

ID	Agent	consult.	Org.	No.	Title	Object/Support	your suggested changes	why necessary:	P&E General Response	P&E Detailed Response	Minister Recommendation	Plan amendment	justification
DP11 83		Mr Ralph Buchholz		Map .1	Proposals Map	Neither	Remove area to the east of Mont Nicolle school and north of Vue du Vallon from built up area to green zone. See attached map.	There is a clear boundary change where the dominant landscape form changes from built up area to the east of Mont Nicolle from the northern boundary of the properties Vue du Vallon. The error in the hardcopy version of the map was not spotted until after they had been released for public consultation.			Minister minded to amend error on hardcopy version of proposal map as published on 26th September 2009	Area identified to the east of Mont Nicolle school and north of Vue du Vallon to be zoned as green zone on draft proposals map. See attached map.	There is a clear boundary change where the dominant landscape form changes from built up area to the east of Mont Nicolle from the northern boundary of the properties Vue du Vallon. The error in the hardcopy version of the map was not spotted until after they had been released for public consultation.
DP11 84		Mr Ralph Buchholz		Map .1	Proposals Map	Neither	Include fields 236 & 237 in St. John into important open space zoning boundary.	These fields are zoned in the 2002 Island plan as H3 sites and following a review of all sites were not included in the draft plan as they were not required (in terms of numbers) and did not meet with the Minister's stated aim of protecting green field sites. It is noted however that they may come forward in the future as part of potential village plan proposals brought forward by the parish. Therefore the area should be designated important open space to extend the area, which has the same landscape value, currently zoned for this purpose to the immediate east. The error in the hardcopy version of the map was not spotted until after they had been released for public consultation.			Minister minded to amend error on hardcopy version of proposal map as published on 26th September 2009	fields 236 & 237, St. John to be zoned as important open space on draft proposals map.	The fields are important areas of important open space with in the village envelope and should be protected from development.

DP11 68		Kevin Pilley		Map .1	Proposals Map	Neither	Key on Town Proposals Map needs amendment: should change 'Potential Pedestrian Priority Street (Proposal 17)' to 'Pedestrian Priority (Proposal 18)'	To correct an error	Amend error		Minister minded to amend error	Key on Town Proposals amended to 'Pedestrian Priority (Proposal 18)'	Clear error on key map.
DP26 4		Kevin Pilley		Map .1	Proposals Map	Neither	Error on key on Proposals maps (both): safety zones on key refer to Policy NR6, whereas reference should be to NR5.		Noted and amend Plan as suggested		Minister minded to amend Plan	Key on draft proposals map amended to Policy NR5	Clear error on key map.
DP34 9	Mr James Naish	Mr Lambert Caree		Map .1	Proposals Map	Objectin g	On behalf of our Client, Mr Lambert Caree, owner of the above Fields, we write to ask if the boundary of the built-up zone and green zone can be adjusted to a more logical line at the field boundary.	On the draft Island Plan the green zone/built up area is drawn through Field 616/617 at the edge of the agricultural sheds as shown on the O/S. However, the most southerly shed has recently been extended as the attached photograph shows, but the O/S has not been updated yet to indicate this. As the BUA boundary is supposed to reflect the existing buildings/development, it would seem sensible for the built-up zone to be extended to the field boundaries which would also enable our client to be able extend his other shed more easily in the future. See attached letter	Minded to amend	Given that planning approval has been granted and that construction to extend a pre-existing shed has since been completed, it is reasonable to extend the Built-Up Area boundary to reflect the development that has taken place on this site.	Minister is Minded to amend	Built up area boundary extended on proposals map to include shed.	Recent planning approval and construction to extend a pre-existing shed has changed the character of this area to built up.
DP55 9		Deputy John Le Fondre		Map .1	Proposals Map	Objectin g	Inconsistency - the document refers to Policy NE 6 whilst the map refers to Policy NE 5		Noted	Amend inconsistency between Policy NE5, NE6 as shown in written document and Proposals Map	The Minister is minded to amend the Proposals Map to deal with the errors identified on the proposals map relating to nomenclature of policies	Key on draft proposals map amended to Policy NE6	Clear error on key map.

DP66 9	Deputy James Reed	Education, Sport and Culture	Map .1	Proposals Map	Objectin g	<p>Rouge Bouillon School The ESC Department is considering possible options in respect of Rouge Bouillon School, and it would wish to be consulted in the event that the Police Station and/or Fire Station sites should become available for redevelopment. These sites adjoin the school, and there may be scope, for example, to acquire part of this area for additional school facilities , e.g. for an outdoor play area. Sites for Educational Use Several sites are currently identified in the Island Plan under Policy SCO 1 as being ' safeguarded for educational use , the alternative development of which will not be permitted unless it can be demonstrated they are no longer required for educational purposes '.</p> <p>Three sites are listed under this policy (Field 327, St. Martin ; Field 1219, St. Helier; and the former d'Hautree School site) , and the Ministerial Team recommend s that these should be retained under this policy in the new Island Plan for the reasons given below - (i) Field 327. St. Martin : Discussions are currently taking place between the Property Holdings and Planning Departments about the location of the proposed new primary school , with the current preferred location for the new school building being on either Field 327 or 327A, and the Ministerial Team recommends the new Island Plan should allow for either possibility. (ii) Field 1219, St. Helier: This is commented upon in more detail in paragraph 6(i) of the attached report. (iii) Field 525, St. John : This is commented upon in more detail in paragraph 6 (ii) of the attached report. (iv) Former d'Hautree Site, St. Helier: This site is also commented upon in the attached report (see paragraph 6(iv)). In addition</p>	Noted, and minded to accept proposals to safeguard additional land for educational purposes, where the evidence of need can be demonstrated.	<p>The following comment is made in relation to the specific sites identified: Rouge Bouillon Fire and Police HQ: the Planning and Environment Department is not aware of the proposed relocation of either service from this site during the Plan period and they remain operational. The policy regime provided by Policy SCO1 would, under SCO1(3) enable this site to be used for educational purposes should the evidence of need be demonstrated and the site cease in its current use. As the site is owned by the States, it is considered appropriate for the Dept for ESC to register its interest in the potential release of the site for educational use with Jersey Property Holdings if it hasn't already done so. Field 327 and 327A, St Martin: Field 327 is already safeguarded for educational purposes. Field 327A is protected as Open Space under Policy SCO4. It is considered that the development of Field 327A for the provision of a school would have the potential to adversely affect the character of the village and would prejudice the adequate provision of school playing fields; Field 263A, Grouville: this land is protected as open space under Policy SCO4. The redevelopment of the southern part of the site for school play space is not considered to be objectionable on the basis that it represents another form of open space that has a greater community benefit provided that the</p>	<p>The Minister is minded to amend the draft Plan, at SCO1 and the Proposals Map, to support the further safeguarding of land for educational purposes in the following locations, where there is justifiable evidence of need: part of Field 263A, Grouville; part of Field 782, St. Ouen; part of Field 1533, St. Helier. The Minister is not minded to amend the draft Plan in relation to: Rouge Bouillon Fire and Police HQ; Field 327A, St Martin.</p>	<p>Proposals map amended to include: part of Field 263A, Grouville; part of Field 782, St. Ouen; part of Field 1533, St. Helier as sites protected for Education purposes.</p> <p>Amend supporting justification by the addition of the following paragraphs after para 7.13:</p> <p><i>At Grouville Primary School, the Education, Sport and Culture Department consider that it would be beneficial to secure a further outdoor play area on part of Field 263A. The redevelopment of the southern part of the site for school play space is not considered to be objectionable on the basis that it represents another form of open space that has a greater community benefit.</i></p> <p><i>At Les Landes Primary School, the Education, Sport and Culture Department consider that it would be beneficial to secure a further outdoor play area on Field 782, which adjoins the existing school playing field.</i></p> <p><i>First Tower School presently has no direct or easy access to outdoor sports facilities. The further safeguarding of land to provide appropriate facilities to First Tower School would be supported where there is demonstrable evidence of need.</i></p> <p>Policy SCO1 amended to:</p> <p><u>Educational Facilities</u></p> <p>The development of public or private educational sites and facilities for alternative uses will not be permitted except in exceptional circumstances and only where it can be demonstrated that the premises are surplus to public and private educational requirements and the wider community need.</p> <p>Proposals for the development of additional educational facilities or for the extension and/or alteration of existing educational premises will be permitted provided that the proposal is;</p> <ol style="list-style-type: none"> 1.within the grounds of existing education facilities; or 2.on a safeguarded site; or 3.within the Built-up Area; <p>To address deficiencies in the provision of education facilities, the following sites are safeguarded for educational use, the alternative development of which will not be permitted unless it can be demonstrated that they are no longer required for educational purposes:</p> <ol style="list-style-type: none"> 1. Field 327, St. Martin; 2. part of Field 1219, Mont a L'Abbe, St Helier; 3. the former D'Hautrée School site; 4. part of Field 263A, Grouville; 	<p>At Grouville Primary School, the Education, Sport and Culture Department consider that it would be beneficial to secure a further outdoor play area on part of Field 263A. The redevelopment of the southern part of the site for school play space is not considered to be objectionable on the basis that it represents another form of open space that has a greater community benefit.</p> <p>At Les Landes Primary School, the Education, Sport and Culture Department consider that it would be beneficial to secure a further outdoor play area on Field 782, which adjoins the existing school playing field. First Tower School presently has no direct or easy access to outdoor sports facilities. The further safeguarding of land to provide appropriate facilities to First Tower School would be supported where there is demonstrable evidence of need.</p>
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DP788	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Field 121 9, La Grande Route du Mont A L'abbe, St Helier, Re-Zoning Case to Educational Use and Category A Housing	<p>I write in response to the Draft Island Plan White Paper and to the proposal to re-zone the above site for educational use and for Category A Housing. Because, Haute Vallee School has confirmed that it only requires half the land (rather than the two-thirds proposed to be zoned for these purposes as shown on the Draft Proposals Map), and because the owner is only willing to fund this development on behalf of Haute Vallee School if the remaining half of the site is re-zoned for Category A Housing (rather than the third shown on the Draft Proposals Map) and subject to all the units being 1st time buyer to make the development as a whole economically viable, then he would be happy for it to be put forward on this basis. We are therefore suggesting the removal of the allotments which, in the Development Brief attached as Appendix B to the Draft Island Plan, is also reserved a third of the site. The provision of allotments are not however regarded to be of strategic importance and, given the encouragement for this type of development in the Draft Island Plan, can easily be located elsewhere, unlike the educational and Category A Housing development which rely on each other in terms of delivery. Moreover, the increase in the number of new dwellings that can be provided will help to satisfy the serious shortfall of Category A Housing in the island and on what is, arguably, the most sustainable site given its location on the edge of the town of St Helier and its proximity to local shops and services. I understand this case will be referred to the Independent Inspector and we will be given the opportunity to make representations at his Examination in Public. Please advise me when this is likely to take place and whether we will be able to make our representations to the Inspector in person.</p>	noted and supported	<p>The Minister may consider enlarging the site to increase the capacity for affordable housing in the early years of the Plan, in the light of his intention to recommend removal of Samares Nurseries, Cooke's Nurseries and Longueville Nurseries from Policy H1. In addition it is recognised, following discussions with Education, that the cost of providing the playing fields is in the region of £900,000 and this could affect the viability of the housing area. Educations also stipulate a minimum of 50% of the field is required for sports a field (DP805).</p>	<p>Minister minded to increase the size of the site zoned for housing (to be no larger than 50% of the field 1219) and carry out further consultation.</p>	<p>The eastern half of Field 1219, St. Helier to be zoned for category A housing.</p>	<p>Evidence that ESC department only require 50% of field for education purposes and due to costs of developing education sports field the site would likely be unviable for category A housing under previous zoning area. Additional Category A housing units are also required with the expected loss of Samares nursery site</p>
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DP79 9		Mr Chris Sampson	States of Jersey Transport & Technical Services	Map .1	Proposals Map	Objecting	Zoning of La Collette Area. The Planning Zones shown for La Collette in the Draft Island Plan do not reflect our plans for the current or future uses of the site and do not fully account for safety restrictions imposed post Buncefield . Further information to follow. See attached letter		Accept	On the grounds of potential risk from adjacent land uses, represented by the revised safety zones at La Collette (Policy NR5), there is likely to be a restriction on general public access to this area. On this basis, the use of the land here for a publically accessible area of open space is not viable on safety grounds. The land can continue to serve, however, as a visual green buffer to the industrial uses and built forms at La Collette, and remain to be protected as open space. \	The Minister is minded to amend the draft Plan	Amend plan at 7.53, 4 th bullet to read: La Collette 2 coastal park: the planning framework for the use of land at the La Collette 2 reclamation facility envisages the provision of a significant area of open space at the completion of reclamation activity. <i>Whilst originally proposed to be publicly accessible, this area is within an identified area of risk, owing to the proximity of hazardous installations. On this basis, the area remains to be developed as open space, to provide an important visual feature and landscape buffer, but will not be publicly accessible.</i>	This area is within identified areas of potential risk where public access is inappropriate on the grounds of public safety.
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DP890		James Ransom	Longueville Garden Centre	Map .1	Proposals Map	Objecting	<p>I am writing to you with reference to the proposed rezoning of Longueville Garden Centre. My name is James Ransom and I currently lease the garden centre off Mr. Hamon with the hope to buy it. I have offered Mr. Hamon (over the past 2 years or so) 3 offers to purchase the property to continue as a garden centre business. The last cash offer I had offered Mr. Hamon was 20% higher than the highest valuation I had carried out on the centre. I would like to object to the proposed planning rezoning of Longueville Garden Centre on the following grounds. Access on peak traffic times will be a hazard to say the very least. With 10-15 houses (I understand there is a push to get 20+) could mean an extra 30 to 40 cars trying to leave and return at peak times. The road is packed enough and onto a very busy road by a trading estate. It would also be not viable to have then exit or enter from Rue Messervy this will be far too much traffic for the small lane. This is a perfectly viable business and I would be unable to start one in just any site. As above I have offered cash at more than market price. The traffic flow is far less on the site at the peak times than it would be as an estate. St Saviour parish is grossly under pressure with a number of far more viable redundant sites proposed for development like the milk marketing board; Mr. Carters proposed field development and the proposed revamping of Les Cinqs Chenes estate.</p>		Objection noted	<p>The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Saviour and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.</p>	Minister minded to support request to remove site from Plan.	Longueville Nursery Category A housing site removed from proposal map and policy H1.	Site not supported by Parish of St. Saviour.
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DP95 1		Deputy Philip Rondel	Parish of St John Working Party	Map .1	Proposals Map	Objecting	The western part of Field 525 is allocated for a playing field for St John's School.		Noted, and minded to accept proposal to safeguard western part of the site for school playing field, where the evidence of need can be demonstrated. Not minded to accept proposal to safeguard land for the purposes of facilitating car-borne access to the site and parking.	It is incumbent upon the Minister for ESC to demonstrate evidence of need for provision of school playing field facilities. The following has been submitted: The school currently uses the playing fields at St. John's Recreation Ground, which are situated about half a mile from the premises, and students have to walk along a busy main road to get there. This road has no pavement and is therefore considered unsuitable for the younger age range, and as a result the pupils in the Reception class and Years 1 and 2 do not have access to playing fields . If a playing field were to be provided on Field 525, it is recommended that such a facility should have a minimum area of 2,500 square metres so as to meet the U.K. statutory requirements for 5-11 primary schools.	The Minister is minded to accept proposal to safeguard western part (up to 2,500 sqm) of F.525 for educational purposes to enable the provision of school playing field facilities and would be minded to support an amendment of the Plan.	Proposals map amended to include: part of western part (up to 2,500 sqm) of F.525, St John for educational purposes. Amend supporting justification by the addition of the following paragraphs after para 7.13: <i>At St John's Primary School the school currently uses the playing fields at St. John's Recreation Ground, which are situated about half a mile from the premises, and students have to walk along a busy main road to get there. This road has no pavement and is therefore considered unsuitable for the younger age range, and as a result the pupils in the Reception class and Years 1 and 2 do not have access to playing fields. It is recommended that such a facility should have a minimum area of 2,500 square metres so as to meet the U.K. statutory requirements for 5-11 primary schools.</i> Policy SCO1 amended to: Educational Facilities The development of public or private educational sites and facilities for alternative uses will not be permitted except in exceptional circumstances and only where it can be demonstrated that the premises are surplus to public and private educational requirements and the wider community need. Proposals for the development of additional educational facilities or for the extension and/or alteration of existing educational premises will be permitted provided that the proposal is; 1.within the grounds of existing education facilities; or 2.on a safeguarded site; or 3.within the Built-up Area; To address deficiencies in the provision of education facilities, the following sites are safeguarded for educational use, the alternative development of which will not be permitted unless it can be demonstrated that they are no longer required for educational purposes: 1. Field 327, St. Martin; 2. part of Field 1219, Mont a L'Abbe, St Helier; 3. the former D'Hautrée School site; 4. part of Field 263A, Grouville; 5. part of Field 782, St. Ouen; and 6. part of Field 1533, St. Helier; 7. <i>western part (up to 2,500 sqm) of F.525, St John</i>	Currently facilities serving the school are inadequate
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DP76 5	A H Harris		1	Background and Context	Neither	<p>Village Schemes - where village schemes setting out conservation areas etc have been developed in consultation with the Parishes, they should not be amended or ignored without prior consultation with the Parish concerned. Until appropriately amended, they remain in force. The map included with the draft Island Plan, and those available at the road show venues, were far too small to establish whether all elements of the St Mary Village Scheme have been honoured.</p>		Noted	<p>The St Mary's Village Development Plan was adopted by the States on 07 April 1994. Whilst many of the objectives of the development plan have been delivered e.g. new community centre, key elements of the plan remain valid, including the definition of the village boundary, which remains largely intact as does the protection of important areas of open space. These substantive elements are now, however, embedded in the draft Island Plan policy framework and they effectively supersede the provisions of the earlier local development plan. Because of this, as stated at 4.87, it is not considered necessary to renew village plans, unless there are specific reasons to do so (as set out at Proposal 14). It is considered beneficial, however, that the draft Plan clearly sets out its status relative to those local development plans that have been produced earlier and, on this basis, it is considered appropriate to include a definitive list of all of those earlier development plans which will be superseded by the new Island Plan upon adoption.</p>	<p>The Minister is minded to amend the draft Plan to include a list of development plans superseded by the new Island Plan</p>	<p>The following development plans are superseded by the new island plan:</p> <ol style="list-style-type: none"> 1. St. Mary's village Development Plan (1994) 2. St. Martin's conservation & Development Plan (1994) 3. St. Ouen's Bay Planning Framework (1999) 4. Waterfront Development Plan (2001) 	<p>Revised plan supersedes previous plans due to either more up to date evidence base or plans /proposals completed.</p>
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DP82 8	Mr Rod Mcloughl in	1	Backgroun d and Context	Objectin g	Protect and enhance our unique culture and identity. It would be desirable to add this to the list to make that linkage explicit in the expectation that there is further scope to safeguard and reinforce what makes the Island unique in the Plan.	<p>ESC has an important stake in the Island Plan through its stewardship of cultural policy. Although , in one sense, the Island Plan is inevitably 'about' the Island's culture in the general sense , there is an opportunity to be more specific about linking up some other aspects of the cultural agenda. The States Cultural Strategy identifies as a specific objective the goal of expanding the cultural content of the Plan. Objective 4.3 is: "To adopt more comprehensive cultural objectives for inclusion in the next revision of the Island Plan". ESC is charged with contributing to that expansion of cultural focus . Other objectives in the strategy which are relevant to this are:</p> <ul style="list-style-type: none"> o To support the guardian and stewardship roles for preserving the built and natural environment of the Island, particularly for those facilities and collections which most foster a sense of identity and pride. (1 .3) o Working with other States departments and cultural providers to help develop 'green tourism ' through signage, artworks , information, tours etc. (3.3) o To commission local artists and crafts-workers wherever possible to enhance new public developments and to encourage the private sector to do likewise in their new developments. (3.6) o To improve the public domain by developing and extending the current Public Art Policy and by developing public art strategies for different locations . (4.1) o To strengthen the existing Percent for Art policy for all future developments, both public and private . (4.2) o To develop guidelines and management plans that will help improve public space and the built environment. (4.4) <p>The Cultural Strategy clearly envisages, therefore, a direct relationship between the Island Plan and cultural outcomes. Although there are numerous references in the Plan to heritage and culture, there are opportunities to strengthen the direct relevance of planning policy to cultural identity. Notably, the list of States Strategic Plan priorities which are directly related to the Plan at 1.6 does not currently include priority 15:</p>	Accept	At 1.6 add 'Protect and enhance our unique culture and identity' to the list of strategic priorities	The Minister is minded to amend the draft Plan	<p>Section 1.6 to read:</p> <p>1.6 The following are priorities identified in the document that can be directly related to the Island Plan;</p> <ul style="list-style-type: none"> • Maintain a strong, environmentally sustainable and diverse economy. • Limit population growth. • Maintain and develop the Island's infrastructure. • Protect and enhance our natural and built environment. • Adequately house the population. • 'Protect and enhance our unique culture and identity' 	Error in editing of draft plan.
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DP840		Mr Rod Mcloughlin			Economic Growth and Diversification	Neither	At 2.58 consideration might be given to adding the creative industries to the list of sectors of the economy, particularly in view of the possibilities afforded by the Island Plan to encourage creative artists in exerting a positive influence over the environment.		Accept	Considered appropriate to accept the comment made in view of the potential offered for economic diversification and contribution towards local quality of life	The Minister is minded to amend the draft Plan	2.58 Some developments can accommodate particularly high value types of employment, for example, the finance industry can provide relatively high returns from within a small footprint. Other sectors of the economy, such as the service sector, tourism, retail, agriculture and creative industries are equally important to the economy and can also contribute to other aspects of the quality of Island life such as a relatively greater level of access to community benefits and services or in the case of agriculture, the quality and character of the Island's countryside.	Change makes list of sectors more comprehensive.
DP1021		Ray Shead	The Jersey Chamber of Commerce	Policy GD 1	General Development Considerations	Objecting	No reference to Eco-homes or Building Research Establish Environmental Assessment Method (BREAAAM) requirements for commercial developments and residential schemes. There should not be a presumption that only UK architects can produce schemes in line with objective GD1. This is uneconomic, money goes out of the Island, it is difficult to manage, expensive and inappropriate as all senior architects on the Island have been trained off Island. It is recommended that this clearly places energy, carbon emissions and sustainability at the heart of new developments.		Accept	Energy standards for buildings, as set by the Building Bye-Laws in Jersey, are presently the subject of review. Work is also underway to develop, publish and adopt supplementary planning guidance which seeks to promote and encourage the more energy efficient design and construction of buildings, particularly homes. Matters about the use of non-local architects are not material to the draft Plan.	The Minister is minded to amend the draft Plan to require new development above a specified threshold to incorporate renewable energy production.	Addition of new policy in Natural Resources – Energy Resources, section of Plan <i>All new development (either new build or conversion) with a floor-space of 1,000 m2 or ten or more residential units will be required to incorporate renewable energy production equipment to provide at least 10% of the predicted energy requirements.</i>	To actively promote energy efficiency in new buildings it is considered appropriate to incorporate a new policy in the draft Plan that reflects the 'Merton Rule' and subsequent variations, by requiring new development above a specified threshold to incorporate renewable energy production. Not only would this encourage the greater use of and reliance on renewable energy sources (e.g. photovoltaic energy, solar-powered and geo-thermal water heating, energy crops and biomass), it would also encourage energy saving measures to reduce the cost of providing 10% renewables (e.g. greater insulation, greater use of terraces and other energy efficient building forms, condensing boilers, passive stack ventilation, improved interior day lighting standards etc).

DP57		Mr Stephen de Gruchy		Policy GD 1	General Development Considerations	Supporting	Support with Caveats Re: paragraph 3(e). I am not sure that the word, "unreasonably" is the most appropriate one. The way 3(e) is drafted, it begs the question, "When would it be reasonable to affect safety?" I suspect the answer is only when it is not material. So, perhaps 3(e) could be amended to say something like, "not affect, to any material extent, the safe operations of"		Accept	The proposed amendment is considered to be more appropriate and to provide greater clarity.	The Minister is minded to amend the draft Plan	Revise Policy GD1(3)(e) to read: <i>not affect, to any material extent the safe operations of Jersey Airport and Jersey harbours, including both the Island's harbours and navigation marks.</i>	The proposed amendment is considered to be more appropriate and to provide greater clarity.
DP875		Mr Stephen D Smith	Health Protection Services	Policy GD 1	General Development Considerations	Neither	New accommodation in mixed use developments or subject to high external noise environments should be limited, but where appropriate and permitted designed and built to comply with WHO guidelines i.e. a) Bedrooms - internal noise should not be greater than 30dB(A) Leq, 8 hr (23:00 - 07:00 hrs); b) Living rooms - internal noise should not be greater than 35 dB(A) Leq, 16 hr (07:00 - 23:00 hrs); c) Kitchens - internal noise should not be greater than 45dB(A) Leq, 16 hr (07:00 - 23:00 hrs). The provision of acoustic double-glazing and whole house ventilation will be needed to achieve these noise levels. If external noise levels exceed WHO guidance balconies should not be provided.		Accept the need for clear guidance	It is considered that the implications of noise are already adequately addressed by this draft policy, at GD1(3)(c). Proposal 1 also enables the development of supplementary planning guidance to determine thresholds for safe and appropriate exposure to levels of noise for different types of development. It is considered appropriate that SPG be developed, in consultation with Health Protection, to develop SPG to address the comments made in order to provide clarity and certainty about appropriate noise standards.	The Minister is minded to amend the draft Plan at Proposal 1 and Appendix A to identify the requirement for additional guidance to establish acceptable thresholds for exposure to noise	1.7 To enable an assessment to be made as to whether the considerations listed in Policy GD1 have been fully and properly taken into account an appropriate level and quality of information must be provided with a planning application. In certain circumstances, applicants may be required to submit more detailed information in the form of Design Statements, Environmental Impact Assessments (EIA), Transport Assessments, Archaeological Evaluations, site investigations for contaminated land, travel plans, waste management plans, crime reduction assessments, noise standards or other additional information, as an integral element of a planning application. <u>Appendix A</u> Addition of the Development of noise standards in the list of new supplementary planning guidance	

DP988		Captain Howard Le Cornu	States of Jersey Harbours	Policy GD 1	General Development Considerations	Objecting	The impact any land based development on the visibility of existing navigation marks (both land and sea based) when viewed from the sea should be taken into consideration at the planning stage, especially in St Helier. We would like to see this point strengthened and raised in importance. It is more than 'harm the amenities of the neighbouring uses'.	The RYA and British Marine Federation have produced a useful reference document - 'Planning Guide for Boating Facilities' . We would recommend that this is considered as best practice.	Noted	Policy GD1(3)(e) makes reference to the impact of development upon the safe operation of Jersey harbours. It is considered, however, that the purpose of this part of the policy should be widened to include reference to development where it does "not affect, to any material extent, the safe operations of" both the Island's harbours and navigation marks.	The Minister is minded to amend the draft Plan	Revise Policy GD1(3)(e) to read: <i>not affect, to any material extent the safe operations of Jersey Airport and Jersey harbours, including both the Island's harbours and navigation marks.</i>	Policy is more specific to which potential planning applications can be measured against.
DP1032		Ray Shead	The Jersey Chamber of Commerce	Policy GD 7	Design Quality	Objecting	This should include improved performance and environmental standards for buildings to support future energy and environmental targets and energy policy objectives.		Noted	The Minister for Planning and Environment is minded to develop a Jersey Code for Sustainable Homes as supplementary planning guidance	The Minister is minded to amend the draft Plan to make reference to his intent to develop, publish and adopt a Jersey Code for Sustainable Homes as supplementary planning guidance	Update to Proposal 2: The Minister for Planning & Environment will develop, publish and adopt a Jersey Code for Sustainable Homes as supplementary planning guidance. Appendix A: Add Jersey Code for Sustainable Homes to supplementary planning guidance list.	Supports sustainable development objectives as outlined in section 2.7 on sustainable development

DP609		Mr Bruce Willing		Policy GD 7	Design Quality	Objecting	There needs to be specific reference to environmental requirement and sustainable building codes or standards within this section of the DIP	The DIP is very well put together, clearly by a panel with many direct and vested interests; it is well written, clear to understand and vastly long at over 600 pages. It is a 'pantehnicon' of thoughts, principles and statements designed to cover all eventualities and has the collective value of being able to be used to counter any proposals that might fall outside the views and prejudices of the individual planners. Yet, within Section 4 dealing with The Built Environment, there is no direct reference to the need for environmental protection, sustainability, or National standards. (They are referred to, in outline, in the Guiding Principles) This is a pity and, at the very least, the DIP should aspire to the UK Code for Sustainable Homes Standard, or propose that Jersey adopt its own version of the standard, particularly if the Department is to be renamed as "The Environment Department".	Noted	The Minister for Planning and Environment is minded to develop a Jersey Code for Sustainable Homes as supplementary planning guidance	The Minister is minded to amend the draft Plan to make reference to his intent to develop, publish and adopt a Jersey Code for Sustainable Homes as supplementary planning guidance	Update to Proposal 2: The Minister for Planning & Environment will develop, publish and adopt a Jersey Code for Sustainable Homes as supplementary planning guidance. Appendix A: Add Jersey Code for Sustainable Homes to supplementary planning guidance list.	Supports sustainable development objectives as outlined in section 2.7 on sustainable development
DP1110		Mr Ben Ludlam	C Le Masurier Ltd	3	Historic Environment	Objecting		The general detail on Historic Buildings in the document is not clear and 3.9 suggests a single Listing class. This is now subject to a separate consultation and to which we have sent comments. The Listing of Historic Buildings needs to be review in its entirety with a greater degree of detail / consideration for each specific building.	Reject	This is a comment on the review of the historic environment protection system, which is under review, and not on the policy framework to be provided by the Island Plan. The issue raised will be considered as part of the HE Review.	The Minister is minded to amend the draft Plan as a matter of course to reflect the progression of the review of the historic environment protection regime, which has been approved for implementation following supportive consultation.	No substantive change other than Plan will simply be rewritten, where relevant, to make sure that it is up-to-date and using appropriate nomenclature relative to progress of review of historic environment protection regime.	To ensure updatedness of plan

DP46 5		Mr Charles Alluto	The National Trust for Jersey	Objective BE 2	Regeneration of St. Helier Objectives	Objecting	The Trust is concerned to see the use of the term showcase for the town's heritage features.	The heritage features of St Helier are its historic character, scale, grain and spatial quality and it is essential that the design-led high quality built environment should seek to build upon, enhance and be compatible with these elements and not simply highlight St Helier's flagship heritage sites.	Minded to accept	It is clear, from other parts of the draft Plan, specifically the Historic Environment chapter, that the Minister is seeking to adopt a holistic approach to the protection, maintenance, enhancement and promotion of the Island's historic environment. It is acknowledged that this objective is inconsistent with this approach highlighting as it does, specific heritage features, rather than the contribution that the historic development of the built environment makes, in its entirety, to the character and sense of place in the built environment.	The Minister is minded to amend the draft Plan to delete the word 'features' from Objective BE2	Character, quality and vitality Establish a design-led high quality built environment, which showcases its heritage;	It is clear, from other parts of the draft Plan, specifically the Historic Environment chapter, that the Minister is seeking to adopt a holistic approach to the protection, maintenance, enhancement and promotion of the Island's historic environment. It is acknowledged that this objective is inconsistent with this approach highlighting as it does, specific heritage features, rather than the contribution that the historic development of the built environment makes, in its entirety, to the character and sense of place in the built environment.
DP11 66		Kevin Pilley			Jersey Airport Regeneration Zone		Para. 4.82 requires amendment to state that any land-use masterplan or development brief for Jersey Airport will be adopted and published as supplementary planning guidance by the Minister for Planning and Environment following consultation and engagement with key stakeholders, including local residents.	To promote consistency with Proposal 12 and to provide clarity and to remove ambiguity.	Accept	Para. 4.82 requires amendment to state that any land-use masterplan or development brief for Jersey Airport will be adopted and published as supplementary planning guidance by the Minister for Planning and Environment following consultation and engagement with key stakeholders, including local residents.	The Minister is minded to amend the draft Plan	4.82 Any land-use masterplan or development brief for Jersey Airport will be adopted and published as supplementary planning guidance by the Minister for Planning and Environment following consultation and engagement with key stakeholders, including local residents.	To promote consistency with Proposal 12 and to provide clarity and to remove ambiguity.

DP11		Matthew Waddington		Proposal 12	Jersey Airport Regeneration Zone	Objecting	4.76 & map - tighten to limit development & regeneration zone to areas inside airport boundaries - clarify what kinds of development are contemplated within that zone and what difference it makes to what would otherwise have been permitted there.	Para 4.76 is much too vague about what regeneration means at the airport. The map also needs to tally with the text - the text only talks about the airport itself, but the map appears to show the regeneration zone stretching outside the airport towards the airport garages and Les Ormes. The text needs to make clear whether this is intended or not - if it is then this is a major aspect of the plan worth more than one vague paragraph. I would object to any effective expansion of the airport, or its associated industries, in this direction (but the plan is not clear as to what is and is not counted as "non-aeronautical sources" and "commercial development activity"). Open space should not be up for grabs for development simply because it is near the airport entrance. Nor should it be assumed that developments of all sorts should be allowed to claim a need to be next to the airport. Nor should building over green land outside the airport be disguised as "regeneration" on a par with regenerating run-down parts of St Helier. Nor should it be assumed that areas next to the airport should be treated as if they were part of the airport itself (not least because that would just lead to a logic of constant creeping expansion with no sensible basis). If this is not what is intended then the plan should make that much clearer and not offer scope for developers to exploit lack of clarity.	Accept	The map is indicative only and the text makes reference to the fact that the commercial masterplan for the Airport is being developed which will relate to all of the landholdings of Jersey Airport, which includes land out with the airport operational boundary. The commercial masterplan remains to be the subject of a planning assessment, which will need to consider the land use implications of any proposals which emerge. It is not known, at this time, what form any proposals might take, but it is identified that non-operational land at the airport may have the potential to provide for commercial/industrial floorspace (see 5.113). The development and adoption of any land-use masterplan for the Airport will be the subject of consultation with all stakeholders, including local residents. Any proposals which have implications for agricultural land would fall to be considered under Policy ERE1 and Policy NE7. To provide greater clarity, however, it is considered appropriate that the boundary for the Airport Regeneration Zone is amended to include that land administered by Jersey Airport only and which will be the subject of the Jersey Airport Masterplan.	The Minister is minded to amend the draft Plan to revise the boundary of the Jersey Airport Regeneration Zone	The boundary for the Airport Regeneration Zone is amended to include that land administered by Jersey Airport only and which will be the subject of the Jersey Airport Masterplan.	To provide greater clarity and certainty related to the area of the airport development/master plan.
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DP35 2		Mr Tony Gottard		Proposa l 14	Village Plans	Neither	add footnote at end of Proposal 11, 12, 13 and 14 referring to Article 6 Planning and Building (Jersey) Law 2002	Reference to Article 6 would make clear the basis on which the Minister is able to issue and adopt supplementary planning guidance for different parts of the Island	Accept	Reference to Article 6 would make clear the basis on which the Minister is able to issue and adopt supplementary planning guidance.	The Minister is minded to amend the draft Plan to insert the relevant footnotes	Add footnote to Proposal 11, 12, 13 and 14 to state that <i>Article 6 of the Planning and Building (Jersey) Law enables the Ministers to publish guidelines and policies in respect of development generally; any class of development; the development of any area of land or the development of a specified site.</i>	
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DP11 61	Mr Roberto Lora	Policy E 1	Protection of Employment Land	Objectin g	We refer to the above mentioned property, and in particular the Threat to Hotels and their current Market Valuation or the property sale, exit strategy presented by the Draft (Jersey) Island Plan September 2009.	Without wishing to be too specific, Policy E1 of The (Draft) Jersey Island Plan 2009 presumes against the loss of employment land. During the current Island Plan (2002) period, many commercial sites in the countryside and St Helier have been allowed to be re-developed as an exception to Policy (C5) & (C6) to provide housing. This option to provide additional housing would be lost if Policy E1 is approved by the States, and could significantly affect our business. This Policy also presumes against the loss of employment land in town, and therefore for all such sites in the built up area, any proposals for them to be redeveloped for housing would have to be accompanied by a Viability Test involving for instance, marketing these properties (namely our hotel) at a reasonable commercial rate for 12 months prior to making an application! This will severely restrict the early release of land for housing, and only if it proves that no purchasers are available, will an application be considered for residential development! In conclusion we believe that the (Draft) Jersey Island Plan 2009, hinders our market value, based on sale of the property (not as a going concern!) and affects the industry as a whole, in terms of equity in hotel properties and the support of the banking/finance industry. Also we believe this is not in the interest of the island as a whole for the reasons outlined and is potentially, extremely bad news. This Island Plan 2009 obviously requires serious discussion and re-drafting!	Minded to support with adjusted wording	It is recognised that this policy is too prescriptive towards tourism based employment sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points to be drafted as; There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site for 12 months on terms that reflect the lawful use and condition of the premises; or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to	Minister minded to support amendment to policy EO1	There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site on terms that reflect the lawful use and condition of the premises; , or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to the community of the proposal outweighs any adverse effect on employment opportunities and the range of available employment land and premises; or 4. The existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems'	It is recognised that this policy is too prescriptive towards tourism accommodation sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points
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DP51 8	Mr Paul Harding	The Associatio n of Jersey Architects	Policy E 1	Protection of Employme nt Land	Objectin g	<p>The section about 'Protection of Employment Land', between Paras. 5.18 and 5.22, will have a major effect on redundant redevelopment or conversion of existing sites that have been used for employment such as offices, hotels, other tourist accommodation, restaurants, working farm buildings, etc. - in fact virtually all types of buildings where Islanders work ? for alternative uses. This contradicts the principal Economy Objective within E1, stipulating the principal criteria should be to "encourage a balanced and more diverse economy and assist all sectors of the economy to adapt to change in the market place ". We submit Policy E1 will have exactly the opposite effect, to prevent building uses adapting to changes in the market place. This policy underscores the presumption against changing use of any buildings used for employment for other purposes.</p>	<p>The AJA submits that Planning Policy should not be used to distort market forces as this Policy seeks to achieve. About ten years ago the Planning Department and Planning Committee of that time attempted to prevent redundant hotels changing use and this failed. The Isle of Man used their planning policy in a similar way to distort market forces and they ended up with an important part of their building stock consisting of boarded up buildings. Imposing distortions of this nature is contrary to a key aspect of States strategic aims, referred to in Para. 5.7, of encouraging competition and the free market place.</p>	Minded to support.	<p>It is recognised that this policy is too prescriptive towards tourism based employment sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points to be drafted as; There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site for 12 months on terms that reflect the lawful use and condition of the premises; or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to</p>	<p>Minister minded to support amendment to policy EO1</p>	<p>There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site on terms that reflect the lawful use and condition of the premises; , or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to the community of the proposal outweighs any adverse effect on employment opportunities and the range of available employment land and premises; or 4. The existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems'</p>	<p>It is recognised that this policy is too prescriptive towards tourism accommodation sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points</p>
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DP68 9		Mr Andrew Fleet	Style Group Ltd	Policy E 1	Protection of Employment Land	Objectin g	Policy EI is contradicted by Policy BEI supported by Objective BEI where the latter encourages new development on previously developed sites, which in the main are likely to be former employment sites. The requirement to undertake marketing of a former employment site for a 12 month period is unrealistic. If the employment use has ceased to trade from the location then an early sale of the property is often required. If the demand exists for employment in the location then it will be identified in a 3 to 6 month time period. If a time period for marketing is required (and this is questionable) it should be restricted to a 6 month period .		Agree	Remove the explicit reference in point 1 "for 12 months", so that the revised version reads: 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site on terms that reflect the lawful use and condition of the premises; Supplementary planning guidance will be written to provide more information on what is expected in terms of length of marketing as it is recognised that different types of employment sites will have different sensitivities to the length and method of marketing required. This policy has also been put forward to the inspector with some amendments to exempt office and tourism accommodation from the policy, which will further reduce impact of this policy.	Minister minded to agree to proposed changes.	<p><u>Policy E1 – protection of employment land</u></p> <p>1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site on terms that reflect the lawful use and condition of the premises;</p> <p>Insert new paragraph between 5.21 and 5.22 in supporting text</p> <p>5.22 All Proposals to re-develop or convert employment sites will need to demonstrate that they are no longer viable for the existing use before they are considered for alternative uses by the Minister for Planning & Environment. Supplementary planning guidance will be written to provide guidance on what is required to demonstrate that a site is no longer viable and that has been subject to full and proper marketing of the site.</p> <p><u>Appendix A:</u> Add Protection of Employment land to supplementary planning guidance list.</p>	it is recognised that different types of employment sites will have different sensitivities to the length and method of marketing required
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DP77 5	Seamus Morvan	Morvan Hotels	Policy E 1	Protection of Employment Land	Objectin g	<p>Our following submission seeks to ensure that policy is put in place that is effective in allowing tourism businesses to flourish in line with market demands in the future. We are committed hoteliers of long standing but we do have serious concerns with regard to the actual effect of proposed policy in the following areas:</p>	<p>I. Employment Land - I understand that there is a need to generate significant yield of homes from current brown field sites within the life of the new plan. This is made more necessary given the low number of re-zoning proposals from within the Green Zone.</p>	<p>If employment land is 'protected' in respect of tourism sites (due to a presumption against their loss), sites are unlikely to be yielded up for homes from this sector, nor will tourism operators be able to use the capital from such re-developed land to re-invest into other market driven tourism business opportunities. Indeed, this policy will serve to devalue tourism sites generally, as they will lack their underlying 'switch value' into housing, thus reducing their desirability to tourism investors, leading to a reduced ability to raise finance for tourism investment into tourism sites generally. This would be contrary to the desirable aim of the States to facilitate a more diversified economy.</p>	<p>There is a need for permeability, with tourism sites both allowed to enter and exit tourism land use, if the tourism industry is to flourish in line with the customer demands in the future. Out dated product must be able to exit the industry and new product encouraged to come on-line. If the policy, in its effect, serves to artificially</p>	Minded to support amendment to policy	<p>It is recognised that this policy is too prescriptive towards tourism based employment sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. It is also recognised that older stocks of tourist accommodation, given their location and site characteristics, are often more suitable for residential rather than further forms of commercial development.</p>	Minister minded to support amendment to policy EO1	<p>There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site on terms that reflect the lawful use and condition of the premises; , or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to the community of the proposal outweighs any adverse effect on employment opportunities and the range of available employment land and premises; or 4. The existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems'</p>	<p>It is recognised that this policy is too prescriptive towards tourism accommodation sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points</p>
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DP858	Gerald Fletcher	Jersey Hospitality Association	Policy E1	Protection of Employment Land	Objecting	<p>2. the proposed development would serve tourism objectives, as envisaged in Objective EVE 1, can be shown to result directly in a significant and proportionate benefit in terms of economic activity on a site or sites elsewhere in the Island; 3. the tourism operator in question wishes to exit the industry. 3. The overall benefit to the community of the proposal outweighs any adverse effect on employment opportunities and the range of available employment land and premises; or 4. The existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems'</p>	<p>A similar approach to that suggested above could be applied to Policy E1, by adding a further subsection which would provide flexibility in respect of tourism related development. (Suggested Policy wording revisions are made in BOLD) 'There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5 Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site for 12 months on terms that reflect the lawful use and condition of the premises; or 2. the proposed development would serve tourism objectives, as envisaged in Objective EVE 1, can be shown to result directly in a significant and proportionate benefit in terms of economic activity on a site or sites elsewhere in the Island; 3. the tourism operator in question wishes to exit the industry. 3. The overall benefit to the community of the proposal outweighs any adverse effect on employment opportunities and the range of available employment land and premises; or 4. The existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems'</p>	Minded to support with adjusted wording	<p>It is recognised that this policy is too prescriptive towards tourism based employment sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points to be drafted as; There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site for 12 months on terms that reflect the lawful use and condition of the premises; or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to</p>	Minister minded to support amendment to policy EO1	<p>There will be a presumption against development which results in the loss of land for employment use as supported by the Strategic Policy SP5Policy SP 5 'Economic Growth and Diversification', unless; 1. It is demonstrated that the site is inappropriate for any employment use to continue, having regard to market demand. Applications will need to be accompanied by documentary evidence that the size, configuration, access arrangements or other characteristics of the site make it unsuitable and financially unviable for any employment use and confirmation by full and proper marketing of the site on terms that reflect the lawful use and condition of the premises; , or 2. The existing development is predominantly office or tourist accommodation; or 3. The overall benefit to the community of the proposal outweighs any adverse effect on employment opportunities and the range of available employment land and premises; or 4. The existing use is generating environmental problems such as noise, pollution, or unacceptable levels of traffic and any alternative employment use would continue to generate similar environmental problems'</p>	<p>It is recognised that this policy is too prescriptive towards tourism accommodation sites and that previous attempts to protect primes site tourist accommodation from other forms of development was not successful and dropped. Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration. For these reasons an amended policy is proposed that takes on board these points</p>
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DP10 48		Ray Shead	The Jersey Chamber of Commerc e	Policy ER 1	Retail Expansion in the Town Centre	Supporti ng	<p>Chamber is supportive of the policies which seek to maintain the viability of the town centre and existing village shopping centres. It is agreed that there is sufficient retail capacity already as correctly identified by DTZ. Economic Indicators E1 are coarse and not adequate to analyse the unique retail character of St. Helier and project the likely impact of change on town centre retailing.</p> <p>Recommendation. The draft IP should be reviewed under the objectives and values described in the UK Government's Planning Policy Statement 4 (PPS4) published 29/12/09. In particular KPIs Annex D Page 32 A9 to A13. There should be a bias towards maintaining town centre commercial activity and an economic impact assessment should be prepared as a planning requirement when a proposal for a significant development is made.</p> <p>Springboard and ATCM have launched a new research tool aimed to deliver performance monitoring and benchmarking for town and city centres -link: http://www.milestoneuk.org/</p>		Agree with comments	<p>With regard to indicators, the current indicators are to be reviewed and amended to follow indicators in Strategic Environmental Assessment document which follow PPS4 objectives and values. Comparisons to UK retail town centres benchmarks is a difficult area and not always useful to judge Jersey against, given the Island's unique characteristics and so not always useful to follow the 'Milestone' approach.</p>	Minister minded to support	None as the monitoring indicators will be updated through the development of the annual monitoring report.	The annual monitoring report will be produced from January 2011 and it is not possible at this point to indicate which monitoring indicators might be amended.
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DP21		Mr David Seymour	Seymour Hotels of Jersey	Policy ER 5	Development of Evening Economy Uses	Neither	With regard to proposals for new night-clubs and other uses with the potential to cause noise or other disturbance, the Minister will pay particular attention to the impact on nearby homes, (Add: hotels, offices and shops) and the character and amenity of the area.	The impact of large numbers of revellers standing outside smoking, shouting, singing and just entering and exiting late night pubs and clubs located near hotels, offices and shops is often disregarded by planning authorities but the effects are significant. Hotel guests complain about noise emanating from the streets late at night, threatening behaviour of large drunken crowds when returning to their hotel after dining in one of the Islands' restaurants and disturbed sleep - there is ample evidence to suggest that the visitor economy is at risk of this aspect of the late night economy. Hotel staff are also subject to threatening behaviour and verbal abuse when trying to keep unwanted persons out of premises late at night as well as having to clean up the disgusting mess of vomit, urine and take-away rubbish left in doorways by the morning - shops and offices are similarly affected.	Accept amendment to plan	Amend plan as suggested but issues surrounding disturbances caused by members of the public to hotel guests and staff are not matters under the control of the planning law.	Minded to amend plan	<p>Amend para. 5.66 as follows:</p> <p>Within the town centre of St Helier and local centres such as Gorey and St Aubin, there is a range of non-retail activities such as arts and cultural venues, restaurants, cafés, hotels, food take-aways, public houses, bars and night-clubs. These areas and their evening uses are particularly important to the Island's tourism function as well as serving the local population. St Helier town centre and the local centres are appropriate locations for the development of new evening economy uses. With regard to proposals for new night-clubs and other uses with the potential to cause noise or other disturbance, the Minister will pay particular attention to the impact on nearby homes <i>and other residential accommodation, including hotels</i>, and the character and amenity of the area.</p>	Hotels included in list but not offices or shops as these are not prime evening economy uses.
DP57 2		Deputy John Le Fondre		Policy EIW 2	Protection of Existing Industrial Sites	Neither	Jersey Steel - there is an anomaly between the written Plan and the proposals map. In a number of places within the written plan Jersey Steel is referred to as being a protected site for industrial purposes. However the draft proposals map has redefined the land as built up area. This needs to be rectified, as it would infer that the protection of light industrial has been removed and the site rezoned for housing.		Comments noted and agree	Amend draft proposals map to include Jersey Steel as protected light industrial site	Minister minded to amend draft proposals map to include Jersey Steel as protected light industrial site	Draft proposals map amended to include Jersey Steel as protected light industrial site	Error on proposals map as Jersey steel is on the list of protected sites under policy EIW2.

DP39 6		Vallois		6	Housing	Objectin g	To remove No 4 on policy H1 to not allow development on Longueville Nurseries	Longstanding issues with consistent building within districts of St Saviour whereby a large amount of development has gone up over the years and the traffic issues have not been taken properly into account. This area is largely populated, large amounts of traffic in particular with regards Rue Des Pres trading estate. Parking issues surrounding the area already and blind corner for accessibility.	Objection noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Saviour and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.	Minister minded to support request to remove site from Plan.	Longueville Nursery Category A housing site removed from proposal map and policy H1.	Site not supported by Parish of St. Saviour ..
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DP66 2	Conneta ble Peter Hanning	Parish of St Saviour	6	Housing	Objectin g	<p>I would submit that this Parish has already contributed more than its fair proportion of all categories of housing. Indeed, we currently have large concentrations of (States) social rented flats and housing estates, and the prospect of a mixed tenure Retirement Village which will largely satisfy the current life-long retirement needs of the Island. This project on re-zoned land at Chasse Brunet (George Carter) is expected to yield 98 open market and 80 social rent dwellings for the over 55's and a 75 bed residential care and dementia home. The redundant JMMD Dairy site will contribute a further 70+ dwellings. However, in respect of this application, any proposal to extend the development into the green zone southerly pasture must be firmly resisted as this will only encourage further applications to infill on open fields on either side. I take great issue with the inclusion of (BA) Longueville Nurseries in the Draft Housing Development Briefs. I must object in the strongest possible terms to rezoning this land for Category A Housing. To develop between 10 to 15 dwellings would cause significant traffic implications. The existing narrow by-road would struggle to service that many new homes as well as the existing properties therealong. The merger onto Longueville Road is also problematic to say the least, and would add further strain to the tailbacks that frequently occur outside of the Trading Estate. This is a 'field too far' and a line must be drawn to arrest further incursions into the countryside. I take comfort in your publicly expressed announcement that you would be minded not to entertain development proposals that were opposed by the Connetables</p>	Objection Noted	<p>The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, as this site is not supported by the Constable of St. Saviour, and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan, this site has been withdrawn.</p>	Minister minded to support request to remove site from Plan.	Longueville Nursery Category A housing site removed from proposal map, policy H1 & Append B	Site not supported by Parish of St. Saviour ..
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DP15 5		Mr Stephen de Gruchy			H: Introductio n	Neither	Paragraph 6.6 appears to have the incorrect residential qualification period. A Housing Dept webpage says it is o 10 years aggregated residence for persons born locally, or o 11 years continuous residence for someone born outside the Island.		Agree	Paragraph 6.6 to be amended to reflect current Housing qualification period	Minister minded to amend plan	<p>Amend para 6.6</p> <p>The provision of housing in Jersey is linked to residential qualifications. Those without residential qualifications are able to live in lodgings, staff accommodation or registered lodging houses but cannot lease or purchase accommodation. Residential qualifications can be gained following eighteen years continuous residence or by application to the Minister for Housing. The States has approved, in principle (January 2001), a gradual reduction in the qualifying period to eleven years and will, in 2010, likely consider further changes relating to access to housing qualifications (see Managing Migration: new proposals for housing qualifications). In accord with the Strategic Plan objective of providing adequate housing for all Island residents, the Plan seeks to address qualified and unqualified housing requirements.</p>	Error in drafting
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DP11 01	Mr Roy Smith	Policy H 1	Category A Housing Sites	Objectin g	<p>Because of these recent and current planning proceedings in relation to this site, I hope you will understand that at present I have no alternative but to strongly object to the proposed rezoning of the site for Category A housing . It goes without saying, that, in the event that we are unsuccessful with our revised application and/or the associated appeals to the Royal Court, we would then support the alternative development of the site for Category A housing. I sincerely hope that all concerned in the decision making process on this matter will understand my position having read this representation.</p>	<p>I wish to make this representation and explaining my position on this matter, it is important to set out the recent and current planning situation regarding this site. Closure of business I have worked on and managed Beauvoir Nurseries (also know as De La Mare Nurseries) for some 37 years and have owned the site for the last 24 year s. Due to changing economic circumstances it was with deep regret that I was forced to close the business down on a phased basis during the period July to December 2008. I was the last person in Jersey to soley grow flowers for a living on a commercial basis for the local trade. Partnership agreement with developer During the period of the running down of the business, I entered into a partnership agreement with a developer OK Ltd) to pursue a residential development on the site. It was and is our understanding that the principle of redeveloping the site for housing (and not Category Ahousing) complies with the existing Jersey Island Plan 2002. Existing Island Plan In referring to the existing Island Plan Policies. I quote below point's previously made by my architect and advocate. These are as follows: On the existing Island Plan the south east corner of the site lies within the e 'Built up Area ' boundary, but most of the site lies in the 'Countryside Zone' where, under Policy C6, there is a general presumption against new housing development being allowed. However, Island Plan Policy C20 deals specifically with redundant glasshouse sites in the countryside. In summary, Policy C20 presumes against redevelopment of redundant glasshouses for non-agricultural purposes throughout the countryside generally, but allows for such redevelopment, as an exception to the general presumption against development in the countryside, where such sites are located alongside defined urban settlements (as at De La Mare Nurseries) and subject also to the proposed development complying with other listed planning criteria under Policy C20. This policy fits in with other Island Plan policies aimed at countryside protection (Policy C6) and the broader Island Plan spatial strategy and sustainability policies (under</p>	<p>Mr Smith's comments are noted. The planning application process, and any subsequent appeal if refused, will determine whether development is acceptable under the 2002 Island Plan. The Draft Plan proposes part of the site for Category A development, and as Mr Smith states, it is a fall back position for him in the event that the application fails</p>	<p>The Minister may consider enlarging the site to increase the capacity for affordable housing in the early years of the Plan, in the light of his intention to recommend removal of Samares Nurseries, Cooke's Nurseries and Longueville Nurseries from Policy H1</p>	<p>The Minister is minded to increase the size of the site and carry out further consultation.</p>	<p>Pending an outstanding appeal and discussions with the owner no firm amendment can be suggested at this time.</p>
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DP35 9		Mr Vincent Obbard		Policy H 1	Category A Housing Sites	Objectin g	St Clement has provided more than its fair share of St Helier's housing overspill.	We have a specific concern relating to the proposed development of Samares Nurseries for housing. The main freshwater drain from the nurseries flows into the canal running through Samares Manor Gardens, a proposed site of Special Interest. If homes are built at the Nurseries, the existing drainage will be insufficient, causing flooding to the gardens, nearby housing, the Golf Course and Georgetown Park Estate.	Comments noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition	Samares Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Clement.
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DP38 5	Mr Paul Martin	Policy H 1	Category A Housing Sites	Supporti ng	No changes are required. The stated objective of the Island Plan to ensure there is a sufficient supply of housing stock to meet projected demand.	It is vital that islanders and politicians are encouraged to view the Island Plan as a whole and to recognise that there is an overriding need to ensure that affordable housing is available for the local population. Similarly, it is abundantly clear that Jersey must aim to protect its areas of natural beauty, in particular its coastline and remaining countryside. Finding a compromise between these two competing objectives was never going to be easy. Those who reject any development are perhaps oblivious to (or in ignorance of) the difficulties faced by sections of the population who are unable to find affordable accommodation. This problem is particularly acute for young working families. On the other hand, although it might deliver the affordable housing that is acutely required, it is also clear that building on greenfield sites is also particularly undesirable. The only sensible approach to meeting competing demands seems to be that taken by the authors of the plan - focussing on developing brownfield sites and the regeneration of St Helier in preference to rezoning greenfield sites (which should only be considered when all other options have been exhausted). It has proved fortuitous that certain parishes have been 'spared' the urban-creep of development suffered by St Helier and its surrounding areas. Suggesting that some parishes have 'suffered too much' and that development should take place in 'rural' parishes misses the point entirely. History cannot be undone. Parishes close to St Helier have become relatively urbanised but this was, and is, inevitable given their location. Emphasis should be placed on brownfield sites within built-up areas, wherever they happen to be situated. This will ensure that Jersey's true countryside is safeguarded for the future. Having reviewed each of the Category A Housing sites, it appears that each has been carefully chosen. What concerns me is that the work of the authors in describing the appropriateness of each of the sites is very likely to be ignored by many objectors who are unable or unwilling to recognise that new development is necessary to meet the objectives of the plan or who	Comments noted	Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition	Samares Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Clement
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DP62 4	Conneta ble Deidre Mezbouri an	Policy H 1	Category A Housing Sites	Objectin g	<p>As Connétable of St Lawrence and with the support of the St Lawrence Parish Roads Committee, I submit the following comments for consideration. Planning policies and initiatives must not be permitted to disregard issues that affect specific areas within our Island. Where it is quite clear that it would be inappropriate to apply an Island wide policy, there can be no argument for enforcement. A case in point is the proposal to re-zone the Cookes Rose Farm site in St Lawrence for Category "A" housing (current planning zone is "Site safeguarded for Category "A" Homes"). I have been contacted by a number of Parishioners who consider the proposal to be inappropriate and ill advised; they support my view (and that of the Roads Committee) that it is a poor site for re-zoning for the purposes of Category "A" housing. Lack of Suitability</p> <p>The site has limited pedestrian access; the principle physical constraint is the narrow access road, already serving approximately forty dwellings; the area has limited capacity to accept new development. TTS has consistently opposed re-zoning because of the distance from facilities and amenities, as well as the limited bus service to the area. The local food store is within walking distance, however there are no pavements in the area for pedestrian safety. Should a topographical survey confirm that a pumping station was required for foul drainage (for more than six buildings), this could result in a cost to the public purse if TTS assumed responsibility for ongoing maintenance. Surface water costs could be considerable, there are no Public surface water sewers and the nearest watercourse is some</p>	The Constable's comments are noted	Minister likely to recommend deletion of Cooke's Nursery from the Draft Plan given opposition of the Constable.	Cooke's Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Lawrence .
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DP62 3		Deputy Ian Gorst		Policy H 1	Category A Housing Sites	Objectin g	I want to put on record my complete support for the Connetables representations to remove the Samare Nursery site form the proposed re-zoning.	I have no doubt that the inclusion is not required, that the plan will deliver appropriate supply, and that its inclusion would result in the continued over development of St Clement. Which is totally unacceptable.	Noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition	Cooke's Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Lawrence.
DP68 1		G V Gaudin		Policy H 1	Category A Housing Sites	Objectin g	The Samares Nursery site should not be developed for housing but returned to agricultural use	Full support and consideration should be given to the submission of the National Trust for Jersey	Noted		The Minister is minded to amend the draft Plan to withdraw the Samares Nursery housing site	Samares Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Clement.

DP71 3		Mrs J Egre		Policy H 1	Category A Housing Sites	Objectin g	Field 739 St Peter I am writing to you as the owner of the above field in light of the recent publication of the draft Island Plan. I note with some distress that one of the sites proposed for re-zoning is Samares Nurseries in St Clement. I live in St Clement and can confirm that it is without doubt completely unacceptable for St Clement to suffer any further large scale development such as the one proposed. However I do recognise that new homes are still required and would therefore ask that the above field be considered for re-zoning. I enclose a copy of the location plan which shows the site to be adjacent existing development. This field is without doubt far more suitable for development than the suggested St Clement site; it is close to the village and all the amenities which that afford. I would be prepared to consider a partnership with the Parish for either first time buyer or sheltered housing. Whilst this is currently within the countryside zone it is across the road from a recently approved development which was also within the countryside zone. The site could be developed almost as soon as any permission was granted. I ask that this request for consideration be presented to the independent inspector so that it can be considered alongside other sites during the examination in public. Thank you for reading this letter, I look forward to receiving your confirmation that my field will be considered as requested.		The comments are noted.	It is likely that the Minister will recommend removing Samares Nurseries from H1 given the opposition from the Constable and the petition to this effect that the Constable has lodged in the States. Field 738 St Peter is too remote from the village centre to fit with the Plan's Spatial Strategy	Not suitable for H1 site	Samares Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Clement.
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DP84 4		Mrs Susan Kerley		Policy H 1	Category A Housing Sites	Objectin g	Field 114, Cookes Rose Farm, Le Passage, St. Lawrence. Appendix B2	Field 114, Cookes Rose Farm, Le Passage, St. Lawrence. Appendix B2 I wish to object to the rezoning of this land for the development of up to 30 units of accommodation. The reasons for my objection are that it is not commensurate with several of the major policies in the Draft island Plan. SUSTAINABILITY To develop this land would not be commensurate with a sustainable pattern of development for the Island and is in an inappropriate location. The farm is at least a mile from St. Lawrence Village, has very limited public transport and very few amenities. There is only one small paper shop within walking distance. Because of the adjacent agricultural use the Health Protection Services have said that this site could pose a risk of developing into a statutory nuisance issue. POLICY SP6 REDUCING DEPENDENCY ON THE CAR. The roads in the whole of this area are narrow and almost all have no pavements. The nearest Primary School is in the village and because of the lack of pavements most parents deliver their children by car. This development would not therefore comply with Policy SP6 Reducing dependency on the car. Anybody who lives in this area will need at least one car to take children to school, to shop, to visit the Parish Hall, to go to Church and to go to work. The development is for up to 30 units of accommodation. If these are added to the present application for 17 luxury houses the number of vehicles in this area could be increased by 50 to 60 cars. Le Passage is a one way road at present because it is so narrow and it is surrounded by private estates. In addition the St. Lawrence Main Road narrows at the entrance to Le Passage. This is already a bottleneck. Passing is particularly difficult with heavy duty vehicles travelling to Ronez Quarry and the Thistlegrove industrial site (which there are plans to enlarge). There is also the weekly Maillards auction. TTS has recognised the seriousness of this problem and consistently not supported this application. ERE6/7 To develop land here does not comply with ERE 6/7 para 5.156 which states that redundant greenhouses are regarded as temporary structures and should be removed.	Objection noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Lawrence and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.	Minister minded to support request to remove site from Plan.	Cooke's Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Lawrence.
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DP90 2	Conneta ble Len Norman	Policy H 1	Category A Housing Sites	Objectin g	Further to our recent conversations I write to formally request you to remove Samares Nursery from the list of Category A Housing Sites on the grounds that it is not necessary.	Further to our recent conversations I write to formally request you to remove Samares Nursery from the list of Category A Housing Sites on the grounds that it is not necessary, it overburdens a Parish which has already contributed more than its fair share of housing provision for the Jersey population, that by doing so you renege on your promise not to allow major development without the approval of the relevant Connétable and that a more suitable use could be found for the site. It is not necessary. This is a simple matter of mathematics. Between now and 2018 you are expecting an overall demand for homes of 4,000 in number compared to an estimated supply of 4,575. The Plan is therefore proposing an oversupply by some 14% % and this before taking into account the additional homes that would be provided in the scheme to support Parish vitality in the northern and central Parishes. Under Policy H1 on page 250 of the draft plan you look to the seven sites mentioned to yield some 200 homes in total of which, I imagine, some 100 would be on Samares Nursery. By removing this site from the list the total anticipated oversupply of homes would reduce 475, plus, of course the vitality scheme homes. Overburdening of St Clement It is often not realised that St Clement is Jersey's smallest Parish with a land area of only 4.2 km2, some 50% less than, for example, St Mary, the second smallest, which covers some 6.5 km2. On the other hand, St Clement is home to 9% of Jersey's people with a population of 8,196 giving a density of 1,951 persons per km2 compared with St Mary, which has a population of 1,591 and a density of 245 persons per km2 From the following table, taken from the 2001 Census, it can be seen that despite being the smallest Parish by some margin, the density level in St Clement is second only to St Helier. This I think proves my assertion that this Parish has done more than its fair share in housing the local population and it is no wonder that St Clement wishes to resist any further significant development. During my election campaign last autumn it was reaffirmed to me that most Parishioners are opposed to further large scale development in St	The Constable's comments are noted. He will be presented a petition to the States, which will be debated on 6 July 2010	The Minister is likely to recommend that this site is removed from the draft Island Plan given the Constable's opposition and the petition.	Samares Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Clement..
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DP26 2	Mr Mike Wadding ton	Policy H 3	Affordable Housing	Objectin g	<p>Affordable Homes However, the Draft Island Plan is contradictory as well dogmatic. If the concept is to redevelop St Helier for homes rather than the countryside, why apply the equally onerous requirements for a 40% component of affordable homes to new developments to each? We need a more constructive approach to the provision of affordable homes, particularly in town where land values are at their highest. Our politicians need to encourage regeneration St Helier, rather than put legislation in place to force developers to provide it which, if as demanding as currently proposed, will simply stop it happening. More "carrot" and less "stick". Lifting the burden for suitable residential homes in St Helier could include:</p> <ul style="list-style-type: none"> a. tax breaks for developers b. a lighter touch to listed building protection c. less red tape in planning-fast tracking the right types of projects d. more height and density to compensate for high land values and better quality homes e. selling shell-only homes to first-time buyers to save money f. teaming up with Highlands College trainees to help finish off the shells with grants from the States g. subsidizing developers to create double-height living spaces. European apartments are often described by volume rather than floor area? 	<p>The comments regarding differentiation in Policy H3 between the countryside and the built-up areas are noted, and given the higher existing land values in the latter (particularly St Helier) could prevent the regeneration of St Helier.</p>	<p>The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.</p>	<p>Replace para. 6.106 onwards and Policy H3 with the following:</p> <p><i>6.106 The Island Plan Review adopts, as a key element of strategy, a reliance on private sector 'windfall' development, both within St Helier and in other parts of the Built-up Area, in accord with Policy SP 1 'Spatial Strategy', to meet the Island's housing need: many houses will be developed on sites not specifically identified or zoned for housing in the Island Plan. It is considered that there is no reason why, apart from developments of one housing unit, these developments should not make a contribution towards the provision of affordable housing. Approximately 30% of applications for residential development may, therefore, be affected by this policy and will be required to provide a contribution of 12.5% of development yield to meet the Island's needs for affordable housing().</i></p> <p><i>6.107 It is, however, recognised that as sites become smaller, the challenge of achieving on site provision of affordable housing becomes greater. On this basis, it is proposed that for developments with a capacity of two-eight units of accommodation that the affordable housing contribution of 12.5% may be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere. This will, however, be applied flexibly, and where they choose to do so, developers may provide their affordable housing on site.</i></p> <p><i>6.108 For developments with a capacity of over eight units, a contribution of 12.5% affordable housing will be required on site.</i></p> <p><u>Policy H3 Affordable Housing</u></p> <p><i>Permission will not be granted for any development involving the provision of two or more housing units, whether or not this forms part of a mixed-use scheme, unless and until the Minister for Planning and Environment is satisfied that the development has maximized the opportunity for the provision of affordable housing, in accord with the parameters of this policy.</i></p> <p><i>The Minister will require a proportion of</i></p>	<p>Reducing the proportion of affordable homes for developments of 2 or more units from 40% to 12.5% removes the concerns about viability that may have led to a reduced supply of housing developments.</p>
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DP41 5	Mr Marc Burton	Institute of Directors	Policy H 3	Affordable Housing	Objectin g	<p>Affordable homes - whilst we would support some requirement for the provision of affordable homes, the current intent of 40% of every development is far too high and unworkable as: The trigger level of 2 units or more is far too low and needs to be increased, particularly as the majority of sites can fall onto the 5 units or less category; The requirement to provide a viability assessment with the planning application will be too late in the process or more sites will have to be purchased on a 'conditional' basis as developers will not take the risk in buying sites on predetermined values when the requirements could change significantly at the planning stage; Further consultation and agreement will be required with the construction industry and developers concerning the 'commuted sum' and calculations used to determine the value of affordable homes particularly as the document states that the Minister will determine the tenure of all proposed affordable homes; Consideration needs to be given on the timing of the introduction of the affordable homes percentage relative to sites currently in the process of either being purchased or with a pending planning application. An introductory period would be advisable; Consideration should therefore be given to providing possible incentives to developers etc. to ensure development does continue and is not stagnated. On the basis that the percentage is reduced to a more reasonable level, less incentives will be required however at 40% serious thought will be required i.e. tax breaks, quicker planning process for these sites etc; See attached letter</p>	<p>Unless a lower figure is agreed, 40% will effectively stop all development and thus increase demand and further accelerate the value of the current housing stock making property even less affordable for first time buyers etc; Lessons should be learnt from the mistakes in the UK where mixing social classes does not always work and the targets set have not been met; 40% will stop development overnight and land values will drop considerably meaning owners will not sell; There is no back up or evidence on how 40% has been calculated and this figure does not appear to be supported from the numbers stated as the future requirements for the island; At 40%, effectively the private sector is being asked to subsidise the public sector to provide the shortfall in affordable housing; See attached letter</p>	<p>The comments are noted, particularly the impact on viability and the disincentive for landowners to make land available for development. The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.</p>	<p>The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.</p>	<p><i>As above.</i></p>	<p><i>As above.</i></p>
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DP54 6	Mr Paul Harding	The Associatio n of Jersey Architects	Policy H 3	Affordable Housing	Objectin g	We submit the States should be seeking to control release of land (other than 'Windfall' sites in the Built?Up area in private ownership) into private housing development by reaching agreements with landowners as outlined in para. 9.3 (see AJA submission), funding and implementing servicing of the land, then selling on the sites for affordable housing to developers who will build on them.	The AJA is of the common opinion that the requirement to provide social housing from private developments will, quite simply, bring all private housing developments over 2 or more units to a complete stop. It is simply unrealistic to expect private housing purchasers, through the developer, to pay for 40% of the development being subsidised - whether this is by way of a commuted payment or actual homes makes no difference. For example a small development of 3 houses will require the developer to make a commuted payment equating to allocating 2 of those houses as low cost homes. To pick on just one aspect of the policy as drafted ? in all other parts of the world it is an accepted economic fact of life that affordable housing is located in less exclusive locations, but if it were to become a planning requirement that a redevelopment of, say, an exclusive sea?front site in Jersey had to contain at least 40% of affordable housing that seems just plain daft and against all intuitive logic. The 'opt?out' clause ? basically a stealth development tax ? could kill all development stone?dead and seems fraught with difficulties (eg: who is to decide whether a development is 'economically viable' and what criteria will be used?). Has a proper in?depth study been carried out into the economic realities of this policy? If so, we need to see the evidence and results. There can only be three possible outcomes from this Policy: ? a) Private housing development stops ? result 2009 Draft Plan housing projections fails and demand outstrips supply of existing homes, therefore pushing up prices. b) Housing land prices are pushed down - result landowners don't sell for housing and/or makes regeneration unviable, with the same end impact upon housing market. c) The cost of the affordable housing commuted payment pushes up housing prices in excess of other influences making housing even more un?affordable than at present. This Policy is hostile to the regeneration of St Helier, where it is more expensive to redevelop sites. Many private house purchasers will also be put off buying a house where 40% of the	Noted	The comments are noted, particularly the impact on viability and the disincentive for landowners to make land available for development. Although this method of procuring affordable homes has worked before, notably at Belle Vue, the likelihood of the States acquiring land to pass-on to developers to build affordable houses is limited as there is insufficient capital funding in place for acquisition. However, it may be necessary to use already acquired States land to provide affordable housing should the proposed policies fail. The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.	The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere.	<i>As above.</i>	<i>As above.</i>
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DP5 82		Deputy John Le Fondre		Policy H 3	Affordabl e Housing	Objectin g	Affordable Housing - to impose a percentage of a 40% requirement on a small development seems an extremely considerable burden, and I would suggest that the financial impact of such a proposal should be carefully considered as to its potential consequences.		The comment is noted.		The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.	<i>As above.</i>	<i>As above.</i>
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DP610		Mr Bruce Willing		Policy H3	Affordable Housing	Objecting	<p>The policy of providing 'Affordable homes' is admirable, but naïve. As in the UK, the cost of housing is directly related to the contemporary difference between supply and demand. Only if the States wants to become its own 'developer' can this change significantly. Artificially imposing a ration of 'affordable homes' on each development is a real inhibitor to achieving the number of homes required. This policy needs urgently to be reviewed and revised.</p>	<p>When considering the development of affordable homes, the DIP is contradictory as well dogmatic, particularly in setting out a fixed, mandatory component of 40% affordable homes in any new development. If the concept is to redevelop in St Helier, rather than in the countryside, placing this restriction on the higher value urban land will inhibit developers, rather than encourage them. If St Helier is the chosen place for redevelopment (and if the States can be persuaded to include the Quennevais/St Aubin/Airport conurbation as an alternative or an additional development area) the following needs to be considered as a means of assisting urban regeneration within the DIP:</p> <ul style="list-style-type: none"> a. Tax breaks for developers b. A lighter touch to listed building protection c. Less red tape in planning - fast tracking the right types of projects d. More height and density to compensate for high land values and better quality homes e. Selling shell-only homes to first-time buyers to save money f. Teaming up with Highlands College trainees to help finish off the shells with grants from the States g. Subsidising developers to create double-height living spaces. (European apartments are often described by volume rather than floor area.) <p>In short the policy of providing 'Affordable homes' is admirable, but naïve. As in the UK, the cost of housing is directly related to the contemporary difference between supply and demand. It is a market. Only if the States wants to become its own 'developer' can this change significantly. Artificially imposing a ration of 'affordable homes' on each development is a real inhibitor to achieving the number of homes required. This policy needs urgently to be reviewed and revised.</p>	<p>It is recognised that this policy may be a disincentive to landowners to release sites, as the obligation placed on developers will force down the land value. The bulleted suggestions for enabling the provision of affordable housing are noted.</p>	<p>The effect of supply and demand on the sale price of housing is understood. Providing a proportion of affordable housing as part of 'market' developments works elsewhere, and the current Island Plan has been successful in achieving the provision of social rented and discounted price first-time buyer housing on sites zoned for the purpose. The 40% target on sites over 6 dwellings is 'worst case', and the likelihood is that the Minister will recommend to the Inspectors that reduce this proportion will reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. The policy needs to be firm and prescriptive to ensure consistency, but there will be a viability test to assess whether each development is viable. Where not, a lower target for affordable provision will be agreed. In order achieve the required numbers of affordable homes over the plan period 2010-2019, it will be necessary to zone, or otherwise identify, sites for approximately 350 homes. See policy H1</p>	<p>The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.</p>	<p><i>As above.</i></p>	<p><i>As above.</i></p>
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DP61 9	Mr Paul Bradbury	States of Jersey	Policy H 3	Affordable Housing	Neither	<p>I respond on behalf of the Migration Advisory Group, and with specific reference to the Laws administered by the Population Office on behalf of those Ministers. Our primary objectives under the Laws we administer, and in relation to the Migration Policy, are to manage migration in line with the Population and Economic Growth Policies, and in a manner that seeks to minimise aggravation on our housing stock, and more generally manages demand on other Island resources. Accordingly, our comments are confined to these specific responsibilities. With this in mind, we would seek to be assured that the provisions around affordable housing - such as the requirement to produce 40% affordable housing on developments over 6 units where this is viable - do not adversely effect incentives to develop, especially on brown field sites, such that sufficient supply of housing is not forthcoming to meet population objectives. Should this occur we would be concerned about the impact on the general affordability of housing , notwithstanding any shortfalls in affordable housing. In a similar vein, we would want to be assured that the levels of affordable housing through the affordable housing gateways does not adversely effect the provision of sufficient housing outside these gateways, again, with reference to the level of supply needed to meet the population objectives and bearing in mind the finite and limited land resources of Jersey. Ultimately, this reflects our general concerns as to the need for housing to be affordable across the board. All the above is said appreciating the other needs that need to be reconciled in the plan, in particular, the need to preserve our environment and to promote economic growth, in which we also take a keen interest, and the need to provide affordable paths to home ownership and suitable housing for all sections of society, including those less advantaged. I should finally add that the other specific housing policies do not present us with any particular concerns in so far as the Laws administered by us on behalf of MAG are concerned.</p>	Noted. The comment on viability is understood, and the policy will in all likelihood be amended to make it less onerous.	As above	Amend the policy so that it is less onerous as far as viability is concerned	<i>As above.</i>	<i>As above.</i>
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DP658		Mr Mark Le Boutillier	GR Langlois	Policy H3	Affordable Housing	Objectin g	Policy H3, The introduction of 40% of affordable homes across all Cat B sites:- We believe that this policy will dissuade landowners and developers from developing houses in the much needed mid to lower end of the market. Developers are more likely to plan schemes with properties at the higher end of the market as the financial contribution towards affordable housing would not seem to differ greatly between mid and higher priced homes.		The comments are noted		The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.	<i>As above.</i>	<i>As above.</i>
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DP66 3	Mr Martin Clancy	Dandara	Policy H 3	Affordable Housing	Objectin g	<p>I write to register my dissatisfaction with the current proposed affordable housing policies contained in the current draft Island Plan. I previously made my views known during meetings with Kelvin MacDonald as to affordable policy and nothing was taken on board. We are at the very front of developing in Jersey and an introduction of a policy of this kind will result in huge house price inflation due to lack of supply in the housing market.</p>	<p>In out line terms the effect of this policy would mean: A reduction of at least 400/0 in land values of brown field land, resulting in land owners not willing to sell for residential as the current use as alternative uses, commercial, retail etc would give them a better return . Sites where say a dozen apartments could be planned would be reduced to say 2 or 3 houses in order to reduce the affordable housing liability. Development finance is not available in the market place as it once was, imposing the 400/0 contribution will make the proposals even less attractive. Any affordable policy will impact as out lined above, but I agree that it has to be delivered in some manner, as the Islands negative view of supplying homes in the countryside is well documented and I believe that there will be little or no zoned land in the new Island Plan. The policy should be amended to introduce a level between 5% to 10% affordable homes on new sites coming forward for planning. This percentage depending on how the supply line is met, the market performing etc could be increased and kept under constant review by the Minister. The only element in the development process which pays for this contribution is the land price, so the policy has to be introduced only on new sites which are not under contract to purchase or which have planning or going through the planning process. If there is a policy of affordable homes implemented the following issues must be considered and where appropriate amendments put in place to ensure that the policy works. The introduction of share equity is relevant to this as the policy came in but the mortgages, legal structure etc was not considered and this led to delays in its implement at ion. Items that will need consideration prior to introducing a policy: 1. Is there a demand for the affordable properties. 2. Who will take on the properties and where will the finance come from. 3. Are Housing Trusts an acceptable social housing provider any longer, or does the Housing Department want to control everything. 4. At what price levels are the affordable sold at. 5. A feasibility mechanism in place to justify a reduction in the amount of</p>	<p>The comments are noted, and in particular those on viability and the disincentive to landowners.</p>	<p>A 5%-10% proportion of affordable housing on market sites will not, of itself, deliver sufficient affordable homes to meet the 10 year target</p>	<p>The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.</p>	<p><i>As above.</i></p>	<p><i>As above.</i></p>
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DP14 2		Mrs T Syvret			Housing Developm ent within the Built- up Area	Objectin g	<p>The proposed re-zoning of the land at Samares Nursery is totally inappropriate to the stated objectives of providing Housing Trust and Social Rented accommodation as detailed within the draft plan. Given that the original Island plan stated the land as category H4 as a site to be "safeguarded for future development" - Together with a requirement for full public consultation, and a presumption against the development that will prevent the future use of the site for future housing development. I do not believe that consultation within the scope of a revised Island plan will give the detail of discussion that should be afforded to this site, and any consultation should be run as an independent topic. The Planning Minister has already turned down a proposed development on a H3 site on the original plan stating that the H2 sites should be exhausted first, and a further review undertaken at that point to assess any continuing need. Why then is an area of land originally zoned as H4 & in need of public consultation prior to any rezoning being considered over and above existing H2 and H3 sites? The land is sited within what is already a substantially built up area, with the high-rise flats of Le Marais, and surrounding lower rise flats, together with the redeveloped Le Squez estate. Placing additional Social Rented and Housing Trust properties in this area will only add strain to not only an inadequate drainage system, but cause significant over-density of what is likely to be tenants with children, who are likely to find insufficient entertainment within the immediate area. A survey of the issues encountered by the Police (Honorary & States) should be reviewed from when Le Squez was fully populated to</p>	See above	Objection noted	<p>The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative sites will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. clement and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.</p>	Minister minded to support request to remove site from Plan.	Samares Nursery Category A housing site removed from proposal map, Policy H1 & Appendix B	Site not supported by Parish of St. Clement ..
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DP80 5		Mr Jeremy Harris		Policy SCO 1	Educational Facilities	Supporting	There is a shortfall in the provision of playing fields for Haute Vallee School, with just one playing field being available to the school for outdoor sports and activities. This causes timetabling difficulties for the school, as well as problems with the overuse of the playing surface. Field 1219 lies immediately to the south of the school grounds, and it has the potential to be partly developed as one or more playing fields for the school , and its development for this purpose would be strongly supported by both the ESC Department and the school. This potential has been recognised in the draft Island Plan, in both paragraph 7.17 and Policy SCO1 . The ESC Department is supportive of this proposal on condition that at least half of the field is designated for playing fields.		Noted	Noted	The Minister notes the support for this policy where it relates to the safeguarding of part of Field 1219, St Helier for educational use	Amend the Proposals Map and Policy SCO1 to state that: the <i>western half</i> of Field 1219, St. Helier to be safeguarded for Education purposes.	Evidence that ESC department only require 50% of field for education purposes and due to costs of developing education sports field the site would likely be unviable for category A housing under previous zoning area. Additional Category A housing units are also required with the expected loss of Samares nursery site
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DP40		Kevin Pilley		Policy SCO 4	Protection of Open Space	Neither	Amend the definition of outdoor sports facility on table 7.1 to include commercial sports facilities and golf courses. This change would ensure that such sites are subject to the Policy regime of SCO4. Amendment will be required to the Proposals Map to embrace those outdoor sports facilities, including golf courses, not presently designated as Open Space on the Proposals Map. Table 7.2 will require subsequent amendment to reflect the additional area of land embraced by this change.	The value and benefits of open space are set at 7.3 of the Plan. In particular, outdoor sports facilities contribute to the quality of life in Jersey. The proposed typology for open space in Jersey, undertaken as part of the work carried out by JPC Strategic Planning and Leisure Consultants, at table 7.1 of the draft Plan, suggests that this excludes commercial sports facilities and golf courses. It is considered, however, that this definition is flawed in that such outdoor sports facilities do make a valuable contribution to sports, leisure and recreation in Jersey and it is appropriate for the planning system to acknowledge this and to seek to consider any potential change in their supply as a material consideration. Issues of public accessibility (including cost) to such facilities can form part of this consideration. It is relevant to note that the UK PPG17 includes these types of facilities in the definition of open space also.	Accept	Set out above	The Minister is minded to amend the draft Plan to include commercial sports facilities and golf courses within the typology of 'Outdoor sports facilities' and to thus ensure that they are subject to Policy SCO4 and defined on the Proposals Map.	<p>Typology of Open Space types at Table 7.1 amended to state, in respect of Outdoor sports facilities: Seasonal and fixed sports spaces, both privately and publicly owned (<i>including</i> commercial sports facilities and golf courses).</p> <p>Draft Proposals Map amended to include the following golf courses;</p> <p>La Moye Golf Course, The Royal Jersey Golf Course; Les Mielles Golf Course; Les Ormes, St Clements and Wheatlands.</p> <p>Map 7.1 (Protected Open Space) amended to include golf courses</p>	The value and benefits of open space are set at 7.3 of the Plan. In particular, outdoor sports facilities contribute to the quality of life in Jersey, including privately owned and commercial sports facilities which do make a valuable contribution to sports, leisure and recreation in Jersey and it is appropriate for the planning system to acknowledge this and to seek to consider any potential change in their supply as a material consideration. Issues of public accessibility (including cost) to such facilities can form part of this consideration. It is relevant to note that the UK PPG17 includes these types of facilities in the definition of open space also
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DP11 82		Kevin Pilley		Policy SCO 5	Provision and Enhancem ent of Open Space	Objectin g	Add provision to require the provision of open space as an integral element of new development proposals, as appropriate. (Ref to residential amenity space standards and Open Space Strategy)	There is a need to ensure that provision is made for new open space as an integral element of new development, in terms of the amount of open space provided and with regard to the quality and utility of that space, in order that a good quality development and urban environment is secured. This is particularly important given the proposed intensification of development on existing built sites and in the existing Built-up Area.	Accept	Add the following to SCO5; 'To ensure the adequate provision, accessibility and quality of open spaces throughout the Island and in local neighbourhoods, the Minister for Planning and Environment will require the provision of open space in association with new development. Development proposals which do not make adequate open space provision will not be approved. Open space provision will need to be made in accordance with guidance to be developed and adopted by the Minister in accordance with Proposal 17'. There is also a need to provide supporting information in the preamble to the policy.	The Minister is minded to amend the draft Plan	<u>Insert new paragraph 7.54:</u> There is a need to ensure that along with new development in the built up areas, there is adequate provision of new, good quality open space. This is particularly relevant given the proposed intensification of development on existing built sites and in the existing Built-up Area. The Minister will therefore ensure that all new development makes adequate provision for open space in line with the guidance to be developed and adopted by the Minister in accordance with Proposal 17. <u>Added to policy SCO5:</u> 'To ensure the adequate provision, accessibility and quality of open spaces throughout the Island and in local neighbourhoods, the Minister for Planning and Environment will require the provision of open space in association with new development. Development proposals which do not make adequate open space provision will not be approved. Open space provision will need to be made in accordance with guidance to be developed and adopted by the Minister in accordance with Proposal 17'.	There is a need to ensure that provision is made for new open space as an integral element of new development, in terms of the amount of open space provided and with regard to the quality and utility of that space, in order that a good quality development and urban environment is secured. This is particularly important given the proposed intensification of development on existing built sites and in the existing Built-up Area.
DP18 7		Mr Stephen de Gruchy		Policy TT 8	Access to Public Transport	Supporti ng	Support with caveat I think the requirements of the second paragraph would be unduly onerous for a developer of 5 units and, possibly, commercially unrealistic. I think a more proportionate approach would be to apply the requirements of the second paragraph only where the development is for 10 units or more.		The comments made are noted and accepted.	The Minister is minded to amend the draft Plan to raise the threshold of this policy to relate to 10 units of residential accommodation and also to introduce thresholds for employment-related land uses, of 250sqm for office use, 500sqm for retail use, with other uses being considered on their likely employee numbers and generation of traffic.	The Minister is minded to amend the draft Plan	Amend first para of Policy TT8: <i>All new development of 10 units of residential accommodation and employment-related land uses with floorspace of over 250sqm (for office use) and 500sqm (for retail use) and where other development proposals are likely to lead to a significant movement of people into and out of a site, should be within 400 metres of a bus service.</i>	

DP10 07		Captain Howard Le Cornu	States of Jersey Harbours	Policy TT 15	Operational Development at the Port of St Helier and Jersey Airport	Objecting		The port operational area is not defined in the Plan or on the Proposals Map. As suggested above, a 'Jersey Harbours Regeneration Zone' would ensure a co-ordinated approach to these issues in the same way as Jersey Airport at 8.160.	Noted	There is a requirement to define the operational area of the Port of St Helier to enable the application of Policy TT15. This will be addressed in the amended draft Island Plan: in the absence of any proposals from Jersey Harbours, it is proposed that the operational area of the port be based on that presently defined in the 2002 Island Plan.	The Minister is minded to amend the draft Plan to include the definition of the operational area of the Port of St Helier based on that presently defined in the 2002 Island Plan.	Draft proposals map amended to include the operational area of the Port of St Helier	There is a requirement to define the operational area of the Port of St Helier to enable the application of Policy TT15.
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DP62 1	Ms Sarah Le Claire	9	Natural Resources and Utilities	Objectin g	<p>That the Planning and Building (Jersey) Law 2002 and associated orders and policies applicable to micro-generation on private property should, in principle, be extended to commercial and other buildings, even if some further qualifications are needed; That a positive statement about the possible long term advantages of utility scale renewable energy to the future of this Island during this century be added prominently to the introductory passages of chapter 9 of the Island Plan or to the specific decisions themselves; That a statement should also be added that all major planning decisions, whether about renewable energy or other long term questions, involve a balance of priorities which can change over time.</p>	<p>Renewable Energy is dealt with in the Island Plan White Paper in Chapter 9 - 'Natural Resources and Utilities'. The current Planning and Building (Jersey) Law 2002 allows some sorts of micro generation to be installed without the need for planning permission. They mainly relate to personal dwellings "within the curtilage of a dwelling house". It would be desirable to extend this encouragement to public, commercial and other buildings. The Island Plan White Paper then goes on to deal with possible utility scale generation of renewable energy and makes the point that the whole area of the Island and its territorial waters are considered as one for planning purposes with the intention of safeguarding the visual, ecological and other aspects of the coastline which need to be managed "so that it [the coastline] can continue to enjoyed by generations to come ". This is the background to two draft decisions Nos. 2 and 3 (pages 362 and 363) which set out the considerations which will be taken into account in deciding whether exploratory proposals, or proposals for development of utility scale schemes, should be allowed to proceed. The plan then goes on to dismiss on-shore wind generation on a utility scale and covers other on-shore renewable energy production in Policy decision No 4 (page 365). A common thread in all three policy decisions is to state in full all the many conditions which any proposal will have to fulfil to be considered for planning permission. All three decisions frequently use terms such as 'unacceptable' (visual impact, impact on features of ecological, archaeological, or historic importance, impact on the character of the immediate and wider background etc) or 'unreasonable' (impact on neighbouring uses and the local environment etc). It is safe to say that confronted by this list of subjective criteria (who is to judge the 'unacceptability' or 'unreasonableness') it is extremely unlikely that any developer will risk investing in utility level schemes on the grounds that the qualifications would open the way for small groups to hold up a decision for a very long time. All decisions of this magnitude are a balance of</p>	Reject	<p>The issue of permitted development rights, relative to the proposed relaxation of restrictions governing the use of micro-generation on commercial properties, is not a matter for the Island Plan. It is considered that the policy regime in the draft Plan does not preclude this use an, it is being proposed that the draft Plan be amended to actively promote energy efficiency in new buildings through a new policy in the draft Plan that reflects the 'Merton Rule' and subsequent variations by requiring new development above a specified threshold to incorporate renewable energy production (floorspace of 1000sqm or 10 or more residential units). Not only would this encourage the greater use of and reliance on renewable energy sources (e.g. photovoltaic energy, solar-powered and geo-thermal water heating, energy crops and biomass), it would also encourage energy saving measures to reduce the cost of providing 10% renewable (e.g. greater insulation, greater use of terraces and other energy efficient building forms, condensing boilers, passive stack ventilation, improved interior day lighting standards etc). Balance of priorities: it is considered that the draft Plan provides sufficient information at the introduction to this section to clearly state the context within which decisions related to renewable energy proposals will</p>	<p>The Minister is minded to amend the draft Plan to introduce a new policy to encourage energy efficiency in new development.</p>	<p>Addition of new policy in Natural Resources – Energy Resources, section of Plan</p> <p><i>All new development (either new build or conversion) with a floor-space of 1,000 m2 or ten or more residential units will be required to incorporate renewable energy production equipment to provide at least 10% of the predicted energy requirements.</i></p>	<p>To actively promote energy efficiency in new buildings it is considered appropriate to incorporate a new policy in the draft Plan that reflects the 'Merton Rule' and subsequent variations, by requiring new development above a specified threshold to incorporate renewable energy production. Not only would this encourage the greater use of and reliance on renewable energy sources (e.g. photovoltaic energy, solar-powered and geo-thermal water heating, energy crops and biomass), it would also encourage energy saving measures to reduce the cost of providing 10% renewables (e.g. greater insulation, greater use of terraces and other energy efficient building forms, condensing boilers, passive stack ventilation, improved interior day lighting standards etc).</p>
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DP11 64		Mr Howard Snowden	Jersey Water	Objectiv e NR 1	Natural Resources and Utilities Objectives	Neither	The penultimate bullet point in Objective NR1 states " to support the appropriate development and siting of new facilities and infrastructure by utility companies" We trust this can be interpreted such that the Planning & Environment Minister would give special consideration for future essential water supply infrastructure works.		Noted	Policy NR13 'Utilities Infrastructure Facilities' covers future proposals for additional utility infrastructure and is generally supportive. Where Jersey Water propose "essential" water supply infrastructure, which does not meet the locational requirements of Policy NR13, the proposal will have to be determined on its individual merits having regard to Policy GD1 'General Development Considerations' and other relevant policies of the Plan.	Amend Policy NR13 to read:"...will be permitted provided that the proposal is required to meet a proven need and is: 1. within the grounds of an existing utility infrastructure facility; or 2. within the Built-up area."	Utilities Infrastructure Facilities Proposals for the development of new or additional utility infrastructure facilities or for the extension and/or alteration of existing utility infrastructure facilities will be permitted provided that the proposal is required to meet a proven need and is: 1. within the grounds of an existing utility infrastructure facility; or; 2. within the Built-up area." The alternative development of utility infrastructure facilities will only be permitted where it can be demonstrated that they are no longer required for utility infrastructure purposes.	Policy NR13 'Utilities Infrastructure Facilities' covers future proposals for additional utility infrastructure and is generally supportive. Where Jersey Water propose "essential" water supply infrastructure, which does not meet the locational requirements of Policy NR13, the proposal will have to be determined on its individual merits having regard to Policy GD1 'General Development Considerations' and other relevant policies of the Plan.
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DP35		Mrs ani Binet			Energy Resources	Supporting	<p>I support the idea of reducing energy use by improving the energy efficiency of the existing built environment and by setting high standards for all new buildings, and the idea of encouraging home owners to produce their own green energy, but I do not think the policy goes far enough, as well encouraging micro generation by reducing the planning restrictions on certain micro generators I believe that it should be written into the planning policies that new builds, as well as being energy efficient should also, to some extent, be energy self sufficient. By using good eco design new buildings could have the micro generator technologies built in to the very fabric of the building so that they are properly designed to work with these technologies enabling them to be much more efficient than installing these new technologies on buildings later on.</p>	<p>It would increase the energy efficiency of new buildings and decrease the islands dependency of fossil fuels and imported nuclear energy thereby reducing the vulnerability of the island and the environmental impacts from fossil fuel emissions and nuclear waste disposal, as well as going further to meet the goal of 'Secure, Affordable, Sustainable Energy'.</p>	Noted	<p>More detailed policies encouraging renewable energy technology in new builds are asked for. Energy standards for buildings, as set by the Building Bye-Laws in Jersey, are presently the subject of review. Work is also underway to develop, publish and adopt supplementary planning guidance which seeks to promote and encourage the more energy efficient design and construction of buildings, particularly homes. To actively promote energy efficiency in new buildings it is considered appropriate to incorporate a new policy in the draft Plan that reflects the 'Merton Rule' and subsequent variations by requiring new development above a specified threshold to incorporate renewable energy production. Not only would this encourage the greater use of and reliance on renewable energy sources (e.g. photovoltaic energy, solar-powered and geo-thermal water heating, energy crops and biomass), it would also encourage energy saving measures to reduce the cost of providing 10% renewables (e.g. greater insulation, greater use of terraces and other energy efficient building forms, condensing boilers, passive stack ventilation, improved interior day lighting standards etc).</p>	<p>The Minister is minded to amend the draft Plan to require new development above a specified threshold to incorporate 10% renewable energy production.</p>	<p>Addition of new policy in Natural Resources – Energy Resources, section of Plan</p> <p><i>All new development (either new build or conversion) with a floor-space of 1,000 m2 or ten or more residential units will be required to incorporate renewable energy production equipment to provide at least 10% of the predicted energy requirements.</i></p>	<p>To actively promote energy efficiency in new buildings it is considered appropriate to incorporate a new policy in the draft Plan that reflects the 'Merton Rule' and subsequent variations, by requiring new development above a specified threshold to incorporate renewable energy production. Not only would this encourage the greater use of and reliance on renewable energy sources (e.g. photovoltaic energy, solar-powered and geo-thermal water heating, energy crops and biomass), it would also encourage energy saving measures to reduce the cost of providing 10% renewables (e.g. greater insulation, greater use of terraces and other energy efficient building forms, condensing boilers, passive stack ventilation, improved interior day lighting standards etc).</p>
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DP41 9		Mr Marc Burton	Institute of Directors		Energy Resources	Neither	<p>The document refers to the promotion of the use of renewable energy sources. How this will be met is another question and the Island Plan appears to be silent on how renewable energy can be utilised and where for example wind turbines etc. could be sited. Whilst we acknowledge that the Island Plan is for a ten year period and that renewable energy may take longer to establish, thought should be given now to its utilisation and planning requirements to facilitate the harvest of our natural resources; The introduction of the new building bye-laws is essential to meeting the objectives of the Island Plan in terms of energy consumption and this matter needs to be addressed at the earliest opportunity, particularly now that the byelaws are under review and will be deferred; The Island Plan stays partly silent on how energy consumption can be reduced. Thought should be given to state requirements i.e. ECO Homes, BREEAM for commercial and residential developments etc. This is particularly relevant to affordable and social housing to ensure standards are improved. The building bye-laws (as and when they are changed) should not be the only means of improving standards. Has consideration been given to providing incentives to improve energy efficiencies i.e. tax breaks, fast track planning etc?; See attached letter</p>	See attached letter	Accept	<p>Energy standards for buildings, as set by the Building Bye-Laws in Jersey, are presently the subject of review. Work is also underway to develop, publish and adopt supplementary planning guidance which seeks to promote and encourage the more energy efficient design and construction of buildings, particularly homes. To actively promote energy efficiency in new buildings it is considered appropriate to incorporate a new policy in the draft Plan that reflects the 'Merton Rule' and subsequent variations by requiring new development above a specified threshold to incorporate renewable energy production. Not only would this encourage the greater use of and reliance on renewable energy sources (e.g. photovoltaic energy, solar-powered and geo-thermal water heating, energy crops and biomass), it would also encourage energy saving measures to reduce the cost of providing 10% renewables (e.g. greater insulation, greater use of terraces and other energy efficient building forms, condensing boilers, passive stack ventilation, improved interior day lighting standards etc).</p>	<p>The Minister is minded to amend the draft Plan to require new development above a specified threshold to incorporate 10% renewable energy production.</p>	<i>As above</i>	<i>As above</i>
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DP48		Mr Jamie Copsey			Off-shore Renewable Energy	Supporting		<p>I do think that this is one exception which should be encouraged as a development, wherever it may be. I appreciate this may be non-negotiable. However, I do feel that we have the luxury of concerning ourselves with the visual impact of such installations. I would like to see this point balanced by consideration of the volume of renewable energy such installations may provide; if it generates significant quantities of energy then visual concerns should be over-riden. What we consider now to be a visual scar, in time becomes a point of interest. Wind turbines on the sutra pass leading into Edinburgh now provide an inspirational view, demonstrating how human innovation can be used to harness the worlds resources not simply exploit them. Bring on wind turbines and tidal energy in Jersey! This should also apply to personal installations of renewable energy sources. Planning regulations should promote greater energy self-sufficiency, arguably at all other costs.</p>	Noted	<p>The respondent suggests that there potentially too much emphasis paid to the visual impact of wind turbines in the planning process should such an application come forward. Stakeholder views are accounted for in the Environmental impact Process. Should an application come forward for a surface piercing renewable energy installation in Jersey waters an Environmental Impact Assessment would be mandatory. EIAs are iterative processes with stakeholder views being taken into account throughout the process. Visual impact, among many other considerations, would be addressed. It is quite possible that diverse and possibly opposing opinions would be bought forward and it will be for the Minister to make a planning decision based on the evidence in the round. It may be that a further stage of Examination in Public (Public Enquiry) is sought to further evaluate the evidence. Energy standards for buildings, as set by the Building Bye-Laws in Jersey, are presently the subject of review. Work is also underway to develop, publish and adopt supplementary planning guidance which seeks to promote and encourage the more energy efficient design and construction of buildings, particularly homes. To actively promote energy efficiency in new buildings it is considered</p>	<p>The Minister notes the comments made about off-shore wind energy The Minister is minded to amend the draft Plan to require new development above a specified threshold to incorporate 10% renewable energy production.</p>	<i>As above</i>	<i>As above</i>
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DP10 12		Captain Howard Le Cornu	States of Jersey Harbours		Policy Context	Neither	para 9.65: To be considered as part of the 'Jersey Harbours Regeneration Zone'	To ensure this is not considered in isolation from other aspects of port development.	Noted	It is accepted that there may be other means by which Jersey Harbours will create adequate facilities for importing the Island's future sand requirements, as plans are developed for the 'La Collette and the Port Regeneration Zone.	Minister minded to amend Plan Amend Point 5 of the modified minerals strategy set out in Para. 9.65 to read:"5. Creating appropriate facilities at St. Helier Harbour for importing all the Island's future sand requirements..."	5. Creating appropriate facilities at St. Helier Harbour for importing all the Island's future sand requirements, with sufficient flexibility to allow for bulk importation of some crushed rock, if, as a consequence of future monitoring, this looks a strong likelihood in the longer term; and	It is accepted that there may be other means by which Jersey Harbours will create adequate facilities for importing the Island's future sand requirements, as plans are developed for the 'La Collette and the Port Regeneration Zone.
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DP20 7	Mr Stephen de Gruchy	Policy NR 8	New or Extended Mineral Workings	Supporting	Support with caveat The first numbered point 5 seems unnecessary given that the JCRA has powers to ensure that monopolies do not abuse their market position.	Support Noted	At present there is a 'duopoly' operating in the Island for quarrying of crushed rock. Clearly, if a 'monopoly' situation were to occur, where one operator could exercise control over price and/or output it would be a cause for concern (e.g. providing potential for abnormal profits), which could pose a risk for the local construction industry and work against the Island's economic interests. Preventing a monopoly situation arising is, I think, a laudable aim, which I believe is a reasonable consideration (among many) in helping to formulate and support the Jersey Minerals Strategy. However, it is fair to say that the Island's Planning and Building Law is concerned with land use matters and is not designed to safeguard competition and consumer choice. As this law does not specifically provide for competition issues to be addressed in the planning consent process, criterion 5 should be removed from the policy and any such matter should be addressed by the JCRA and the Island's competition laws, which are designed to protect consumers from any unfair monopoly business activities / anti- competitive behaviour.	The Minister is minded to omit criterion 5 from Policy NR8 and the corresponding bullet point in the explanatory text (para. 9.83)	<p><u>Policy NR8 New or Extended Mineral Workings</u></p> <p>Proposals for the winning and working of crushed rock outside permitted sites will only be granted consent where:</p> <ol style="list-style-type: none"> they are required to meet a proven need, whether this be an actual or forecast shortfall in the crushed rock landbank; there is an essential requirement for a particular type of rock which would not otherwise be met from existing workings; their impact on the environment is acceptable; there is no unacceptable adverse impact on the amenities of the area; it would avoid the sterilisation of resources that would otherwise occur; and they would not result in an excessive increase in the level of permitted reserves, such that it would lead to oversupply and encourage wastage. <p>The preference will be to extend existing quarries. Proposals to open new ones will only be considered where the applicant can demonstrate, to the satisfaction of the Minister for Planning and Environment, that there are no alternative opportunities to extend existing sites which would meet the proven need and be more environmentally acceptable.</p> <p>The Minister will require an Environmental Impact Assessment for any proposals for new or extended mineral workings and these will only be permitted where:</p> <ol style="list-style-type: none"> the proposal is in line with the Jersey Mineral Strategy (as modified) and the Policy SP 3 'Sequential Approach to Development'; there is a demonstrated need for the resource to be worked in terms of its geological characteristics and properties, the gross, net and saleable reserves and the market that the proposal is intended to serve; 	At present there is a 'duopoly' operating in the Island for quarrying of crushed rock. Clearly, if a 'monopoly' situation were to occur, where one operator could exercise control over price and/or output it would be a cause for concern (e.g. providing potential for abnormal profits), which could pose a risk for the local construction industry and work against the Island's economic interests. Preventing a monopoly situation arising is, I think, a laudable aim, which I believe is a reasonable consideration (among many) in helping to formulate and support the Jersey Minerals Strategy. However, it is fair to say that the Island's Planning and Building Law is concerned with land use matters and is not designed to safeguard competition and consumer choice. As this law does not specifically provide for competition issues to be addressed in the planning consent process, criterion 5 should be removed from the policy and any such matter should be addressed by the JCRA and the Island's competition laws, which are designed to protect consumers from any unfair monopoly business activities / anti- competitive behaviour.
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DP10 13	Captain Howard Le Cornu	States of Jersey Harbours	New Off- loading Facilities for Imported Aggregates	Neither	para 9.97: This could be less specific within the Plan. It should be the responsibility of Jersey Harbours to provide appropriate facilities as identified.	The need to be less specific about the type and nature of the new facility required for future sand imports is accepted.	This can be determined as part of comprehensive development plans for the port area and/or the La Collette and Port Regeneration Zone. The important planning requirement is that adequate facilities are made available to ensure a continuous supply of sand to the building industry when local production ceases.	<p>Minister is minded to make the following amendments: Recommendation 1: That the text is amended at the end of the third sentence of para. 9.100 to read: "...as part of the 20 Year Port Masterplan study. It is clear now that the extent and nature of the facility needs to be reviewed , given: - the recently extended life expectancy of La Gigoulande Quarry; - the new strategic approach to mineral planning, which looks to maximise opportunities for local production of crushed rock aggregate; - the possibility that planning permission will be forthcoming for the working of additional crushed rock resources at La Gigoulande and Ronez; and - the proposal to produce a comprehensive plan for the 'La Collette and the Port Regeneration Zone'. Ultimately, Jersey Harbours will have responsibility for making adequate provision for sand importation as part of emerging plans for the development of the port.</p> <p>Recommendation 2: That the beginning of Policy NR12 is amended to read: "The Minister for Planning and Environment will support the provision of adequate aggregate importing facilities (principally for sand imports) at St.</p>	<p>9.100 The area safeguarded for an importing facility in the 2002 Island Plan relied on the creation of a separate wharf and adequate storage yard facilities, sufficient to handle total imports of around 200,000 tonnes of aggregates per year. In addition to sand imports, it was then intended to cater for 135,000 tonnes per year of crushed rock aggregates when consented reserves at La Gigoulande were exhausted (then thought to be anywhere between 2013 and 2020). The size of the safeguarded area was determined by a feasibility study carried out by WSP International Ltd. in 2000 as part of the 20 Year Port Masterplan study. It is clear now that the extent and nature of the facility needs to be reviewed , given: - the recently extended life expectancy of La Gigoulande Quarry; - the new strategic approach to mineral planning, which looks to maximise opportunities for local production of crushed rock aggregate; - the possibility that planning permission will be forthcoming for the working of additional crushed rock resources at La Gigoulande and Ronez; and - the proposal to produce a comprehensive plan for the 'La Collette and the Port Regeneration Zone'</p> <p><u>Policy NR12 New Off-loading Facilities for Imported Aggregates</u></p> <p><i>The Minister for Planning and Environment will support the provision of adequate aggregate importing facilities (principally for sand imports) at St. Helier Harbour and will seek to ensure, in consultation with Jersey Harbours, that the facilities are provided at the earliest opportunity, prior to the ceasing of sand extraction at Simon Sand and Gravel Ltd in 2018.</i></p> <p>Detailed proposals for the facility should include an Environmental Impact Assessment to ensure the environmental risks are thoroughly assessed and potential adverse effects are satisfactorily mitigated.</p> <p>Proposals will only be permitted where it is demonstrated that they;</p> <p>1. Will not have an unreasonable impact on neighbouring uses, the local environment and human health, by</p>	The need to be less specific about the type and nature of the new facility required for future sand imports is accepted.
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DP21 3		Mr Stephen de Gruchy		Policy NR 15	Satellite TV Receiving or Communic ation Antennae	Supporti ng	Support with caveat To avoid the horrible sight of multiple dishes on a building, I think that the policy (final paragraph) should be amended to state a presumption against the approval of individual dishes in a multi occupancy building i.e. a presumption that approval will only be forthcoming for a communal dish.		support noted and it is agreed that the policy should be more pro- active in encouraging the use of communal satellite dishes, where appropriate	That the final para. of Policy NR15 is amended to read: "Where there are proposals for larger housing developments and buildings in multiple occupancy, developers will be expected to provide carefully sited communal satellite dishes, to avoid the unnecessary visual clutter associated with a proliferation of individual antennae and reduce the overall impact on the environment.	The Minister is minded to amend the draft Plan	<p><u>NR15 Satellite TV Receiving or Communication Antennae</u></p> <p>Applications for the installation of satellite dishes will be judged on their merits, having particular regard to:</p> <ol style="list-style-type: none"> 1. the nature of the building and its surroundings; 2. the type, size and colour of the equipment in relation to its background; and 3. whether the building is a protected building or within a Conservation Area. <p>In all cases, the Minister will seek to minimise any adverse impact. Applications which cause significant harm will be refused.</p> <p><i>Where there are proposals for larger housing developments and buildings in multiple occupancy, developers will be expected to provide carefully sited communal satellite dishes, to avoid the unnecessary visual clutter associated with a proliferation of individual antennae and reduce the overall impact on the environment.</i></p>	Policy amended to be more pro-active in encouraging the use of communal satellite dishes, where appropriate
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DP21 7	Mr Stephen de Gruchy	Policy WM 2	New and Expanded Waste Managem ent Facilities	Supporti ng	There are some typos in: first paragraph numbered (2) and paragraph (5) on page 420.	Noted	The first criterion no.2 is superfluous	The Minister is minded to amend the draft Plan to 1. Omit first criterion no.2 2. Amend last criterion no.5 to read: "will not have an adverse effect on bio-diversity and..."	<u>WM2 New and Expanded Waste Management Facilities</u>	The first criterion no.2 is superfluous
									The Minister for Planning and Environment will support suitable proposals for new and expanded waste management facilities.	
									All proposals for new waste management facilities, including expansion of existing facilities, will be expected to demonstrate that they:	
									1. meet an identified / demonstrable waste management need;	
									2. support the 'Waste Hierarchy' set out in the Solid Waste Strategy and represent the best practicable environmental option for the waste stream(s) they will serve;	
									3. will not inhibit or prevent the development of more sustainable waste management options further up the 'Waste Hierarchy';	
									4. will allow for the recovery of materials and/or energy from waste, wherever practicable; and	
									5. will operate to the highest pollution control standards.	
									Priority will be given to proposals located at suitable sites with an existing waste management use.	
									Where this is not possible, new permanent waste management facilities should normally be located on sites with the following characteristics:	
									1. previous or existing waste management land use; or	
									2. existing quarries, as appropriate; or	
									3. previous or existing industrial land use; or	
									4. a port area of a character appropriate to the development;	
									5. suitable redundant agricultural buildings; or	

DP22 1		Mr Stephen de Gruchy		Policy WM 6	Inert Waste Recycling	Supporti ng			Note: some minor modifications are needed to text of Policy WM5 for clarification and to avoid repetition.	1. Omit number 4 from first para. 2. Omit "To this end," from para 2, start of second sentence.	The Minister is minded to amend the draft Plan	<p><u>Policy WM5 Re-use and Recycling Centres</u></p> <p>The Minister for Planning and Environment will support proposals for:</p> <ol style="list-style-type: none"> 1. new centralised Re-use and Recycling Centre site/s; 2. other Re-use and Recycling Centres / "bring banks", including 'mini-recycling centres' where they will develop and improve the existing States' coordinated network; and 3. enhancements to existing Re-use and Recycling Centres, where they will improve their operational capacity <p>In order to enable and encourage recycling and sustainable waste management, the Minister will seek to ensure that appropriate storage is provided for waste and recyclables in all new development. To this end, storage should be provided within all new development for waste facilities that are:</p> <ul style="list-style-type: none"> • for both recycling and residual waste; • of adequate capacity; • safe and accessible to users and waste collectors; • sited and designed to minimise nuisance to users and neighbours; • designed with sufficient flexibility to allow for reasonable future changes in waste collection services; and • in keeping with the design of the development. <p>Consultation with the Parishes and the Minister for Transport and Technical Services on the suitability of such facilities will take place prior to approval of new developments.</p> <p>Where the development of re-use and recycling collection facilities / bring banks is considered appropriate, but cannot be provided on site for reasons accepted by the Minister, their provision in a suitable location off-site will normally be required by use of Planning Obligations.</p> <p>The Minister will require an Environmental Impact Assessment to be carried out for any development likely to</p>	modifications made to text of Policy WM5 for clarification and to avoid repetition
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DP23 2		Mr Stephen de Gruchy		Policy LWM 3	Surface Water Drainage Facilities	Supporti ng			Support Noted	Note: some minor modifications are needed to text of Policy LWM3 for clarification and consistency. The 6th bullet point should read "...gradual release to a public surface water sewer."	The Minister is minded to amend the draft Plan	<p>Surface Water Drainage Facilities</p> <p>The Minister for Planning and Environment will expect proposals for new development and redevelopment to incorporate Sustainable Drainage Systems (SuDs) into the overall design wherever practicable.</p> <p>Applicants will be required to ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:</p> <ul style="list-style-type: none"> • Store rainwater for later use in accordance with Proposal 20 'Water Conservation'; • Use infiltration techniques, such as porous surfaces; • Attenuate run-off in open water features for gradual release to a watercourse; • Attenuate run-off by storing in tanks or sealed water features for gradual release to a watercourse; • Discharge run-off direct to a watercourse; • Attenuate rainwater by storing in tanks or sealed water features for gradual release to a public surface water sewer; and • Discharge rainwater to the public surface water sewer. <p>Sustainable drainage systems will not be required where it can be demonstrated by the applicant that there are practical reasons for not doing so, such as:</p> <ul style="list-style-type: none"> • They would be likely to cause significant land or water pollution; or • The site's ground conditions would preclude their use; or • The size of the site precludes their use; or • They would cause damage to adjacent buildings or sites. <p>Discharges of surface water to groundwater, or to local watercourses and water bodies will be required to meet quality standards and conditions set</p>	modifications made to text of Policy LWM3 for clarification and consistency
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DP37 7		Mrs Anne Bougourd		B.2	Glasshouse Site, Field 114, Le Passage, Carrefour Selous, St Lawrence	Neither	I wish to comment re B.2 Glasshouse Site, Field 114, Le Passage, Carrefour Selous, St Lawrence. I would like to suggest that if this is re-zoned for building extreme care is taken as the ingress and egress to the site in Le Passage is fraught with difficulties. For entrance to the site the road is very narrow and can only be accessed from La Grande Route de St Laurent. From the north the entrance to Le Passage is fairly easy to negotiate but from the south it is very difficult as the turning is sharp and large vehicles have problems now. As a resident of Le Clos de Devant it seems to me that the route most people will prefer to take into the proposed development is either through Le Clos Sara or Le Clos de Devant- both of which are private roads and owned by the residents who are responsible for their upkeep. If the development goes ahead with the main entrance to the site from Le Passage we will have to take steps to prevent through traffic in some way. The way out of the site is one way towards the west and routes either right or left from the crossroads are extremely narrow. A preferable route to take might be by making the entrance and exit to the site in Rue de la Golarde where there is two-way traffic and much easier turning from La Grande Route de St Laurent.	Great care needs to be taken with regard to this site.	comments noted	The access issues are noted, however, this site is not supported by the Parish of St. Lawrence and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn.	Minister minded to remove site from Plan.	Cooke's Nursery Category A housing site removed from proposal map, Policy H1 and Appendix B.	Site not supported by Parish of St. Lawrence .
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DP14		Mr Howard		B.2	Glasshouse Site, Field 114, Le Passage, Carrefour Selous, St Lawrence	Objecting	Delete this from the Island Plan.	<p>I am truly amazed that this site is being considered, the single access through Le Passage is bad enough without adding another 40 or so units - I am assuming the application for the farm buildings immediately to the West is also likely to be integrated into this proposal. The surrounding lanes are usually full of cars reversing back and forth now, and the introduction of probably 50 - 70 new cars will exacerbate an already poor situation, not helped by the Hampton Court development recently. La Rue de Douet de Rue will become even more of a rat-run than it already has. There are no pavements anywhere and no space as far as I can determine for new ones. The knock on effect of yet more commuter traffic down Mont Felard (starting to become the Queen's Road of mid-Jersey in rush hour) will not assist an already overpacked inner road/Rue de Galet junction, often at a standstill and backed up for a considerable distance most days of the week. I would be interested to know if this site has Parish support? The gross recent overdevelopment of the southern strip of the Parish will be compounded if this is approved. If a glasshouse is redundant it should, wherever possible, be returned to the green field it once was, even if it is just for grazing of cattle or horses. This proposal just amounts to creeping urbanisation which should be resisted. I am not a resident of this area but I am of St. Lawrence.</p>	Objection noted	<p>The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Lawrence and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.</p>	Minister minded to support request to remove site from Plan.	Cooke's Nursery Category A housing site removed from proposal map, Policy H1 and Appendix B.	Site not supported by Parish of St. Lawrence .
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DP59 3		Deputy John Le Fondre		Table B.4	Site Details	Neither	Computational Error - Cook's Rose Farm - as well as having a maximum density of 19 dwellings per acre - against 15 in the main written document (page 249 - para 6.79), 19 dwellings per acre on a developable area of 1.3 acres does not equate to the 30 potential dwellings stated. 15 dwellings per acre would give rise to 19.5 (ie 20) dwellings, not 30. 19 dwellings per acre would give rise to 24.7 (ie 25). The figures should be corrected to show a maximum of 20 units.		Noted		Minister notes error	Cooke's Nursery Category A housing site removed from proposal map, Policy H1 and Appendix B.	Site not supported by Parish of St. Lawrence ..
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DP79 6	Mr Michae l Stein	Mr Michael Stein	MSPlannin g Ltd	B.3	H2(3) Samares Nursery, La Grande Route de St Clement, St Clement	Supporti ng	I write in response to the Draft Island Plan White Paper and to the proposal to re-zone the above site for Category A Housing . The document supports the Minister for Planning and Environment's proposal to re-zone the site and demonstrates the reasonable nature of the proposal, and how it will assist in achieving the aims of the States Strategic Plan, Draft Island Plan "Proposal 16" the Provision of Homes" and "Policy H1". See attached report	See attached report The Draft Island Plan and the subsequent investigations submitted with this representation (See attached report), clearly sets out the spatial benefits of re-zoning Samares Nurseries and demonstrates that the infrastructure required is either in place or can reasonably be achieved as part of the development. It has been demonstrated that the development of this site for Category A Housing is practically possible and is essential if local families , which do not qualify for States Housing but cannot achieve open market prices, are to be given the opportunity to purchase a home during the next 10 years. It has been shown that re-zoning this site is actually crucial given the sparsity of other re-zoned sites and the potential difficulty of delivering family homes in St. Helier. Indeed , in our discussions with the Minister of Housing, he has identified the Samares Nurseries site as being the most important strategic site for Category A Housing and he would consider its removal from the Island Plan as being calamitous, especially as he appreciates that the 300 Category A Houses proposed in the Draft Island Plan is wholly inadequate. Equally, it has been demonstrated that the proposal will not given rise to significant increases in traffic and indeed will contribute to the provision of alternative means of transport, in particular safer cycling facilities. Other general development considerations such as design, landscaping and potential contamination can be managed in such a ways to maintain the amenity of the immediate neighbouring properties through the Development Brief and Development Control requirements. The representation raised by the Connétable for St. Clement fails to acknowledge that re-zoning this derelict and potentially polluted site will not have a significant effect on the character of the Parish in terms of its urbanity or that visually, it will stitch comfortably into the existing Built-Up Area. Equally, it would not be economically viable to remediate the land to revert it to agricultural land . The charge that this site is not required does not stand up to scrutiny given the	support noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style categories A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. clement and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.	The Minister is likely to recommend that this site is removed from the draft Island Plan given the Constable's opposition and the petition.	H2(3) Samares Nursery Category A housing site removed from proposal map, Policy H1 and Appendix B.	Site not supported by Parish of St. Clement.
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DP11 75		Mrs. Celia Scott Warren		B.4	Longueville Nurseries, New York Lane, St Saviour	Neither	I believe that with Longueville Nurseries earmarked for Category A housing, and in order to address the present difficulty crossing Longueville Road, there should be further initiatives to achieve the long-awaited pedestrian facility at Miladi Parade.	The Longueville Road pedestrian improvement at Miladi Farm would slow traffic down in that area and greatly enhance pedestrian safety.	comments noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Saviour and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.	Minister minded to remove site from Plan.	Longueville Nursery Category A housing site removed from proposal map Policy H1 and Appendix B	Site not supported by Parish of St. Saviour.
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DP11 87		G V Gaudin		B.4	Longueville Nurseries, New York Lane, St Saviour	Objectin g	The Longueville Nurseries site should be fully utilised and not just used for 10 houses		Noted		The Minister is minded to withdraw the proposed zoning of the Longueville Nurseries site from the draft Plan	Longueville Nursery Category A housing site removed from proposal map, Policy H1 and Appendix B.	Site not supported by Parish of St. Saviour.
DP78 9		Senator Terry Le Main	States of Jersey Housing Departme nt	B.4	Longueville Nurseries, New York Lane, St Saviour	Neither	I hold the view that the proposals for site B4 do not represent it being used to its maximum potential and represents a missed opportunity to take development to the full extent of the site to the North and East towards the existing developments of Le Bernage and Longueville de Bas.		comments noted		The Minister is minded to withdraw the proposed zoning of the Longueville Nurseries site from the draft Plan	Longueville Nursery Category A housing site removed from proposal map, Policy H1 and Appendix B.	Site not supported by Parish of St. Saviour.