP?	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.
<p>Also if people want to live in a large property and can afford to do so ,what on earth are we stopping them for ?? Are we really going to stop wealthy immigrants from building what they want ?? We should not be stopping wealthy immigrants coming ...things are turning down ...be careful</p>	<p>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.</p> <p>There is no evidence that supports the need to provide very large homes in Jersey; and there will already be a supply of larger homes within the existing housing stock. Much of the island's current need is for smaller homes: Jersey's Future Housing Needs 2019- 2021 report identified a potential shortfall of 2,750 one-, two- and three-bed dwellings (both flats and houses), together with a surplus of 4+ bed-homes over the report period.</p> <p>Evidence from the census suggests that over 40% of owner-occupied homes in the island were under occupied where households had two or more bedrooms above the standard required relative to the number of people living in the house. This suggests that a large proportion of existing large homes in the island are not being put to optimal or best use.</p> <p>A dwelling of 279 sqm (or 3,000 sq. ft.), 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 significant market value that is well beyond the reach of most islanders.</p> <p>In 2021, a working household in Jersey with mean net income was not able to service a mortgage affordably on the purchase price of a median-priced house of any size. For the purchase of a median-priced 4-bedroom house (at £1,200,000) in the fourth quarter of 2021, by a household with mean net income, the total deposit required was £752,000 which represents a deposit gap of over 10.</p>

Consultation feedback	Response
<p>3000ft2 is not a large house by any means. But the thinking behind this is plain wrong.</p> <p>Why would stopping people building large homes mean that more smaller homes would be built and come onto the market at affordable prices? This does not follow, any more than banning the sale of new cars over say £30,000 (again not an expensive car today) will lead to garages rushing to sell greater numbers of affordable cars.</p>	<p>Noted. A dwelling of 279 sqm (or 3,000 sq. ft.), 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 significant market value that is well beyond the reach of most islanders.</p>
<p>Within the "5.7 Redevelopment of existing dwellings" section of the SPG, (page 10) the following is noted. We have added sections of particular interest in bold type.</p> <p><i>In the case of existing dwellings, the development of replacement buildings should not be larger than that being replaced in terms of gross floorspace, building footprint or visual impact. Evidence should be provided to demonstrate that the redevelopment of the building will deliver environmental gain, related to the repair of landscape character. This could be achieved through improvements in siting, design and use of materials in addition to the specific enhancement of landscaping to better integrate the development into its landscape context. Any proposed increase in the size of residential floorspace will require exceptional justification having regard to functional needs or necessary improvements to the standard of accommodation and should not exceed 279 sq.m. (3,000 sq. ft. gross internal floorspace)."</i></p> <p>The requirement that replacement buildings should not be any larger than the building replaced is very likely to completely stymie development and (sustainable) improvement of properties outside the Built-Up area, as such requirements will render projects utterly unviable financially. Accordingly, there will be a large number of properties that will remain abandoned on the expectation that this unreasonable and counter-productive policy is abandoned in the future.</p> <p>Why is the figure for the maximum area of a house set at 3,000 square foot. What is the motivation for this cap? It is suggested that this is in order "to tackle the housing crisis", but we are at a loss as to exactly how this will occur. Given all of the other restrictions on new units of accommodation outside the Built Up Zone, including those in this draft SPG, the likelihood of two 1500 square foot homes (or three 1,000 sq ft homes) being acceptable rather than one 3,000 square foot home is highly unlikely.</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p> <p>It is relevant to note that the policy provision limiting the redevelopment of existing dwellings to no larger than the building being replaced, in terms of gross floorspace, existed in the 2011 Island Plan in both NE6 and NE7, policies which were applicable to both the green zone and the Coastal National Park. These provisions did not appear to preclude development proposals for new residential development in these locations during the last plan period: over 600 new homes were built in the countryside between 2013-2021 (see: <a href="https://www.gov.je">Strategic Housing (gov.je)</a>).</p> <p>The basis for the introduction of a standard to better manage the size of new homes is set out above.</p>
<p>5.9 Redevelopment of redundant employment buildings</p> <p>We note that an exception to the 3,000 sq. ft. cap is proposed for developments where the existing building is considerably larger. We should have thought that no such exceptions should be made, not least so as to minimize the risk of controversial applications such as the recently</p>	<p>Noted. As stated in the guidance, this policy provision seeks to deal with the exceptional circumstances of the redevelopment of what are usually large outworn employment buildings. Their presence does little to maintain or enhance the character of the area in which</p>

Consultation feedback	Response
<p>approved development of the Water's Edge Hotel. Given that the stated purpose of the cap is to enable the construction industry to focus on tackling the housing crisis, we believe that such large-scale projects should also be suspended.</p>	<p>they are located, and the policy is designed to deliver significant environmental gains through redevelopment.</p> <p>Given that these are usually large buildings, with significant floorspace, there has to be a reasonable expectation that their redevelopment will deliver not only significant environmental improvement but a reasonable level of development in order to make the proposal viable.</p> <p>In these circumstances, the size of new buildings, and associated floorspace, will be considered on their merits relative to the scale of the existing building to be removed; that which is to replace it; and the environmental improvements delivered.</p>
<p>We would suggest that the SPG clarifies that the 3,000 sq. ft. limit is a ceiling which includes any subsequent planning applications or revisions to the same property. We often see that such subsequent applications materially increase the size of the property from that envisaged by the initial application.</p>	<p>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.</p> <p>In the case of the extension of existing homes (or subsequent extensions to new 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.</p> <p>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.</p> <p>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 home.</p> <p>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.</p> <p><b>POTENTIAL CHANGE:</b></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, will be added to the guidance.</p>

8. 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?

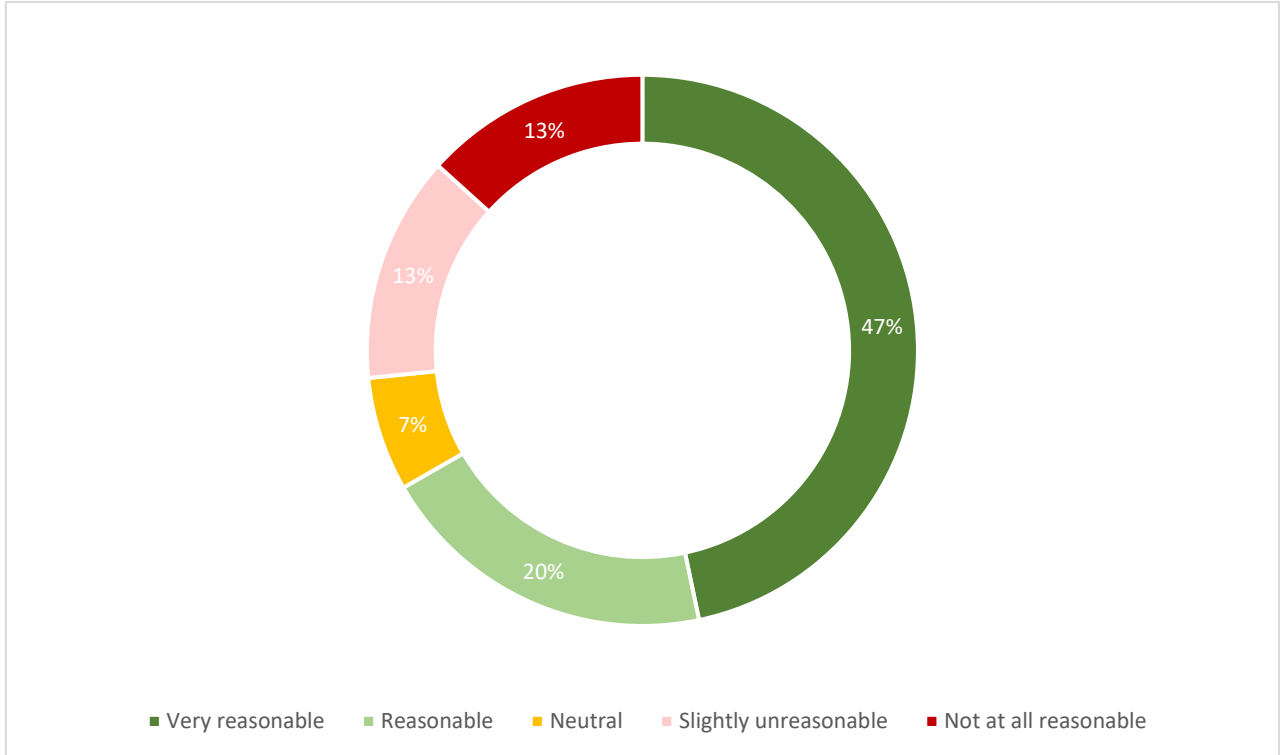


Consultation feedback	Response
<p>Most of the items listed in Appendix 2 are already covered on the Planning Application form - additional categories could be added to this, for example, density. I am not sure what benefit a schedule of accommodation provides.</p>	<p>Noted. For non-householder applications, the existing planning application form requires the submission of the following information only:</p> <ul style="list-style-type: none"> <li>• Net gain or loss of residential units</li> <li>• Existing number of units</li> <li>• Proposed number of units</li> <li>• Breakdown of proposed unit sizes</li> </ul> <p>It does not require any information about the following:</p> <ul style="list-style-type: none"> <li>• Number of existing homes on the site</li> <li>• Number of homes to be provided</li> <li>• Net number of homes to be provided on the site</li> <li>• Gross site area</li> <li>• Net site area</li> <li>• Density of development (dwellings per hectare)</li> <li>• Density of development (habitable rooms per hectare)</li> <li>• Number of dwellings by type (house or flat) and size (bedrooms)</li> <li>• Schedule of accommodation by type (i.e. house or flats; and number of bedrooms) relative to:</li> </ul>

Consultation feedback	Response
	<ul style="list-style-type: none"> <li>○ potential occupants (bedspace, differentiating between single- and double-bedrooms)</li> <li>○ living space</li> <li>○ internal storage space</li> <li>○ external/'dirty' storage space</li> <li>○ external amenity space</li> <li>○ vehicular parking provision</li> <li>○ cycle parking provision.</li> </ul> <p>This information might be provided on drawings, but it is not provided in a clear, consolidated and accessible form where a proposal might be quickly assessed against adopted standards.</p>
<p>Yet more work for agents. Planning need to demonstrate that uses to which this additional information will be put.</p>	<p>Noted. The provision of this information in a clear, consolidated and accessible form will enable a more efficient and effective assessment of a proposal against adopted standards.</p> <p>This should be of benefit to decision-makers and applicants.</p>

9. 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
I don't think there is enough oversight into the actions of the super rich on this island (such as the unrestrained felling of trees). I think these requirements are entirely appropriate.	Noted.
Yet more work for agents. Planning need to demonstrate that uses to which this additional information will be put.	Noted. The provision of this information in a clear, consolidated and accessible form will enable a more efficient and effective assessment of a proposal against adopted standards. This should be of benefit to decision-makers and applicants.

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

Consultation feedback	Response
<p>We are aware that the policy intention to give greater flexibility in the creation of the new homes in the countryside arose during the course of the finalisation of the Bridging Island Plan. Whilst we are unaware of the specific reasons why Senator Moore’s suggested amendment was adopted, we are aware of a representation made at the time by the Chamber of Commerce which stated the following. We have included the most relevant points in bold type.</p> <p>“It is constantly stated that it is “unsustainable” to create new homes in the countryside. This makes no sense for the following reasons.</p> <ul style="list-style-type: none"> <li>• Large areas of the Green Zone are within very easy access of public transport routes.</li> <li>• The notion of unsustainability relates principally to trip generation. A better public transport system would address this issue.</li> <li>• The gradual and inevitable replacement of carbon-based fuel driven vehicles will result in zero carbon emission trips, particularly in light of the very low carbon emission electricity source. Of course, one needs to take into account manufacturing carbon requirements of private vehicles, but this is a separate matter.</li> <li>• There are, in fact, many community facilities in green zone areas (including very good primary schools), and part of the plan states that rural diversification and stimulus of rural services is a desired outcome.</li> <li>• The re-use or redevelopment of redundant buildings within countryside areas for housing (or, indeed, for employment uses) is surely more “sustainable” than creating new housing on re-zoned sites.</li> <li>• There remain significant employment opportunities outside of Built-Up Areas. Is it more sustainable to require that someone who works in St Martin live in St Helier? Or that a rural based business should have its administration base in St Helier?</li> <li>• The intelligent and appropriate re-use or redevelopment of countryside buildings can provide more housing, and more diverse housing, in a brown field context with minimal impact upon the visual and ecological character of the countryside.”</li> </ul> <p>The thrust of the suggestion was that it was more sustainable to re-use existing buildings within the countryside to create new units of accommodation than it is to simply demolish such buildings and lose the development area to the Island as a whole. A reasonable consideration is that if a building exists, it already has an impact on the countryside character, and, so long as this</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p>



Consultation feedback	Response
<p>was not worsened by any proposal, there would be little need to object.</p> <p>We feel that the manifestation of this policy revealed in greater detail through the proposed SPG, is not contributing to making any change to policy in terms of maximising the sustainable efficiency of already developed buildings and sites, and this is explained further in this document.</p>	
<p>The first concern with this is what is meant by an "Interim" policy? This must relate to a period of time, but no such period is defined. As such, these proposed policies will be in place until they are withdrawn, and therefore they are as permanent as all other planning policies.</p>	<p>Noted. This is incorrect. Other planning policies are set out in the Island Plan which is approved by the States Assembly, following a prescribed process of review and consultation, set out under Articles 3, 4 and 4A of the Planning and Building (Jersey) Law. They can only be changed within the context of an island plan review.</p> <p>The proposed introduction of an 'interim' policy is brought forward by the Minister under the auspices of Article 6 of the Planning and Building (Jersey) Law. Any such policies or guidance can be amended by the Minister for the Environment, when considered necessary or appropriate to do so.</p>
<p>How long is interim?</p>	<p>Noted. See above.</p>
<p>Generally we are very much in favour of what is in this consultation.</p>	<p>Noted.</p>
<p>We also believe that what is being proposed needs to falls within the bigger picture questions of short medium &amp; long term population forecasts and the need to apply higher building, community &amp; ecological standards to all developments.</p> <p>There is also the question, as we understand it, that these consultations follow from the Island Bridging Plan, which was rushed through to suit the previous Council of Ministers and its plans for inappropriate development at Overdale. Despite the effort put in, the plan only covers the period to 2025. We think it should be extended to run to say 2032, but that this will require reconsideration of some key issues</p>	<p>Noted. The bridging Island Plan is a short-term plan precisely because the preparation of a long-term plan at a time of great uncertainty, resulting from the CV-19 pandemic and Brexit, made long-term planning unviable.</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> <p>Whilst the bridging Island Plan has a plan period of 2022-2025, it will remain in place until it is superseded by the next island plan.</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. Article 6 of the law enables the Minister to publish policy in between reviews of the Island Plan.</p> <p>POTENTIAL CHANGE:</p> <p>In order to promote clarity and to clearly differentiate the status of SPG relative to bridging Island Plan policy, however, consideration will be given to a revision of the guidance to remove reference to 'interim policy' and to present the key contents and parameters of the guidance as 'standards' only.</p>
<p>There are no considerations in relation to the established character of an area, which is an issue in many other polices of the BIP, particularly in relation to the obvious desire for locally-relevant development and Placemaking</p>	<p>Noted. It is explicitly stated in the guidance that <i>'In determining planning applications, development proposals need to be considered and tested against the plan as a whole. Proposals for residential development outside the</i></p>

Consultation feedback	Response
<p>objectives. For example, many areas of Jersey are characterised by large houses in their own grounds, including within the BuiltUp Area.</p>	<p><i>built-up area, whilst enabled in principle by the strategic policy framework, need also to be considered in relation to the detailed policy provision set out by Policy H9 – Housing development outside the built-up area, ... amongst others, as relevant..'</i></p> <p>Policy GD6 – Design quality is of particular relevance in this respect.</p>
<p>There is also a very significant issue concerning the wording of Policy H9(2) and how it is considered in paragraph 5.2 of the proposed SPG on Housing Outside the Built-Up Area, following the States Assembly voting in favour of adopting P.36/2021 Amendment 26, as lodged by Senator Moore during the Bridging Island Plan Debate</p> <p>The wording of proposed paragraph 5.2 does not include that the endorsement of Amendment 26 requires that support should be given to the creation of new homes through conversion, extension and / or sub-division of any part of an existing building.</p> <p>The correct position is set out in Policy PL5 and SP2. Amendment 26 sought to broaden the scope of what can be permitted, whereas the adopted wording in Policy H9(2) and the associated supporting text introduced to the adopted version of the BIP has tightened it, to apply to only the principle dwellinghouse structure itself. This is incorrect and does not follow the democratic vote of the Assembly.</p> <p>There is no ambiguity in the wording of Amendment 26 but if any context is needed then the States Debate can be recapped in Hansard. This records that the Minister himself understood: <i>"This one does not address dwellings, it addresses buildings. It means any building can be put up for conversion into a new dwelling or subdivision; any building."</i></p> <p>Hansard specifically records that the same position was understood by the Connetable of Trinity and the Deputy of St. Martin when they participated in the Debate. It was also consistently expressed by Senator Moore, confirming it would apply to a loft space above a garage and a gardener seeking to rent a stable as a home. None of the Members had a different understanding, they all knew the scope was wide, as this is how the Amendment was drafted.</p> <p>This position is however not expressed in the adopted BIP Policy H9(2) neither is it properly referenced in the proposed SPG, and it should be rectified in both documents.</p>	<p>Noted. This is incorrect and without substance.</p> <p>Policy H9 (then Policy H8 in the draft plan) was amended by both P.36/2021 amendment 26 brought by the then Senator Moore; and P.36/2021 amendment 92, brought by the Minister for the Environment.</p> <p>The States Assembly vote on the wording of a proposition and any amendments brought to it: the changes agreed by both of these amendments, which were approved by the States Assembly, are accurately and faithfully presented in the approved bridging Island Plan.</p>
<p>A recent debate with Kristina Moore before she was Chief Minister instructed planning to be more flexible which the assembly agreed. The drafted policy was actually tighter than the original and removed any flexibility.</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate</p>

Consultation feedback	Response
<p>Greenhouses, garages, yards, gardens - within existing curtilages should be considered.</p> <p>We are losing our young due to the affordability of housing, if parents can prove a need and fulfill a strict criteria then new development outside conversion/ extension/ sub-division should be considered. This comment is specifically related to policy H9 and not H9A.</p> <p>In essence, there should be a further section where new builds would be considered in exceptional circumstances, under strict criteria. This document should consider the needs of the population over the next couple of decades rather than be added to in a piecemeal fashion</p>	<p>under the Island Plan and is complementary but subordinate to it.</p> <p>As part of the debate to approve the new bridging Island Plan Policy H9 (then Policy H8 in the draft plan) was amended by both P.36/2021 amendment 26 brought by the then Senator Moore; and P.36/2021 amendment 92, brought by the Minister for the Environment.</p> <p>The changes agreed by both of these amendments, which were approved by the States Assembly, are accurately and faithfully presented in the approved bridging Island Plan in Policy H9.</p>
<p>Where permission is granted for the construction of new houses in the countryside, this should be subject to a condition or POA to ensure that the dwelling should not be used as Air BnB accommodation as this does not help provide additional housing.</p>	<p>Noted. The use of all or part of a dwelling to provide short-term holiday accommodation requires the benefit of planning permission under the auspices of Article 5(2)(g) of the Planning and Building (Jersey) Law.</p>
<p>We wish to suggest another paragraph in addition to the current 6 in Policy H9 as follows:</p> <ol style="list-style-type: none"> <li>The dwelling will be sold to a first time buyer at 75% of the market value with the remaining 25% transferred to the Parish.</li> <li>The Parish supports the development and there is proven demand in the Parish.</li> <li>There are a maximum of 5 dwellings in the development. Both the landowner and the developer share the cost of donating 25% of the value of the property to the Parish.</li> </ol> <p>We have not been able to identify the data that was used to justify policy H9, we recognise that there has been extensive consultation but to our knowledge, this has been qualitative based not quantitative based.</p> <p>We believe that consideration of our proposal needs to include a qualitative analysis of supply and demand for first time buyer properties on a parish by parish basis, analysed into where the properties are currently situated and planned to be situated per the attached partially completed spreadsheet.</p> <p>We attach a spreadsheet showing the information we have been able to obtain in the time available, and will continue to gather more.</p> <p>Once the data is available, we believe it will support our suggestion as FTB properties should be spread around the Island in the same proportion on existing properties in order to enable buyers to live near their parents and family and reduce vehicle journeys.</p> <p>Please also see the comments on the attached spreadsheet regarding the number of existing FTB</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate under the Island Plan and is complementary but subordinate to it.</p> <p>The BIP will meet the need to provide affordable homes, principally through the use of government-owned land, the rezoning or allocation of land and support for the direct provision of affordable homes delivered through Andium Homes. It identifies and allocates 16 sites for the direct provision of affordable homes to address the island's housing needs and to help maintain sustainable communities under the provisions of <a href="#">Policy H5 – Provision of affordable homes</a>.</p> <p>Not all of these mechanisms are, however, sustainable in the long-term and it has been long recognised that private developers of open market homes can, and should, play a more active role in delivering more affordable homes. <a href="#">Policy H6 - Making more homes affordable</a> requires development proposals involving the creation of 50 or more new dwellings to provide at least 15% of the development being made available for sale or occupation by islanders eligible for assisted purchase housing. This policy will take effect on the adoption of planning guidance, which is being prepared.</p>

Consultation feedback	Response
<p>properties being available to qualified buyers on the gateway being reduced due to:</p> <ul style="list-style-type: none"> <li>• No longer being affordable</li> <li>• Owner being allowed to rent rather than sell</li> <li>• Resale not restricted</li> </ul>	
<p>I am struggling to understand the position that is being taken that the Bridging Island Plan which is seeking to narrow the circumstances where new households might be created outside the built-up area.</p> <p>My experience of decision-making under the 2011 (Revised 2014) Island Plan, was that it provided a very strict policy framework and there were only limited circumstances when new dwellings could be approved outside the Built-Up Area.</p> <p>This policy context should be made clear as the policy direction and spatial strategy being promoted does not appear to support the traditional Jersey land-use pattern. The Jersey family is what makes the Jersey community unique. Historically, Jersey families lived in small hamlets or in the same Parish, supporting each other and sharing trips for shopping, trips to the doctors and so on. There was no need for cross island vehicle trips to visit relatives; because they lived close by and usually within walking distance. Whilst over the decades, with increased immigration, this pattern has shifted, it still holds true in the country parishes – and is especially relevant to this consultation, The development of homes in the countryside.</p> <p>The spatial strategy, which was introduced to the island in the 1960's by Mr Barette and which has become established by successive Island Plans, has been successful (on the whole) at protecting the island's landscape, however as it is now framed it does not appear to support the traditional Jersey cultural or land use model. That isn't to say that more homes shouldn't be directed to the Built-Up Area for the right purpose, but the blanket policy approach provided by the Bridging Island Plan, 2022 makes it almost impossible for families living in the countryside to support each other.</p> <p>The joint approach to this consultation i.e. H9 &amp; H9A is further muddying the approach as both policies deal with different issues.</p> <p>How many homes could be created for islanders within existing buildings, or within existing building groups, close to parish centres and existing communities? The concern about impact on landscape and other environment character is understood, but these are detailed considerations that can be controlled and assessed when applications for development are made. Could some of the positive impacts of allowing families to live closer to each other be, that there are fewer vehicle trips on the</p>	<p>Noted. To promote the most sustainable pattern of development in the island, this bridging Island Plan seeks to principally meet the community's need for homes in the island's built-up areas.</p> <p>The plan, by virtue of Policy H9, recognises, however, that it would be unreasonable to resist all forms of development to improve people's homes where they lie outside the built-up area; and where there is the potential to optimise the use of existing dwellings through the creation of new households. This new policy allows greater flexibility to create new homes in the countryside, through the extension or sub-division of existing dwellings; by re-using traditional farm buildings or listed buildings; and the conversion or redevelopment of employment buildings and dwellings.</p> <p>It is also relevant to note that the plan offers support to the vitality of some of the island's rural parish communities through the allocation of land for the provision of affordable homes, at St Ouen, St Peter, St Mary, St John, Trinity and St Martin.</p>

Consultation feedback	Response
<p>road and could there be greater support available for parish communities.</p> <p>This does not have to be on a field or area of countryside importance. There are a number of areas within the curtilage of existing building groups that could be considered. It is disappointing to see garages are excluded from the consultation document. Yards with no value that could be further landscaped have not been considered, nor has the potential benefit of tidying a site with additional landscape character when sufficient infrastructure is available. Sympathetic and sensitive siting, design and use of materials, a net benefit to the environment, and the community benefits have not been considered.</p> <p>There will always be a pressure to build. Not only are local youngsters now completely priced out of the market, the financial global pressures of the next few years will create a bottleneck of first time buyers and provide further pressure to the planning department. There is no consideration given to unique family businesses in the countryside such as farming and tourism.</p> <p>I am essentially asking you to take an “outside the box” approach and allow some local families to support their children’s wish to remain in the island when there is the opportunity to do so – within a strict framework that benefits rather than harms the environment.</p> <p>I’m not sure where we have lost the opportunity to create communities in the last few decades, and I realise it is in part due to an over-reaching desire to protect the essence of our island, but there are opportunities where we could have a win, win situation.</p> <p>Allowing the re-use of existing buildings/ unattractive spaces within existing curtilages could provide a limited number of homes could allow families to support each other at no cost to the GoJ?</p> <p>There would obviously need to be nett benefit to the community and this wouldn’t solve every issue, but could maintain small communities within a series of strict guidelines under exceptional circumstances.</p>	
<p>We have taken it that this SPG does not apply to the rezoned affordable housing sites designated in the BIP</p>	<p>Noted. This is correct. As required by Policy H5, the sites rezoned for the provision of affordable homes will be the subject of their own supplementary guidance in the form of development briefs.</p>
<p>Release more derelict land</p>	<p>Noted. This guidance explains how the existing Island Plan Policy H9: Housing outside the built-up area will be applied in practice. This policy has already been approved by the States Assembly, when it approved the Island Plan in March 2022, and it cannot be changed by guidance. Supplementary planning guidance is designed to operate</p>

Consultation feedback	Response
	<p>under the Island Plan and is complementary but subordinate to it.</p> <p>The release of further land can only be considered within the context of an island plan review.</p>
<p>The fish must be encouraged to buy small flats in town with 0.4 parking spaces per property, they must live in this for 6 years (with a minimum of 7 months per year spent in it) before they can purchase a larger property inside the built up area where they also have 0.4 parking spaces per property.</p>	